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**Volume 2: Comments and Responses  
Final General Management Plan / General Plan  
Environmental Impact Statement / Environmental Impact Report**

# REDWOOD

**National and State Parks  
Humboldt and Del Norte Counties • California**

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**FINAL**  
**GENERAL MANAGEMENT PLAN / GENERAL PLAN**  
**ENVIRONMENTAL IMPACT STATEMENT / ENVIRONMENTAL REPORT**

Volume 2 Comments and Responses: *Final General Management Plan / General Plan /  
Environmental Impact Statement / Environmental Report*

**REDWOOD**  
**NATIONAL AND STATE PARKS**  
Humboldt and Del Norte Counties, California

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**COMMENTS AND RESPONSES ON THE  
DRAFT  
GENERAL MANAGEMENT PLAN/GENERAL PLAN  
ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL  
REPORT**

This second volume of the *Final General Management Plan / General Plan / Environmental Impact Statement / Environmental Report, Redwood National and State Parks*, (the final plan) presents agency and public comments received on the *Draft General Management Plan / General Plan / Environmental Impact Statement / Environmental Report, Redwoods National and State Parks* (the draft management plan). The comments and agency responses allow interested parties (including National Park Service [NPS] and California Department of Parks and Recreation [CDPR] decision makers) to review and assess how other agencies, organizations, and individuals have responded to the proposed action (alternative 1, the preferred alternative in the draft plan), the other alternatives, and their potential impacts.

The agencies received about 600 comment letters as well as many questions and verbal comments at meetings held in the RNSP area. About 269 of these 600 responses were in the form of preprinted forms that people signed and sent in. In addition the agencies received 23 post cards and 657 signatures on petitions — most of which were focused on keeping Freshwater Lagoon Spit as it is.

All comments received were reviewed and considered by the National Park Service and the California Department of Parks and Recreation in the preparation of the final plan, consistent with CDPR policies and the requirements of 40 CFR 1503. Comment letters with substantive comments from federal and state agencies, local agencies, private organizations, businesses, and individuals (when not redundant) have been reproduced in this volume.

As defined in *NPS-12: NEPA Compliance Guideline*, comments are considered substantive when they:

- (a) question, with reasonable basis, the accuracy of information in the draft plan
- (b) question, with reasonable basis, the adequacy of environmental analysis
- (c) present reasonable alternatives other than those presented in the draft plan
- (d) cause changes or revisions in the proposal

In addition to responding to substantive comments, the agencies felt it necessary to respond to comments that were considered to be important to the local communities. All written comments were addressed by means of the written responses in this volume; where appropriate, the text of the final plan was revised. Comments that led to plan revisions are noted.

Because of the volume of the comments received, not all comment letters have been printed. When significant numbers of written comments were redundant, only a representative sample letter or form has been printed, along with a single response applicable to all similar comments. For some comments that varied only slightly, summary comments have been included. For example, a response to a comment might say "See summary comment B." The summary comments A through H are presented below for easy reference. The previous table of contents will also guide readers who are referred to other letters for a response to a comment.

In accordance with federal privacy requirements, addresses and telephone numbers of all individuals have been blocked out. All written

comments submitted to the National Park Service and the California Department of Parks and Recreation are available for review at the superintendents' offices in Crescent City.

### **Summary Comment A — Freshwater Lagoon Spit**

The agencies received numerous comments in a variety of forms regarding the future management of public use at Freshwater Lagoon Spit, particularly the agencies' proposal to eliminate overnight use. The factors used as the basis for that proposal were presented in the draft plan. Commentors opposed to the proposal pointed out that the opportunity to camp or park overnight next to the ocean without paying a fee was very enjoyable and an experience unique to Freshwater Lagoon Spit; that persons parked overnight in RVs required little in the way of services and, therefore, caused little drain on agency resources; and that persons staying overnight contributed to the town of Orick's economy.

Others perceived existing types and levels of public use at the site to be very appropriate and disagreed with the agencies' reasoning for eliminating overnight use; some viewed the fact that the area is in a coastal high hazard zone as a minor consideration. Many commentors indicated that paying a small fee for overnight use would be appropriate; others opposed fees. Other commentors supported the proposal because of concerns over the unsightly and unsanitary conditions caused by the large numbers of RVs; the lack of access to parking and the ocean for day users because of the many RVs parked along the highway; the inappropriate competition by the agencies with local privately owned campgrounds and RV parks; and traffic safety concerns related to uncontrolled access. Other commentors suggested allowing overnight use only in the fall and winter or reducing the size of the camping area during those periods.

The agencies are committed to managing public use at Freshwater Lagoon Spit in such a way as

to allow all visitors to enjoy the outstanding scenic values that exist at the southern gateway to the parks and also to providing visitors high-quality first and last impressions of the parks. The agencies do not believe that those objectives can be achieved by allowing continued overnight camping/parking along the highway. In consideration of concerns expressed by commentors over the potential loss of camping opportunities and the need to replace the capacity that would be lost, the agencies have revised the preferred alternative to provide for a three-year phaseout of overnight use at Freshwater Lagoon Spit to allow the private sector the opportunity to construct appropriate replacement facilities in the vicinity. Also, to eliminate the perceived unfair competition with privately owned campgrounds, the agencies will charge a fee for overnight use of the spit during that three-year phaseout period.

The National Park Service would then develop the Freshwater Lagoon Spit site and manage it as a high-quality day use facility with structured parking and safe access to and from the highway, pedestrian access to the beach, and appropriate interpretive exhibits and other support facilities. The agencies believe that developing and managing a well-designed day use facility at the gateway to the parks would enhance the experience of visitors and travelers on Highway 101 and have positive effects on the gateway community of Orick as well.

### **Summary Comment B — Unfulfilled "Promises"**

The unfulfilled "promises" referred to by several commentors seem to refer to visitation/tourism projections made in studies conducted before the establishment of the national park and the corresponding levels of economic activity projected in local communities that have proven to be too high 30 years later. Other commentors also expressed frustration over the relative absence of major/commercial public use facilities in the national park; they viewed this as being inconsistent with conditions they envisioned

before and after the national park was established and as the National Park Service's demonstration of inadequate concern for the economic interests of local communities.

The National Park Service and California Department of Parks and Recreation believe that the decline or lack of significant growth in the economies of some local communities in the past 30 years can be traced primarily to the overall decline of the timber and fishing industries in the region and other adverse economic factors affecting the state, not to the establishment of the national park. The absence of public accommodations and other commercial facilities in the parks reflects NPS and CDPR policies that provide generally that developments such as lodges and other concessions facilities should be in local communities rather than in the parks. If it is feasible to develop such services and facilities in gateway communities, providing them in the parks would result in unnecessary impacts on resources and create inappropriate competition with the private sector.

The preferred alternative in the final plan (see the discussion of gateway communities in the "Interdependence of Parks and Communities" section and the discussion of commercial services for visitors in the "Public Use, Recreation, and Visitor Safety" section) reflects those policies by affording local communities the opportunity to generate economic growth by providing visitor services and facilities and employee housing outside the parks. The agencies believe that visitation to the parks will be stimulated by cooperative packaging and promotion of specialized recreation and tourism opportunities that (1) are compatible with the parks and the surrounding region, (2) are based on their significant natural, cultural, recreational, and scenic values, and (3) draw on enhanced public interest in adventure travel and eco/cultural tourism.

### **Summary Comment C — Trails**

Several commentors questioned specific trail proposals in the draft plan. The preferred alternative has been revised to establish certain general and specific objectives, standards, and priorities for future trail development and to emphasize the need to develop a new joint agency trail plan to supersede existing NPS and CDPR trail plans. Details of future trail development and specific recreational trail use policies would be addressed in the new joint agency trail plan rather than in this *General Management Plan/General Plan*. The new trail plan would be developed with full public involvement and close coordination with gateway communities and neighboring jurisdictions to ensure that the parks' trail system would be integrated into a broader regional system and compatible with gateway community transportation plans. NPS and CDPR staff will consider comments pertaining to trail issues received in response to the *Draft General Management Plan/General Plan* during the development of the joint agency trail plan.

### **Summary Comment D — Purpose of the Parks**

Some commentors questioned the origin and accuracy of the purpose of the parks included in the draft management plan. It was developed using excerpts from the state's previously approved *General Plan* for the three redwood state parks and the legislation that established and expanded the national park. The excerpts that articulate the purposes of the individual parks have been broken out as separate quotes in the final plan.

### **Summary Comment E — Businesses in Orick**

Numerous commentors questioned the economic impact of removing camping from Freshwater Spit. The information in the draft management plan on Freshwater Lagoon Spit users (pp. 224–225) indicates that just under 25% of

current RV users and tent campers would stay at a campground in the town of Orick if space was available. Thus, opportunities for expanding tourist facilities in Orick would be enhanced under the proposed action. (Currently there is one small RV campground, the Orick Motel, RV, and Mobile Home Park — mostly with limited capacity.) Conversely, the immediate effect of terminating overnight use at Freshwater Lagoon Spit could result in lower aggregate expenditures on goods and services in Orick as RV users and tent campers seek accommodations at locations other than Orick. As noted in the draft plan (p. 225), more than half the total purchases by Freshwater Lagoon Spit users were made in Orick.

Terminating overnight use at Freshwater Lagoon Spit could result in reduced spending at Orick businesses by such users (also noted on p. 300 of the draft plan). This would clearly impact the town's economy adversely, although the increase in RNSP visitation projected under the proposed action might offset, at least partially, the loss in economic activity from reduced spending by current Freshwater Lagoon Spit users. Mitigation for the loss of visitor business at Orick could include improved signs indicating the availability of visitor goods and services; information brochures at information centers indicating the availability of local service providers; and local public agency development (possibly with NPS/state support) of a new privately operated RV park and campground on private lands in the immediate vicinity of Orick. The text has been revised to better reflect these impacts and mitigations.

#### **Summary Comment F — Roads in Alternative 1**

There were also many comments about the road proposals. Roads such as Bald Hills, Howland Hill, Cal Barrel, and Davison, in Redwood National and State Parks provide an opportunity for those who are otherwise unable to visit primitive areas of these parks on foot to do so by auto. These are low-speed scenic drives that

capture a feeling of how travel through this area occurred in the past. Several of these routes are historic. NPS and CDPR staff are reengineering some of these roads for safety and to prevent erosion and stream sedimentation. Rerouting or modifying these roads will in some cases raise ownership and easement issues. Widening or building new road connections that would require the removal of old-growth trees would not be considered. The alternative 1 section regarding roads in the parks has been rewritten to permit the exploration of these and other management options.

#### **Summary Comment G — The Regional Scope of the Socioeconomic Environmental Analysis**

Several commentors questioned the analysis and lack of focus on specific communities. The socioeconomic inventory and impact assessment for the RNSP plan is regional in scope. The socioeconomic assessment covered the two-county region and was based on interviews with knowledgeable people, personal observation of the researchers, and available information from published sources. A general format was followed in providing information on communities in or near Redwood National and State Parks.

However, it was recognized that several issues dealt with in the draft plan would likely have special significance for the Orick community. Studies were undertaken on Freshwater Lagoon Spit visitor use and off-road vehicle use associated with commercial beach fishing with a view to understanding the potential impact on Orick from policy changes in regard to these activities. Some newly published and anecdotal information has been added in the final plan to address this request for more focus on Orick.

#### **Summary Comment H — Impacts on the Orick Community**

The preferred alternative proposes additional facilities, including visitor information centers



and possibly a new lodge, as well as improved and expanded campgrounds if the need exists, which would provide opportunities for visitors. These actions would help to stimulate spending on lodging, transportation, food, fuel, retail goods, and services in the area (as noted in the conclusion to the "Socioeconomic Impacts" section of the draft plan on pp. 299 and 300), with potential benefits to the town of Orick.

There would also be increased economic activity from both construction and operation of new facilities. Thus, additional jobs would be generated both directly and indirectly as a result of implementing the preferred alternative.

It is also recognized in the draft plan that some local groups would be impacted under the proposed action, including business people

engaged in retail and services trade, who sell goods and services to RV users and tent campers who stay overnight at Freshwater Lagoon Spit; commercial fishermen who currently engage in beach fishing at Freshwater Lagoon Spit and Gold Bluffs Beach; and some agricultural workers who would be displaced if land acquisitions were made by the National Park Service. It is also worth noting that land acquisitions for estuarine restoration and/or land with scenic or significant resource values would be on a willing-seller basis so there would be no adverse impacts on the owners of the land. Wood carvers would also be impacted as a result of prohibiting off-road vehicle use for wood gathering purposes on RNSP beaches. Text has been added in the final plan to expand on and clarify these impacts.

COMMENTS

RESPONSES

USDA Forest Service

Pacific Southwest  
Research Station

Redwood Sciences Laboratory  
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Arcata, CA 95521

OCT 16 11:59

October 8, 1998

Superintendents  
Redwood National and State Parks  
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Crescent City, CA 95531

Dear Superintendents:

I am responding to your request dated July 31, 1998, to review and comment on the Draft General Management Plan / General Plan / Environmental Impact Statement / Environmental Impact Report for Redwood National and State Parks (GMP).

This document was somewhat difficult for me to fully comprehend because the discussions of the diverse issues were dispersed throughout the 458-page document and the Alternatives seemed to be a mix-and-match process for which the logic of inclusion was not clear. Consequently, I will attempt to focus my comments on concerns related to issues of hydrology and geomorphology.

- 261-A I have served as an expert for the government on watershed management and hydrology prior to and since the Park expansion hearings and lawsuits of the mid-1970's. As stated in the GMP (p 8), "The national park was expanded 'with particular attention to minimizing siltation of the streams' (PL 90-545) and '... to protect ... Park resources from damaging upslope and upstream land uses' (PL 95-250)". It seems to me that none of the Alternatives discussed in the GMP give adequate emphasis to dealing with those activities outside of the Park which impact Park resources. Further, there seems to be an undue emphasis on continuing restoration activities within the Park boundaries, where such additional activities will have progressively smaller effects. For example, when the Park was expanded in 1978, there were about 300 miles of road in Redwood Creek within Park boundaries and about 900 miles upstream of the Park. Since 1978, about 145 miles of roads within the Park had been decommissioned or obliterated, leaving 155 miles identified as needing treatment (Table 2; p 30). During that time, however, most of the unstable roads within the Park have been decommissioned and the 155 miles of road within the Park identified as needing treatment
- 261-B clearly pose less risk to Park resources than the 911 miles of road upstream of the Park. In addition, the statement on page 29 that "Most of these abandoned logging and ranch roads are within the Redwood Creek basin in the national park" is in error and is not supported by the data provided in the GMP (Table 2 shows that only about 17% of these roads are within the Park). Another error seems to be the depiction of "Planned Road Removal" in the Figure
- 261-C "Roads in the Redwood Creek Basin" on page 17. If memory serves me correctly, many of the roads shown have already been removed (for example, the old M-Line roads southeast of Bridge Creek). Another point of consideration is that while the 145 miles of roads were being treated within the Park, an additional 200 miles of road were being constructed upstream from the Park.

FEDERAL AGENCIES

261-A RNSP managers clearly recognize the potential impacts from external threats originating upstream of the national park and have had a program directed toward this concern for at least the last 15 years. Our ability to work in the upper basin is at the pleasure of the landowner(s) and is, therefore, somewhat opportunistic. However, we believe significant progress has been made in recent years toward developing meaningful cooperative working relations with upper basin landowners. In March 1995, following meetings with private and industrial landowners, memoranda of understanding between the park and individual companies and landowners were signed. The memorandums of understanding state that the park and private landowners will "voluntarily cooperate to identify, prioritize, and correct, where economically feasible, potential sediment sources in the Redwood Creek basin." These memorandums of understanding provide the framework for cooperative erosion control on private lands in the upper Redwood Creek basin and were complemented by cooperative agreements with the Bureau of Land Management, U.S. Fish and Wildlife Service, and Humboldt County Resource Conservation District.

RNSP staff believe that most of the ingredients for a successful erosion control program in the upper basin are in place. RNSP and private landowner relationships have greatly improved, the primary stakeholders have signed official agreements, and there is an increasing awareness of the importance of controlling or preventing erosion from roads, especially in light of declining salmonid populations. RNSP staff participation during field review of proposed timber harvest plans on private lands have become more widely accepted. Besides attending most preharvest inspections, RNSP geologists now perform detailed field mapping of areas proposed for timber harvest while foresters prepare their harvest plans. By working together, resource concerns can be identified and protective measure can be incorporated into the harvest plan before it is submitted for filing and official review.

RNSP staff are currently facilitating an inventory of roads in the upper Redwood Creek basin upstream of the national park boundary to identify erosion potential. This is being accomplished by reallocating funds from within-park erosion control work to the upper basin. We view this inventory to be the basis for an erosion control plan to be developed in cooperation with private landowners. This is requiring a significant shift in funds and personnel toward upper basin concerns.

261-B This text has been rewritten.

261-C The map as been corrected to depict all roads in the parks that have been removed or treated.

Federal Agencies

COMMENTS

RESPONSES

261-D

The continued emphasis on Landform Restoration of the roads within the Park is difficult for me to understand. The environmental value of Landform Restoration is overstated in the GMP. For example, on page 326 (and elsewhere) the statement that "Complete landform restoration ... would result in greater long-term benefits for owls and murrelets because forest regrowth would be more complete and fragmentation would be reduced." is probably true in a hypothetical sense, but I doubt that such a conclusion is supported by any scientific evidence. I expect that the canopy of the forest would fully occupy the space left by the relatively narrow and linear road, whether or not trees were growing on the roadbed. Further, and more importantly, the relative efficacy in reducing environmental damage to Park resources of such an expensive treatment is questionable, particularly when compared to the need for widespread treatment of much more severe road problems in the lands upstream of the Park. The amount of money required to accomplish 1 mile of Landform Restoration would accomplish many miles of road decommissioning.

In addition to working with land owners to improve and decommission roads in the upper Redwood Creek watershed, I suggest that RNSP thoroughly review existing land management regulations applicable to private lands (e.g. Forest Practices, County grading, Clean Water Act, Cumulative Effects) and take action to ensure that those regulations are strictly enforced. In some cases, existing regulations, if vigorously enforced, would protect Park values. In other cases, present regulations are inadequate and RNSP should propose modified regulations that will provide improved protection to RNSP resources downstream. It is not uncommon for entities (e.g. Santa Cruz County, municipal watersheds) to require improved protection for their resources. For example, there are amendments to the California Forest Practice Rules for Santa Cruz County that requires additional measures and specifies that a County representative is authorized to participate in review of plans and inspections of activities (see 14 CCR 926.30). Language in PL 90-545 and PL 95-250 strongly suggests that RNSP has authority to require additional regulations needed to protect Park resources from activities on lands adjacent and upstream of the Park.

261-E

Contrary to the statement on page 167 that "Overall, the water quality in the parks meets or exceeds the water quality objectives established by the North Coast Regional Water Quality Control Board", EPA has listed Redwood Creek as sediment impaired under Section 303(d) of the Clean Water Act. Since EPA and the North Coast Regional Water Quality Control Board are presently formulating a "Water Quality Attainment Strategy and Implementation Plan", this should provide additional impetus for RNSP to aggressively develop regulations and monitor activities on private lands in the Upper Basin to protect Park resources.

261-F

All of the Alternatives (p. 64, 85, 105, 126) state that "... leased resource management staff offices in Arcata would be relocated to ... the Orick area". There may be some internal RNSP efficiency in such a relocation, but I believe the downside will be highly undesirable. A primary reason for expanding the Park was to provide protection to the Tall Trees riparian groves along Redwood Creek. PL 95-250 specifically directs that management of the Park shall benefit from the results of erosion and sedimentation studies. The RNSP has a highly qualified cadre of hydrologists, geologists, and geomorphologists that are conducting such studies and receive direct benefit from proximity to the large number of scientists and professionals in the Arcata area associated with Humboldt State University, Forest Service,

261-D The National Park Service and the California Department of Parks and Recreation (the agencies) agree that there is a great deal of uncertainty in predicting the long-term effects of watershed restoration on endangered species. The uncertainty is primarily because of the effects on forest-nesting birds are indirect effects that will not be known for many years. The effects of complete landform restoration of all abandoned logging roads proposed under this alternative is compared generally to the effects of less thorough treatment of more roads under the proposed action. Complete landform restoration under this alternative involves more thorough treatment of all abandoned major and minor logging roads, rather than limited removal of minor logging roads and complete removal of all major roads under the proposed action. The agencies believe that if sufficient funding were available, more thorough treatment of all abandoned roads would provide better regrowth of the natural vegetation patterns over the long term (decades to centuries) than the restoration of some roads or pieces of roads. Because of the short timeframe over which watershed restoration techniques have been developed, there has been insufficient time for scientific studies of how well original vegetation will be restored based on watershed treatments designed primarily to restore drainage patterns rather than vegetation patterns. Treatment of a single linear feature (road corridor) would not be expected to restore vegetation patterns to the same degree as thorough restoration of a widespread network of linear features.

261-E The plan has been revised to reflect the inclusion of Redwood Creek on the Environmental Protection Agency's list of impaired waters under Section 303 (d)(1)(A) of the Clean Water Act. The parks' role in timber harvest plan review and in dealing with adjacent land uses and other external influences is discussed on pages 19, 29, and 63 of the draft plan. The total maximum daily load (TMDL) process provides an assessment and planning framework for actions needed to attain water quality standards and was established by the Clean Water Act. The parks' role in the Redwood Creek TMDL process has been to respond to requests for information and data as requested and to comment on drafts of the plan.

261-F Although all alternatives envision consolidation of the NPS offices currently in Arcata and Orick in a new office facility outside the parks near Orick, the the agencies intend to retain a small staff presence in the Arcata area in office space shared with other federal agencies. The staff remaining in Arcata would be those whose primary duties involve participating in interagency GIS coordination and other cooperative programs with other agency staff, and private landowners that focus on the redwood ecosystem, such as erosion control efforts in the upper Redwood Creek basin.

COMMENTS

RESPONSES

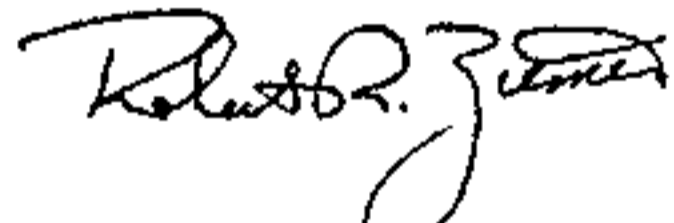
3

261-F

Bureau of Land Management, Environmental Protection Agency, Fish and Wildlife Service, National Marine Fisheries Service, Geological Survey, and Weather Bureau. Orick is devoid of such resources. In addition, as discussed above, many of the issues and much of the work affecting RNSP is in the upper Redwood Creek basin that is accessed via highway 299 through Arcata. If the staff are moved to Orick, an additional 45 minutes of driving (one-way) would be required to reach the upper basin. Such a relocation would have the effect of discouraging working relationships with professional colleagues and will also tend to reduce the frequency of visits to the upper basin.

The GMP has correctly identified on p 48 under "Issues" that "The natural functioning of the Redwood Creek estuary is critical to the survival of anadromous fish ..." Only Alternative 3 (p 88) begins to prescribe the actions necessary to address that issue. Effective management of the estuary has been deficient for many years and actions such as described in Alternative 3 should be adopted. I suggest, however, that the proposed actions fail to address additional important considerations, such as continued gravel mining and clearing of riparian vegetation upstream of the estuary. I would not describe such actions as the "Preservation Emphasis". I would describe them as "prudent".

Sincerely,



Robert R. Ziemer  
 Chief Research Hydrologist  
 Director's Representative

COMMENTS

RESPONSES

United States  
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Agriculture

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October 13, 1998

NOV 15 09:21:17

Superintendents  
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RE: Redwood National and State Parks General Management Plan

My primary concern is an unbalanced approach to reducing road-related erosion hazards in the Redwood Creek basin. The last time a major flood tested the stability of the landscape was 25 years ago. Since then, roads have proliferated in the basin upstream of the Park, and I fear that the next test will show that erosional hazards to Park resources have not been significantly reduced. The probability is good that a severe flood will occur before erosional hazards in the basin as a whole are significantly reduced if the timetable in the GMP is adopted. The Park has identified the 'greatest human-induced threat to downstream aquatic and riparian resources in and along the main channel of Redwood Creek are the roads upstream of the national park'. Given limited resources for restoration, should the Park concentrate on completely restoring the landscape within the Park (mostly in places visitors would never see) or on reducing the threat to the riparian corridor, including the Tall Trees Grove and Trail, Redwood Creek, and its estuary by targeting the largest, treatable sources of sediment? Removing road crossings and unstable fills and out-sloping roads ('partial road removal') can prevent human-related sediment from reaching stream systems and affecting riparian and aquatic ecosystems. Completely obliterating roads ('complete landscape restoration') can aid this goal, but is much less cost-effective because not much erosion control is gained at considerable expense.

The greatest road-related hazards come from the Redwood Creek basin upstream of the Park, and it is here that the Park Service has the most to gain by cooperating with private landowners and other agencies in controlling erosion. The Park should gain authorization to participate in timber harvest plan inspections in the Redwood Creek basin. The presence of Park professionals in review teams would greatly improve protection measures, even without special measures in Forest Practice Rules. None of the alternatives in the GMP offer a choice of concentrating efforts in the upper basin while scaling back landscape restoration in the Park. There are approximately six times the miles of logging roads in the upper basin as

262-A See comment A in the previous U.S. Forest Service letter. Alternative 1 describes the RNSP staffs' preferred plan for watershed restoration. We recognize, however, that it may not always be possible to reach these goals. Achieving the management strategies of alternative 1 would require significant increases in available funds for watershed rehabilitation. In the absence of increased funding, managers would exercise the flexibility necessary to achieve the highest priority projects. At the discretion of RNSP managers, and in consideration of available resources, the level of erosion control and restoration work within the national park may vary from the parks' preferred technique of partial landform restoration to road decommissioning and erosion prevention. However, the preferred technique would be implemented whenever possible given adequate fiscal and personnel resources. Similarly, watershed restoration activities might be directed at any time from erosion control work within the national park to erosion control or related efforts in the upper basin. The future erosion control and disturbed lands restoration plan would explore more detailed site-specific implementation priorities for watershed restoration activities.

262-A

COMMENTS

RESPONSES

262-A

there are within the park. How were the proposed relative expenditures in the upper and lower basin justified according to how well they protected Park resources in and along Redwood Creek (including the Tall Trees Grove)?

262-B

Redwood Park lies in the lower one-third of highly erosive and disturbed basin with mixed ownership and varied downstream resources. Protecting these special resources is highly challenging. The Park has a talented and experienced resource staff based mainly at the Arcata office. This group enjoys an enviable reputation in the field of ecosystem research and management, and much of their success can be attributed to their association with professionals and academicians at research and land-management agencies and Humboldt State University in the Arcata area. Moving the group to Orick would stifle their interactions with the scientific community and greatly reduce their effectiveness. Moreover, it would also make working in the upper basin much more impractical since the upper basin is much more accessible from Arcata than it is from Orick.

I believe the Park should move quickly to permanently restore the Redwood Creek estuary. The estuary is a key habitat component for salmon and steelhead and is currently nearly unusable. In order to restore populations of salmon and steelhead, it makes little sense to spend millions on restoring watershed conditions if the estuary is allowed to remain in its current state. Acquisition of land to allow removal of the lower sections of the levees should be given highest priority. Moreover, once the hydrologic functioning of the estuary is restored, restoration of aquatic habitats with instream structures and woody debris should be explored.

*Thomas E. Lisle*  
Thomas E. Lisle  
Research Hydrologist

262-B Although all alternatives envision consolidation of the NPS offices currently in Arcata and Orick in a new office facility outside the parks near Orick, the The agencies intend to retain a small staff presence in the Arcata area in office space shared with other federal agencies. The staff remaining in Arcata would be those whose primary duties involve participating in interagency GIS coordination and other cooperative programs with other agency staff, and private landowners that focus on the redwood ecosystem, such as erosion control efforts in the upper Redwood Creek basin.

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COMMENTS

RESPONSES



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Coastal California Fish and Wildlife Office
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(707) 822-7201 FAX: (707) 822-8136

NOV 10 1998

In Reply Refer To:
1-14-98-205

November 5, 1998

Memorandum

To: Park Superintendents, Redwood National and State Parks, Crescent City, California
From: Project Leader, Coastal California Fish and Wildlife Office, Arcata, California
Subject: Comments on the Redwood National and State Parks' Draft General Management Plan/General Plan and Environmental Impact Statement/Environmental Impact Report

The Fish and Wildlife Service (Service) has reviewed Redwood National and State Parks' (Parks) draft General Management Plan/General Plan (Plan) and Environmental Impact Statement/Environmental Impact Report (EIS/EIR). Our comments below address biological issues associated with the Plan and adequacy of the EIS/EIR, and interagency cooperation.

GENERAL COMMENTS

The Service supports the following proposals: 1) closure of Freshwater Spit to overnight camping as proposed in alternative 1; 2) management of vehicles on the beach as proposed under alternative 3; 3) development of new visitor services and facilities outside the parks as proposed under alternative 2; 4) management of second-growth forests as proposed under alternative 3; and 5) management of visitor use levels and recreational activities as proposed under alternative 3.

The Service also supports the delineation of management zones; however, we would like to see ecosystem function considered when delineating management zone boundaries. For example, boundaries of the primitive zone should be delineated to protect large relatively undisturbed old-growth stands. Under the proposed alternative, large old-growth stands are divided into a number of zones. It does not appear that the location of the stand boundaries was an important criterion utilized in the development of the zones. We recommend that the location of the zone boundaries be reassessed to consider protection of old-growth forests.

Various facets of the proposed action appear to contradict stated goals or objectives for resource management (e.g., proposals for new trails and recreational facilities). The proposed alternative needs to provide clear guidance to resolve future conflicts between the Parks' conflicting missions to preserve resources and increase visitation. The Plan needs to outline the criteria that would be used to determine when sensitive resources may be impacted and how those impacts would be evaluated. A clear understanding of potential impacts from proposed management actions to sensitive resources would help

455-A

455-B

455-A As the following table indicates, approximately 38% of the estimated 41,000 acres of old growth stands are in primitive zones.

Table with 3 columns: Management Zone, Acres, % of Remaining Old Growth. Rows include Primitive (15,474 acres, 38%), Backcountry Mechanized I (4,305 acres, 35%), Backcountry Non-Mechanized (10,693 acres, 26%), and Front Country/Developed (362/15 acres, 1%).

The areas included in primitive zones were selected because they include significant stands of old growth forests and are relatively free of development and disturbance. Ecosystem function is the primary goal of establishing primitive zones, which are to ensure the existence of areas where resources and natural processes predominate. This is consistent with the goals of backcountry zones also, however no new human development(s) will be allowed in designated primitive zones.

In the long term, especially after restoration activities have been completed, primitive zones will serve as sanctuaries for species that may prefer little or no human disturbance. Previously planned trails and other developments in what are now primitive zones will no longer be allowed, necessitating revision of existing plans. Primitive zones will also be given priority consideration for conduct of watershed rehabilitation measures.

We believe having entire watersheds designated as primitive provides a better management approach and greater level of protection than following the checkerboard pattern of old growth boundaries. Because approximately half of the parks have been logged, there are no major watersheds that are exclusively old growth. Primitive zones include as much of entire watersheds as is reasonable given landownership patterns and existing highways, trails, and developments. Watershed area, percentage old growth within the watershed, percentage primitive zone in each watershed, and percentage of the watershed's old growth also within a primitive zone, are given in the following tables for the southern and northern sections of the parks. Tables are sorted by primitive zone as percentage of watershed area.

**COMMENTS**

455-E 455-D 455-C

to prevent resource damage. The Parks' goal should be to control recreational use that may result in degradation of sensitive resources before the impacts occur rather than waiting until changes are documented on-site.

There is a noted lack of contiguity between sections of the EIS/EIR. Issues are not clearly identified and tracked across all sections of the document. The alternatives are not consistently described by topic area. Specific guidance is lacking for many program areas. Significance criteria are not identified. The environmental consequences section does not consistently discuss indirect, direct, and cumulative impacts.

Many of the comments we address are common for one or more alternatives. The length of the document and comment period precludes documentation of how comments relate to all alternatives. Please review our comments and determine the extent to which they may apply to one or more alternative. Time constraints precluded our review of the entire document.

Specific comments on the EIS/EIR are provided in the attachment. We appreciate the opportunity to review the Plan and EIS/EIR. If you have questions regarding our comments, please contact Robin Hamlin at (707) 822-7201.

cc:  
 CDFG, ATIN: Herb Pierce, Eureka, California  
 FWS, ATIN: D. Laye, Klamath Falls, Oregon  
 FWS, ATIN: L. Simons, Yreka, California  
 FWS, ATIN: K. Wolcott, Red Bluff, California

**RESPONSES**

South Area

Watershed Name	Watershed Area (acres)	Old Growth as % of Watershed	Primitive Zone as % of Watershed Area	% of Watershed's Old Growth in Primitive Zone
Larry Dam	1183.1	20.7	100	100
Elf	465.6	59.4	100	100
Lost Man	6548.6	24.4	100	100
Devils	4404.6	34.5	99.8	100
Little Lost Man	2364.6	89.1	91.4	96.1
May	1126.6	0.4	88.4	42.6
Tom McDonald	4426.4	13.6	88.4	94.2
Cloquet	699.5	29.3	63.3	58.6
Coastal Drainage	7043.4	42.5	16.8	33.2
Miller	850.1	19.8	35.2	81.9
Boyes	1325.5	26.4	36.3	0
Redwood Creek **	20414.9	45.9	29.8	30.3
Fortyfour	1976.7	6.4	19.6	0
Prairie *	10270.0	55.9	9.5	12.2
Hayes	376.6	95.8	14.4	14.6
Bridge	7168.4	18.0	0.5	0.8

\* Includes area not identified as one of the major tributaries to Prairie Creek basin

\*\*Includes area not identified as a major named tributary watershed. Only RNSP lands are included.

North Area

Watershed Designation*	Watershed Area (total)	Watershed Area (acres) within the parks	Primitive Zone as % of Watershed Area**	Old Growth as % of Watershed Area	% of Watershed's Old Growth in Primitive Zone**
Damnation/Nickel	3996.6	3953.7	35.6	91.5	96.2
Wilson	8577.3	787.7	84.1	53.5	63.2
W Branch Mill	7149.2	2294.5	16.4	41.5	16.4
Clarks Creek	13525.4	3093.6	74.1	38.1	55.6
Jed Smith W. Drainage	4128.7	2521.1	52.4	30.7	32.2
Mill Creek	7953.4	5274.2	76.1	19.9	26.1
Richardson/Saugep	13417.1	4141.7	28.7	15.9	0
Smith/Cedar/Sheep	4973.0	2677.3	73.1	15.2	20.8
E Mill/Bummer	8502.7	720.6	10.4	0.0	0

\*Includes areas not identified as major named tributary watersheds.

\*\*Refers to area of watershed within Redwood National and State Parks.



COMMENTS

RESPONSES

Redwood National and State Parks  
 Draft General Management Plan/General Plan  
 Environmental Impact Statement/Environmental Impact Report

SPECIFIC COMMENTS

455-F	<u>INTRODUCTION. Page 3.</u> This section should specify the time period for which this plan will guide management activities in the Parks.
455-G	<u>Issues beyond the scope of the joint plan. Page 10.</u> Provide a brief discussion on why the listed issues were not considered to be significant. Clarify why the following issues and concerns were considered beyond the scope of this document: 1) develop management policies to resolve human/wildlife conflicts with mountain lions, elk, and other animals; 2) protect and restore natural dune communities; and 3) explore better management practices with respect to dead and downed wood collection.
455-H	<u>ALTERNATIVES, INCLUDING THE PROPOSED ACTION</u> In general, it is difficult to compare the alternatives due to a lack of a quantitative description of each alternative. For example, how many acres of second growth forests will be managed under each alternative?
455-I	The descriptions of the alternatives do not include appropriate mitigation measures as required in the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (CEQ Regulations) (§ 1502.14). This section of the CEQ Regulations states that agencies shall include appropriate mitigation measures not already included in the proposed action or alternatives. All relevant reasonable mitigation measures are to be identified and the probability of the measures being implemented must be discussed. Mitigation should be included in the description of the alternative. In addition, the California Environmental Quality Act (CEQA) requires agencies to implement feasible mitigation measures or feasible alternatives as a means of reducing the severity of significant environmental effects (Pub. Resources Code, § 21002). The final EIS/EIR should identify appropriate mitigation measures.
455-J	<u>Actions common to all alternatives. Public use, recreation, and visitor safety. Page 21.</u> This section states that a visitor carrying capacity analysis must be conducted to determine the level of visitor use that could be allowed without adverse impacts on resources. When would the analysis be done? Isn't this information needed prior to selecting a preferred alternative? Will the analysis consider impacts to sensitive park fauna such as listed species? Will it consider impacts on Park visitors and on fauna due to noise generating activities?
455-K-N	<u>Actions common to all alternatives. Management zones. Page 21.</u> Additional information is needed on the delineation of zone boundaries. For example, the criteria used to delineate the zone boundaries for each alternative and how the zone lines correlate with the location of old-growth stands. Table 1 on management zones should give overall direction on implementing limited operating periods for use of mechanized equipment in the various zones. Noise levels are described as low, moderate, or high in Table 1; define the categories.

**455-B** The National Park Service and the California Department of Parks and Recreation (CDPR) believe that the impact analysis adequately addresses sensitive resources that might be affected and the potential impacts on those resources. The resources affected and the impacts discussed in the plan are as specific as possible given the general nature of the plan.

**455-C** The parks would control, to the best of their ability, any activity before that activity caused degradation of sensitive resource.

**455-D** The National Park Service and the California Department of Parks and Recreation believe that the issues are clearly identified and are tracked across each alternative, as is appropriate, by issue topic area. The issue statements are presented only once in alternative 1 in order to minimize the already substantially complex document. The agencies believe that each alternative is consistently described by topic area. Because this management plan represents the broadest level of park-level planning that is done, specific guidance for many program areas is not appropriate and is deferred to implementation planning (*Director's Order 2*; 3.3.1.2; page 5).

**455-E** Significance criteria would be identified in the text where significant impacts, if any, are described. Indirect and direct impacts are discussed in the text where they occur. It was decided not to systematically call out these terms or have headings for them, given the complexity of the document). However, cumulative impacts are given a heading under each impact topic and are consistently discussed.

Also, the organization of an environmental impact statement is, in large part, dictated by the Council on Environmental Quality regulations (40 CFR Parts 1500-1508). Furthermore, this document also had to meet the requirements for a California environmental impact report and the requirements for both NPS general management plans and the CDPR's general plans. We believe that, given all these constraints, the document is an acceptably clear presentation of a complex array of material.

**455-F** The suggestion has been added to the text.

**455-G** The material in the text has been reorganized to clarify the reasons for not considering the issues listed on the indicated page. Specifically, (1) develop management policies to resolve human/wildlife conflicts with mountain lions, elk, and other animals, (2) protect and restore natural dune communities, and (3) explore better management practices with respect to dead and downed wood collection are topics that are more appropriately dealt with in existing or future more detailed implementation plans. This management plan / general plan provides the broad guidance for these more specific implementation plans.

COMMENTS

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455-0 Table 1 also lists a transportation zone. Park resources adjacent to U.S. highways would be protected in this zone. A Caltrans disposal site is currently located within the transportation zone. The document does not discuss the use of this or other disposal sites nor how current and future management of the disposal site is consistent with the expected resource condition (i.e., protect resources). In addition, what is the expected restoration strategy for Caltrans disposal sites?

Actions common to all alternatives. Restoring disturbed lands. Page 29.

455-Q 455-P Restoration activities under each alternative are restricted to road decommissioning. A discussion is needed on any other identified ecological restoration needs within the Parks and guidance on site selection for restoration activities. Short-term impacts (e.g., noise disturbance and habitat loss) to threatened and endangered species and long-term benefits (e.g., habitat restoration associated with road decommissioning) should be included in Table 2.

Actions common to all alternatives. Wetlands. Page 31.

We support the Parks intent to restore degraded wetlands whenever feasible. We also concur with the avoidance of adverse impacts to existing wetlands as a result of park activities to the "greatest extent possible". We recommend that any compensatory mitigation for wetland impacts resulting from park activities replace the function of the habitat lost as well as the acreage.

Actions common to all alternatives. Threatened and endangered species. Page 31.

This section merely states that you will comply (e.g., consult on all your actions) with section 7 of the Endangered Species Act (Act). Consultation is mandatory for Federal agencies and is not a discretionary management option. It would be more appropriate to state in a separate section of the Plan that you will comply with all appropriate Federal and State laws.

455-R In this section, a discussion on your commitment to implementing approved recovery plans for the marbled murrelet, bald eagle, peregrine falcon, and brown pelican is lacking. Recovery plans outline specific population targets as well as recovery tasks. Also, discuss how the Park is implementing section 7(a)(1) of the Act which requires all Federal agencies to utilize their programs to carry out conservation programs for listed species. This could include actions such as implementation of limited operating periods to prevent disturbance during the breeding season.

Actions common to all alternatives. Future action plans needed. Page 35.

455-S Provide a timeframe for completing the identified action plans. It is unclear if projects will be implemented prior to completion of the action plans. For example, will campsites and hiking trails be developed under the existing plans prior to completion of the backcountry management plan and the comprehensive trail plan? To the extent possible, as the Parks proceed with the development of individual action plans we recommend you coordinate with the Service and other interested resource agencies during the development and implementation of these plans. Also as a reminder, consultation will need to be completed on these plans.

455-T Additional discussion is needed regarding the second-growth management plan. For example, which criteria are used for selecting areas to be treated. Suggested criteria to include are reduction of fragmentation and protection of key old-growth stands.

455-U Actions common to all alternatives. Mitigation measures for facility construction Page 36. Mitigation measures for activities other than facility construction are not described. The term "facilities" is not defined in the glossary. Do facilities include trails? Mitigation measures for facility construction

455-H A comparison of the alternatives requires a different approach from one that uses more detailed and quantitative information. This management plan represents the broadest level of park-level planning / decision making that is done. Nevertheless, there is substantial, though general information (including impacts) that provide definite distinctions among the alternatives.

455-I The NPS guidelines for compliance with the National Environmental Policy Act suggest that mitigation actions be discussed in the impact section. Under the California Environmental Quality Act (CEQA), a significant effect on the environment means a substantial, or potentially substantial, adverse change in the environment (state *Public Resources Code* Section 21068). The National Park Service and the California Department of Parks and Recreation believe that none of the proposals would result in substantial adverse impacts on RNSP resources or other aspects of the RNSP environment. Mitigation is described under the various impacts topics that will reduce or minimize any adverse effects that might result from implementing the proposals. Both agencies recognize that mitigation in addition to what is described in the plan may be prescribed as a result of consultations with various regulatory agencies having authority over certain resources.

455-J The carrying capacity analyses proposed for Fern Canyon, Tall Trees Grove, Lady Bird Johnson Grove, and Stout Grove would consider both environmental and social factors. The agencies anticipate that these studies would subsequently result in the establishment of desired resource conditions and levels of public enjoyment/satisfaction at those sites which, in turn, would lead to the establishment of measurable conditions or standards to be monitored. These factors would be used to determine appropriate public use levels and the capacity of support facilities.

455 K & L See response A above.

455-M Text has been modified in the final plan. Mechanized equipment used for recreational purposes (e.g., bicycles) would be allowed only within developed, frontcountry, and mechanized backcountry zones.

Trail, development, and other plans would specify exact locations and levels of use allowed. Limited operating periods for use of equipment used for maintenance activities would be discussed as part of the formal consultation process when necessary to ensure the protection of threatened and/or endangered species.

455-N Noise levels described in table 1 are intended to give a generalized level of disturbance noticeable by humans that might be reasonably expected in each management zone -- given existing background levels originating outside the parks.

COMMENTS

RESPONSES

455-V-W	<p>outside of currently disturbed areas are not disclosed, nor are methods for minimizing long-term impacts to wildlife. The width of the undisturbed vegetation buffer zone along streambanks should be specified. Describe "appropriate restrictions" that would be imposed on construction and restoration activities in murrelet and owl habitat.</p>
455-X	<p><u>Alternative 1, Proposed Action, Page 37.</u>                  On page 8, the Plan states that the issues are listed under the proposed action section of Alternative 1. However, the issues listed in this section appear to be management programs identified to achieve the objectives rather than issues as used under NEPA. Examples of issues listed in this section are watershed management, vegetation management, and artificial impoundments. An issue should be a clear statement of an environmental resource that might be adversely affected by some specific activity identified to meet an objective. The CEQ regulations (§ 1501.7) state that the lead agency shall determine the significant issues to analyzed in detail. It would be appropriate to identify significant issues such as old-growth forest, threatened and endangered species, wildlife, biodiversity, and critical habitat. These issues should then be tracked throughout all sections of the document. As written, the issues are not clearly identified and do not track consistently through the document</p>
455-Y	<p><u>Alternative 1, Concept, Page 37.</u>                  This section states that facilities would be retained in areas with sensitive resources, however new uses and visitor facilities in such areas would be required to be low impact. In addition, new visitor services and facilities in other areas of the parks would be provided if the services and facilities did not impact sensitive resources. The Service considers any adverse effects to listed species to not be low impact; therefore, new construction of facilities or trails in suitable habitat for listed species would not comply with this concept. Clarify the extent to which construction of new visitor services would affect listed species.</p>
455-Z	<p>This section does not provide guidance on how to resolve conflicting objectives under the various topics covered in the alternative. For example, an objective under natural resources is "Restore and maintain the Parks' ecosystems as they would have evolved without human influences since 1850 and perpetuate ongoing natural processes." An objective under education and interpretation is "Develop new visitor services and facilities in the parks in locations that will expand visitor' awareness of the parks' diverse resources and enhance visitor's abilities to gain access to resource and activity sites." The Plan should provide clear guidance on how to resolve conflicts between the Parks' conflicting missions to preserve resources and increase visitation.</p>
455-AA	<p><u>Alternative 1, Management zones, Page 37.</u>                  Identify which trails are included in the 28 miles of trails that would not be constructed in the primitive zone under this alternative.</p>
455-AB	<p><u>Alternative 1, Natural Resource Management and Protection, Objectives, Page 38.</u>                  The description of the basic concept of this alternative states that the parks' natural resources would be preserved and protected; however, there is no objective listed to protect and recover threatened and endangered species. The text does not include an objective that addresses conservation of biodiversity.</p>
455-AC	<p>The first objective listed concerns the perpetuation of the redwood forest ecosystem. This objective should be rewritten to include all park management efforts not just resource management efforts. Note the following definition of an objective (36CFR 219.3): "An objective is a concise, time-specific statement of measurable planned results that respond to pre-established goals."</p>

**455-O** The conditions for use and management of the disposal site along the Highway 101 Bypass are described in the highway easement deed among the U.S. Department of Transportation, Federal Highway Administration, and the California Department of Transportation (Caltrans). The deed is recorded in Humboldt County records, book 497, pages 133-39. The National Park Service consented to the transfer of an easement subject to conditions for management of the disposal site. These conditions include restrictions on materials disposed (surplus soils and rocks derived from either side of the highway between post mile [PM] 122.00 in Humboldt County and PM 0.16 in Del Norte County, uncontaminated gravel stockpiled for replenishment of truck escape ramp gravel, and temporary stockpiling of erosion control materials) and a requirement that the site shall be graded and revegetated according to specifications mutually agreed upon by the National Park Service and Caltrans.

**455-P** Proposed restoration activities are included in the discussion of the actions common to all alternatives beginning on page 38 of the draft plan have been clarified. Restoration includes two approaches, one of which is road decommissioning.

**455-Q** This table focuses on the direct effects of watershed restoration work as mandated by the national park's expansion legislation to reduce sedimentation to streams for the protection of aquatic resources, rather than to the more indirect effects on species that inhabit the forested areas surrounding restoration sites. Because required measures relating to threatened and endangered species (e.g., seasonal timing of work and sound limits on work) would be adhered to in either road decommissioning or landform restoration, there would be no difference between these methods from a noise basis. Other advantages and disadvantages for threatened and endangered species can be understood from the descriptions given in the table in the sections "Benefits to Resources" and "Threats to Resources during and after Treatments " The discussions in the Environmental Consequences provides more complete discussion of the impacts of implementing the overall strategy prescribed in the "Actions Common to All Alternatives" section and each alternative section, respectively.

**455-R** The National Park Service and the California Department of Parks and Recreation (the agencies) recognize their obligations under the Endangered Species Act and are actively working with the U.S. Fish and Wildlife Service to protect listed threatened and endangered species to the greatest extent possible while meeting other statutory obligations to provide for visitor use and enjoyment of the parks. RNSP staff consult with the U.S. Fish and Wildlife Service as required under Section 7 of the Endangered Species Act, and develop mitigation for any actions that might adversely affect listed species through this consultation process. The recovery plans for the species mentioned do not obligate the agencies to undertake specific tasks, nor do recovery plans necessarily provide specific

COMMENTS

RESPONSES

455-AD

Alternative 1. Natural Resource Management and Protection. Issues and actions Page 38.

The action item subheadings in this section should be the same as the subheadings in the environmental consequences section and the summary tables. For example, the subheadings under natural resources in the alternative section are watershed management and restoration in and upstream of the park; watershed management and restoration in Redwood Creek Estuary; and vegetation management. Subheadings in the environmental consequences section under natural resources are soils, water quality, floodplains, wetlands, and threatened and endangered species. The threatened and endangered species section is further divided into impacts of the following: watershed restoration, second-growth forest management, prairie restoration, fire management, artificial impoundments, visitor use, conclusion, and cumulative impacts. However, these last subheadings are not consistently used for each resource. This organization makes it very difficult to review the document and assess the effects of the proposed action.

455-AE-AF

Provide timeframes for completion of the identified action items. Actions should be identified to achieve the following identified objectives: ensure that all resource management efforts are consistent with and supportive of the perpetuation of the redwood forest ecosystem; restore and maintain the Parks' ecosystems as they would have evolved without human influences; protect Park resources from threats outside of the Park boundaries; and acquire baseline information on biological resources.

The exotic plant management plan and restoration of non-forest communities are not discussed.

Alternative 1. Natural Resource management and Protection. Watershed management and restoration in and upstream of the Parks. Page 38.

The Service supports and commends the watershed restoration program of the Parks. We concur with the assessment that road decommissioning and other restoration efforts in the Redwood Creek watershed need to be accelerated to recover fish and wildlife populations and habitats and to minimize additional damage from past land use activities.

455-AG

This section should also address restoration activities other than road removal such as restoration of native dune communities.

455-AH

Alternative 1. Natural Resource management and Protection. Watershed management and restoration in Redwood Creek Estuary. Page 48.

Under the description of actions, the Plan correctly notes that only partial restoration of estuary function is possible if current land use practices continue and then suggests that estuary restoration can be achieved with only partial removal of the Redwood Creek flood control levees. Based upon the information available to the Service at this time, we have concluded that most, if not all, of the levees would need to be removed or reconfigured to help restore the biologic as well as the hydrologic functions of the estuary and lower reach of Redwood Creek. While we agree that greater benefits can be achieved as more of the levee is removed, significant restoration of the estuary, including restoration of associated wetland and riparian values in the Redwood Creek floodplain, will require a significant change in the location and maintenance of the levees. Such restoration will require actions that cannot be conducted by the Parks alone due to limitations in funding, authority, and land ownership. We propose that the Parks work with the Service, National Marine Fisheries Service, California Department of Fish and Game, Army Corps of Engineers (Corps), County of Humboldt, the citizens of Orick, and other interested parties to develop a comprehensive plan for restoring the Redwood Creek estuary and the associated fish and wildlife values of the lower Redwood Creek floodplain.

population targets. For example, the "Recovery Plan for the Threatened Marbled Murrelet" (USFWS 1997) states that "Management commitments and monitoring have been implemented" but does not specify committed parties. Furthermore, this recovery plan does not provide specific population targets but says that more specific delisting criteria will be possible after marbled murrelet population size, population trends, and demographic goals have been better determined for each of the conservation zones.

455-S The plans will be done at an appropriate and logical time, as funding allows, within the 10- to 20-year life of this plan. Also, the following has been added to the text in the "Future Actions Plans Needed" section: "These plans will be done in a sequence to ensure that there is consistency of actions implemented among plans and tiering down from this *General Management Plan / General Plan.*"

455-T Criteria for site selection will be described in the future RNSP second-growth management plan. Managing the second-growth forests in Redwood National and State Parks is a complex action that is beyond the scope of this general management plan.

455-U Facilities are listed under the "Appropriate Kinds of Activities and Facilities" column in Table 1: The Management Zones. Trails are facilities. Mitigation measures for activities and facility construction outside disturbed areas are disclosed. Where these discussions occur is displayed in the index under "mitigation." The conservation strategy described for threatened and endangered species will be applied to all wildlife, in keeping with NPS and CDPR policies for protecting resources. Because of the general nature of this plan and the variety of wildlife resources in the parks, it is not possible to describe specific mitigation measures for each species that might be affected by a proposal. All projects that have the potential to affect wildlife are reviewed by RNSP wildlife biologists, and appropriate mitigation measures are incorporated into the project before implementation.

455-V The nature of buffer zones of undisturbed vegetation adjacent to streams would be site specific and would depend upon type of development, potential impacts from site development, and use. Measures that might be necessary for protection of threatened and/or endangered species would be determined through consultation with the appropriate regulatory agencies.

455-W Appropriate restrictions depend on the action, the location, and the time of year. Restrictions on watershed restoration activities are described on pages 262 and 267 in the draft plan. In general, these same restrictions on timing (so that actions occur outside breeding seasons) apply to all RNSP actions that create noise or disturbance in excess of ambient noise in suitable northern spotted owl or marbled murrelet habitat.

Federal Agencies

## COMMENTS

## RESPONSES

455-AI

We disagree with the statement that water level management in the estuary conserves salmonid habitat. One measure of moving towards restoring the function of the Redwood Creek estuary will be the elimination of artificial breaching. We are not aware of any natural breach of the estuary that has been proved to occur during the summer rearing season prior to the onset of fall storms. Natural breaches of the estuary are not a concern. Illegal breaches of the estuary are a law enforcement issue and do not justify controlled breaching. It is our understanding that the existing Corps permits which allow breaching of the estuary are predicated upon the protection from flooding of public structures and facilities, such as Hufford Road and the Redwood Information Center. As part of any plan to restore the function of the estuary the location or design of these structures will need to be altered. As such, we concur with your intention to remove the Redwood Information Center and transfer the functions of that facility to another site.

455-AJ

Alternative 1. Natural Resource management and Protection. Vegetation management. Page 48.  
Criteria used to select sites for second-growth management are not discussed in the description of this alternative. However, the discussion of environmental consequences (page 285) states that the long-term benefits to owls and murrelets will be less under this alternative than under alternative 3 because sites would be selected for treatment with an objective of increasing visitor use and enjoyment rather than increasing suitable nesting habitat. These statements appear to contradict statements under the description of the alternative. The alternative description states that "managing those second-growth stands that are critical to ecosystem restoration would be emphasized." Will this not always be the case? If the criteria used to select stands for treatment will vary under the various alternatives this needs to be clearly described under each alternative.

Alternative 1. Natural Resource management and Protection. Artificial Impoundments. Page 51.  
We concur with the removal of artificial dams and impoundments along with the restoration of former free-flowing streams or wetlands they are usually placed in. Any dams or impediments to anadromous fish migration that are not removed should be modified to allow unrestricted passage for migration.

455-AK

Alternative 1. Cultural resource management and protection. Page 52.  
This section states that hiking and equestrian trails would be removed from sensitive resource areas. On page 14 "sensitive resources" or "sensitive areas" are defined as old-growth redwoods, ..., threatened and endangered species and their habitat, ..." This conflicts with actions listed in this alternative under hiking which states "the current system of hiking trails would be maintained". Please rectify this and other similar conflicts.

455-AL

Alternative 1. Public use, recreation, and visitor safety. Objectives. Page 57.  
An objective is needed that addresses management of "natural quietness" within the parks. This section refers to the development of "appropriate" public use and providing facilities in "appropriate" locations. Some discussion is needed on what types of uses and locations would be considered "appropriate".

455-AM

Alternative 1. Public use, recreation, and visitor safety. Issues and actions. Page 57.  
This section raises the issue of visitor use levels and the potential to damage natural resources. It states that decisions must be made in the future whether to encourage more visitors and that a visitor carrying capacity analysis would be conducted. However, the major differences between the various alternatives are the amount and types of visitor use that will be provided in the future. It is not appropriate to make these decisions without the types of information called for under this action item.

**455-X** We agree that watershed management, vegetation management, etc., are not issues, but rather are topic headings used in this document to help organize the issues that are presented under these topics. In the "Alternatives, Including the Proposed Action" part of the document, the same issues are carried exactly the same across all alternatives under identical topic headings. These issues are also addressed in both the "Affected Environment" and "Environmental Consequences" parts of the document. In most cases different topic headings from what are used in the alternatives sections are used in these latter sections. These topic headings are related to the impact topics discussed. Again, within each of the "Affected Environment" and the "Environmental Consequences" parts, the same topic headings are carried through each respective section. Some additional topics are discussed in the "Affected Environment" section to provide important background and context.

An issue is more clearly defined for the general public as a problem for which a decision is needed to resolve alternative uses of a resource or alternative paths of action. At this general level of planning, the issues can be framed as those programs on which the parks will focus their efforts to protect resources and provide for visitor enjoyment of those resources. Because issues are generated by the public during scoping, as well as by the agencies that need to plan how to manage the parks, issues are usually not generated in the form of the CEQ definition.

**455-Y** The National Park Service and the California Department of Parks and Recreation strive to minimize adverse effects on resources. "Low impacts" must be distinguished from "no impacts." It is impossible to manage Redwood National and State Parks with no impacts on any listed species because of the land uses of the surrounding non-RNSP lands. The National Park Service and the California Department of Parks and Recreation have legislatively established requirements for managing resources in the parks as well as for providing opportunities for visitor use. Because Redwood National and State Parks were, in part, created from an area that has obvious effects from past land uses, some of which continue outside RNSP boundaries, there will be ongoing impacts on resources within the parks. Other activities outside of the direct control of the parks that affect threatened and endangered species include operation and maintenance of public roads such as Highway 101, Highway 199, and the Bald Hills Road, and the management of the flood control levees along Redwood Creek in Orick. The general impacts on listed threatened and endangered species from constructing new visitor facilities have been described in as much detail as is possible in a general plan. Any construction that has the potential to affect listed threatened and endangered species would be preceded by site-specific planning and environmental compliance documents. The National Park Service and the California Department of Parks and Recreation will consult under section 7 of the Endangered Species Act with the U.S. Fish and Wildlife Service, or the California Department of Fish and Game as appropriate, to

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455-AN

This section states that "visitor use would be limited to that which would result in no significant impacts on resources and their values." Significance criteria need to be described. The CEQ Regulation (§ 1508.27) state that "significantly" as used in NEPA requires considerations of both context and intensity. The degree to which the action may adversely affect an endangered or threatened species or critical habitat should be considered in evaluating intensity.

455-AO

This section also addresses the following future developments: new campsites in existing state parks; primitive campsites; and hiking trails called for in existing plans. Will these developments occur prior to conducting a carrying capacity analysis and completion of a backcountry management plan and of a comprehensive Parks trail plan? This section also states that new campgrounds in state parks would be considered for future construction. Criteria that will be utilized to determine if new campground construction is appropriate should be outlined.

455-AP

The number of miles of trails to be developed and associated effects under each alternative should be clearly outlined. For each alternative, a map should be provided showing the approximate location of the proposed trails in relation to the management zones. It appears that trails called for in the existing Redwood National Park backcountry trails plan, the Davison Ranch concept plan, and trails included in a comprehensive regional trail system outside of the primitive zone would be constructed. Has the regional trail system been proposed or is it described in the existing plans? There is no way for a reviewer to know how many miles of trail are included under each alternative. In addition, a number of trail connections are discussed. Are these in addition to the above mentioned trails. There is no discussion in this section about new hiking trails to be constructed in the state parks only equestrian trails. Will new hiking trails be constructed in the State Parks under this alternative?

This section also discusses designating new mountain bike trails in areas where bikes would not damage park resources and the development of loop trails in Coyote Creek basin and of a regional bike trails system. Are these in addition to the trails called for in existing plans? Define what is meant by "damage park resources". Does this include impacts (i.e. habitat loss or modification and disturbance) to Federally listed species?

Summarize and disclose public use information that supports the need for additional hiking trails and campgrounds.

Alternative 1. Interdependence of parks and community. Adjacent land uses. Page 63.

455-AQ

The adjacent land uses section includes the following as an issue: "Strategies to minimize negative impacts need to be analyzed and incorporated into this joint plan as appropriate." It is unclear when these strategies will be developed. Only two action items are identified: actively participate in planning, zoning, and other land use activities; and support land uses that are compatible with park values. Provide a timeframe for developing the strategies and incorporating them into the plan.

455-AR

No clear differences exist between the alternatives regarding the parks' response to adjacent land uses. Activities occurring outside of the Park boundaries may impact many park resources. The Plan should identify potential threats to park resources from sources outside of the park boundaries such as logging, development, and exotic species. Provide a discussion on potential solutions such as conservation easements, zoning, and coordination with other public and private land owners. Include a map to show adjacent public lands and identify a zone of influence around the park.

ensure that any effects on listed species are avoided, minimized, or otherwise mitigated.

**455-Z** The NPS and CDPR challenge is to provide the necessary and appropriate emphasis on visitor use and resource protection, not to resolve a conflict between these. The agencies strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and emphases on visitor use and resource protection, as required by law. In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. The agencies strongly believe that the degree of emphasis on visitor use and resource protection is completely consistent with the enabling legislation for the parks. The National Park Service strongly believes that all of these alternatives achieve its legally mandated standard that is expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations" (NPS Organic Act, 16 USC 1 and NPS *Management Policies* 1:3).

**455-AA** A sentence has been added to clearly state that new trails would not be developed in primitive zones.

**455-AB** Two of the parks' goals (see the "Actions Common to All Alternatives" section) — "The natural and cultural resources of the parks are preserved and protected" and "Lands, ecosystems, and processes that have been altered by modern human activities are restored or replicated" — address protecting and recovering threatened and endangered species and conserving biodiversity. Furthermore, in alternative 1, under the "Natural Resource Management and Protection, Objectives" subsection, "Ensure that all resource management efforts are consistent with and supportive of the perpetuation of the redwood forest ecosystem as the prime resource of the parks" also addresses these topics. These topics are also addressed in the description of the conditions that are to be achieved under each of the zones, especially in the table 1 column, "Resource Condition or Character."

**455-AC** Although this suggestion is well taken, there are many actions that could be broadened in a similar fashion, but to do so in this case and others would reduce the specificity in an intentionally very general document. Where appropriate, specific direction is given for other management efforts having to do with the perpetuation of the redwood forest ecosystem. For example, one of the goals in the "Actions Common to All Alternatives" section is "Redwood National and State Parks serve as a laboratory for scientific study and research that promotes preservation, restoration, and understanding of the parks' resources." And, in alternative 1, an action item for interpretation (in the "Education and Interpretation" subsection) is "Interpretive operations and media would be used to provide a similar emphasis on general and preservation information about natural and cultural history topics"; this action provides direction to interpretive staff about the

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### Alternative 1. Operations Facilities and Interagency Cooperation. Page 64.

This section discusses the proposed relocation of resource management staff to the Orick area from the current facility in Arcata. This proposed action is a concern to the Service. The Service currently has an operating intra-agency agreement that has been funded in excess of \$80,000 for GIS related interagency work. This agreement has been the financial base for the North Coast Geographic Information Cooperative (NCGIC), which involves a large group of many federal, state and local agencies, as well as many non-governmental groups, some of which are listed below. NCGIC does not currently receive any funding beyond that provided by the Service through the intra-agency agreement, and funding provided by the Park. It is vitally important to the community of GIS users that are in the position of providing support to resource managers, that they have a means to communicate, share ideas and priorities, share existing data, and develop new area-wide geographic data with the input of these partners. Under Executive Order 12906, Federal agencies are required to make their geospatial data freely available to the public, and avoid duplication of effort in creating such data. Northwest California includes many threatened and endangered species, which require assessment from an ecosystem and range-wide perspective. Problems have resulted from agencies developing and maintaining separate geographic data sets for the same purpose, resulting in delay and confusion. NCGIC promotes integrating all data from many organizations into singular versions, which are seamless across ownerships and the landscape. This approach provides new opportunities to evaluate ecosystem health. Park participation and leadership in NCGIC has developed a system which allows timely access to data from many organizations which manage public resources. The Service has initiated an internet site for NCGIC, which has helped to spread the knowledge and publicity about the group's efforts. The progress of the NCGIC will continue to create a visible statement that the Park is putting forth an effort to comply with executive order 12906.

The Service feels that the transfer of Park personnel from Arcata to Orick would jeopardize ongoing cooperative efforts between the Parks and the following agencies/organizations:

U.S. Fish and Wildlife Service  
USFS-Six Rivers National Forest  
USFS-Redwood Sciences Laboratory  
Bureau of Land Management  
Natural Resource Conservation Service  
U.S. Geological Survey  
National Marine Fisheries Service  
Environmental Protection Agency  
National Weather Service  
Army Corps of Engineers  
Humboldt State University - Spatial Analysis Lab  
California Department of Fish and Game  
California Department of Transportation  
California Department of Forestry  
Forest Science Project  
Humboldt County Planning Department

Besides the above-mentioned agencies, many local landowners, local agencies, and local nonprofit groups that the Parks interact with on redwood ecosystem concerns are all based in the Eureka-Arcata area. Many joint projects have been conducted by the Parks and various other agencies recently. These include biologic and geomorphic inventories, the evaluation of Habitat Conservation Plans and Aquatic Habitat Conservation Plans, formulating and reviewing watershed analyses, developing a regional slope stability

requirement to provide interpretive programs on redwood forest ecosystem preservation, which ties in with one of the parks' primary themes.

**455-AD** See the response to comment X in this letter. Also, subheadings for such topics as impacts from watershed restoration, etc. are included in the discussion of impacts on threatened and endangered species to help the reader distinguish these subsections in a rather long section. These subheadings are not used for other impact topics because the clutter is unwarranted in relatively short sections. And, in many cases, there are no impacts from those topic areas on some impact topics.

**455-AE** See the response to comment S in this letter.

**455-AF** This management plan / environmental impact statement/report represents the broadest level of park-level planning/decision making that is done. Decisions about many more specific and site-specific actions are deferred to implementation planning to be done in the future (*NPS Director's Order 2*; 3.3.1.2; pg. 5). Only those actions are presented in this document that will be implemented fairly soon because there is an immediate need and funding is believed to be forthcoming. Many actions for other objectives are not articulated because, by the time they could be implemented, conditions most likely will have changed so that the action would no longer be valid. RNSP biologists acquire baseline information on fish and wildlife resources as funding permits. The parks hosted a workshop in April 1999 for RNSP staff and researchers to identify critical components of the parks' ecosystem that will be inventoried and monitored. These components are thought to be the minimum elements necessary to understand and evaluate the baseline condition of the parks' resources. Inventory and monitoring is an NPS initiative aimed at providing parks with baseline information necessary to manage all park resources. RNSP staff take advantage of these special initiatives and any other cooperative activities, funding sources, and volunteers to develop baseline information.

**455-AG** This section specifically addresses watershed restoration because that program is congressionally directed and one of purposes for which Redwood National Park was expanded in 1978. The restoration of native dune plant communities through removal of exotic plant species is being accomplished under the 1995 *Exotic Plant Management Plan*. A more comprehensive dune community restoration program will be included when a RNSP-wide vegetation management plan is prepared.

**455-AH** Both agencies agree that restoring the Redwood Creek estuary will require cooperation among several agencies, the Yurok Tribe, and private landowners. The flood protection function of the levees and the safety of Orick residents living within the original floodplain of Redwood Creek will be major considerations during planning for estuary restoration.

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model, studies on the effects of roads and restoration strategies, and the development of common geospatial data. The sharing of data development and data themes and instant peer review results in a stronger regional perspective and less duplication of efforts, maximizing the use of funds and ultimately leading to better scientific credibility of Parks' studies overall. Cooperation among agencies has blossomed during the last few years, and we believe it will be a negative consequence to both the Parks and the other agencies/organizations to physically withdraw personnel from the Arcata area and from all the ongoing cooperative efforts.

Alternative 2. No Action. Concept. Page 67.

455-AS Additional information is needed regarding the management concepts under this alternative. The only stated concept for this alternative is that "...the Agencies will continue what they are doing for natural resource protection, preservation, and restoration". Provide a summary on the current management direction. A discussion is also needed concerning how conflicts between resource protection and increased recreational use are being resolved under existing direction.

Alternative 2. No Action. Natural resources. Vegetation management. Page 78.

455-AT Clarify how prairie restoration and fire management would differ under this alternative, compared to alternative 1. Provide a clear summary of the differences between the alternatives for prairie restoration, fire management, and new trail construction. For each alternative, summarize the miles of new trail construction that will occur in old-growth forests.

Alternative 3. Preservation emphasis. Public use, recreation, and visitor safety. Objectives. Page 100.

455-AU The following objective only occurs under alternatives 3 and 4: "... ensure that public use activities are consistent with National Park Service and California Department of Parks and Recreation regulations and policies". This objective should occur under all of the alternatives.

Alternative 3. Preservation emphasis. Public use, recreation, and visitor safety. Hiking. Page 101.

455-AV The following concept is included in the introduction for this alternative: "No new impacts would be allowed in areas with sensitive resources.", implying that no new trails would be built in old-growth forests. If this is the intent, it should be clearly stated.

Alternative 3. Preservation emphasis. Visitor access and circulation roads. Howland Hill Road Page 103.

455-AW Under this alternative, Howland Hill Road should be paved to eliminate the annual need for maintenance and disturbance during the marbled murrelet and northern spotted owl breeding season.

Alternative 4. Visitor use emphasis. Natural resource management and protection. Fire management. Page 118.

455-AX This is the only alternative that includes protection of specimen trees in old-growth forests from fire as an action item. This would be an appropriate action under all of the alternatives. Provide a definition of "specimen tree".

Alternative 4. Public use, recreation, and visitor safety. Visitor use levels Page 121.

455-AY Define what is meant by the following statement: "Visitor use would be allowed to increase to levels that would not create unacceptable impacts on the resources" Explain how this statement differs from the following statement under the preferred alternative: "Visitor use would be limited to that which would result in no significant impacts on resources and their values." Clarify the terms "unacceptable impacts" and "no significant impact".

455-AI Both agencies agree that salmonid habitat in the Redwood Creek estuary would be better protected if all natural processes were intact, including natural breaching of the sandbar. However, both agencies also believe that controlled breaching is the best solution currently available to protect the salmonid habitat from the deleterious effects of illegal breaching. The parks' past experiences with uncontrolled breaching suggest that it is preferable to take a proactive approach rather than to concentrate on enforcement or other administrative actions after the damage is done to the juvenile salmonids that inhabit the estuary.

455-AJ Criteria for site selection for managing second-growth forests in the parks will be presented in the second growth management plan and accompanying environmental documents. The proposed action seeks to provide an appropriate emphasis on managing RNSP resources with a focus on protecting resources and managing with a focus on visitor use and enjoyment. Although the primary emphasis of second-growth management under the proposed action would be on ecosystem restoration, some second-growth management would be directed toward those stands whose restoration would contribute to visitor enjoyment.

455-AK The text has been changed to be consistent with the proposals for trail development. This section is specific to cultural resource protection. Some cultural resources, such as archeological and ethnographic sites, are also included in the list of sensitive resources.

455-AL Natural quietness is addressed in several locations in the document, most notably in the table 1 zone descriptions for both "Resource Condition or Character," and "Visitor Experience" columns. Appropriate public uses are those that are consistent with the NPS Organic Act, derived regulations and policies, enabling legislation for the parks, and the purpose and significance of the parks. Many factors would be considered in determining appropriate locations for facilities, including such things as locations out of sensitive resources, the kind of need, the location of related facilities and resources.

455-AM The variation in visitor use in the alternatives deals with types of use. The amount or extent of a visitor use type is what varies across the alternatives -- not the number of visitors that would use any particular area, location, or facility or participate in a particular type of visitor use. Carrying capacities are needed to determine how many people can use places in the parks without causing unacceptable resource degradation. The management zones described in this document provide a very general carrying capacity in terms of resource degradation that will be tolerated in each zone and what visitor experience can be expected in terms of encounters with other visitors and RNSP staff. Those general carrying capacities will be refined in more detailed implementation planning.



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Table 8: Summary of alternative actions. Vegetation management. Page 132.  
 Table 8 would be easier to interpret if it summarized the proposed management under alternative 1 and then succinctly discussed the similarities and differences of other alternatives, compared to alternative 1. Provide a summary of the number of acres of second-growth forest treated under each alternative. The number of acres treated is discussed under the effects section and should also be summarized under the description of the alternatives. Summarize how prairie restoration and fire management under alternatives 1, 3, and 4 will vary from the current management under the existing management plans (alternative 2).

Table 8: Summary of alternative actions. Recreational activities. Page 138.  
 Summarize the number of miles of new trail construction under each alternative.

455-AZ

Table 9. Summary of impacts common to all alternatives. Page 144.  
 Add additional subheadings to address impacts to wildlife, old-growth forests, critical habitat, and biodiversity. This section states that park activities would be managed to avoid or minimize potential adverse impacts on listed species. Many on-going park activities are resulting in adverse impacts to listed species. To date, the Parks have been authorized incidental take (due to disturbance) on 3,500+ acres of murrelet habitat and 3,000+ acres of spotted owl habitat annually. This amount of incidental take is expected to occur in the Parks for the next 5-7 years. Provide a discussion concerning these adverse impacts. As proposed many of the activities included under the various alternatives such as new trail and campground construction in old-growth forest will have additional adverse impacts on listed species. This section needs to be rewritten to accurately reflect the impacts to listed species and/or to explain how these impacts will be minimized or avoided.

455-BA

Table 10. Summary of impacts of alternative actions. Page 146.  
 Add the following additional impact topics: wildlife, old-growth forests, critical habitat, and biodiversity. This table states that both alternatives 1 and 2 would have no "significant adverse impacts" on listed species. The criteria used to determine significance and adverse impacts need to be clearly outlined, since adverse effects are already planned to occur over the next 5-7 years (e.g., watershed restoration and annual facilities maintenance programs). Under the Act, "adverse affect" is the appropriate finding if an effect to a listed species is not discountable, insignificant, or beneficial. If incidental take is anticipated as a result of a proposed action, an adverse affect determination should be made. Clarify how the term "adverse impact" in the Plan relates to an adverse affect determination. If adverse effects from previous consultations are not expected to occur in the future, please notify us so we can adjust our environmental baseline.

455-BB

The following is stated under "The quality of the visitor experience": "Visitors would have some limited additional opportunities to directly experience sensitive resources, although these resources would be well protected." Since by definition sensitive resources include listed species and their habitats; explain how these resources will be protected.

AFFECTED ENVIRONMENT

This section should only describe resources that will be affected by the various alternatives [CEQ Regulations (§ 1502.15)]. Each affected resource should then be used in the analysis of direct, indirect, and/or cumulative aspects of the alternatives. There are a number of topics discussed in this section that do not clearly vary by alternative (i.e. climate and ground water). It would be more appropriate to have an in-depth discussion of resources such as old-growth forests.

**455-AN** We agree that significance criteria will need to be developed and described. However, that process is deferred to more detailed implementation planning. Those criteria are not needed to make the decisions for this management plan / environmental statement.

**455-AO** The National Park Service and California Department of Parks and Recreation are preparing a comprehensive RNSP trail plan and a RNSP backcountry management plan to guide the development of trails and primitive camping areas. These planning efforts will require public involvement, including an analysis of visitor demand, and will be based on the prescriptions for resource conditions and visitor experience described in the management zoning section. New campgrounds or campsites in the state parks will be developed only after evaluation of visitor demand and will require site-specific planning and environmental review to ensure that resources can be protected.

**455-AP** See previous comment AA in this letter.

**455-AQ** The National Park Service and California Department of Parks and Recreation are working actively with adjacent landowners, gateway communities, the Yurok Tribe, and local, state, and federal agencies to ensure that RNSP resources and values are maintained and protected. RNSP staff are participating in local and regional planning efforts and are seeking involvement in RNSP planning projects from stakeholders to work toward mutually beneficial outcomes and increased appreciation of the parks' values. This increased communication will improve the ability of both park agencies to protect RNSP resources.

**455-AR** The National Park Service and California Department of Parks and Recreation are using all available authorities to protect RNSP resources from activities occurring outside the boundaries that might adversely affect RNSP resources. Both agencies are working cooperatively with landowners, agencies, and communities to develop solutions to common problems and to reduce threats and impacts on RNSP resources.

**455-AS** Current management direction under the no-action alternative (alternative 2) is described on pages 78-86 in the draft plan under the "Actions" headings. Recreational use is not increasing to the point where resources are being compromised in most areas of the parks during most of the year. Conflicts between recreational use and protection of resources are managed according to the laws, policies, and regulations.

**455-AT** The differences between prairie restoration programs and fire management under the proposal and the no-action alternative are summarized in table 8 on page 132 of the draft plan. Under the no-action alternative, trails would be constructed as described in the NPS 1984 *Backcountry Trail Plan*, the 1996 *Davison Ranch Development Concept Plan*, and the 1985 *State Redwoods Parks General Plan*.

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455-BC

Natural Resources. Water Resources. Floodplains and flooding. Page 162.  
It is our understanding that the Redwood Creek levees were constructed to contain a 250-year event also described by the Corps as the "Standard Project Flood" rather than a 100-year flood event as mentioned. We also understand that the magnitude of this event is approximately 77,000 cubic feet per second.

455-BD

Natural Resources. Water Resources. Estuaries. Page 164.  
We disagree with the Parks' policy on controlled breaching of the Redwood Creek estuary. There is no information to support the conclusion that any controlled breaching at the estuary benefits anadromous salmonids. The Service supports the Corps' statement that a long-term solution to the restoration of the Redwood Creek estuary should be pursued that eliminates the need for artificial, controlled breaching of the estuary that primarily serves to protect infrastructure located in high risks flood locations.

In addition to detrimental effects of the flood control levees themselves, periodic maintenance of the levees on Redwood Creek by Humboldt County prevents the restoration of the riparian corridor along the lower end of Redwood Creek. This maintenance eliminates considerable habitat for fish and wildlife and further impairs the productivity and recovery of the Redwood Creek estuary.

455-BE

Natural Resources. Wildlife. Page 179.  
Discuss any species that have been extirpated or introduced to the parks. With the exception of threatened and endangered fish (pages 185-189), there is a notable absence of discussion regarding important aquatic species, especially fish, that frequent streams, rivers, nearshore ocean waters, and wetlands in the Parks. Several of these species have important ecological, cultural, or recreational significance. Some species of note include green sturgeon (*Acipenser medirostris*), Pacific lamprey (*Lampetra tridentata*), eulachon (*Thaleichthys pacificus*), and surf smelt (*Hypomesus pretiosus*). We recommend adding a brief discussion of such species to the affected environment section in the final EIS/EIR.

455-BF

Natural Resources. Rare, threatened, and endangered species. Page 181.  
The following statement is incongruent with past consultations that have been completed with the Parks: "Location and timing of Parks' operations, including maintenance and development of trails, roads and facilities and activities that alter habitat, have been restricted to protect listed species, especially during the breeding season." A number of consultations have been completed to allow park activities to occur during the breeding season. This section needs to be rewritten to accurately reflect park activities that are currently occurring or projected to occur during the breeding season. If the Plan will alter the predicted effects of past consultations, please provide us with a revised assessment of effects on prior consultations.

This section states the following: "A conservation strategy has been developed for managing RNSP operations to protect these and other listed species from habitat loss and to minimize disturbance." Where is the conservation strategy and why isn't it referred to in Appendix F the summary of existing plans? In addition, the term "minimizing disturbance" appears to contradict "protect listed species", as stated in the previous comment. Please rectify the apparent differences.

455-BG

Marbled murrelet. This section describes potential murrelet nest trees as having branches at least 6 inches in diameter. Change this to branches at least 4 inches in diameter. This would be consistent with the form developed for the 1997 formal consultation on the Parks' annual maintenance activities entitled "Characterizing trees for potential nesting substrates" and with the marbled murrelet recovery plan.

455-BH

The discussion on detections implies that murrelets have only been detected in a few old-growth stands within the parks. It would be more accurate to state that murrelets have been found occurring in all old-

About 78 miles of new hiking and equestrian trails proposed in the 1984 NPS trail plan and about 22 miles of hiking, bicycling, and equestrian trails proposed in the Davison Ranch plan would be constructed under alternative 2. Some of the trails proposed under the Davison Ranch plan are under construction. It is not possible to calculate accurately the length of new trail construction that would occur in old-growth forest without site-specific planning and a design. Many trail alignments were identified based on aerial photographs or existing logging road alignments, with limited ground-truthing. Because of the terrain and the condition of the abandoned roads, trail alignments are often changed substantially based on the conditions encountered at a site.

455-AU The text has been changed in response to this comment.

455-AV See previous comment AA in this letter. A sentence has been added to clearly state that new trails would not be developed in primitive zones.

455-AW Paving Howland Hill Road would entail short-term noise and disturbance similar to noise and disturbance from the annual maintenance program. After the road was paved, there would continue to be short-term noise and disturbance from annual maintenance needed for any road. Also, visitor and non-RNSP traffic would probably increase if the road were paved, with a resultant increase in noise and disturbance.

455-AX Specimen trees are very large live individual redwood trees. Trunks may be blackened by low intensity prescribed fires without killing the trees. Under this alternative, which emphasizes visitor enjoyment of resources, these trees would be protected primarily to avoid blackening the trunks, which some visitors find objectionable. Under all alternatives, all prescribed fires would be planned and conducted to avoid destruction of any mature old-growth trees. One of the functions of prescribed fire is to minimize the adverse effects of intense uncontrolled fires, including the destruction of mature live trees.

455-AY The management zones for each alternative describe the resource conditions and the visitor experiences that would be acceptable in different zones under each alternative. The sensitivity of the resources vary with the location, the type of resource, and the season of the year. Some resources have specific statutory protections, and other resources are protected by policy, guideline, or desired condition (management zone). No significant adverse impacts to resources would be allowed under any alternative. If significant adverse effects on resources are found to be occurring or to result from a specific proposal, the agencies will use all available authorities or modify the proposal to reduce the impacts.

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	growth stands that were surveyed in RNSP. Thus, the Parks assume that all suitable murrelet nest trees are occupied.
455-BI	Add a discussion on the results of recent at-sea murrelet surveys off of the coast of the Parks. There also needs to be a discussion on the Parks commitment to implementation of the marbled murrelet recovery plan goals.
455-BJ	<i>Bald eagle and peregrine falcon.</i> Add a discussion on the Parks' commitment to implementation of the recovery plan goals for both of these listed species.
455-BK	<u>Natural Resources. Noise in relation to threatened and endangered wildlife. Page 185.</u> Why is this discussion included in the effected environment? Will the amount of noise under the various alternatives vary, if so, explain. Provide a reference for the "federal noise guidelines".
455-BL	<u>Natural Resources. Threatened and endangered fish. Page 185.</u> This discussion states that no systematic tidewater goby survey has ever been conducted in the parks; however, David Anderson has conducted surveys (refer to Redwood National and State Parks 1997 Annual Report of Tidewater Goby Activities). These surveys should be acknowledged.  Neither the Service or the Pacific Fisheries Management Council have any fisheries management responsibilities in the Klamath River. <i>Oncorhynchus</i> is misspelled. Trout should be dropped from the name for steelhead.
455-BM	<u>Public Safety. Redwood Information Center. Page 232.</u> The decision to construct the Redwood Information Center at its present site rather than at an alternate site at the south end of Elk Prairie was apparently based on the concern for potential adverse impacts to elk. The EIS/EIR does not discuss potential impacts to elk from any of the alternatives, including the proposed new site for the information center in the vicinity of the B-Mill deck. Elk should be an issue that is tracked throughout the document.
455-BN	<b>ENVIRONMENTAL CONSEQUENCES</b> The CEQ Regulation (§ 1502.14) state that the environmental consequences section should provide a clear basis for choice among the alternatives. This section should also identify the degree to which each alternative meets the objectives. The CEQ Regulation (§ 1502.16) state that this section shall include discussions of direct and indirect effects and their significance and means to mitigate adverse environmental impacts. We do not believe the draft document adequately meets the intent of these regulations.
455-BO	<u>Introduction. Page 237.</u> As commented earlier, wildlife, critical habitat, old-growth forests, and biodiversity should be issues discussed in each section of the plan.
455-BP	<u>Regulations, assumptions, and methods for evaluating impacts. Natural resources. Summary of regulations and policies. Page 238.</u> This section should summarize Park Service policy regarding wildlife, such as the following direction from the 1988 Management Policies: The National Park Service will assemble baseline inventories on its natural resources and monitor them over time to detect or predict changes (p. 4:4); and the National Park Service will seek to perpetuate the native animal life as part of the natural ecosystems of parks (p. 4:5). It

**455-AZ** The document has been revised to reflect the results of consultations with the U.S. Fish and Wildlife Service for incidental take of listed threatened or endangered species allowed under section 7 of the Endangered Species Act. Planning for construction of new visitor facilities, such as trails and campgrounds, would include section 7 consultation on the effects of these plans on listed species.

**455-BA** Criteria for significance have been added to the plan under the "Assumptions and Methods for Assessing Impacts" section that was on page 247-48 of the draft plan.

**455-BB** Because of the general nature of this plan, it is not possible to specify exact methods of protection for all listed species in the variety of habitats they occupy in the parks. The National Park Service and the California Department of Parks and Recreation will allow visitor use of the parks as described in the "Management Zoning" section (on pages 21-28 and on the zoning maps on pages 39-43 in the draft plan). Listed threatened or endangered species and their habitats would be protected from adverse impacts due to visitor use according to conditions established by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service under the formal section 7 consultation for this plan.

**455-BC** The document has been revised to reflect that the levees were designed by the Army Corps of Engineers to protect Orick and the surrounding areas with standard project flood protection.

**455-BD** See comment AI above.

**455-BE** This document focuses on major issues ripe for discussion. The "Affected Environment" section provides a brief discussion of species that are most likely to be affected by proposals in the plan. The list of extirpated or introduced plants and animals would be lengthy and would not add to the understanding of any of the proposals. The parks' 1995 *Exotic Plant Management Plan*, which is referenced in appendix G (final plan), lists 13 introduced plant species that the RNSP managers consider to have the highest priority for control. With the exception of surf smelt, none of the fish species mentioned are the subject of any specific proposal in the plan. A discussion of the surf smelt fishery, one of the species fished commercially by beach fishermen, appears on page 220 of the draft plan.

**455-BF** Before the listing as threatened of northern spotted owls and marbled murrelets, the development and maintenance of facilities and resource management projects such as watershed restoration and vegetation management were conducted when and where needed, provided that any adverse impacts could be mitigated to the satisfaction of regulatory agencies. Following listing of these species, the location and timing of many activities were restricted. For example, trail and campground maintenance activities that involved use of chain saws in and within

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is National Park Service policy to treat potential impairments in the same manner as known impairments. When a potential for resource impairment exists, actions shall be based on strategies that retain the resource in an unimpaired condition until such time as doubts are resolved (p. 1:4).

Regulations, assumptions, and methods for evaluating impacts. Natural resources. Wetlands. Page 243.  
We recommend that the Parks strive for the goal of a net gain of wetland acreage and functions within the Parks' boundaries.

455-BQ

Regulations, assumptions, and methods for evaluating impacts. Threatened and endangered species. Summary of regulations and policies. Page 246.  
Discuss the responsibility of Federal agencies under section 7(a)(1) of the Act to utilize their authorities in furtherance of the purposes of the Act by carrying out programs for the conservation of listed species.

455-BR

Regulations, assumptions, and methods for evaluating impacts. Threatened and endangered species. Assumptions and methods for assessing impacts. Page 247.  
This section states the following: watershed restoration projects in RNSP have been curtailed since 1994 because of noise restrictions to protect northern spotted owls and marbled murrelets during their respective breeding seasons. This statement is not accurate. The Service completed a formal consultation with the Parks in 1998 to cover the watershed restoration program from 1998 to 2004. Prior to 1998, consultations were completed on an annual basis to cover the watershed restoration program. This section also states the following: no work that generates sustained noise above local background levels is permitted within 0.25 mile of suitable nesting habitat during the nesting season, projects have tended to be short in duration. This is also inaccurate. The Service has completed consultations with the Parks for a number of activities that occur during the breeding season. This section should be rewritten to accurately reflect consultations completed to date on Park activities.

455-BS

According to the introduction, the purpose of this section is to address methods and assumptions used to assess the impacts on each topic. No methods and assumptions are described for assessing impacts to listed species. This section only discusses the watershed restoration program and noise disturbance. No discussion is presented on how the various alternatives will be compared. Provide a discussion on how the difference in degree of effects and significance of effects on listed species will be compared under each alternative.

455-BT

Impacts of actions that are common to all alternatives. Threatened and endangered species. Page 260.  
The organization of this section with inconsistent subheadings makes it difficult to track all aspects of the various alternatives under each resource. Provide separate discussions for indirect, direct, and cumulative impacts under each resource.

455-BU

Introduction. This section states that "Snowy plover nesting would also be affected by these proposals, but there would be no direct impacts on plovers, which have not been observed to nest in the parks in recent years." This statement assumes that plovers will not nest on park beaches during the life time of this plan. Provide justification for this statement. Remember that plovers may be directly impacted by activities during the winter as well as in the summer.

455-BV

Provide significance criteria for the negative effects on nesting bald eagles. Describe any management direction that will be implemented to protect future bald eagle nests from disturbance or habitat loss.

0.25 mile of old-growth forest have been subject to restrictions regarding when chain saws could be used so that breeding birds are not disturbed by noise. Following winter storms, trails frequently require intense work to remove fallen branches or trees. Many trails require routine maintenance to remove annual vegetation growth. Because restrictions on noise were instituted to protect breeding owls and murrelets, much of this maintenance work that formerly occurred on a year-round schedule has been restricted to specific time periods. Watershed restoration projects were formerly initiated as early in July as possible so that earthmoving work could be accomplished before the onset of heavy rains. The heavy equipment used in watershed restoration projects creates noise in excess of that typically found in old-growth forest. When watershed restoration projects occur within 0.25 mile of suitable owl or murrelet habitat, those portions of the project are not allowed to begin until the breeding season restrictions are lifted in mid-July (owls) or mid-September (murrelets). The development of new facilities in old-growth habitat is discouraged by the U.S. Fish and Wildlife Service because of potential impacts on murrelets related to predation thought to be facilitated by visitor use.

The conservation strategy for protecting listed species is not a specific implementation plan and therefore does not appear in appendix G (final plan). A conservation strategy appears in a shaded box in the discussion on threatened and endangered species in the "Actions Common to All Alternatives" section.

455-BG The document has been revised based on this comment.

455-BH The document has been revised to indicate that all suitable old-growth forest habitat is assumed to be occupied by marbled murrelets unless determined otherwise after monitoring by RNSP staff.

455-BI The at-sea surveys conducted offshore of the parks outside the boundaries are not relevant to the proposals in this plan and do not contribute to a reader's understanding of the impacts of those proposals. The National Park Service and the California Department of Parks and Recreation are committed to preserving endangered species as a component of the parks' ecosystems. See also the previous comment R in this letter.

455-BJ See previous comment R in this letter.

455-BK The discussion on noise is provided so that readers understand the effects of noise and noise-related disturbance on listed threatened and endangered species, primarily northern spotted owls and marbled murrelets. The peregrine falcon was removed from the federal list of endangered species on August 25, 1999. Because the falcon is still listed by the state of California as endangered, the parks will continue to be managed to protect this bird. Noise will vary under the different alternatives, depending on the amount of construction, maintenance, resource

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455-BW-BY	<p>The alternatives need to consistently address impacts to marbled murrelet critical habitat.</p> <p><i>Noise and Disturbance.</i> The section on impacts of noise and disturbance should also address western snowy plovers and bald eagles.</p> <p><i>Construction-related Impacts.</i> This section states that "Direct effects of construction would include noise and excessive disturbance . . .". Direct effects of construction could also include habitat removal and degradation and should be discussed.</p>
455-BZ	<p><i>Watershed Restoration.</i> This section states that during any one year, there might be minor effects - but not adverse effects - on marbled murrelets on up to 300 acres of suitable habitat from noise disturbance due to the watershed restoration program. The 1998 formal consultation on the watershed restoration program authorizes incidental take in the form of loss of marbled murrelet reproduction associated with 182 acres of suitable nesting habitat, this is not considered to be a minor effect. In addition, this conflicts with the statement on page 144 of the plan which states that activities would be managed to avoid or minimize potential adverse impacts. Take was also authorized for habitat loss within the home range of 10 northern spotted owl activity centers; however, this section states that the watershed restoration projects would not result in a major short-term reduction of overall spotted owl nesting habitat. As commented earlier, define the significance criteria and ensure significance criteria are consistent with criteria used for determination effects for the purpose of the Act.</p>
455-CA	<p><i>Vegetation Management.</i> Provide a discussion of dune community restoration. This section states that there will be no direct or long-term adverse impacts on critical habitat. What about burning of old-growth forests and its potential impact on suitable habitat and disturbance during the breeding season of listed species? Provide a discussion of the potential loss of northern spotted owl or marbled murrelet habitat due to prairie restoration.</p> <p><i>Fire Management.</i> Discuss potential degradation or removal of suitable habitat and disturbance during the breeding season due to prescribed fire.</p>
455-CB	<p><i>Visitor Use.</i> There are two subheadings titled "Impacts related to visitor use". This section states that "area closures would be implemented where necessary to protect listed species nest sites from unnecessary disturbance by human activities." Describe what would be considered unnecessary disturbance.</p>
455-CC	<p><i>Trail Use and Maintenance Activities.</i> Discuss additional recreational activities such as camping and vehicles on the beach. Under this section there is a discussion regarding the hazard tree removal program. It states that "No nest trees have ever been located in the three state park campgrounds in old-growth forests." Identify the species referred to and how the surveys were conducted. Considering the difficulties in locating marbled murrelet nests, it does not seem appropriate to imply that no nests occur in these areas unless they have been thoroughly surveyed. Disclose which species were the object of surveys conducted in the campground areas.</p>
455-CD	<p>Table 23 (page 267) displays the acreage of suitable habitat for listed species and the acreage of proposed and existing facilities and development, excluding roads and trails, within potential suitable habitat. Why were roads and trails excluded? Does this acreage include State Parks? If not, this needs clarification. Explain why acreage are shown for only a portion of the Parks' facilities and developments.</p>

management activities, and visitor use allowed. The references to the federal noise guidelines appear in appendix J (final plan) and in the bibliography under Bolt, Beranek, and Newman 1971.

**455-BL** Annual surveys of the Redwood Creek estuary are aimed at monitoring the abundance of juvenile salmonids and are not primarily directed at tidewater gobies. Except for the surveys of the Redwood Creek estuary, other estuarine or tidal areas in the parks have not been surveyed for the presence of gobies. The document has been revised in accord with the other comments.

**455-BM** The National Park Service and the California Department of Parks and Recreation believe that existing regulations, guidelines, and RNSP policies are sufficient to manage elk populations in the parks. Thus, elk management is not an issue requiring a decision at the level of a general management plan and an environmental impact statement.

**455-BN** The Environmental Protection Agency reviewed this environmental impact statement/report and found it adequate under NEPA requirements, the CEQ regulations, and section 309 of the Clean Air Act (see the EPA's letter in the "Comment and Response" section under federal agencies). Impacts are discussed at a level of detail appropriate to a general management plan. Direct and indirect effects are discussed under each impact topic chosen for analysis. Mitigation that could be prescribed for general categories of actions that are likely to occur is described in the "Actions Common to All Alternatives" section. Because of the general nature of this plan, site-specific impacts and appropriate mitigation are often not known. All future actions that have the potential to affect resources will be subject to additional site-specific environmental compliance as more detailed planning is undertaken.

**455-BO** NEPA regulations and NPS policy require that issues addressed in general plans be those for which a decision is needed on alternative ways to manage a resource. The agencies believe that there is sufficient authority in existing regulations, policies, and guidelines to adequately protect and manage these resources. The management zones and the management objectives provide the direction to manage these resources with alternative emphases.

**455-BP** Existing NPS policies for wildlife management are incorporated by reference into the plan.

**455 BQ** Section 7 of the Endangered Species Act (16 USC 1536(a)(1-2)) requires that the federal agencies shall carry out programs for the conservation of endangered species, and shall ensure that actions are not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of critical habitat. All proposed actions described in this plan are consistent with those requirements. The responsibilities

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455-CE	<p><i>Conclusion.</i> Clearly summarize the indirect, direct, and cumulative effects for each listed species. This section states that adverse impacts on owls and murrelets would be minimized by restricting watershed restoration, vegetation management activities, construction, and maintenance of facilities to the nonbreeding season. The Parks recently completed consultation for the 10 year annual maintenance program and 6 year watershed restoration program. These activities were not restricted to the nonbreeding season. See prior comments about the need for updating us if the effects of past consultations are anticipated to change.</p>
455-CF	<p>This section concludes there would be "minor adverse impacts" on owls and murrelets from smoke, construction, maintenance, and visitor use of trails. This statement needs justification. The formal consultation on the Skunk Cabbage memorial grove trail documents the long-term adverse impacts from human activity along the trail. Similar effects would be expected for any future trail construction without additional use constraints. Again, explain the significance criteria and ensure consistency with determination of effects criteria used under the Act.</p>
455-CG	<p><i>Cumulative Impacts.</i> This section states that Park activities would be managed to avoid or minimize potential adverse impacts on listed species to the greatest extent possible. Explain how this would be accomplished, given our previous comments about consultations to date. This section states that continued timber harvest of stands occupied by murrelets outside the parks would reduce the overall population of murrelets. This would be a moderate to major short-term direct adverse impact on individual birds and a moderate direct adverse impact on the population. Define the criteria used to support these conclusions.</p>
455-CH	<p>The final marbled murrelet recovery plan was published in 1997. Cite the final, not draft, recovery plan.</p>
455-CI	<p><u>Impacts of implementing alternative 1. Threatened and endangered species. Page 284.</u> The subheadings in this section should coincide with the subheadings used under the description of the alternatives. Under each subheading direct, indirect, and cumulative impacts and their significance, and mitigation measures should be addresses for each listed species. There is no discussion under some alternatives on the western snowy plover, peregrine falcon, or bald eagle. The subheading titles are inconsistent. This makes it very difficult to evaluate if all aspects of the proposed alternative have been addressed. A consistent format needs to be followed for the conclusion sections under the various alternatives.</p>
455-CJ	<p><i>Watershed restoration.</i> This discussion only addresses long-term benefits for owls and murrelets. Discuss short-term impacts, direct, indirect, etc.</p>
455-CK	<p><i>Second-growth forest management.</i> This discussion states that the degree of benefit for owls and murrelets would depend on whether the primary objective was to restore stand characteristics that favor nesting habitat or whether other objectives such as restoration of tree species diversity or removal of exotic tree species was assigned higher priority. The description of the alternative needs to outline which objective would be given higher priority. The description goes on to state that some sites selected for treatment would be chosen to increase visitor use and enjoyment rather than to increase suitable nesting habitat. If the criteria used to select stands for treatment will vary between the alternatives, then this needs to be clearly outlined in the description of the alternatives. In addition, the description of the alternatives should give the number of acres to be treated during the various time periods. There should be some discussion regarding the age of redwood stands and their expected response to thinning, since under this alternative some stands may not be treated for 160 to 190 years.</p>

of the parks under the Endangered Species Act are described on page 246 of the draft plan. NPS *Management Policies* and *Natural Resources Management Guidelines* fully describe NPS requirements for endangered species management. These documents are incorporated by reference into this plan and environmental impact statement. See also responses to comments R and AZ in this letter.

**455-BR** The plan has been revised to reflect the results of the current status of consultations on watershed restoration actions.

**455-BS** The plan has been revised to provide a discussion of differing degrees of significance of impacts on listed species. See response to the previous comment BA in this letter. The assumptions discussed in this section of the plan that relate to analysis of impacts on listed species include the time available for watershed restoration projects (page 247 of the draft plan); the growth potential for trees used to estimate the effects of second-growth management (page 248 of the draft plan); and the effects of noise and disturbance on wildlife in general (page 248 of the draft plan). Discussions of noise and calculations of old-growth forest habitat in the parks were placed in an appendix because of the technical nature of these discussions.

**455-BT** There is no requirement to provide headings for each category of impact. All relevant impacts have been discussed under each impact topic at a level appropriate for a general plan given the available information. Cumulative impacts on major resources chosen as impact topics are discussed at the end of each impact topic.

**455-BU** Continued human use of RNSP beaches might result in disturbance thought to discourage plover nesting. There is less human use of beaches during the winter. If the parks' annual surveys should find that plovers are attempting to nest on parks' beaches, RNSP staff would consult with the U.S. Fish and Wildlife Service to determine how to protect nesting plovers from human disturbance.

**455-BV** Observations in 1998 suggest that a pair of bald eagles may be nesting in or near the parks. It is not possible to accurately describe impacts from RNSP activities based on the possible sighting of a single nest. How any future nests would be protected would depend on the location of the nest.

**455-BW** Murrelet critical habitat has been designated within Redwood National and State Parks only in the three state parks. General impacts on marbled murrelet critical habitat are addressed on pages 263 (vegetation management), 264 (fire management), and 266 (hazard tree removal) in the draft plan. There are no site-specific proposals in the plan for which impacts to murrelet critical habitat can be analyzed in additional detail. The discussion of general effects from noise and disturbance on page 260, general effects from human use on pages 261-262, and

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455-CL	<i>Prairie restoration.</i> Discuss the potential removal of suitable murrelet habitat and disturbance to owls or murrelets.
455-CM	<i>Fire management.</i> Discuss potential removal or degradation of suitable habitat due to the prescribed burn program. This section states that all burns will be conducted outside the nesting season, yet your staff has contacted our office to conduct burns during the nesting season due to a continued problem with not being able to attain proper burn conditions outside of the breeding season. We continue to recommend conducting prescribed fires outside of the marbled murrelet breeding season to avoid adverse effects on murrelet reproduction.
455-CN	<i>Visitor use.</i> Specific information should be provided on all of the new trails included in the description of the alternative. Information is provided on the amount of old-growth forest within 0.25 mile of existing trails. Does this include old-growth stands in State Parks? Why does this only include trails and not all of the Parks' facilities? The discussion only describes the impacts of constructing the east side trail and Skunk Cabbage Groves trails, what about the other proposed trails? This section should give acreage figures for all proposed trails in the National and State Parks. The baseline figures should include all existing developments, trails, and roads in old-growth forests. There is no discussion about the construction of new campsites, campgrounds, primitive campsites, primary interpretive center in the B-mill deck vicinity, or new Hiouchi information center.
455-CO	<i>Conclusion.</i> This section only discusses the long-term benefits from park activities. There is no discussion about increased recreational use and new developments.
455-CP	<i>Cumulative impacts.</i> There is no discussion how the Parks would respond to impacts occurring outside the Park boundaries or coordinate with adjacent landowners. This section concludes that the cumulative adverse impact on marbled murrelets and northern spotted owls in the region from increasing visitor use and development in the parks would be minor. This statement needs further justification for the murrelet. The cumulative impacts section under the various alternatives should follow the same format and provide information on the same issues. For all alternatives, provide information on all listed species.
455-CQ	<u>Impacts of implementing alternative 2. Threatened and endangered species. Page 308.</u> The sub-headings under this alternative are not in the same order as those discussed under alternative 1. There is no discussion on fire management under this alternative, and there was no discussion on estuary restoration under alternative 1.
455-CR-CS	<i>Watershed restoration.</i> This discussion only addresses beneficial impacts. There is no discussion of short-term negative impacts.
455-CT	<i>Artificial impoundments and estuary restoration.</i> Address the tidewater goby.
455-CT	<i>Prairie restoration.</i> This discussion states that restoring natural ecological processes would result in indirect long-term benefits for all listed species. Explain how listed species will benefit, since the prairies are not suitable habitat for any listed species. Discuss whether suitable murrelet nest trees may be impacted.
455-CU	<i>Visitor use.</i> This discussion mentions that noise impacts could be mitigated by various means. This is not relevant unless the mitigation measures are part of the proposed alternative. Describe the mitigation measures that would be implemented. This section concludes that the construction of more campsites at

general effects from trail use and maintenance on page 266 applies to critical habitat.

**455-BX** The document has been revised according to this comment.

**455-BY** No large trees would be removed for construction without surveys to determine if the trees are suitable nest trees for any listed bird species. Understory shrubs and small trees might be removed depending on the location of the construction, if surveys by RNSP biologists indicate that these trees are not suitable nesting habitat and that the removal of shrubs and small trees would not significantly degrade nesting habitat. Trees suitable for nesting by listed species would not be removed. Habitat degradation is a subjective evaluation that habitat is less suitable than prior to disturbance and cannot be quantified in the same terms as loss of habitat. All construction will be preceded by site-specific planning, accompanied by environmental compliance documents and subject to consultation with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service if any listed species or designated critical habitat might be affected.

**455 BZ** A discussion of levels of significance has been added to the plan. The plan has been updated to reflect the most recent results of consultations with the U.S. Fish and Wildlife Service. Also see responses to comments BA, BF, and CE in this letter.

**455-CA** The restoration of dune communities is not an issue requiring a decision at the level of a general management plan and is therefore beyond the scope of this plan. Exotic plant species are being removed from beaches as funding allows in accordance with the approved *Exotic Plant Management Plan*. The effects on listed species of prescribed burning in old-growth are discussed on pages 263-65, 288-89, 328, and 345 in the draft plan. Prairie restoration would have no direct effects on marbled murrelet habitat because there is no suitable murrelet habitat in prairies or oak woodlands. Impacts on owl habitat and from drifting smoke are mentioned on pages 264-65, 288, 310, and 327 of the draft plan.

**455-CB** Unnecessary disturbance would include unlimited visitor access to the entire beach. Beach access under Native American or commercial fishing permits could be allowed with restrictions. The double heading has been corrected in the final plan.

**455-CC** Visitor use of vehicles on the beaches is included in the general discussion of disturbance effects from increased visitor use on page 265 of the draft plan, and camping is discussed on page 266. The first sentence of the paragraph at the bottom of page 266 that discusses the effects of hazard tree removal refers to northern spotted owls and marbled murrelets. The document has been revised to clarify who conducts surveys.

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455-CU	Gold Bluffs Beach would not result in new adverse impacts on the snowy plover because the amount of human use in the immediate vicinity of the campground makes it generally unsuitable for plover nesting. If Park activities at Gold Bluffs Beach have made this habitat unsuitable for plover nesting this needs to be addressed. This discussion also concludes that the construction of new campgrounds in suitable owl and murrelet habitat would be an adverse impact but the amount of habitat affected would be very small. This needs to be placed in context to how much suitable habitat within the Parks is already impacted.
455-CV	<u>Impacts of implementing alternative 3, Threatened and endangered species, Page 326.</u> <i>Watershed restoration.</i> This discussion only addresses long-term beneficial impacts. There is no discussion of short-term negative impacts.
455-CW	<i>Second-growth forest management.</i> This section states there would be no short-term adverse impacts on marbled murrelets from noise because the stands are not suitable murrelet habitat. The treated stands may be adjacent to suitable habitat and unless limited operating periods will be imposed this statement is not correct.
455-CX	<i>Prairie restoration.</i> Discuss the potential for impacting suitable murrelet nest trees.
455-CY	<i>Fire management.</i> Provide data to support the following statement: opening the understory canopy with fire would have minor positive benefits for murrelets by increasing the space available for them to maneuver to a nest. Discuss the adverse effect of removing understory trees in relation to future benefits <i>understory trees would have provided relative to development of potential nest trees, microhabitat, and cover from predators.</i> Discuss potential long-term adverse impacts due to escaped fire removing or degrading suitable habitat.
455-CZ	<i>Visitor use.</i> This section states that there would be a reduction by 9 % of the old-growth forests in the parks that would be affected by trails. Similar information needs to be provided for the other alternatives. In addition, this section states that 54% of the old-growth would be within 0.25 mile of roads, trails, or facilities. Alternative 1 describes the percentage of old-growth within 0.25 mile of trails only. Similar data need to be presented in each alternative. This discussion also includes impacts from the hazard tree program while the discussion for alternative 1 does not.
455-DA	<u>Impacts of implementing alternative 4, Threatened and endangered species, Page 344.</u> <i>Visitor use.</i> Alternative 4 would result in the greatest long-term adverse impacts on owls and murrelets, however, it also states that 69 percent of the old-growth forest would be within 0.25 mile of a road, trail, or facility. This is the same estimate that was given for alternative 1. Are the trail and facilities developments in alternative 1 and 4 the same? There is no discussion about impacts from new campgrounds.
455-DB	<i>Conclusion.</i> Construction and maintenance activities would be conducted at times to avoid adverse impacts on listed species. If limited operating periods will be imposed for all activities during the breeding season, this needs to be described in the description of the alternative. Restricting all construction and maintenance activities to the time period outside of the breeding season is not discussed under alternative 3 (the preservation emphasis alternative). Implementation of limited operating periods is not clearly stated for each of the alternatives.

455- CD Acreages of suitable habitat are provided to give readers an understanding of the amount of threatened and endangered species habitat in the parks. Information on roads and trails is available in the biological assessments that have been submitted to the U.S. Fish and Wildlife Service. The information on roads and trails is incorporated by reference because it is too lengthy to be included in this general plan. Because this is a joint plan for management of Redwood National Park and the three redwood state parks included in the national park boundary as described on page 3, all information that does not specifically refer to either national or state park lands applies to both national and state parks.

455-CE See responses to comments AZ, BF, and BZ in this letter. Both agencies agree that some work is allowed during the breeding seasons for northern spotted owls and marbled murrelets. However, see comment 455 BF regarding the agencies' position that before listing of owls and murrelets, work was conducted in more locations without being limited to certain dates. We agree that the format of the document, especially the impact section, is not ideal. However, we believe that changes at this point would not be cost-effective.

455-CF See response to comment BA for a discussion of how significance is determined.

455-CG The agencies believe that the proposed actions do not result in significant adverse effects on listed species, with significant defined to mean actions that would jeopardize the continuing survival of a listed species. Given the requirement that visitors be allowed to use and enjoy the parks, it is the agencies' position that all proposed actions are in full compliance with the requirements of the Endangered Species Act and NPS and CDPR policies and guidelines, as discussed in response 455 BQ. The *Federal Register* notice that lists the marbled murrelet as threatened (57 FR 45328, October 1, 1992) describes the primary factor leading to the listing as loss of mature and old-growth forest habitat. Based on this statement, it is reasonable to state that continued timber harvest of old-growth forests outside RNSP boundaries would be a major adverse impact. Without knowing how much timber would be harvested, and whether harvest units are occupied by murrelets, it is the agencies' position that less harvest could have less impact, and therefore could result in a moderate adverse effect. Assuming that the U.S. Fish and Wildlife Service allows timber harvest under an incidental take permit, as we believe is occurring on private timberlands in Humboldt County, it is consistent with the levels of significance defined in response AZ above - that these impacts are moderate.

455-CH The text has been changed in the final plan.

455-CI Impacts and the mitigation for impacts on each listed species will vary with the site-specific action and the species. It is not possible in a general plan to describe the impacts in more detail. The discussion of impacts on peregrine



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455-DC	<u>Consultation and coordination. Page 355.</u> <i>Consultation with the U.S. fish and Wildlife Service.</i> This section references a species list issued by the Service on January 1997. Species lists are only valid for 90 days from the date of receipt. This section should reference a current species list. This section should state that consultation on this plan will be completed prior to signing the Record of Decision. It would have been beneficial to have solicited Service involvement early in the development of the issues and alternatives, given some of the apparent conflicts.
455-DD	<i>Summary of major issues raised during scoping.</i> Exotic plant management and appropriate visitor use levels in sensitive resource areas are implied to be adequately addressed in this document; however, little to no information regarding these two issues is provided in the Plan.
APPENDIXES, BIBLIOGRAPHY, GLOSSARY, AND PREPARERS	
455-DE	<u>Appendix D. Development cost estimates. Page 397.</u> This table shows construction of various facilities as follows: 75 new campsites in existing campgrounds; 100 miles of foot trail; 30 miles of equestrian trail; 30 miles of bicycle trail; Jedediah Smith Redwood State Park entrance and access road; Del Norte Coast Redwood State Park entrance and access road; primary visitor center; and Hiouchi information center. These construction activities need to be adequately described in the description of the alternatives and the effects chapter. In the tables, the number of miles of new trail for alternative 1 is the same for alternative 2 and alternative 3; however, under the environmental consequences these alternatives are presented as being different.
455-DF	<u>Appendix F. Summary of referenced plans. Page 408.</u> This section should include the final recovery plans for marbled murrelet, American peregrine falcon, bald eagle, and brown pelican.
455-DG	<i>Fire management plan.</i> This summary states that the plan requires that all wildfires be suppressed. Provide a discussion in the Plan regarding the future strategy for managing wildfires. The existing fire management plan does not include extensive burning in vegetation types other than oak woodlands and prairies. Provide a clear discussion under each alternative on the development of a new fire management plan to cover burning in other vegetation types (e.g. old-growth redwood forests).
455-DH	<i>Backcountry trail plan.</i> Identify trails that have already been constructed and those the Parks do not plan to construct. Under each alternative, clearly state which trails and how many miles would be permitted based on the location of the primitive zone boundaries.
455-DI-DK	<i>Davison Ranch development concept plan.</i> Clarify under each alternative whether all actions called for in this plan will be implemented, such as the 22 miles of new trails.
455-DI-DK	<u>Appendix G. Trails called for in existing state plans. Page 411.</u> Identify trails that have already been constructed and those the Parks do not plan to construct.
455-DI-DK	<u>Appendix H. Rare, sensitive, threatened, and endangered species known to occur in Redwood National and State Parks. Page 413.</u> Update the breeding observation section for the peregrine falcon to represent the presence of known nesting sites within the Parks. Discuss plover wintering areas.

falcons, bald eagles, and western snowy plovers appears on page 260 of the draft plan.

**455-CJ** Short-term effects of all proposed actions on northern spotted owls and marbled murrelets are discussed on pages 260-67 of the draft plan.

**455-CK** Site-specific management strategies for second-growth management will be presented in the second-growth management plan. The management strategies might vary by site based on the resource values and potential visitor use. It is appropriate that management strategies of an implementation plan reflect the emphases of RNSP management presented in this general plan. It is not reasonable to attempt to predict what actions the agencies might be taking more than 100 years in the future.

**455-CL** Prairie restoration would have no direct effects on marbled murrelet habitat because there is no suitable murrelet habitat in prairies or oak woodlands according to the definition of suitable murrelet nesting trees in the *Federal Register* listing notice (57 FR 45328, October 1, 1992) and in the *Recovery Plan for the Threatened Marbled Murrelet*. The prairies themselves are not suitable nesting habitat for any listed species that occur in the parks. Some of the older Douglas-fir trees on the prairie edges might be suitable for northern spotted owls. Impacts on suitable owl habitat and on both species from drifting smoke from prairie restoration activities are mentioned on pages 264-65, 288, 310, and 327 of the draft plan. Long-term indirect benefits for all listed species in the parks are anticipated from restoring native communities and processes because of the benefits of restoring all communities that comprise the original ecosystem in which these species live. Also see responses to comments CA and CX in this letter.

**455-CM** The text has been revised to reflect that prescribed burning in old growth depends on weather conditions.

**455-CN** Specific information on trails does not meet the purpose of and need for a general plan. Specific information on trail construction and facility maintenance has been provided to the U.S. Fish and Wildlife Service in the biological assessments, which are incorporated by reference into this document. Additional information on trails will be included in the new comprehensive trail plan. The purpose of a general plan is to provide broad guidance for development of appropriate facilities, but it cannot provide the site-specific detail necessary to describe impacts at the level requested. The trail plan and any plans for new construction will be prepared when it is likely that funding will be available. These plans will be accompanied by environmental compliance documents that will describe the impacts for each trail or development on a site-specific basis. Both agencies will consult with the U.S. Fish and Wildlife Service on all plans for all new construction under section 7 of the Endangered Species Act, and will develop site-specific mitigation according to the results of the consultations.

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455-DL

Appendix J. Sound level measurement for determining impacts on threatened and endangered species. Page 423. Clarify why this section is included.

455-DM

Appendix L. Acreage of existing and proposed RNSP facilities and development within potential habitat for threatened and endangered birds. Page 426. This table should include all facilities, roads, and trails. It should also include all suitable habitat within 0.25 mile of these facilities, otherwise it presents a very misleading picture. Only one acreage figure is presented for each facility yet the note states that the acreage represents habitat for all listed terrestrial species. Since these species have very different habitat requirements (i.e. murrelets and plovers), clarify what the acreage figure represents.

455-CO Short-term adverse impacts on listed species from noise and disturbance due to increased visitation and construction of new facilities are described on pages 261, 265, 289, 290, and 291 of the draft plan.

455-CP See response to comment 455 AZ for the definition of minor impacts. Because of the wide range of possibilities of actions that could occur outside RNSP boundaries, and the variety of listed species that occur within the parks, it is not possible to provide a meaningful discussion of how the National Park Service and California Department of Parks and Recreation might respond to all these actions based on NPS and CDPR responsibilities under the Endangered Species Act. The discussion of cumulative impacts on listed species on pages 267-71 discusses the major impacts. The National Park Service and the California Department of Parks and Recreation will use all available authorities to protect resources within their boundaries. Page 260 of the draft plan describes why the impact section is focused on birds that nest in old-growth forests and salmonids. We agree that the format of the document, especially the impact section, is not ideal. However, we believe that changes at this point would not be cost-effective.

455-CQ The discrepancies have been corrected in the final plan.

455-CR The first sentence under "Watershed Restoration Impacts" on page 308 of the draft plan describes short-term adverse effects on coho salmon. Other adverse effects are described under "Impacts of Actions That Are Common to All Alternatives" on pages 260-63 in the draft plan.

455-CS Artificial impoundments are not in locations that were formerly tidewater goby habitat, so there would be no effects on gobies from any action related to artificial impoundments. Effects on gobies from estuary restoration are discussed on pages 270, 285, 309, 327, and 345 of the draft plan.

455-CT See response CL above.

455-CU Mitigation measures are relevant regardless of where they appear in a document. It is confusing for most readers to include minor mitigation measures in the description of the alternatives because the readers often do not know what adverse effect is being mitigated. This is especially true for indirect long-term effects. It is not possible to know all potential mitigation measures that might be needed without site-specific analyses of actions. The primary mitigation measures for adverse effects on wetlands and threatened and endangered species are described on page 31 of the draft plan in the "Actions Common to All Alternatives" section. Other mitigation is described where the impact is described. Human use of beaches is mentioned on page 184 of the draft plan as one of the causes of plover decline. The National Park Service and the California Department of Parks and Recreation do not know the extent to which visitor use of Gold Bluffs Beach has affected western snowy plovers. The context for the amount of

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endangered species habitat affected by RNSP facilities excluding roads and trails appears in appendix L (final plan). The amount of old-growth forest that would be affected by trail construction proposed in approved plans appears on page 289 of the draft plan. Because of the number of listed species and the variety of habitats occupied by these species, this detailed information appears in the biological assessments submitted to the U.S. Fish and Wildlife Service and the National Marine Fisheries Service under section 7 consultations and is incorporated by reference into this document.

**455-CV** Short-term benefits for threatened and endangered species from watershed restoration are discussed on page 326 of the draft plan. Short-term negative impacts are discussed on pages 260-63 in the draft plan in the "Impacts of Actions That Are Common to All Alternatives" section.

**455-CW** Breeding season noise restrictions for work within 0.25 mile of any suitable northern spotted owl or marbled murrelet habitat are mitigation measures that are common to all alternatives. The site-specific impacts and primary mitigation measures for all second-growth management activities will be discussed in the second growth management plan and the accompanying environmental document.

**455-CX** See previous responses to comments 455 CA and CL.

**455-CY** The document has been revised according to this comment. The potential adverse effects of catastrophic fires on forest nesting birds, both from removing nesting habitat and from fire suppression, are discussed under impacts common to all alternatives on pages 264-265, 269, and 328 of the draft plan. It appears to be important for murrelets to have numerous dominant trees for nesting opportunities, but at the nest site, a lower density of dominant trees may facilitate access to the nest tree for a bird with limited flying maneuverability (Grenier and Nelson 1995). Hamer and Nelson (1995) suggest that murrelets may be choosing nesting sites with lower canopy closures immediately around the nest to improve flight access but selecting nest platforms with dense overhead cover for protection from predation. Grenier and Nelson (1995) found that some forest stands occupied by murrelets in Oregon were in forests whose structures had been affected or produced by fire. Factors that decrease the likelihood of intense fires allow higher densities of remnant trees. All stands had older forest structures that survived or were created by fire (snags, woody debris). The National Park Service and the California Department of Parks and Recreation recognize that while low canopy closure may allow murrelets access to nests, most nests near openings were unsuccessful.

**455-CZ** The information on the percentage of old growth within 0.25 mile of trails for alternative 1 appears, in the draft plan, on page 289, for alternative 2 on page 311, and for alternative 4 on page 346. The discussion of impacts from hazardous tree management for alternative 1 appears on page 266 of the draft plan under the "Impacts of Actions That Are Common to All Alternatives" section.

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Alternative 3 has a separate discussion of hazard tree removal impacts because there might eventually be fewer state park campsites from which hazard trees are removed. In the other alternatives, campsites would be retained or added.

**455-DA** The locations of new trails proposed under this alternative will be described in greater detail in the new comprehensive trail plan. This detailed, site-specific plan will describe how much additional old growth might be affected. The impacts of adding new campgrounds under alternative 4 -- noise and disturbance, habitat modification, construction-related impacts, and human use -- are included in the "Impacts That Are Common to All Alternatives" section on pages 260-62 of the draft plan.

**455-DB** Limited operating periods would be instituted only when such a restriction is needed to protect resources. It is neither efficient nor effective to manage a park on a part-time basis, even under a preservation-oriented alternative. Resource management and visitor use would occur daily on a year-round basis in at least some locations throughout the parks. See page 247 in the draft plan and responses to comments BA, BF, BZ, and CE in this letter for a discussion of limited operating periods in certain locations to avoid or reduce noise disturbance to breeding threatened and endangered birds.

**455-DC** This section is a history of the interaction with the U.S. Fish and Wildlife Service. The January 1997 date refers to the date of the parks' initial request for a list of threatened and endangered species. The list was received in May 1997. The parks receive quarterly updates of the list of threatened and endangered species, with the most recent list received in November 1998. The endangered species that are known to occur or that might inhabit the parks and their most current status appear in appendix I (final plan). This information was updated several times during the preparation of the plan to account for changes in the status of coastal cutthroat trout and Klamath Mountains Province and Northern California steelhead. Although the current list received from the U.S. Fish and Wildlife Service does not include several endangered plants, these species will be retained in the appendix so that readers are aware of the possibility that these plants might be encountered on RNSP lands.

**455-DD** The *Exotic Plant Management Plan* provides sufficient guidance for the National Park Service and the California Department of Parks and Recreation to manage exotic plants within RNSP boundaries. Therefore, the parks believe that general management plan-level decisions are not needed for additional guidance for managing exotic plants. Visitor use in sensitive resource areas is addressed in as much detail as appropriate in a general plan. Additional site-specific implementation plans listed on pages 35-36 of the draft plan will address visitor use if appropriate for a given plan.

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**455-DE** By statute, the National Park Service is required to provide costs estimates in general management plans, and unit quantities are required to prepare these estimates. As the introductory text for appendix A (final plan) explains these are general estimates with assumptions (not specific proposals) made on facility sizes primarily for the purpose of comparing alternatives. Specific quantities for facilities (such as the 75 campsites quoted) will be determined through more detailed site planning, design, and compliance activities. Note that, based on a change in text for the trail proposals (to defer all decisions to a new RNSP-wide trail plan), the trail cost estimates have been removed from the appendix. In the end the final cost of the trails is anticipated to be much less than shown in the draft management plan because it is likely that much if not all of the work will be done by day labor crews, volunteers, and other lower-cost implementation techniques.

**455-DF** This section summarizes RNSP plans that are referenced in the general plan. It is not intended to summarize management plans prepared by other agencies.

**455-DG** This section summarizes what is in the current approved *Fire Management Plan*. It is beyond the scope and general nature of a general management plan to provide detailed outlines of the number of acres of each vegetation type to be burned and the exact location of those burns. The current approved *Fire Management Plan* includes provisions for burning in five locations other than the Bald Hills prairies and oak woodlands, including coastal shrub and old-growth vegetation types. The next revision of the *Fire Management Plan*, scheduled in 2000, will discuss the resource management goals to be achieved by use of prescribed fire in other vegetation types. The National Park Service has recently updated its *Fire Management Guideline* in accordance with nationwide fire management goals and policies that apply to all federal land management agencies.

"Director's Order #18: Wildland Fire Management" was issued November 17, 1998. It is based on the December 1995 *Final Report of the Federal Wildland Fire Management Policy and Program Review*. Under the new NPS policy, until a fire management plan is approved, all wildland fires must be aggressively suppressed, taking into account the resources to be protected and firefighter and public safety. All fires burning in natural or landscaped vegetation will be classified as either wildland fire or prescribed fires. All wildland fires will be effectively managed, considering resources and human safety, using the full range of strategic and tactical options described in an approved fire management plan. A systematic decision making process will be used to determine the most appropriate management strategies for all unplanned ignitions and for any prescribed fires that are no longer meeting resource management objectives. The full range of suppression strategies will be considered by the superintendents who are guiding suppression efforts. Methods used to suppress wildland fires should minimize the impacts of the suppression action and the fire, commensurate with effective control

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and resource values to be protected. Firefighter and public safety is the first priority in all fire management activities. NPS policy recognizes that the need to expedite operations in the wildland fire management program, combined with the interagency nature of the program, has resulted in a body of law and business and personnel management practices that are quite different from those that normally apply to the National Park Service.

**455-DH** No new trails would be constructed in the primitive zone. The RNSP comprehensive trail plan will describe existing and proposed trails and will list those trail segments that will be removed or relocated. Miles of existing trails in primitive zone boundaries are given in the management zoning section for each alternative.

**455-DI** Under all alternatives in the management plan, the actions described in the *Davison Ranch Development Concept Plan* will be implemented, as described in the "Finding of No Significant Impacts" issued in October 1996.

**455-DJ** See previous comment DH in this letter.

**455-DK** The document has been revised according to these comments.

**455-DL** Information on how noise levels are calculated is included to provide background and definitions for terms used in the noise section on page 185 of the draft plan. Previous comments (BK and BX in this letter) relate to discussions of noise effects and an explanation of noise level calculations is appropriate if noise might affect listed species.

**455-DM** Because of the number of endangered species with different habitat requirements throughout the parks, this general plan can only summarize and present enough information to give the reader a general idea of how many facilities might be located in suitable habitat for an endangered species. Tables in the referenced biological assessments provide detailed acreages of habitat throughout the parks for each species.

COMMENTS

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U. S. Geological Survey  
Biological Resources Division  
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October 1, 1998

Superintendents  
Redwood National and State Parks  
1111 Second St.  
Crescent City, California 95531

Dear Mr. Ringgold and Mr. Sermon:

Thank you for the opportunity to review the Draft General Management Plan for Redwood National and State Parks. The document represents an immense effort, and covers a wide range of concerns. We support the preferred alternative, Alternative 1, but have a few comments on misstatements or the lack of coverage on some critical topics. We first address some general concepts, and then discuss specific comments.

Priorities in road rehabilitation

264-A

P. v. Alternative 1 proposes that watershed restoration will be accomplished mainly through partial landform restoration. Although road decommissioning (partial road removal) and landform restoration (complete road removal) are defined in the glossary, "partial landform restoration" is only defined on p. 29. It would help the reader to add this definition to the glossary. Table 2 on p. 30 ( which defines the two types of road rehabilitation work being used in the watershed) does not describe partial landform restoration either, so it is difficult to know specifically what Alternative 1 is proposing for park roads. ~~This leads~~ to confusion later on P 239.

264-B

P. 239 p. 7. It would be helpful to clarify that funding to repair damage from the January, 1997 storm will extend through 2001, and then funding would be reduced to 1996 levels. It is unclear how "completion dates for the alternatives are based on these prior funding levels." For example, Alternative 1 proposes an increase in treating roads from 2.5 to 9.5 miles per year, with partial landform restoration (a high cost treatment) as the preferred method, but with no increased funding over 1996 levels. How would this be accomplished?

264-C

We suggest that if the objective is to reduce erosion potential on abandoned roads as quickly as possible, that a lower cost treatment such as partial road removal (rather than landform restoration) be used on less critical road segments in order to treat more stream crossings for a given amount of money. In order to meet Alternative 1's goal of treating 9.5 miles of road per year, some flexibility in prescribing the intensity and type of treatment will be necessary. The level of treatment should depend on the erosion susceptibility of a road as well as visibility to visitors.

264-A Many changes were made throughout the document, including the glossary, to help clarify the terminology.

264-B The preferred alternative can only be implemented as proposed with increased funding. We have calculated that this would require an additional \$640,000 per year (in '98 dollars) to treat the remaining roads within the parks and approximately \$400,000 per year additionally for upper basin. In the absence of a significant increase in funding to achieve the goals of the preferred alternative, treatments may be modified and priorities shifted as appropriate to treat as many high priority sites as quickly as possible. Comment B in Sabra Steinberg's letter has more detailed information on how costs were calculated.

264-C This is correct. Significant increases in funding are required to achieve the goals of alternative 1 in a timely manner. Without increased funding, managers would retain and exercise the flexibility necessary to achieve the highest priority projects. See also replies to comment A in the U.S. Forest Service 10/18/98 letter and comment A in the U.S. Forest Service 10/8/98 letter.

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264-D

In addition, given that there are 1110 miles of road the upper basin and 155 miles of roads to be treated left on parklands, the park should seriously consider reallocation of some park resources to erosion prevention efforts in the upper basin. Long-term protection of downstream park resources, such as the Tall Trees Grove and the aquatic and riparian habitats of Redwood Creek, depends on the diminishment of threats located outside parklands.

264-E

Bioregional Perspective

P. 153 Affected Environment:

The discussion on affected environment breaks park resources down to a species-by-species level. For example, the discussion on marbled murrelets (P. 183) discusses the habitat requirements in terms of individual tree characteristics without discussing the importance of RNSP lands in a regional context. There needs to be a discussion of Bioregional Ecosystem Issues which covers critical habitat issues such as biodiversity, connectivity of habitat throughout the redwood region, forest fragmentation, distribution of aquatic and terrestrial refugia, wildlife migration corridors, landscape level analyses, etc. If the goal is to engage in ecosystem management, the park needs to discuss implications of its actions that go beyond a single species or its own political boundaries.

4264-F

Adaptive Management

P. 20. The GMP states "Management decisions about resources and visitor use are based on and supported by adequate scientific information." Reid and Furniss (in review) discuss the relationship between land management and science:

State-of-the-art environmental management plans acknowledge that the current state of ecosystem knowledge is imperfect, so they generally incorporate an element of "adaptive management:" outcomes of actions are to be monitored so that future decisions can benefit from experience. In the Pacific Northwest, for example, effectiveness monitoring is an essential component of the Northwest Forest Plan, and is intended to be the feedback mechanism whereby the Forest Plan can be continually improved to better meet its objectives.

We believe that the concept of adaptive management should be a cornerstone of RNSP management activities, and that new scientific information (based on in-house, interagency or academic studies) should effectively be brought into the planning and development stages of park management. Redwood National Park's expansion legislation (Public Law 95-250) specifically states that the "Secretary ...shall adapt his general management plan to benefit from the results of (erosion and sedimentation) studies." This implies that the parks' management decisions may need to change through time, even though a general management plan has been adopted. There is no explicit statement about adaptive management or monitoring in the Draft General Management Plan. We believe that RNSP should continue its current long-term monitoring efforts, and institute monitoring programs to assess proposed management actions for those areas where monitoring does not already exist.

264-G

Water Quality Issues

P. 167. last paragraph: "Overall the water quality in the parks meets or exceeds the water quality objectives established by the North Coast Regional Water Quality Control Board." In fact, the Environmental Protection Agency has listed Redwood Creek as sediment impaired, under

264-D See reply to comment A in the U.S. Forest Service 10/8/98 letter.

264-E Resource descriptions included in the "Affected Environment" section are provided for a reader to understand those resources that would be affected by actions proposed in the alternatives. Issues covered in the plan are those brought up during scoping and for which the National Park Service and the California Department of Parks and Recreation believe a decision is needed and alternatives exist. It is a stated objective of the plan (page 38 of the draft plan) to ensure that all resource management efforts support the perpetuation of the redwood forest ecosystem. Biodiversity is one component of the ecosystem, along with the other processes and components mentioned in the comment. NPS and CDPR policies and guidelines provide guidance to allow the parks to address regional and ecosystem issues including the role of the parks in the maintenance of biodiversity. The discussions of single species are needed to describe the biology of listed threatened and endangered animals so that readers can judge the effect of proposed management actions on these species. The cumulative impact discussion (pages 268-271 in the draft plan) describes the effects of human activities throughout the Pacific Northwest region, in concert with natural processes and events, on threatened and endangered species.

264-F We have practiced adaptive management throughout the science program at Redwood National and State Parks. The legislation that expanded the national park in 1978 (PL 95-250) states that: "the Secretary shall undertake studies and publish the results . . . and shall adapt his general management plan to benefit from the results of such studies." For example, one basis for a shift of resources and program emphasis to the upper basin is the outcome of sediment source, transport, and storage studies on Redwood Creek. In addition, by evaluating and refining our watershed rehabilitation techniques, we have become much more cost-effective in terms of cost per yard of potential sediment erosion.

264-G The plan has been revised to reflect the inclusion of Redwood Creek on the Environmental Protection Agency's list of impaired waters under Section 303 (d)(1)(A) of the Clean Water Act.



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264-H

Section 303(d) of the Clean Water Act. In conjunction with the North Coast Regional Water Quality Control Board (NCRWQB), the EPA is currently formulating a "Water Quality Attainment Strategy and Implementation Plan" for the Redwood Creek watershed (commonly referred to as the Total Maximum Daily Load, or TMDL process). The GMP needs to discuss the park's intended compliance with the TMDL (perhaps on P. 240), which is due to be adopted by the NCRWQB in December, 1998.

Riparian Forests  
p. 171 Plants

It is interesting to note that special sections are devoted to brushlands, dry forests, etc., but nothing is discussed about riparian forests. The riparian zones of Redwood Creek have been highly disturbed through time (in 1948, 86% of its channel length was dominated by uncut, conifer trees; in 1997 only 15% of the riparian zone was uncut, (Urner and Madej, 1998)). Riparian conditions are critical in influencing stream temperature and aquatic habitat, recruitment of large woody debris to stream channels, and providing wildlife habitat. Riparian forests do not necessarily meet the definition of "riverine wetlands" as described on p. 170 because the influence of riparian forests extends much farther than the area inundated in a wetland. The President's Northwest Forest Plan targets riparian reserves as special areas of concern, and the parks, likewise, should give some specific consideration to riparian forests.

264-I

Interagency Cooperation

P. 64 Actions under Alternative 1:

"...resource management staff offices in Arcata would be relocated to a GSA built-to-specification facility ...in the Orick area."

In March, 1994, an Environmental Assessment by RNSP stated: "because of the present emphasis on establishing partnerships between private and public entities for regional ecosystem management, the NPS acknowledges the desirability of retaining an office in Arcata to interact with the potential partners; to avoid diminishing the established relationship between researchers in wildlife, fisheries, geomorphology and hydrology; to continue to enjoy mutual benefits to the university students and park; and to promote coordinated development of geographic information systems (GIS)."

We feel that the underlying conditions behind that decision are even more pressing today than in 1994, and that a move of critical personnel to Orick would be a setback in the promulgation of region-wide studies on the redwood ecosystem. The access to two-thirds of the Redwood Creek basin is through Arcata, via Highway 299. If the Arcata office is closed, it would be more difficult to provide technical assistance to and coordinate efforts among private landowners, to participate in monitoring the effectiveness of the EPA's Water Quality Attainment Strategy and Implementation Plan, to conduct timber harvest reviews, and to formulate and implement a Coordinated Resource Management Plan.

In addition, a major emphasis of the RNSP's GIS program is interagency GIS. Under Executive Order 12906, federal agencies are required to make their geospatial data freely available to the public. The area encompassed by the Northwest Forest Plan includes many threatened and endangered species, which require assessment from an ecosystem perspective. Past problems

**264-H** Much of the watershed restoration program is directed at protecting streamside resources and aquatic habitats. The National Park Service uses the Cowardin classification system to define wetlands, as directed by the Department of the Interior and noted on page 169. Impact topics were selected based on legal requirements to protect specific resources. NPS and CDPR policies provide authority to protect all resources, not just those that are discussed in the environmental impact statement.

**264-I** Although the preferred alternative envisions consolidation of the NPS offices currently in Arcata and Orick in a new office facility located outside the parks near Orick, the agencies intend to retain a small staff presence in the Arcata area in office space shared with other federal agencies. The staff remaining in Arcata would be those whose primary duties involve participating in interagency GIS coordination, other cooperative programs with other agency staff, and private landowners that focus on the redwood ecosystem, such as erosion control efforts in the upper Redwood Creek basin.

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have resulted from each agency developing and maintaining its own data sets. Integrating all data from many organizations into singular versions, which are seamless across ownerships and the landscape, would provide new opportunities to evaluate ecosystem health using shared copies of data. Park participation and leadership in the North Coast Geographic Information Cooperative will help assure the public has timely access to data from many organizations which manage public resources.

Besides the local landowners, the other agencies that RNSP deals with on redwood ecosystem concerns are all based in the Eureka-Arcata area: U.S. Geological Survey, Bureau of Land Management, U.S. Fish and Wildlife Service, U.S. Forest Service, National Marine Fisheries Service, Environmental Protection Agency, National Weather Service, Army Corps of Engineers, California Departments of Fish and Game and Forestry, county agencies, Humboldt State University, College of the Redwoods and non-profit groups. Many joint projects have been conducted by RNSP and the various agencies recently, including biologic and geomorphic inventories, the evaluation of Habitat Conservation Plans and Aquatic Habitat Conservation Plans, formulating and reviewing watershed analyses, developing a regional slope stability model, studies on the effects of roads and restoration strategies, and the development of common geospatial data. The sharing of data development and data themes and instant peer review results in a stronger regional perspective and less duplication of efforts, and ultimately leads to better scientific credibility of RNSP studies overall. Cooperation among agencies has blossomed during the last few years, and we believe it is a step backward to physically withdraw from all these cooperative efforts.

The following are comments on specific statements in the GMP:

- 264-J P. 15. The document states that 38,000 acres of the Redwood Creek watershed were logged before the expansion of Redwood National Park in 1978. In reality, close to 95,000 acres of the watershed had been logged by this time (about 38,000 acres of the 48,000 acre park expansion area had been logged).
- 264-K P. 17: Roads in the Redwood Creek Basin. This map is misleading because the legend shows a road network for "Planned road removal in Redwood National Park." These roads have, in fact, been removed already, and should be labeled as such. The road network within the Lost Man Creek basin, however, is not shown and should be displayed.
- 264-L P. 19. The statement suggests that RNSP has more review authority in the Park Protection Zone than is reality. Although RNSP staff are invited to pre-harvest inspections on PPZ lands, it should be made clear that RNSP can only give recommendations and have no regulatory authority in the PPZ. This means that suggestions by park staff regarding timber harvest operations may or may not be accepted by private landowners. RNSP staff are not part of the official review committee for timber harvest plans; however, state park personnel are considered part of the official review team for plans adjoining state park lands. RNSP should work towards being acknowledged as part of the official review committee for all timber harvest plans submitted in the Redwood Creek basin.
- 264-M P. 24 No facilities or permanent structures would be allowed in the Little Lost Man Creek

264 J This statement has been clarified in the final plan.

264-K The map as been corrected to depict all roads in this area of the parks that have been removed or treated.

264-L The text on page 19 of the draft plan has been modified to clarify review authority. In addition, current state *Forest Practice Rules (Title 14 California Code of Regulations* sect. 10037.5(a)) state that the director (of the California Department of Parks and Recreation) shall request a representative be present on plans that may affect values on publicly owned parks. The director of the California Department of Parks and Recreation may also request other county, state, federal, or tribal agencies to assist as advisors in the review process. This is not limited to lands adjoining state parks.

We concur that Redwood National and State Parks should be acknowledged as part of the official review committee for all timber harvest plans submitted in the Redwood Creek basin.

264-M The stream gaging station is not considered to be a permanent structure or facility.

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264-N	<p>Research Natural Area. Currently there exists a stream gaging station with associated footbridge and equipment in this area. We hope that the ban on structures would not include the gaging station.</p> <p>P. 29 "Most of these abandoned logging and ranch roads are within the Redwood Creek basin in the national park." In fact, many more roads needing treatment lie outside of park boundaries (1100 miles of roads upstream of park boundaries, as opposed to 155 miles slated for treatment within the park).</p>
	<p>We strongly support the statement that "RNSP staff would provide technical assistance upon request to private landowners for erosion prevention on roads upstream from park boundaries." To address the erosion and sedimentation problems in the watershed, it is critical to formulate an active program to cooperate with upstream landowners in reducing sediment yields. This should be in addition to the on-going involvement with timber harvest plan reviews. The level of effort that is required to deal with many private landowners on more than 70,000 acres upstream of the park points to the need for an expansion of the current park program in addressing upstream threats to downstream park resources. The last sentence of P. 38 also speaks to the limited ability of RNSP staff to further cooperative erosion prevention efforts because of the lack of resources. The park should be committed to pursue additional resources to further erosion prevention efforts throughout the watershed.</p>
264-O	<p>P. 30. "Efforts to reduce erosion potential at stream crossings on national park lands are common to all alternatives..." If these efforts mean constructing rolling dips and upgrading culverts at each crossing, then the draft should state that explicitly. It is unclear why "this reduction of erosion potential at stream crossings would not occur on state lands."</p>
264-P	<p>P. 34 "RNSP would also work with Caltrans and the Federal Highway Administration to ensure environmentally sensitive maintenance operations..." Staff should also help assure that operations on county roads which may affect the park are environmentally sensitive as well.</p>
264-Q	<p>P. 35 Future Action Plans Needed: An additional plan needed is an update of the Water Resource Management Plan to consider wetlands and other concerns that were not identified in the original 1985 plan.</p> <p>Coordinated Resource Management Plan: Such a plan would need to be agreed upon by all landowners. It would result in <b>recommended guidelines</b> rather than a mandated set of land management practices for each watershed, as stated in the Draft General Management Plan.</p>
264-R	<p>P. 48 Restoration in Redwood Creek estuary: "A combination of land acquisition, conservation easements, partial levee removal and restructuring <u>would be considered</u> for restoring the estuary." This statement obligates the park to only consider action, but not necessarily implement any corrective action. Changes in estuarine conditions represent a serious threat to the viability of salmonids in the Redwood Creek watershed, and we suggest that the parks need to be pro-active in its approach to restoring the estuary. In addition, the estuary problem is defined too narrowly. Past and present gravel mining immediately upstream of the estuary and on-going clearing of riparian vegetation</p>

- 264 N The text has been rewritten in the final plan.
  - 264-O This sentence has been deleted in the final plan.
  - 264-P The preferred alternative has been revised to indicate that NPS and CDPR staff would work with county agencies to ensure environmentally sensitive maintenance operations on county roads within the parks.
  - 264-Q We concur that the *Water Resource Management Plan* should be updated. The text that was on page 35 of the draft plan has been modified.
  - 264-R The National Park Service and California Department of Parks and Recreation acknowledge on page 280 of the draft plan that landowner cooperation is needed for some of the actions directed at restoring the estuary. The conclusion and cumulative impact discussions on page 259 of the draft plan list gravel mining in Redwood Creek as one among several of the activities that have altered the physical and biological processes in the estuary. The primary effect of gravel mining is on the channel where the gravel is removed rather than downstream in the estuary. This language remains in the final plan.
- The maintenance of the levees by removing riparian vegetation has been added to the text of past activities that have affected Redwood Creek and the estuary in the final plan.

**COMMENTS**

**RESPONSES**

between the flood levees certainly influences fish migration to the estuary, and should be addressed in this document.

264-S The text in the final plan has been changed.

264-S P. 157, p.2. s.5. The citation should be Madej (1992). The study refers to bedload (sand and gravel), not total sediment load as stated in the GMP. Also, it is important to state the rest of the conclusions of that paper; that is, park hillslopes only contributed 7% of the bedload during the study period (1980-1990). (Reworking of previously deposited sediment accounted for the balance of the bedload budget). The discussion of fluvial erosion from stream diversions in this paragraph is repeated at the top of P. 158, but with different percentages.

264-T Our road inventory shows the following: 606 stream crossings with 310 culverts, 247 head water swales with 75 culverts, 51 springs with 27 culverts, and 291 ditch/road relief sites with 234 culverts. If the number of stream crossings is combined with headwater swales, there are 831 sites that are a stream crossing, headwater swale, or both. Of these 831 sites, only 376 have culverts. This text in the final plan has been modified.

264-T P. 157 p. 3  
The GMP states that of the 683 stream crossings within the park, only 375 (55% of all stream crossings) have culverts. This number of culverts sounds low, based on local experience in mapping and inventorying roads.

264-U The text in the final plan has been changed.

264-V There are 250-350 miles of road in the park protection zone. The text has been modified.

264-U P. 158 first paragraph. The citation for Spreiter and others is incorrect. Information on sediment sources came from the Redwood National Park's Draft Watershed Analysis. It should be stated that percentages are approximate ("42%" implies an accuracy that is impossible to attain). Also, bank erosion contributes less than 6% of the sediment load.

264-W The maintenance of logging roads is required for only one year after timber harvest. The text has been modified.

264-V P. 158 last p.  
The GMP state that 1110 miles of road are in the Park Protection Zone. The 1110 miles of road refers to the entire basin upstream of park boundaries, not just in the PPZ.

264-X The explanation in the "Assumptions and Methods for Assessing Impacts" section (on pages 247-48 of the draft plan) of how timeframes were established for relative impacts on threatened and endangered species of fish and birds has been expanded.

264-W P. 161 p1. The Forest Practice Rules requires maintenance of logging roads for three years after completion of harvest, not after the initial road construction.

The agencies consider the issues raised by commentors related to the management of public use and watercraft on Freshwater Lagoon and elsewhere in the parks, including offshore waters adjacent to the parks, to be too specific to be addressed in detail in this plan. However, the plan has been revised to reflect that public use of Freshwater Lagoon will be managed cooperatively with other jurisdictions. The issue of the use of jet skis in Freshwater Lagoon and elsewhere within the parks can be addressed through agency regulations.

264-X p. 263 The discussion of the impacts of watershed restoration was difficult to follow, because the topics jump from fish to storm impacts to owls and back to fish again, without clearly stating where the data for time frames came from.

264-Y The description of the impacts of watershed restoration activities on the estuary has been revised to clarify the expected effects on fluvial processes in Redwood Creek upstream of the estuary.

264-Y p. 280. Table 24. It is unclear why watershed restoration activities would "reduce downstream streambed migration."

Thank you for your consideration of these comments. We would be happy to discuss any questions that may arise from them.

Sincerely,



Deborah Maxwell  
Center Director

**COMMENTS**

**RESPONSES**

**References**

Reid, L. M. and Furniss, M.J. On the use of regional channel-based indicators for monitoring.  
(in review)

Urner, S. and Madej, M.A. 1998. Changes in riparian composition and density following timber harvest and floods along Redwood Creek, California. Abstract. Society for Ecological Restoration Northwest Chapter Conference and Annual Meeting, Tacoma, Washington.

COMMENTS

RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

REDW-456

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

OCT 13 1998

OCT 19 01 08 24  
RECEIVED  
SUPERINTENDENT  
REDWOOD NATIONAL AND STATE PARKS  
CRESCENT CITY, CALIFORNIA

Dear Sirs:

The Environmental Protection Agency (EPA) has reviewed the **Draft General Management Plan/General Plan/Environmental Impact Statement/Environmental Impact Report (DEIS/EIR)** for Redwood National and State Parks. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The DEIS/EIR identifies four alternatives, including no action, for the management and use of Redwood National and State Parks. Alternative 1, which seeks to achieve a balance between resource protection and visitor use, preserving and protecting the parks' natural and cultural resources but emphasizing restoration more than currently where sensitive resources were at risk, is listed as the proposed action, but a preferred alternative has not been designated.

EPA commends the Park Service and the California Department of Parks and Recreation for its excellent analysis of potential impacts. Our review uncovered no significant environmental issues, so we have rated this document LO (Lack of Objections).

It is clear from the DEIS/EIR that many of the environmental challenges facing the Parks involve past and current logging practices on private lands upstream of the Parks, particularly in the Redwood Creek basin. The DEIS/EIR alternatives identify various time frames for addressing these problems, but few specifics are given. EPA recommends that the DEIS/EIR include specific information on the Parks' role in total maximum daily load (TMDL) development, timber harvest plan review, and Clean Water Action Plan implementation, and a discussion of how these regulatory mechanisms can be used to achieve the Parks' environmental goals. The "Water Quality" section at page 240 should also be updated to reflect all available regulatory tools.

456-A

456-B

We appreciate the opportunity to review this DEIS/EIR. If you have any questions about this letter, please contact Leonidas Payne of my staff at (415) 744-1571.

Sincerely,

David J. Farrel, Chief  
Federal Activities Office

**456-A & B** The plan has been revised to reflect the inclusion of Redwood Creek on the Environmental Protection Agency's list of impaired waters under Section 303 (d)(1)(A) of the Clean Water Act. The parks' role in timber harvest plan review and in dealing with adjacent land uses and other external influences is discussed on pages 19, 29, and 63 of the draft plan. The total maximum daily load (TMDL) process provides an assessment and planning framework for actions needed to attain water quality standards and was established by the Clean Water Act. The parks' role in the Redwood Creek TMDL process has been to respond to requests for information and data as requested and to comment on drafts of the plan.

## SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### ADEQUACY OF THE IMPACT STATEMENT

#### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

COMMENTS

RESPONSES

FORMAL RECORD COMMENT FORM

Redwood National and State Parks / General Management Plan/General Plan/EIS/R

This form may be used to submit comments for the official record at public open house meetings, or it can be mailed by October 9 to the Superintendents, Redwood National and State Parks, 1111 2nd St., Crescent City, CA 95531. Comments may also be submitted in a separate letter to this address, or they can be sent as a letter via electronic mail to: redwplan@nps.gov.

Date: 10/13/98 To avoid our misreading your comments we request that you print if possible.

To: Superintendents, Redwood National and State Parks

From: EPA - SF (name)
via telephone (address)
taken by Peter Keller (zip)

will send in their major comments soon.

one minor comment regarding trails.
on page v. in the summary, 2nd column,
third paragraph is confusing when comparing
to the alternative and discussing
trails that will not be constructed.

263A

263-A The text regarding trails has been changed in the final plan.



COMMENTS

RESPONSES

YUROK TRIBE

Eureka  
1034 Sixth Street • Eureka, CA 95501  
(707) 444-0433  
FAX (707) 444-0437

Klamath  
15900 Hwy. 101 N. • Klamath, CA 95548  
(707) 482-2921  
FAX (707) 482-9465

Weitchpec  
Hwy 169 • Weitchpec Route  
Hoopa, CA 95548  
(707) 444-5806

September 24, 1998

Andrew Ringgold  
Richard Sermon  
Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Re: RNSP General Management Plan – Yurok THPO Comment

Dear Mr. Ringgold and Mr. Sermon,

Thank you for an opportunity to provide THPO comment on the Redwood National and State Parks Draft General Management Plan. I take this opportunity to address three areas of Historic Preservation: Native American Consultation, Cultural zoning of landscapes, and the NPS Programmatic Agreement.

The Plan reflects a commendable effort to consult with tribal governments. Tribal Government scoping meetings, Yurok Tribe Quarterly meeting GMP updates, and a Yurok seat on the GMP task force team have provided avenues for the Yurok Tribe to voice concerns.

GMP maps, reflecting cultural and historic area zoning, show a limited area of land that is designated as cultural zoning. Because cultural zoning of park lands results from NHPA §106 determinations of eligibility and nominations to the National Register of Historic Places and such determinations are linked to only those undertakings found to not be exempt from the NPS Programmatic Agreement, it is suggested that more emphasis within the GMP be placed on NHPA §110 responsibilities with particular regards to increased cultural zoning.

For example, the Yurok Brush Dance Site located at the south side of the mouth of the Klamath River has been found to be eligible for the National Register and accordingly designated as a cultural landscape, while the sandspit and north side of the mouth of the Klamath River, being of equal cultural significance, have not been zoned as cultural.

274-A

INDIAN TRIBES

274-A & B Both the north and south sides of the mouth of the Klamath River are designated as a cultural zone. The north side does not show on the map because at the time of the photograph from which the map was based, the mouth of the river was at the extreme north and therefore a north spit did not exist. (It should be noted that a formal determination of National Register of Historic Places eligibility of the Yurok Brush Dance site has not yet been completed.) The goals of each alternative determine the zoning designations for each alternative. Table 1 describes the appropriate kinds of activities and facilities for each zone. The RNSP *Cultural Resource Management Plan* will be revised and will include projects that contribute towards meeting the NPS National Historic Preservation Act Section 110 responsibilities

COMMENTS

RESPONSES

274-B

It is suggested that a section of the GMP be devoted to a review of how areas of Park lands become zoned as cultural, what types of restrictions and uses are placed upon such lands, and a prospectus for future cultural zoning areas besides the Bald Hills area. If such inclusion is determined to be inappropriate for the GMP perhaps a section that identifies the appropriate RNSP Park Cultural Resource Management Plan and a listing of NHPA §110 responsibilities that such a plan would cover.

274-C

The NPS Programmatic Agreement with NCSHPO was negotiated and signed prior to the establishment of the Yurok Tribe Heritage Preservation Office or the National Association of Tribal Heritage Preservation Officers (NATHPO). It does appear that such a Programmatic Agreement is outdated to the extent that NATHPO is not recognized as an inter-tribal equivalent to NCSHPO and afforded like comment and signatory stature.

On a local level it would be warranted within the scope of the GMP to include a section that assures Yurok THPO comment being afforded upon all RNSP undertakings (despite PA provisions to the contrary for exempt activities) within the Yurok Reservation until such time as NATHPO becomes a signatory to the PA.

Sincerely,

Dr. Thomas Gates  
Tribal Heritage Preservation Officer  
Yurok Tribe

Cc Susan Masten, Chair Yurok Tribe  
Gary Markussen, Yurok Tribal Council Liaison to Yurok THPO  
Ann King-Smith, Archeologist and Native American Liaison RNSP

274-C See appendix H (final plan), which notes consultations with the Yurok tribal heritage preservation officer for all undertakings within the boundaries of the Yurok Reservation.

## COMMENTS

## RESPONSES

## YUROK TRIBE

15900 Hwy 101 N. • Klamath, CA 95548  
(707) 482-2821  
FAX (707) 482-9485

1034 Sixth Street • Eureka, CA 95501  
(707) 444-0433  
FAX (707) 444-0437

November 8, 1998

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

RE: Comments on General Management Plan

Enclosed you will find a document entitled "Yurok Tribe Comments On Redwood National and State Parks Draft General Management Plan / General Plan / Environmental Impact Statement / Environmental Impact Report." This document comprises the comments to date from the Yurok Tribe concerning the GMP. It is not a completed document.

460-A

The Tribe appreciates the generosity of RNSP in granting a 30-day extension of the original 60-day comment period. However, we believe the total 90-day public comment period is insufficient to gather all public comment in a meaningful fashion. All meetings scheduled by RNSP for the purpose of gathering public comment were merely informal, informational meetings, and therefore did not constitute official public hearings as required by NEPA and CEQA.

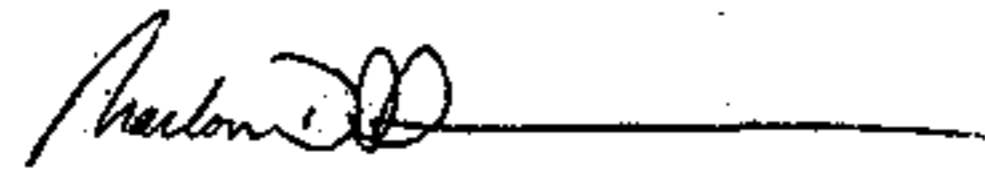
Further, the Yurok Tribe is not merely a member of "the public," whose comments can be summarily dismissed without tribal representation on the committee that drafts the final GMP. Rather, our status as a Self-Governance tribe requires a deeper, more meaningful tribal participation in the process.

Therefore, we are requesting an additional 90-day public comment period so we may compile more complete information regarding all GMP alternatives as they might affect the Yurok Tribe. During this proposed 90-day extension, we request that formal public hearings be held.

Regardless of whether or not the extension is granted, the Yurok Tribe will continue to participate with RNSP in more detailed discussions concerning the Draft GMP alternatives.

Again, thank you for your generosity in previously extending the comment period for 30 days, and for being willing to discuss issues freely concerning our Yurok Tribal / RNSP relationship.

Sincerely,



Marion Sherman, Self-Governance Director  
for  
Susan Masten, Chairperson

460-A All public comments have been considered, regardless of the "formality" of the process by which they were obtained. Public hearings are not required under either NEPA or CEQA requirements. The CEQ guidelines for implementing the National Environmental Policy Act (40 CFR 1506.6) require that an agency "shall make diligent efforts to involve the public" and shall "provide public notice." The form of such notice may include direct mailings, publication in the *Federal Register*, notification to the state clearinghouse, publication in local newspapers of general circulation, other local media, newsletters, postings of notice onsite and offsite, or sponsoring public hearings or public meetings whenever appropriate.

The "Public Notice" section of the California Environmental Quality Act (*California Public Resources Code*, section 21092) states that a "lead agency shall provide public notice." The notice shall be given to the last known name and address of all organizations and individuals who have previously requested notice and shall be given by at least one of the following procedures: publication in a newspaper of general circulation; posting of notice in area where project is located; or direct mailing.

There will be a public hearing before approval of the general plan as required under the *California Public Resources Code*, section 5002.3 which states: "A public hearing shall be scheduled by the State Park and Recreation Commission to each matter of . . . approval of a general plan for a unit. Notice of the hearing shall be posted in plain sight at one or more places within the affected unit, published in one or more newspapers of general circulation in each county within which the affected unit is located, and mailed to every person who has filed a request for notice of the hearing with the commission. . . . The hearing shall be held by the commission in, or within a radius of 100 miles of, the City of San Diego, Los Angeles, San Francisco, San Bernardino, Eureka, Redding, Fresno, Ukiah, Monterey, San Luis Obispo, Santa Barbara, or Sacramento, whichever is closest to the unit affected, not less than 30 days, nor more than 60 days, after the last date of publication of the notice."

YUROK TRIBE

## COMMENTS ON

**“REDWOOD NATIONAL AND STATE PARKS DRAFT GENERAL MANAGEMENT PLAN / GENERAL PLAN/ENVIRONMENTAL IMPACT STATEMENT / ENVIRONMENTAL IMPACT REPORT”**

November 8, 1998

The Yurok Tribal Council and staff have prepared the following comments concerning the Draft Redwood National and State Parks (RNSP) General Management Plan. As noted in various meetings between the Yurok Tribe and RNSP – most recently on September 9, 1998 – the Tribe has a significant and critical interest in any policy and management decisions that might develop as a result of completion of the GMP.

These comments do not pertain to any issues raised by anyone other than the Yurok Tribe, either in public hearings or elsewhere. Those issues may be addressed in another forum. Rather, these comments address those areas of concern that are unique to the Tribe, due to the fact that much of the territory and resources within Park boundaries are squarely within Yurok aboriginal territory, and also because of the special government-to-government relationship between the Tribe and the federal government -- a relationship described and mandated in federal laws and policies.

The following issues are discussed below:

- #1: THE YUROK TRIBE'S STATUS AS A GOVERNMENTAL ENTITY.
- #2: THE YUROK TRIBE'S SUPPORT OF ALL WATERSHED AND ESTUARY RESTORATION ACTIVITIES.
- #3: THE IMPROVEMENT OF RNSP ROADS.
- #4: OPPORTUNITIES FOR YUROK TRIBAL MEMBERS TO PRACTICE TRADITIONAL GATHERING AND SUBSISTENCE ACTIVITIES.
- #5: ACCESS TO PARK LANDS BY YUROK TRIBAL MEMBERS.
- #6: CONFLICTS BETWEEN CULTURAL AND NATURAL RESOURCE USES.
- #7: TRIBAL PARTICIPATION IN INTERPRETATION, EDUCATION AND VISITOR USE ACTIVITIES.

**ISSUE #1: THE YUROK TRIBE'S STATUS AS A GOVERNMENTAL ENTITY.****Background**

The Yurok Tribe is a federally recognized Indian tribe with a valid tribal constitution and duly elected governing body, the Yurok Tribal Council. The Tribal Council has authority, delegated from the Yurok Tribe pursuant to the Yurok Constitution, to deal with public and private entities, and to sign agreements with such entities, as necessary.

As a federally recognized tribe, the Yurok Tribe's relationship with the federal government is that of one government to another. For instance, Congress has found that:

- (A) transferring control to tribal governments, upon tribal request, over funding and decisionmaking for Federal programs, services, functions, and activities, or portions thereof, is an effective way to implement the Federal policy of government-to-government relations with Indian tribes; and

## COMMENTS

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(B) transferring control to tribal governments, upon tribal request, over funding and decisionmaking for Federal programs, services, functions, and activities strengthens the Federal policy of Indian self-determination.<sup>1</sup>

As a result of those findings, Congress stated its policy concerning tribes:

(a) The Congress hereby recognizes the obligation of the United States to respond to the strong expression of the Indian people for self-determination by assuring maximum Indian participation in the direction of ... Federal services to Indian communities so as to render such services more responsive to the needs and desires of those communities.

(b) The Congress declares its commitment to the maintenance of the Federal Government's unique and continuing relationship with, and responsibility to, individual Indian tribes and to the Indian people as a whole through the establishment of a meaningful Indian self-determination policy which will permit an orderly transition from the Federal domination of programs for and services to Indians to effective and meaningful participation by the Indian people in the planning, conduct, and administration of those programs and services. In accordance with this policy, the United States is committed to supporting and assisting Indian tribes in the development of strong and stable tribal governments, capable of administering quality programs and developing the economies of their respective communities<sup>2</sup>

The above-quoted Congressional findings and policies are embodied in the Tribal Self-Governance Act of 1994<sup>3</sup>, which created opportunities for tribes to participate to a greater extent than ever before in the planning and management of federal trust resources, whether held in trust specifically for tribes or not.

In accord with Congress, policies, the President of the United States has declared:

"The United States Government has a unique legal relationship with Native American tribal governments as set forth in the Constitution of the United States, treaties, statutes, and court decisions. As executive departments and agencies undertake activities affecting Native American tribal rights or trust resources, such activities should be implemented in a knowledgeable, sensitive manner respectful of tribal sovereignty. ... I am outlining principles that executive departments and agencies ... are to follow in their interactions with Native American tribal governments. The purpose of these principles is to clarify our responsibility to ensure that the Federal Government operates within a government-to-government relationship with federally recognized Native American tribes. ...

(b) Each executive department and agency shall consult, to the greatest extent practicable and to the extent permitted by law, with tribal governments prior to taking actions that affect federally recognized tribal governments. ...

(c) Each department and agency shall assess the impact of Federal Government plans, projects, programs, and activities on tribal trust resources and assure that tribal government rights and concerns are considered during the development of such plans, projects, programs, and activities.

(d) Each executive department and agency shall take appropriate steps to remove any procedural impediments to working directly and effectively with tribal governments on activities that affect the trust property and/or governmental rights of the tribes.

<sup>1</sup> Pub.L. 103-413, Section 202.

<sup>2</sup> 25 USC 450(a), Pub.L. 93-638, as amended (Pub.L. 100-472, 101-644, 103-413).

<sup>3</sup> Pub.L. 103-413, Title II.

## COMMENTS

## RESPONSES

(f) Each department and agency shall ... design solutions and tailor Federal programs, in appropriate circumstances, to address specific or unique needs of tribal communities.<sup>4</sup>

As a result of these Congressional and Executive policies, the Department of Interior has issued a series of memoranda that address federal/tribal relationships. These Secretarial and agency directives enlarge on and detail procedures to be followed in dealing with tribes.<sup>5</sup> In particular, these Interior documents mandate that agencies consult, cooperate and collaborate with Indian tribes in management of trust resources.

Because of these directives, RNSP has also addressed the Parks' relationship with local tribes, as evidenced by the Memorandum of Understanding (MOU) between RNSP and the Yurok Tribe.<sup>6</sup> This MOU foreshadows and details the Actions Common to All Alternatives of the GMP, which states RNSP will work in partnership with American Indian tribes, "in accordance with applicable laws and agreements."<sup>7</sup> Further, the GMP states specifically that RNSP will "continue working with American Indians not only in a government-to-government capacity, but also in partnership through consultations [and] the positive consideration of economic opportunities ..."<sup>8</sup>

Further, the GMP acknowledges that the Yurok People (who today comprise the federally recognized Yurok Tribe), have lived in the area continuously for thousands of years, interacting with and managing the resources here, and maintaining an active trade network.<sup>9</sup> As RNSP notes, park resources currently are "especially important because of their direct association with contemporary American Indian communities."<sup>10</sup> These same American Indian communities are significant in the history of the region, and have a "connection to the parks' resources" that is to be "recognized and used in the management ... of those resources."<sup>11</sup>

<sup>4</sup> Presidential Memorandum, Apr. 29, 1994, 59 F.R. 22951.

<sup>5</sup> See, for example:

- Executive Order No. 13084, May 14, 1998;
- Secretarial Order No. 3206 - American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act, June 5, 1997;
- Executive Order No. 13007, May 24, 1996;
- Protection of Indian Trust Resources Procedures [Department of the Interior Manual], November, 1995;
- Advisory Memorandum from Assistant Secretary-Indian Affairs: Guidance on the Federal/Tribal Government-to-Government Policy, February 24, 1995;
- Government-to-Government Relations with Native American Tribal Governments - Memorandum for the Heads of Executive Departments and Agencies, April 29, 1994;
- Secretarial Order No. 3175 - Departmental Responsibilities for Indian Trust Resources, November 8, 1993.

<sup>6</sup> General Management Plan, p. 429-30

<sup>7</sup> GMP, p. 33.

<sup>8</sup> GMP, p. 52.

<sup>9</sup> GMP, p. 7.

<sup>10</sup> GMP, p. 9.

<sup>11</sup> GMP, p. 20.

## COMMENTS

Finally, the Yurok Tribe is a designated Self-Governance Tribe, authorized by the Department of the Interior to enter into agreements with Interior agencies for the purposes of fulfilling the policies and mandates of the Tribal Self-Governance Act.<sup>12</sup>

Based on the foregoing, the Yurok Tribe has a relationship with the Parks that goes beyond any expressed wish of RNSP to work in partnership with gateway communities.<sup>13</sup> Rather, based on historical, cultural and legal grounds, the Yurok Tribe has a recognized relationship with RNSP that must be viewed and acted upon in a manner different from the Parks' relationship with other governmental or private entities within the Park's areas of operation, jurisdiction or influence.

**Problem**

The role of the Yurok Tribe in all Park activities (planning, management and implementation) is understated in the GMP. Nowhere is the Tribe's unique status – as an aboriginal and contemporary presence, as a sovereign government, and as a Self-Governance Tribe with an existing agreement with RNSP – emphasized in detail. Although RNSP, on page 5 of the GMP, speaks about wanting to "solidify the relationship and promote better understanding and communication" between the Tribe and RNSP, further specific mentions in the GMP are fragmented and unclear.

We understand the need to speak to certain policies in generalities, in order that the GMP will remain a flexible, organic document. However, certain specific issues must be addressed so no mistake is made in the future, especially as concerns the legal relationship of Indian tribes to the federal government, and the processes of consultation, contracting and compacting that are essential parts of that relationship.

**Recommendations**

Include a short section within the Summary and a separate section within "Actions Common To All Alternatives" that specifically addresses the political significance of Indian tribes generally, and the Yurok Tribe specifically, within the management of RNSP. At other places in which tribes are mentioned, the roles of the tribes should be made more specific and meaningful.

For instance, as mentioned above, the Yurok Tribe is a Self-Governance Tribe inhabiting its aboriginal territory. Therefore, the Tribe must be a full participant in all aspects of Park planning and resource management. Because of the Tribe's crucial and vital interests in the cultural and natural resources within and surrounding the Park, and due to the sovereign governmental status of the Tribe, the Tribe's role should include complete participation in policy and management decisions related to the Park.

As an example of a short section with the Summary, on Page iv, Paragraph 2, the last two sentences of the paragraph should be made into a new paragraph that reads:

Based on federal and state laws, and on the Memorandum of Understanding among the National Park Service, the California Department of Parks and Recreation and the Yurok Tribe (a federally recognized Self-Governance tribe), the Yurok Tribe will be consulted as a co-manager on all issues arising within Yurok aboriginal territory that would reasonably have an effect on the Yurok Tribe's cultural or economic activities. RNSP would further consult informally with representatives of American Indian tribes who have significant interests in use, interpretation and education concerning cultural and natural resources. In addition, RNSP staff would continue to work in concert with the representatives of

<sup>12</sup> See, Tribal Self-Governance Compact between the United States and the Yurok Tribe, dated ??, pursuant to 25 USC, Part D – Tribal Self-Governance, Pub.L. 93-638, Title IV, as added Pub.L. 103-413, Title II, Section 204, Oct. 23, 1994, 108 Stat. 4272.

<sup>13</sup> GMP, pp. 62, 84, 103, 125.

## RESPONSES

460-B, C, D, E The plan has been revised in response to comments submitted by the Yurok Tribe by developing a new section that is common to all alternatives that addresses the government-to-government relationship between the National Park Service, California Department of Parks and Recreation, and American Indian tribes. The new section is intended to address most of the specific issues raised by the Yurok Tribe. The tribe's desire to exercise "comanagement" responsibility with the National Park Service and the California Department of Parks and Recreation was addressed through expanded descriptions of the collaborative relationship between the agencies and the tribe and the cooperative efforts that will be pursued to address many common goals in the areas of resources management, interpretation, and education. The revisions made to the text in the final plan that address American Indian traditional collecting and gathering activities are not as broad and far-reaching as those suggested by the tribe. Some of the tribe's suggestions, the National Park Service and California Department of Parks and Recreation believe, were beyond the agencies' statutory authorities to allow.

## COMMENTS

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American Indian tribes and preservation interest groups to balance the management of cultural resources with interpretation, education, and visitor use.

Examples of other places in which the tribal presence might be strengthened are on Page iii, Summary: Actions Common To All Alternatives, Paragraph 2. The following language might be used:

If any state or federally listed or proposed threatened or endangered species are found ... RNSP would first consult informally with the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Game, and the Yurok Tribe.

Page v, Paragraph 3, 2<sup>nd</sup> and 3<sup>rd</sup> sentences, should be changed to read:

Cultural landscape inventories or reports would be prepared, in consultation with the Indian tribes in the affected areas, for potential cultural landscapes. ~~Despite~~ ~~Although~~ ~~current differences in state and federal policies regarding gathering natural resources for traditional use would probably continue,~~ traditional use of certain plants in Redwood National and State Parks ~~by Native American tribal members should~~ ~~might~~ be permitted in accordance with the management of designated cultural landscapes. RNSP will work with the Yurok Tribe to effect a change in federal laws prohibiting the gathering and/or hunting of plants and animals that are culturally significant to the Yurok Tribe.

Page vi, top of page, 2<sup>nd</sup> full sentence, would read:

Off-road vehicle use on beaches, in connection with traditional American Indian fishing/gathering activities ~~that are consistent with the parks' purposes,~~ would ~~continue at all beaches where applicable,~~ under a joint RNSP/Yurok Tribe permit system. ...

Page 9, Bullet/Paragraph 1, after the last sentence, add:

These Native communities continue to rely on these cultural and natural resources for their spiritual, cultural, physical, and economic sustenance.

Page 34, approximately. Under "Actions Common To All Alternatives," include a new section that addresses the relationship of RNSP with the Yurok Tribe and other tribes in the area. For instance, the tribes are only mentioned in passing on Page 20, and again, briefly, in connection in the section on "Cultural Resource Management and Protection," on Pages 32 and 33. Bullet points 5, 6 and 7 on Page 33 should be moved and expanded into a separate section on RNSP/tribal relationships. For instance, use the language in these comments under "Background," above, to form the new section, entitled, "Tribal Role in Cultural and Natural Resource Management and Protection."

In addition, RNSP needs to clearly recognize and acknowledge the critical distinction between Indian tribes and other governmental entities. Whereas the GMP mentions the necessity for partnering with gateway communities, it must also mention the specific legal mandates to develop and maintain a deeper cooperative and consultative relationship with Indian tribes, and especially with the Yurok Tribe, for reasons detailed above.

### ISSUE #2: THE YUROK TRIBE'S SUPPORT OF ALL WATERSHED AND ESTUARY RESTORATION ACTIVITIES.

#### Background

The Yurok Tribe is currently involved in watershed restoration activities in the Klamath River watershed which are aimed at preserving and restoring resources that are critical to Yuroks culturally and economically. All watershed and estuary restoration activities identified in the GMP will be beneficial, not only to the Parks, but also to the Yurok Tribe as a whole, as they augment current Tribal activities and parallel Tribal goals of restoring



## COMMENTS

## RESPONSES

and sustainably utilizing habitat that is crucial to survival of species that are crucially important to the Yurok Tribe.

**Problem**

In all Alternatives, tribal activities overwhelmingly are mentioned only in the sections entitled "Cultural Resource Management and Protection."<sup>14</sup> Especially notable in this regard is the absence of any mention, in any of the other sections, of the Yurok Tribe's efforts at habitat monitoring and restoration. To the Yurok People, all habitat is important, not only culturally and spiritually, but economically as well. A healthy environment is critically important to maintaining a healthy and prosperous tribal population; the physical and social cannot be separated from the spiritual, as all are parts of the same cultural equation. Therefore, the Yurok Tribe should be recognized not only as cultural stewards, but also as physical caretakers in cooperation with RNSP. This oversight in the GMP is the result of focusing on tribes as only cultural resources and consultants to the Park, while ignoring all other areas of Yurok Tribal interest and expertise.

**Recommendations**

The Yurok Tribe strongly supports all watershed and estuary restoration activities within RNSP. Therefore, language should be included that properly recognizes the interests of the Yurok Tribe and other tribes, as they are consistent with RNSP objectives and purposes.

For instance, under "Natural Resource Management and Protection," page 38, bullet #2, would read:

Restore and maintain the RNSP ecosystems as they would have evolved with local tribal influences in conjunction with ongoing natural processes since 1850.

Bullet #4 on the same page would read:

Cooperate with tribal governments, the timber industry, private landowners, and other government agencies to accomplish long-range resource management planning and reduce threats to the RNSP resources.

In the section entitled "Issues and Actions," in each separate Issue and Action, emphasize the importance to the Yurok Tribe of each issue and every action to be taken. For instance, Under the subheading "Watershed Management and Restoration in and upstream of the Parks," no mention is made of current Yurok Tribe activities in watershed restoration in the Klamath River watershed, nor is any mention made of the fact that the Yurok Tribe intends to continue watershed rehabilitation activities in Fiscal Year 1999. These watershed restoration efforts are vitally important to the Yurok Tribe, because such restoration is critical to other Tribal endeavors such as increasing salmon populations and providing jobs in the woods to Tribal members. This is as or more important than any mere tribal desire to be consultants on cultural resource issues. Therefore, on Page 38, under "Actions," or under a new subheading entitled "Actions Common to All Issues," the following should be inserted:

Pursuant to Federal law and policy, and pursuant to the MOU between the Yurok Tribe and RNSP, all watershed management and restoration activity, as well as all vegetation management activity, within Yurok aboriginal territory that is planned, managed and implemented by RNSP, will be carried out with the full cooperation and participation of the Yurok Tribe.

Also, on Page 51, under the subheading "Vegetation Management: Issues" (continued from Page 48), Paragraph 1 mentions only that "some members of the American Indian community are seeking more involvement in the planning and implementation of resource management actions on their ancestral lands." This is true in a very

<sup>14</sup> GMP, pp. 52-54, 79, 98, 118-19.

## COMMENTS

## RESPONSES

minimal sense, but doesn't begin to convey the magnitude of interests and current activities of the Yurok Tribe in seeing that these "resource management actions" are truly implemented. This entire paragraph should be split into two paragraphs to read:

The prairies and oak woodlands exhibit both natural and cultural values. The current program of conifer removal and burning emphasizes restoring and preserving prairies and oak woodlands in the Bald Hills. The program needs to integrate other natural and cultural values into a more ambitious restoration approach that addresses historic natural and cultural processes and practices, and effects on wildlife, cultural landscapes, and traditional and current American Indian uses and activities in prairies throughout the parks.

~~Some members of the American Indian community tribes in general, and the Yurok Tribe in particular,~~ are seeking more involvement in the planning and implementation of resource management actions on their ancestral lands. The Yurok Tribe currently possesses the management and technical expertise to perform complex habitat restoration activities, and is actively pursuing ways to become more involved in such activities within their aboriginal territory, either alone or in concert with RNSP.

### ISSUE #3: THE IMPROVEMENT OF RNSP ROADS.

#### Background

Under all Alternatives, actions concerning Bald Hills Road<sup>15</sup> are, for all practical purposes, identical. Although there are a few minor changes in wording, all Alternatives basically involve maintaining the Road as a low-speed rural gateway, allowing travelers to enjoy scenic vistas. The Road is seen merely as a "unique alternative route" to the Klamath and Trinity River corridors. Nowhere in the GMP is the importance of the Road mentioned as a frequent shortcut many residents use to decrease travel time between the middle Klamath River and the coast.

Ignoring the true significance of the Bald Hills Road in this way is contrary to the intent expressed throughout the GMP to work with all communities surrounding the Park, and especially with American Indian tribal governments.

Under all Alternatives, under "Interdependence of Parks and Community, Objectives,"<sup>16</sup> RNSP states it will "support sustainable economic development ... in local communities that serve as gateways to the parks," and will "participate as partners with those communities." Alternatives 1, 2 and 3 say RNSP will assist the communities "to develop infrastructure needed for community development." These statements pledge RNSP resources and initiative toward finding ways to keep surrounding communities economically viable.

Further, the GMP acknowledges tribal people have been in the area continuously for at least 4500 years, and maintained an active trade network.<sup>17</sup> RNSP notes that park resources are "especially important because of their direct association with contemporary American Indian communities."<sup>18</sup> These same American Indian communities are significant in the history of the region, and have a "connection to the parks' resources" that is to

<sup>15</sup> GMP, pp. 61, 83, 103, 124.

<sup>16</sup> GMP, pp. 62, 84, 103, 125.

<sup>17</sup> GMP, p. 7.

<sup>18</sup> GMP, p. 9.

## COMMENTS

## RESPONSES

be "recognized and used in the management ... of those resources."<sup>19</sup> As a result, and because of the Federal laws that mandate Federal agencies work with tribes on a government-to-government basis, RNSP has undertaken a Memorandum of Understanding with the Yurok Tribe that echoes and details Actions Common to All Alternatives, which states RNSP will work in partnership with American Indian tribes, "in accordance with applicable laws and agreements."<sup>20</sup> The GMP says specifically that RNSP will "continue working with American Indians not only in a government-to-government capacity, but also in a partnership through consultations [and] the positive consideration of economic opportunities ..."<sup>21</sup>

**Problem**

Contrary to these assertions by RNSP, the GMP states at various places that Bald Hills Road should be kept in its present condition – a very low speed gravel road – which contradicts the RNSP promise to work closely with tribes and communities in developing infrastructure and economic opportunities.

One possible reason for deciding to keep the Bald Hills Road in a more primitive condition is that, "If not carefully managed, public use has the potential to damage natural and cultural resources."<sup>22</sup> According to this logic, if a road is kept in "low speed" condition, fewer people will want to travel on it; the fewer people in the area the less chance of overuse of the resource. This reasoning assumes there is no ongoing use by residents of Humboldt and Del Norte Counties. In fact, the roads that currently run through the parks have been continuously used since before there were any parks in the area.

Further, under management zoning, the Bald Hills area is separated into its own management zone. The Bald Hills Zone differs from the other Transportation Zones, especially from the Low-standard Zone. For instance, in the Low-standard Zone, a "moderate amount of resource modification would be necessary to provide for RNSP operation needs, public safety and administrative access." There, "activities and facilities could include paved or unpaved roads," with the result that "noise in this subzone would be less than in the high-standard subzone because of the lower traffic speeds and volume."<sup>23</sup>

On the other hand, the Bald Hills Zone would be managed in such a way that "quiet would generally be expected, but occasional moderate noise levels, especially near transportation zones and primarily from other visitors ... would be experienced."<sup>24</sup>

This management plan talks only about visitor use, not about utilitarian, everyday use of certain roads in the park to shorten travel time between the upper Klamath River region and the coast at Orick, specifically, the Bald Hills Road. This assumes that all traffic on Park roads will lead to some sort of visitor use and enjoyment of Park resources. In fact, Highways 199 and 101, as well as Bald Hills Road, serve local residents as important transportation arteries, with a very limited amount of Park resource use per trip by local residents. Residents relied on this road before the area was designated a National Park, and over the years, this type of usage has increased.

<sup>19</sup> GMP, p. 20.

<sup>20</sup> GMP, p. 33.

<sup>21</sup> GMP, p. 52.

<sup>22</sup> GMP, p. 21.

<sup>23</sup> GMP, p. 26.

<sup>24</sup> GMP, pp. 26-27.

**460-F & G** The text in the plan referring to the Bald Hills Road has been revised to acknowledge that a significant percentage of current usage is by local traffic that is unrelated to the parks.

NPS and CDPR staff will continue to work cooperatively with Humboldt and Del Norte Counties to address maintenance of county roads within the parks and to seek funds to upgrade them structurally. However, as long as a significant proportion of the traffic using certain county roads is unrelated to the parks, (e.g., heavy equipment, commercial vehicles, commuter traffic), the agencies will not consider assuming maintenance responsibility for those roads.

COMMENTS

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460-G

The GMP states that RNSP wishes to "depend on Del Norte and Humboldt Counties to manage and maintain county roads within the parks that provide access to nonpark lands that serve the general public in addition to RNSP visitors."<sup>25</sup> This attitude is unrealistic, given the fact that the individual governmental entities, by themselves, do not have adequate funding to maintain these roads.

Recommendation

Realistically, RNSP should work with Humboldt County and the Yurok Tribe in finding ways to pave the entire road, all the way to Martin's Ferry, at some point in the near future. Paving and assuming responsibility for maintenance of the road would serve a dual purpose: (1) A properly constructed road, with adequate signage, turnouts and banked curves, would decrease the probability of accidents, and (2) a paved road would decrease traffic noise in the back country, contrary to the assertion that lower traffic speeds and volume mean less noise.<sup>26</sup>

Under "Actions Common to All Alternatives," possibly on Page 34 under "Visitor Access and Circulation," insert the following:

Because of the importance of Bald Hills Road to local residents, RNSP will work in concert with Humboldt County and the Yurok Tribe to develop a plan for funding a road construction and maintenance project which would include the rehabilitation and paving of Bald Hills Road to the Martin's Ferry Bridge. RNSP will continue to consult with Humboldt and Del Norte Counties, and with the Yurok Tribe in identifying further opportunities for other road improvements within the parks.

ISSUE #4: OPPORTUNITIES FOR YUROK TRIBAL MEMBERS TO PRACTICE TRADITIONAL GATHERING AND SUBSISTENCE ACTIVITIES.

Background

At present there is very little opportunity for Yurok Tribal members to practice traditional gathering and subsistence activities within RNSP boundaries. Although a large percentage of RNSP lands fall within Yurok territory (85%) Tribal members have had very limited opportunities to practice traditional gathering and subsistence activities. The lack of opportunities by Tribal members to practice these activities has had, and will continue to have, a significant adverse impact to the Yurok Tribe and its members.

Problem

Cultural zoning within RNSP has historically been done without the participation of or consultation with the Yurok Tribe. The only entity that can correctly or adequately identify the Tribe's dependence on or the importance of the continuation of these activities is the Yurok Tribe. Areas of cultural zoning must be increased to adequately reflect Yurok Tribal concerns. These concerns should be appropriately reflected in the alternative matrices presented in the GMP.

Recommendations

The practice of Tribal gathering and subsistence activities should be identified throughout the GMP (E.G., in the Summary of GMP and in sections regarding Management Zones, Alternatives, etc.). The entire coastal area within Yurok Tribal ancestral territory should be identified as an important gathering territory for the Yurok Tribe. The reader and the public at large must appreciate the importance of these activities to the Yurok Tribe.

<sup>25</sup> GMP, p. 61.

<sup>26</sup> GMP, p. 26.

460-H & I

460-H See responses to comments B, C,, D, and E above.

460-I See responses to comments B, C, D, and E above. Also, the Yurok Tribe's historic dependence on areas of the parks was not the determining factor in establishing cultural zones. Rather, they reflect known areas of cultural significance, including settlement that followed European settlement and that will require special consideration throughout the life of the plan. However, local tribes would participate in all stages of the identification, designation, and maintenance of cultural and ethnographic landscapes.

The text on page 191 in the draft plan has been modified in the final plan to clarify that lands, streams, and coastal areas throughout the parks were important hunting and gathering areas for American Indians.

The new section -- "Relationships with American Indians" -- in the final plan outlines the special relationship of the parks to federally recognized tribes and clarifies when collection of resources for ceremonial or subsistence uses would be allowed. Specifically, collection of certain natural materials would be allowed in conjunction with the maintenance and interpretation of designated cultural and ethnographic landscapes, and as otherwise authorized under applicable laws and regulations.

COMMENTS

RESPONSES

In addition, there is an opportunity to add to the public's experience while visiting the Park. These activities should be tied to the management of cultural and natural landscapes within the Park.

Specific language must be included that properly recognizes the interests of the Yurok Tribe. Such language should be offered early and often in the document, and included in all alternatives. A paragraph might be added to all alternatives that reads:

Yurok people have been practicing traditional gathering and subsistence activities within what are now RNSP boundaries for thousands of years. Tribal gathering and subsistence activities are consistent with and recognized as an essential component of RNSP goals and purposes. The GMP recognizes the importance of these activities and as such these activities will be allowed pursuant to policies and guidance provided by the Yurok Tribe. In addition, these activities provide for a unique opportunity to educate RNSP visitors about important culturally related activities and practices.

See also the Recommendations under Issue #1, above, for further suggested language.

ISSUE #5: ACCESS TO PARK LANDS BY YUROK TRIBAL MEMBERS.

Background

Access to RNSP lands by Yurok Tribal members is related to the issue of practicing traditional gathering and subsistence activities. Access is also related to the practice of Yurok Tribal ceremonies and other activities not necessarily related to gathering or subsistence activities. Without access to the locales where these resources are present or where these activities occur, Tribal members cannot continue these traditional practices. A major concern is vehicle access to Gold Bluff's beach as well as other beach sites. Numerous Tribal members need continuous access to coastal areas to participate in various gathering and subsistence activities. Access to all areas would also ensure equity in the management of subsistence resources.

Open and free access to these locales within RNSP territory is also of major concern to the Tribe in connection with ceremonial and other activities. Tribal members are often required to pay use fees to access locations within RNSP for these types of Tribal activities.

Problem

Lack of access to these areas represents a significant adverse impact to Yurok Tribal members.

Recommendation

Tribal members must have open and free access to all RNSP lands as necessary to continue the practice of traditional gathering and subsistence activities as well as to continue the practice of ceremonial and other activities. Such access should be regulated and monitored by the Yurok Tribe consistent with policies and guidelines developed by the Tribe.

Specific language should be included that properly recognizes the interests of the Tribe in gaining open and free access to RNSP lands as necessary to continue traditional activities, as follows:

Open and free access to RNSP lands for traditional activities by Yurok Tribal members will be permitted pursuant to the relationship between the Tribe and RNSP as a result of the Tribal Self-Governance Act of 1994, as amended, and the Memorandum of Understanding between the Tribe and RNSP. The Yurok Tribe will work with RNSP in developing policies and guidelines for such access.

460-J & K See responses to comments B, C, D, E, I, above and L below.

460-J

COMMENTS

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ISSUE #6: CONFLICTS BETWEEN CULTURAL AND NATURAL RESOURCE USES.

460-K

Background

A number of sections in the GMP speak to potential conflicts between cultural and natural resources. There should be specific criteria and/or measurable standards that provide guidance if this particular circumstance arises. The Yurok Tribe is aware that RNSP is mandated to follow various protocols regarding natural and cultural resource protection. However, strategies for making decisions between equally sensitive resources is not adequately addressed in the GMP "Actions Common to All Alternatives" section.

The Tribe endorses a co-management approach in this area. Such an approach to natural and cultural management provides for the integration of Yurok Tribal management philosophies and can allow for a balance between Native American resource protection and sustainable resource use.

Recommendation

Include specific language in the "Actions Common to All Alternatives" section that recognizes the interests of the Tribe, as they are consistent with RNSP objectives and purposes, as follows:

Any actions involving both cultural and natural resources would be weighted toward protecting and preserving whichever resource would be most easily damaged. Such a determination must be made with the full participation of the Yurok Tribe, in keeping with the Tribe's role pursuant to Federal law and policy, and to the Memorandum of Understanding between the Tribe and RNSP.

ISSUE #7: TRIBAL PARTICIPATION IN INTERPRETATION, EDUCATION AND VISITOR USE ACTIVITIES.

460-L

Background

The Yurok Tribe should be a full participant in interpretation, education and visitor use activities. The Tribe should participate through various arrangements or agreements with RNSP that encourage Yurok Tribal members to carry out appropriate responsibilities related to these activities.

The Tribe and Tribal individuals are in the best position to educate visitors about cultural and related activities. Critical to these types of activities is the ability of the Tribe to participate fully in the planning and implementation phases of such activities. Such a relationship between RNSP and the Tribe will ensure a successful completion of these types of activities.

Recommendation

Add language that properly recognizes the interests of the Tribe in these areas of interest. For example:

Consistent with the objectives of the Yurok Tribe and RNSP, as mandated by Federal law, and as set forth in the Memorandum of Understanding between the Tribe and RNSP, the Yurok Tribe will be a full participant in the planning and implementation of activities related to interpretation, education and visitor use.

460-L A section of the "Actions Common to All Alternatives" section has been rewritten to reflect the government-to-government relationship between the Yurok Tribe and Redwood National and State Parks. This rewrite includes specific objectives regarding American Indian interpretation and describes the enhanced role the tribe would play in planning and implementing activities related to interpretation, education, and visitor use within the parks. See also comments B, C, D, and E above.

COMMENTS

RESPONSES

State of California

Memorandum

To : Mr. Andrew T. Ringgold, National Park Superintendent  
 Mr. Richard C. Sermon, State Parks Superintendent  
 US Department of the Interior and  
 California Department of Parks and Recreation  
 Redwood National and State Parks  
 111 Second Street  
 Crescent City, California 95531

Date: November 10, 1998

From : Department of Fish and Game - Region 1  
 601 Locust Street, Redding, California 96001

Subject: Comments and Recommendations on the Draft General Management Plan/General Plan/  
 Environmental Impact Statement/Environmental Impact Report

The Department of Fish and Game (DFG) has reviewed the draft general management plan/general plan/environmental impact statement/environmental impact report (Management Plan) for Redwood National and State Parks (parks) located in northwestern Humboldt and Del Norte counties. "The purpose of this joint general Management Plan is to provide a comprehensive direction for resource preservation and visitor use and a basic foundation for decision making for the parks." The Management Plan presents and analyzes four separate alternatives which present guidance and direction for joint management of Federal and State lands.

In general, alternative 1 would achieve a balance between resource protection and visitor use, preserving and protecting the parks' significant natural and cultural resources but emphasizing restoration more where sensitive resources were at risk.

Under alternative 2, the no-action alternative, parks' activities would continue at current levels for natural and cultural resource protection, preservation and restoration. Visitor services would be at the current level with the exception of additional campgrounds and campsites which were previously approved.

Under alternative 3, restoration, protection, and preservation of natural and cultural resources would take priority over visitor services.

Preference would be given to providing a wide spectrum of visitor services and experiences under alternative 4. Although the parks' resources and values would be protected, complete restoration would receive less emphasis than it does currently.

Comments that relate to all alternatives are as follows;

The Management Plan only considered noise disturbances on sensitive species associated with rehabilitation work on critical habitat. Other sources of disturbances may result from maintenance of trails, roads, campgrounds, road repair, public recreation uses such as rock and tree climbing, mountain biking, horse riding, hiking, camping, angling, et cetera.

461-A

STATE AGENCIES

461- A Under "Disturbance Effects" (page 248 in the draft plan), the text acknowledges that wildlife may be disturbed by human presence, activity, or movement with or without loud noise. Pages 261-67 discuss potential disturbance to listed threatened or endangered species that might result from various activities including habitat modification, construction, and human use (including trail use and angling).

COMMENTS

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The Management Plan acknowledges increased predation at nest sites for sensitive species due to habitat modification. Park use that increases human presence or concentrates human use (i.e., campgrounds, parking lots, et cetera) will also attract more predators, especially corvids.

461-B Although unlocated at the present time, the DFG believes that a bald eagle nest is likely present on the park. In addition, foraging by wintering bald eagles is common along Redwood Creek and some tributaries. Disturbance during the winter can occur whether or not nesting is known nearby. Additional analysis of potential impacts to this species is needed.

461-C California Fish and Game Code (FGC) Sections 3503.5, 3800, 4700, 4800 and Title 14, Section 460 (see attached), provide varying levels of protection for a number of species that may occur in the park. These sections should be reviewed and potential impacts to covered species evaluated (pages 238 and 260).

461-D The effects of vegetation restoration, thinning or fire management and the anticipated benefit to spotted owls and marbled murrelets should be monitored under a bona fide scientific study (page 269).

Comments specific to alternatives are as follows:

461-E Alternative 1 may not provide direct benefit to the extent as other alternatives due to its focus on treatment of areas that benefit visitor use and enjoyment rather than increasing and restoring sensitive habitat. Many private timberlands in the vicinity of the park are currently negotiating habitat conservation plans with the US Fish and Wildlife Service (USFWS) and are proposing impacts to suitable and occupied marbled murrelet and spotted owl habitat based on the assumption park management will provide increasing levels of habitat for these species through "active" management. Whichever alternative is selected, the Management Plan should include active management to benefit an increase in suitable habitat for marbled murrelets and spotted owls. In addition, a monitoring program should be included to track the efficacy of active management (page 285).

461-F The removal of artificial impoundments at both Marshall Pond and Lagoon Creek are discussed primarily to restore salmonid habitat. The Management Plan states that any losses of wetland habitat and values associated with dam removal would be mitigated. The DFG is unclear at this point as to the actual benefits to salmonids associated with this effort. What is clear however is the significant loss of the recreational sport fishery associated with removal of Lagoon Creek. The Management Plan does not disclose the process for offsetting this major impact. Because of current restrictions (with likely greater restrictions in the future) of anadromous fisheries on the north coast, maintenance of existing trout sport fisheries are important.

461-B The plan has been updated to reflect that a pair of bald eagles successfully nested in the parks in 1999. Before this event, sightings of eagles have generally been overflights. It is difficult to analyze effects on bald eagles without knowing more precisely where eagles might nest or roost in the parks. The section on impacts of noise has been revised to include bald eagles in the list of species that might be disturbed by noise and other human activity. All RNSP planning documents will be accompanied by environmental compliance documents that analyze potential effects on bald eagles in as much detail as possible.

461-C The resources affected and the impacts discussed in the plan are as specific as possible given the general nature of the plan. Site-specific planning documents prepared on implementation plans will describe effects on sensitive animal species in greater detail. The laws, regulations, and policies under which the national and state parks are managed protect native wildlife within the parks. Taking or possession of any wildlife species, including bird eggs, is prohibited in the parks. With the exception of ringtail cats, none of the fully protected mammals listed under the *California Fish and Game Code* section 4800 inhabit the parks.

461-D All resource management programs are monitored under established protocols, in accordance with NPS and CDPR policies. With assistance from researchers and scientists, RNSP staff will be developing a formal inventory and monitoring program to identify critical ecosystem components and develop monitoring protocols for these components.

461-E The impacts of second-growth management on all resources, including marbled murrelets and northern spotted owls, and RNSP values, including visitor experience, will be fully described in the environmental compliance document that accompanies the second-growth management plan to be prepared by RNSP staff. The objectives of this plan will be based on NPS and CDPR policies, not on the needs or assumptions of private industry. A monitoring program will be one component of the plan.

461-F The removal of artificial impoundments is required by existing NPS and CDPR guidance (pages 51-52 of the draft plan). However, as



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Page Three

461-G

The DFG actively supports any alternative which will enhance and restore the estuary of Redwood Creek (i.e., removing a portion of the levees in the lower Redwood Creek valley). We do recommend, however, that the Management Plan explore and alleviate any potential conflicts that may exist with the County of Humboldt under the terms of agreement with the US Army Corps of Engineers regarding levee maintenance within lower Redwood Creek.

461-H

Alternative 2 excludes enhancement of lands through active management for the benefit of marbled murrelets and spotted owls. This activity should be included in all alternatives (page 310). In addition, the Management Plan indicates that proposed visitor services would remain at current levels with the exception of additional campgrounds and campsites which were previously approved. If the location of these previously approved sites are located within suitable marbled murrelet habitat, parks' staff should contact DFG staff as well as USFWS personnel immediately.

461-I

Alternative 3. A thorough review of a monitoring plan and design should precede any habitat modification intended to benefit listed species (page 327).

461-J

Our comments with regard to impacts associated with removal of artificial impoundments would be consistent with alternative 1.

In addition, this alternative explores the greatest benefits of the restoration of the Redwood Creek estuary as well as the greatest quantity of major and minor road treatment (and in the least amount of time) to restore the Redwood Creek watershed. Other road treatment and erosion control on areas within the parks are included as well. Consequently, the DFG recommends approval of alternative 3 with the incorporation of a monitoring plan for sensitive species.

However, we believe that some integration of Alternatives 1 and 3 are possible. For example, in areas outside of critical habitat, instead of removing public use areas entirely (as proposed under alternative 3), relocation of area facilities outside of sensitive habitats such as wetlands and retain the use at the same level and/or resolve resource degradation is possible (e.g., Crescent Beach).

Further, the DFG would like to incorporate by reference our specific comments regarding the proposed *Redwood National and State Parks Forest Recovery Plan and Environmental Assessment* (January 21, 1997, memo to parks) as they pertain to the Management Plan.

## RESPONSES

discussed on page 282, Marshall Pond and Lagoon Creek would be removed only if a determination is made that their dams pose a threat to public safety or resources and then only after a determination that this threat outweighs existing resource values. If the dams are removed, a separate plan and environmental assessment would be prepared that would weigh the positive and negative effects, including mitigating measures, that would accompany the project.

The benefits to native salmonids in the area currently known as Marshall Pond are benefits that would reasonably be anticipated from restoration of Richardson Creek, a stream formerly known to be occupied by anadromous salmonids. There is no trout sport fishery associated with Marshall Pond. The hatchery rainbow trout sport fishery at Lagoon Creek was established by the California Department of Fish and Game under an agreement with Del Norte County before inclusion of this area into the parks. Both Marshall Pond and Lagoon Creek are artificial impoundments created because the original stream channels have either been dammed (Marshall Pond) or the outlet has been blocked by natural processes (Lagoon Creek). Any proposal to remove the dam or the outlet would require site-specific planning and environmental compliance documents, which would consider the impacts on both current resources and visitor uses at these locations. Mitigation for any adverse impacts on resources and visitor experience that would result from removing the artificial impoundments would be included as part of project implementation.

**461-G** The restoration of the Redwood Creek estuary will require the cooperation of federal, state, and local agencies, the Yurok tribe, and private individuals. Specific restoration actions will be considered and must be agreed upon by all involved parties.

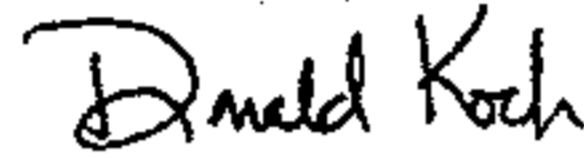
**461-H** Alternative 2 is the no-action alternative. The no-action alternative describes current management direction and programs. There are currently no programs directed at enhancing northern spotted owl and marbled murrelet populations through active management of lands. Watershed restoration would restore habitat eventually, but is not specifically directed at enhancing suitable murrelet or spotted owl habitat.

## COMMENTS

Messrs. Andrew T. Ringgold and Richard C. Sermon  
November 10, 1998  
Page Four

Thank you for the opportunity to provide comments. If you have any questions regarding our comments and recommendations, please contact Environmental Specialist Armand Gonzales at (707) 441-5669 or Associate Wildlife Biologist Karen Kovacs at (707) 441-5789.

Sincerely,



Donald B. Koch  
Regional Manager

### Attachment

cc: Ms. Karen Kovacs  
Mr. Armand Gonzales  
Department of Fish and Game  
619 Second Street  
Eureka, California 95501

## RESPONSES

**461-I** There are no current plans to expand campgrounds or add campsites at any of the state park campgrounds that are in habitat suitable for marbled murrelets. The National Park Service and the California Department of Parks and Recreation will contact the U.S. Fish and Wildlife Service and the California Department of Fish and Game as required under the federal Endangered Species Act or the California Department of Fish and Game for any actions that might affect a federal or state-listed species.

**461-J** The National Park Service and California Department of Parks and Recreation agree that thorough review by agency personnel and knowledgeable researchers of any habitat modification plan designed to benefit listed threatened and endangered species is needed before implementation. The second-growth management plan will undergo full public and agency review.

## COMMENTS

## RESPONSES

Attachment (Fish and Game Code Sections and Title 14, California Code of Regulations Section)

3503.5. It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.

3800. (a) All birds occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds are nongame birds. It is unlawful to take any nongame bird except as provided in this code or in accordance with regulations of the commission or, when relating to mining operations, a mitigation plan approved by the department.

(b) (1) Mitigation plans relating to mining operations approved by the department shall, among other criteria, require avoidance of take, where feasible, and include reasonable and practicable methods of mitigating the unavoidable take of birds and mammals. When approving mitigation plans, the department shall consider the use of the best available technology on a site-specific basis.

(2) Mitigation plans relating to mining operations approved by the department shall include provisions that address circumstances where mining operations contribute to bird deaths, including ponding of process solutions on heap leach pads and exposure of process solution channels, solution ponds, and tailing ponds.

(3) The mine operator shall prepare a mitigation plan that shall be submitted to the department for approval. For ongoing mining operations, the mitigation plan alone or in conjunction with regulations adopted by the commission shall result in an overall reduction in take of avian or mammal species. The department shall provide an opportunity for public review and comment on each mitigation plan during the department's approval process. The mitigation plan shall be prepared on a site-specific basis and may provide for offsite mitigation measures designed to reduce avian mortality. The mine operator shall submit monthly monitoring reports on avian mortality to the department to aid in evaluating the effectiveness of onsite mitigation measures.

(4) The mining operator shall reimburse the department for its direct costs to provide appropriate notice of the mitigation plan to affected local government entities and other affected parties. The mine operator shall provide the department a limited number of copies, as determined by the department, of the mitigation plan for public review.

## COMMENTS

## RESPONSES

(c) The department shall monitor and evaluate implementation of the mitigation plan by the mine operator and require modification of the plan or other remedial actions to be taken if the overall reduction in take of avian or mammal species required pursuant to paragraph (3) is not being achieved.

4700. Fully protected mammals or parts thereof may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected mammal and no permits or licenses heretofore issued shall have any force or effect for that purpose. However, the commission may authorize the collecting of those species for necessary scientific research. Legally imported fully protected mammals or parts thereof may be possessed under a permit issued by the department.

The following are fully protected mammals:

- (a) Morro Bay kangaroo rat (*Dipodomys heermanni morroensis*).
- (b) Bighorn sheep (*Ovis canadensis*), except Nelson bighorn sheep (subspecies *Ovis canadensis nelsoni*) as provided by subdivision (b) of Section 4902.
- (c) Northern elephant seal (*Mirounga angustirostris*).
- (d) Guadalupe fur seal (*Arctocephalus townsendi*).
- (e) Ring-tailed cat (genus *Bassariscus*).
- (f) Pacific right whale (*Eubalaena sieboldi*).
- (g) Salt-marsh harvest mouse (*Reithrodontomys raviventris*).
- (h) Southern sea otter (*Enhydra lutris nereis*).
- (i) Wolverine (*Gulo luscus*).

4800. (a) The mountain lion (genus *Felis*) is a specially protected mammal under the laws of this state.

(b) It is unlawful to take, injure, possess, transport, import, or sell any mountain lion or any part or product thereof, except as specifically provided in this chapter or in Chapter 2 (commencing with Section 2116) of Division 3. This chapter does not prohibit the sale or possession of any mountain lion or any part or product thereof, when the owner can demonstrate that the mountain lion, or part or product thereof, was in the person's possession on June 6, 1990.

(c) Any violation of this section is a misdemeanor punishable by imprisonment in the county jail for not more than one year, or a fine of not more than ten thousand dollars (\$10,000), or by both that fine and imprisonment. An individual is not guilty of a violation of

**COMMENTS**

**RESPONSES**

this section if it is demonstrated that, in taking or injuring a mountain lion, the individual was acting in self-defense or in defense of others.

(d) Section 219 does not apply to this chapter. Neither the commission nor the department shall adopt any regulation that conflicts with or supersedes any of the provisions of this chapter.

#T14 460. Fisher, Marten, River Otter, Desert Kit Fox and Red Fox. Fisher, marten, river otter, desert kit fox, and red fox may not be taken at any time.

COMMENTS

RESPONSES

Nov-09-98 08:50A  
 FACSIMILE COVER  
 01-00-0002

ATTENTION		FROM (Name) CALTRANS - PAUL DETNER	
UNIT/COMPANY REDWOOD STATE & NATIONAL PARKS		UNIT TRANSPORTATION PLANNING	
DISTRICT/CITY		ADDRESS (Mailing) CALTRANS DISTRICT 1 P. O. BOX 3700 EUREKA, CA 95502-3700	ADDRESS (Street) CALTRANS DISTRICT 1 1488 UNION STREET EUREKA, CA 95601
DATE		TOTAL PAGES (including 2.5x3.5 inch)	
11/9/98			
PHONE 1 (Include Area Code) 445-6412		ATSS-PAX 3	
ORIGINAL DISPOSITION <input type="checkbox"/> DESTROY <input type="checkbox"/> RETURN <input type="checkbox"/> CALL FOR PICKUP		ATSS PHONE NUMBER	
COMMENTS			

COMMENTS

REDWOOD PARKS MANAGEMENT PLAN

PLEASE PASS ON TO  
 APPROPRIATE AGENT(S)

THANK YOU  
 PAUL DETNER

COMMENTS

RESPONSES

Nov-09-98 08:50A

P.02

STATE OF CALIFORNIA--BUSINESS, TRANSPORTATION AND HOUSING AGENCY

PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 1, P.O. BOX 3700  
MIRKA, CA 95502-3700  
TOD PHONE 707/445-8483



November 6, 1998

1-Hum/DN-101/199  
Redwood National and  
State Parks General Plan  
Draft Environmental  
Impact Statement/Report  
SCH # 97122063

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Gentlemen:

We have reviewed the Draft General Management Plan/General Plan/Environmental Impact Statement/Environmental Impact Report (GMP/GP/EIS/EIR) for the Redwood National and State Parks and have the following comments:

1. We appreciate the cooperative relationship we have enjoyed with you over the past several years since you have taken over management of the Freshwater Spit. Should changes in the operation be necessitated as a result of this General Management Plan, we will be happy to work with you to facilitate these changes.

462-A

We recommend a traffic study be performed to determine the impact to Route 101 traffic if the spit is converted to day use only. The study should identify peak traffic volumes entering and leaving the spit, and any associated traffic mitigation measures that will be needed.

462-A Any management actions proposed for Freshwater Lagoon Spit that might result in changes in public use and/or traffic levels or patterns will be thoroughly discussed and coordinated with Caltrans to ensure that public safety concerns are addressed.

COMMENTS

RESPONSES

Nov-09-98 08:50A

P.03

- 2. Any modifications to existing accesses to park facilities that connect to the State highways will require Encroachment Permits. Depending on the complexity of the change, traffic mitigation may be required.
- 3. We recommend pedestrian and hiking trails be located so that pedestrians are not placed or routed through areas where they could be in conflict with the motoring public, i.e. trails crossing the State highway within inadequate sight distance.
- 4. Parking areas should be designed so that vehicles are not backing onto the highway, i.e. angled parking.

462-B

5. Page 254 identifies that as a result of erosion, sediment has been transported to lower streams within the Park. This plan should clarify whether the sediment problem at Stone Lagoon and the North Fork of McDonald Creek (McBrindle Creek) will be addressed.

- 6. Route 101 from Eureka, Ca. to Olympia Washington is considered "The U.S. 101 Tri-State Pacific Coast Scenic Byway." Additionally, most of Route 101 on the North Coast, including segments within Redwood National State Parks, is legislatively designated as the Pacific Coast Bikeway. However, many two and three lane segments within Redwood National and State Parks *do not* have paved shoulders that are adequate to accommodate bicycle and pedestrian traffic. This draft plan states "Portions of Highways, particularly Highway 101, are not well suited to safe and leisurely bicycling because of speed and size of motorized vehicles on the highways and because the road shoulders are narrow or absent".

462-C

The development of highway shoulders for bicyclists should be a priority for both Parks and Caltrans. We suggest that the Management Plan call for a collaborative effort between Caltrans and Regional Transportation Planning Agencies to develop paved shoulders.

**462-B** Neither of these areas is within the parks and neither is subject to this plan.

**462-C** The plan has been revised to propose a variety of cooperative efforts to provide or improve facilities for bicyclists as alternatives to using the travel lane portions of through highways.



COMMENTS

RESPONSES

Nov-09-98 08:51A

P.04

462-D

7. Northern California and Southern Oregon are working cooperatively in the development of a California/Oregon Advanced Transportation Study (COATS). COATS will identify Intelligent Transportation Systems (ITS) strategies, applicable to rural areas, which may include tourism and travel information. We will be soliciting input into the COATS study in the near future and will be welcoming your agency's participation in this process. If one of the Plan's management alternatives emphasizing visitor use is ultimately selected, then we suggest including a reference supporting these strategies.

We look forward to receiving and commenting on future documents related to this project. If you have questions regarding this review, please call on me at (707) 445-6412.

Sincerely,



Paul G. Dettner  
 Intergovernmental Review Coordinator  
 Office of Transportation Planning

462-D The plan has been revised to commit NPS and CDPR staff to working cooperatively with Caltrans and regional/local transportation planning agencies to address issues related to future traffic needs and improvements in tourism and travel information.

COMMENTS

RESPONSES

Nov-09-98 08:51A

P.05

MU:

Bcc: 1-RKnapp  
2CSWillis  
3-Murkofsky  
MGLucas  
JEGraham  
RBMcCarthy  
CCFielder  
TADavis  
DLHarmon  
RMorales

COMMENTS

RESPONSES

STATE OF CALIFORNIA — THE RESOURCES AGENCY  
 OFFICE OF HISTORIC PRESERVATION  
 DEPARTMENT OF PARKS AND RECREATION  
 P.O. BOX 942896  
 SACRAMENTO 94296-0001  
 (916) 653-6924  
 FAX: (916) 653-9824

PETE WILSON, Governor



OCT 13 8:00 AM '98

October 1, 1998

REPLY TO: NPS980514A

Mr. Andrew T. Ringfold/Mr. Richard C. Sermon  
 Redwood National and State Parks  
 1111 Second Street  
 Crescent City, California 95531

Dear Sirs:

Thank you for requesting the Office's comments on the Draft General Management Plan/General Plan/Environmental Impact Statement/Environmental Impact Report. My staff has reviewed the document and I would like to offer the following comments.

In general, I thought the document was very good. It provides an adequate level of information to understand the types of historic properties which are present in the parks and how these resources might be managed. For resources on federal land, it identifies the legal process for consideration. However, for projects on state lands, in addition to the California Environmental Quality Act, the means for evaluating and consideration of resources are found Public Resources Code Sections 5024 and 5024.5 (State owned historical resources) and 5024.1 (the California Register of Historical Resources). These citations should be incorporated throughout the document.

267-A

The proposed alternatives do not result in a great deal of variation in the management of historic properties. For the most part, I am pleased to note that the identification, evaluation, and consideration of historic properties will be the similar for each of the alternatives. However, the Cultural Resource Compliance section found in Appendix K identifies the types of activities which could result in effects on cultural resources. While the No Action Alternative results in less consultation regarding effects to cultural resources, all alternatives seem fairly equal. For this reason, I will not offer a recommendation on which alternative should be selected.

While I am not recommending an alternative, I would suggest that once one is selected, that the appropriate section of Appendix K be incorporated into the text of the plan. Appendix K provides direct guidance for implementation of the plan. By direct incorporation, steps necessary for the consideration of cultural resources will be more easily identified.

267-B

More specific comments include:

267-A The text has been changed in the final plan to read as follows: "The joint plan would also comply with the provisions of the California Environmental Quality Act (CEQA) of 1970 (*Public Resources Code* section 21000 et seq.), as well as sections 5024, 5024.1, and 5024.5 of the *Public Resources Code*."

267-B That is the intent.

COMMENTS

RESPONSES

Ringfold/Sermon  
October 1, 1998  
Page 2

267-C  
267-D  
267-E  
267-F

Starting on page 52, one of the "Objective" for each of the alternatives should be consideration of cumulative effects on cultural resources. What effects occurs from the on going management, use, and effects to cultural resources?

Page 53-Native American use should be encouraged and not merely interpreted if their activities contribute to the significance of a cultural landscape. While I recognize that the National Park Service does not currently have a policy for gathering, this could be a goal. In addition, other types of use, (e.g. ceremonial) could be accommodated pursuant to existing policies and should be so identified in the plan.

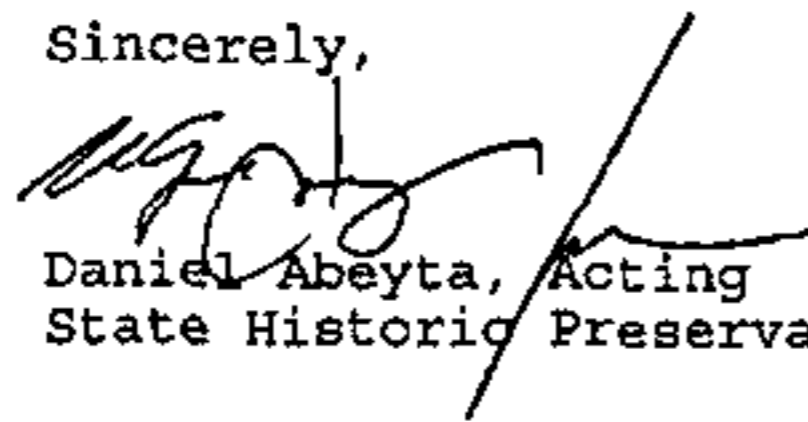
Page 54-Please note the words "National Register" are not capitalized. In addition, it should be clearly stated that preservation involves use and not merely identification, evaluation, and study.

Page 55-The plan provides for the development of a protocol for accessioning natural resource materials which are to be curated. Is there a protocol already in place for cultural resources? If not, is such a protocol necessary?

Many of the specific comments should be incorporated into each of the alternatives as appropriated.

I would like to thank you for the opportunity to offer these comments. If you have any questions, please contact Dwight Dutschke of my staff at 916-653-9134.

Sincerely,



Daniel Abeyta, Acting  
State Historic Preservation Officer

267-C The cumulative impacts on cultural resources are addressed in the environmental consequences section for each alternative.

267-D This section has been rewritten. Please see the new "Relationships with Native Americans" section in the discussion of actions that are common to all alternatives.

267-E The use of national register as a short title, lowercased, is according to NPS editing guidelines, which follow *The Chicago Manual of Style*, 14th edition.

267-F The National Park Service and the California Department of Parks and Recreation have an effective protocol for accessioning cultural resources.

COMMENTS

RESPONSES



California Regional Water Quality Control Board  
North Coast Region

Peter M. Rooney  
Secretary for  
Environmental  
Protection

Internet Address: <http://www.swrcb.ca.gov>  
5550 Skyline Boulevard, Suite A, Santa Rosa, California 95403  
Phone (707) 576-2220 • FAX (707) 523-0133



Pete Wilson  
Governor

October 9, 1998

Superintendents Ringgold and Sermon  
Redwood National and State Parks  
1111 Second St.  
Crescent City, California 95531

Dear Mr. Ringgold and Mr. Sermon:

I am writing to comment on the Draft General Management Plan for Redwood National and State Parks. The effort and technical depth represented by the document are to be commended. Issues related to watershed management are of particular interest to staff of the North Coast Regional Water Quality Control Board, so we welcome the opportunity to provide a few observations.

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CITY OF CRESCENT CITY  
OCT 13 PM 1:26

Water Quality Issues

265-A

P. 167. last paragraph: "Overall the water quality in the parks meets or exceeds the water quality objectives established by the North Coast Regional Water Quality Control Board." In fact, the United States Environmental Protection Agency (USEPA) and the North Coast Regional Water Quality Control Board (Regional Water Board ) have listed Redwood Creek as sediment impaired, under Section 303(d) of the Clean Water Act. In conjunction with the USEPA, the Regional Water Board is currently formulating a "Water Quality Attainment Strategy and Implementation Plan" (WQAS) to achieve a Total Maximum Daily Load (TMDL) for sediment, expressed as a multi-year rolling average, to be applied throughout the Redwood Creek watershed. The objective is to prevent the discharge of controllable sediment, which might otherwise delay recovery of fisheries habitat impacted by historic and ongoing sediment depositional events. A TMDL has certain required elements, among them an allocation for all sources of sediment, natural or induced, regardless of ownership, and related management/prevention. The General Management Plan needs to discuss the park's intended compliance with the TMDL, which will be submitted for consideration of adoption by the North Coast Regional Water Board in December, 1998.

Interagency Cooperation

265-B

P. 64 Actions under Alternative 1:  
"...resource management staff offices in Arcata would be relocated to a GSA built-to-specification facility ...in the Orick area."  
As the largest single ownership in the Watershed, RNSP will continue to be looked to by Regional Water Board staff as active participants in our ongoing public process. In March, 1994, an Environmental Assessment by RNSP stated: "because of the present emphasis on establishing partnerships between private and public entities for regional ecosystem management, the NPS acknowledges the desirability of retaining an office in Arcata to interact with the potential

265-A The plan has been revised to reflect the inclusion of Redwood Creek on the Environmental Protection Agency's list of impaired waters under Section 303 (d)(1)(A) of the Clean Water Act.

265-B Although all alternatives envision the consolidation of the NPS offices currently in Arcata and Orick in a new office facility located outside the parks near Orick, the parks intend to retain a small staff presence in the Arcata area in office space shared with other federal agencies. The staff remaining in Arcata would be those whose primary duties involve participating in interagency GIS coordination and other cooperative programs with other agency staff, and private landowners that focus on the redwood ecosystem, such as erosion control efforts in the upper Redwood Creek basin.

COMMENTS

RESPONSES

.Superintendents, RNSP

2

October 9, 1998

partners; to avoid diminishing the established relationship between researchers in wildlife, fisheries, geomorphology and hydrology; to continue to enjoy mutual benefits to the university students and park; and to promote coordinated development of geographic information systems (GIS).” Underlying conditions behind that decision are even more pressing today than in 1994, and that a move of critical personnel to Orick would be a setback in the promulgation of region-wide studies on the redwood ecosystem. The access to two-thirds of the Redwood Creek basin is through Arcata, via Highway 299. If the Arcata office is closed, it would be more difficult to provide technical assistance to and coordinate efforts among private landowners, to participate in monitoring the effectiveness of the Regional Water Board/USEPA Water Quality Attainment Strategy and Implementation Plan, to conduct timber harvest reviews, and to formulate and implement a Coordinated Resource Management Plan. Regional Water Board staff agrees with the particular view of large industrial land owners and other non industrial landowners, large and small, that the Regional Water Board and USEPA must recognize and build upon landowner agreements developed with the Park in any TMDL WQAS. This will require ongoing access to Park technical resources and personnel. Ready access would be diminished by relocation to the more remote Orick location.

In addition, a major emphasis of the RNSP’s GIS program is interagency GIS. Under Executive Order 12906, federal agencies are required to make their geospatial data freely available to the public. To this end, Park staff have been highly responsive to Regional Water Board staff requests for data. Past problems have resulted from each agency developing and maintaining its own data sets. Integrating all data from many organizations into singular versions, which are seamless across ownerships and the landscape, would provide new opportunities to evaluate ecosystem health using shared copies of data. Park participation and leadership in the North Coast Geographic Information Cooperative will help assure the public has timely access to data from many organizations which manage public resources.

Please call me at 707-576-2661 if you have questions or need more information.

Sincerely,



Bruce Gwynne  
Environmental Specialist

BAG:lmf/rcmpdrf1.doc

COMMENTS

RESPONSES



377 J STREET CRESCENT CITY, CALIFORNIA 95531-4025

Administration/Finance: 707-464-7483 Public Works/Planning: 707-464-9506
Utilities: 707-464-8517 FAX: 707-465-4405

November 2, 1998

Superintendent Andy Ringgold
Superintendent Rick Sermon
Redwood National and State Parks
1111 Second Street
Crescent City, CA 95531

Re: Comments - Draft GMP/GP/EIS/EIR for
Redwood National and State Parks

Dear Sirs:

Please accept these comments as the formal written response from the City of Crescent City.

General Comments:

The various alternatives seem to point out an apparent conflict between preservation of lands within the parks and their use by visitors. The first impression gained is that these various functions of public lands are mutually exclusive. Further review of the detailed information shows that an "all or none"

464-A

concept prevails throughout the document. There appears to be no consideration of transitional development or intermediate visitor usage planning that reflects existing usage and trends. The activity summaries indicate that the current most common uses would have fewer opportunities under the recommended alternatives.

Funding Viability:

464-B

While the plan shows development and maintenance cost estimates for the proposed alternatives, there is no analysis noted for the financial viability of the proposals. A statement of current funding levels and anticipated funding availability would allow for a clearer picture of the financial viability of the alternatives.

LOCAL AGENCIES

464-A The National Park Service and California Department of Parks and Recreation strongly believe that there is definite consideration in all of the alternatives for intermediate levels of development and visitor use. Examination of the zone descriptions given in table 1 show that, for a natural resource park, the frontcountry and mechanized backcountry zones qualify best in calling for intermediate levels of development and visitor use. There is actually a slightly higher percentage of frontcountry and backcountry zones in the proposed action (1.4% and 42.1% respectively) than in the current or no-action alternative (1.2% and 39.3% respectively). Note that the natural environment of the no-action alternative is most comparable to the mechanized backcountry zone of the other alternatives. The agencies strongly believe that the proportion of the parks devoted to these zones is completely appropriate to achieve the legally mandated standard expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations" (NPS Organic Act, 16 USC 1 and NPS Management Policies 1:3).

464-B Funding for proposals contained in the plan is subject to limited resources available within the parks' staffs, competition with other agency priorities, the uncertainties of congressional and state legislature funding processes, and the unknown future for donated funds, partnership opportunities, and volunteer labor. There is no way to assess the specific funding viability for the proposals. This is a long-range plan, and some projects may take 10 or more years to initiate; also, based on experience with other general plans prepared by the agencies, there are some proposals that may not get funded at all during the life of this plan. A statement has been added to appendix A (final plan) explaining this lack of a definitive funding scenario.

COMMENTS

RESPONSES

Page 2  
November 2, 1998  
Redwood National and State Parks

Accessibility:

464-C A general statement regarding accessibility (ADA) should be included to indicate that these issues will be addressed during the development of detailed plans.

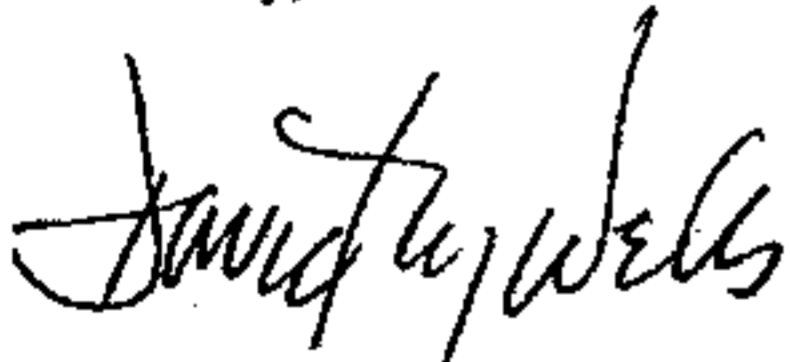
Alternative 2 (No Project):

464-D This alternative is not clearly explained. Along with the detail of the current plan, a list of what has been accomplished will allow better evaluation of the alternatives.

The recommended alternatives, in general, appear to conflict with the information contained in the document. The alternatives are different only in the degree to which they carry forward the same intended course.

I would like to thank you for the opportunity to respond and would also encourage you to extend the comment period further by actively engaging public participation in the further development of the plan.

Sincerely,



David M. Wells  
City Manager

464-C An additional objective has been added to the "Public Use, Recreation, and Visitor Safety" section of the proposed plan, and a general statement has been added to the "Actions That Are Common to All Alternatives" section as recommended by the reviewer.

464-D The National Park Service and California Department of Parks and Recreation disagree that alternative 2 is not clearly explained or that the alternatives conflict with the information contained in the document. Regarding whether the alternatives are different enough from each other or represent an adequate range, see the response to comment A in this letter.



## COMMENTS

## RESPONSES



BOARD OF SUPERVISORS

## COUNTY OF DEL NORTE

583 "G" Street, Suite #1  
CRESCENT CITY, CALIFORNIA 95531

PHONE: (707)  
484-7204  
FAX: (707)  
486-1470

October 6, 1998

Andrew T. Ringgold  
National Park Superintendent  
Richard C. Sermon  
State Parks Superintendent  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

RE: Draft General Management Plan/General Plan/EIS/EIR for Redwood National and State Parks

Dear Sirs:

On behalf of the Board of Supervisors of the County of Del Norte, I would like to thank you for your attendance and comments at our public hearing of September 29, 1998. The County of Del Norte has a vital interest in the management decisions following from the directions contained in the Redwood National and State Parks (RNSP) draft plan. The County of Del Norte, the City of Crescent City, the communities of Hiouchi and Klamath, and the Yurok and Tolowa tribes are all identified in this plan as being potentially affected by the decisions contained in this draft plan. We are your immediate neighbors and are therefore directly affected by your decisions contained within this draft plan. Likewise, we recognize that we are your neighbors and therefore have attempted to be a responsible land steward for the lands immediately adjacent to the park within Del Norte County. To continue this amiable relationship, we ask that you give paramount consideration to our concerns and requests.

Attached are comments prepared by our staff, which the Board of Supervisors is providing to you for your consideration. You may discuss these comments directly with

COMMENTS

RESPONSES

October 6, 1998  
Page 2

staff or you may direct any comments to this office. Alternatively, we would prefer to have a more direct dialogue with you such as you have provided to special interest groups as you identified in your presentation on September 29. To this end, we are specifically requesting an extension of six months for the comment period in order to accommodate this dialogue.

While you may have a different impression of the overall meeting of September 29, I offer you the comment of our staff after the conclusion of that meeting. Our Community Development Director stated to a couple of our Board members that what he observed was very little polarization from the speakers as a whole. He also stated that the lodge discussion was more of a symptom rather than an issue. The need for a lodge is really a "lack of focus" issue. It really doesn't matter that much whether or not a "lodge" is a hotel or not. We don't have to have a hotel but we do need a point or points of focus for the visitors to the Park within Del Norte County.

The legislative purpose of the Redwood National Park is succinctly identified in the act of Congress, which established the Park. "That, in order to preserve significant examples of the primeval coastal redwood and the streams and seashores with which they are associated for purposes of public inspiration, enjoyment, and scientific study, there is hereby establish Redwood National Park in Del Norte and Humboldt Counties, California." The establishing legislation is clear that public inspiration and enjoyment

are key purposes of the Park. The 1978 legislation expanding the boundaries of the Park reinforces the stated purposes of the Park by referencing the original intent of Congress and further stating that the subject expansion is "...to establish a more meaningful Redwood National Park for the use and enjoyment of visitors." The State Park system has a long history of constructing and maintaining improvements within State Park boundaries that are for the purpose of making areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations. This draft plan has not, in our opinion, accomplished nor provided for such improvements nor have the public's enjoyment and inspiration been adequately considered. Therefore, the draft plan does not comply with the legislative purposes of the Redwood National and State Park.

As part of our request for an extended comment period, we are willing to commit the time and energy to a more participatory role in the development of the draft plan. We foresee the potential product from this effort to be either the construction of a new alternative or the formation of a new alternative derived from the existing range of alternatives.

The County of Del Norte is in the third stage of a four stage countywide revision to our General Plan. This revision is for the next 20 years, which is a similar time frame as your planning effort. Any task force developed to assist in the review of the Park plan can also provide input into the County's planning effort.

Secretary Bruce Babbitt stated in a recent keynote address that "Parks have peripheral communities where park plans need to be blended into the needs of towns... We live in

268-A The National Park Service and the California Department of Parks and Recreation strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and with respective emphases on making areas available for public enjoyment and education and preservation of natural, scenic, cultural and ecological values for present and future generations, as required by law and NPS and CDPR policies (NPS Organic Act, 16 USC 1 and NPS *Management Policies* 1:3). In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. Both agencies strongly believe that the relative emphasis between visitor use and resource protection is completely consistent with the enabling legislation for the parks including the 1978 legislation that expanded Redwood National Park.

268-A

## COMMENTS

## RESPONSES

October 6, 1998

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landscapes and communities that must be characterized by unity... The power of local support is what Congress responds to." We are offering an opportunity to work in an active and cooperative effort to develop a Park plan which is reflective of our common and shared interests in the Park, in promoting the outstanding environmental quality of the Park and its surrounding lands, and to also promote sustainable economic development within our collective community.

Your prompt response to the above request would be appreciated.

Sincerely,



Clyde Eller  
Chairman of the Board of Supervisors

CE/ewp/wm

cc: Senator Dianne Feinstein  
Senator Barbara Boxer  
Congressman Frank Riggs  
State Senator Mike Thompson  
State Assemblywoman Virginia Strom-Martin  
Secretary of the Interior Bruce Babbitt  
John J. Reynolds, Regional Director, National Park Service

COMMENTS

RESPONSES

COMMENTS ON THE DRAFT GENERAL MANAGEMENT PLAN/GENERAL PLAN/ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT FOR THE REDWOOD NATIONAL AND STATE PARKS

• General

268-B	1. There is not a reasonable range of alternatives for consideration by the public in reviewing the document or to eventually visit the parklands.
268-C	2. Additional effort should have been expended in developing a user-friendlier document. While the document is impressive, it provides no easy way for the reader to compare alternatives on an item by item or alternative by alternative basis. The Summary of Alternative Actions is selective in what is summarized. It appears that writers of the document chose what they determined to be comparatively important.
	3. Alternative 2 is the "no project" alternative. This alternative would be the continuation of the existing 1980 Redwood National Park General Management Plan and the 1985 State General Plan for the Redwoods State Parks. The discussion of these plans within this alternative should be more clearly constructed. It is difficult for the reader to draw comparisons between Alternatives. The reader would easily assume that Alternative 4 is the user-friendliest alternative in that it is titled as the "Visitor Use Emphasis" alternative. However, the most visitor friendly alternative is Alternative 2 which has a total of 2.2% of its land area devoted to Developed and Frontcountry management zones.
268-D	4. Only Alternative 4 proposes a regional trail system with connections between major existing trails and additional hiking trails. Each of the other alternatives includes a statement that the park will participate in local land use activities that might affect RNSP resources and support and promote land uses that are consistent with maintaining RNSP values, but does not express how this will be achieved.
268-E	5. The use of the term "BP" is not clearly defined. The reader must assume that BP is meant to be "before present." This term should be defined or clarified in its intended use. Not all readers are familiar with such use of "BP" and may not understand its intended meaning.
268-F	6. The combination of actions within any of the alternatives limits the physically handicapped to less than 2% of the Park area. This does not permit these people to experience the wide range of resources available within the Park.
	• Purpose of the Parks – Why They Were Set Aside
268-G	The text of the stated purpose of the Park differs significantly from the actual legislative language for both the actions of Congress and the actions of the State Legislature. The writers of this section have been deliberately selective in using the language within the California Resources Code and have combined this selective phrase with the language of the actions of Congress in establishing the Redwood

**268-B** The National Park Service and California Department of Parks and Recreation strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and emphasizes on, visitor use and resource protection, as required by law. In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. The agencies also strongly believe that the relative emphasis between visitor use and resource protection is completely consistent with the enabling legislation for the parks. The agencies strongly disagree that there is an "all or none" approach taken in any of the alternatives with regard to visitor use versus resource protection. The National Park Service strongly believes that all of these alternatives achieve the legally mandated standard, which is expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations" (NPS Organic Act, 16 USC 1 and NPS *Management Policies* 1:3).

**268-C** The organization of an environmental impact statement is, in large part, dictated by the Council on Environmental Quality regulations (40 CFR Parts 1500-1508). Furthermore, this document also had to meet the requirements for a California environmental impact report and the requirements for both NPS general management plans and the CDPR's general plans. We believe that, given all these constraints, the document is an acceptably clear presentation of a complex array of material. Also, the alternatives are presented in two ways. The first is a complete narrative form where each entire alternative is given as an unfragmented, integrated whole. The second is a summary version that is presented in a tabular or matrix form where selected details are organized in a way to enable detailed item-by-item comparisons of the alternatives. Each provides an important and different perspective. Generally, readers seem to prefer the narrative form. It would make the document unacceptably large to present both versions in a complete form.

**268-D** See summary comment C.

COMMENTS

RESPONSES

National Park. The writers have created new criteria of "unimpaired ecological integrity" where no such criteria exist specifically in either the State or Federal language. The writers have chosen to add this perceived restrictive language of the State code and ignore the same code sections, which call for improvements to be undertaken within state parks for the purpose of making areas available for public enjoyment and education. This created restrictive language permeates the entire approach of this document. While the document does include the entire language of both Congress and the State legislature, such language is buried in appendix C and is not even a footnote within the text of the document.

A similar selective use of the expansion legislation is used to imply a threat of damaging upslope and upstream land use throughout the Park and, therefore, justify a preservation approach to the entire document when such language was specific to the Redwood Creek basin and the adjacent impacts to the then existing Park "worm." This entire section needs correction and, therefore, its impact on the rest of the plan needs correction.

- The Management Zones

1. Page 21 begins a discussion of the nine management zones included in the plan and, therefore, these nine management zones are the general use zones to be used

268-H

for planning and development purposes within the park. The definitions of these zones are vague in that they are not specific but are described on a seven-page chart, which only addresses eight of the nine categories. The lack of specific definitions leads to the potential for two readers to arrive at different conclusions after reading the same sections. This potential exists for those who are not familiar with these terms as well as those who are familiar with the use of these terms but in a different setting.

268-I

2. Each of the four alternative sections includes a graph at the beginning of each section, which displays the different management zones, and the percentage allocated within each alternative to each management zone. Alternatives 1, 3, and 4 are comparative as each contains the same categories. Alternative 2 contains different categories and therefore makes a comparative analysis difficult. The same categories should be used as a set of definitions and should be explained in terms of the categories used for the other alternatives.

268-J

3. Backcountry Mechanized is a misleading definition for this management zone. The use of the term "mechanized" appears to be a cavalier use of the commonly accepted definition of the word. Mechanized is defined by Webster's as "to equip with machinery esp. to replace human or animal labor." The use of the term mechanized therefore leads the reader to believe that this management zone will allow mechanized equipment which replaces human or animal effort such as all terrain vehicle (ATV's), trail bikes, and to some individuals, perhaps their pickup. In reality, the only real difference between Backcountry Mechanized and

**268-E** unmarked comment B.P. means "before present"; the text has been changed.

**268-F** The agencies are committed to provide facilities and services to persons of all physical abilities. An objective has been added to the "Public Use, Recreation, and Visitor Safety" section.

**268-G** See summary comment D.

**268-H** Table 1 on pages 22-28 of the draft plan describes the character, visitor experience, and appropriate activities for each zone and serves as definitions of each zone. A marine zone has been added to this table in the final plan to clarify and characterize offshore areas and describe desired resource conditions and visitor experiences in the marine and intertidal areas of the parks. A discussion of the marine environment has been added to the "Affected Environment" section.

**268-I** As stated on pages 67-68 of the draft plan, management zones described under alternative 2 represent those identified in the previous general plans, use different terminology, and are not directly comparable to alternatives 1, 3, and 4.

**268-J** The most significant difference between the mechanized and nonmechanized backcountry zones is that no form of mechanical transport for visitor recreation would be allowed in the nonmechanized areas. A nonmechanized backcountry zone, where mechanical transport would not be allowed, was distinguished in order for these areas to be consistent with proposed state park wilderness designation, which forbids mechanized transport. Areas designated as state park wilderness include primitive and backcountry nonmechanized zones.

**COMMENTS**

**RESPONSES**

Backcountry non-Mechanized is that Backcountry Mechanized allows the use of mountain bikes.

4. Alternatives 1, 3, and 4 are in reality not that dissimilar. When Backcountry Mechanized, Backcountry non-Mechanized, and Primitive are added together, the totals for these three categories for each alternative is as follows: alternative 1 totals 88%, alternative 3 totals 88.7% and alternative 4 totals 87.6%. The Developed management zone for each of these three alternatives is the same, 1/10 of 1%.

5. Frontcountry is the interface area between the Developed Zone and the non-developed zones. The Developed Zone is 1/10 of 1% of the Park land area and when combined with the Frontcountry Zone, these two zones total 1.5% for Alternative 1, 9/10 of 1% for Alternative 3, and 2% for Alternative 4. These two zones will be and are the contact area for the overwhelming majority of visitors to the Park. Less than 2% of the land area is to be allocated to these uses. This is

not a reasonable range of alternatives to examine in a planning or environmental document.

6. The document needs to expend more effort in addressing the Offshore Zone. What are the policies and plans for this significant resource area?

• Interpretive Themes

1. The plan recognizes the existence of the "coast watch" facility from World War II on the bluffs south of the Mouth of the Klamath River. However, nothing is said about maintaining the site as a historical site with interpretive facilities. This site is a site of historical significance and is worthy of recognition as such.

2. The plan contains no specific discussion regarding the Requa Radar base and its current or future status. This site is vintage "cold war" and therefore is a key historical local and national feature and presents unique interpretive opportunities. The Requa site is approaching 50 years of age and will certainly reach the applicable criteria within the planning period of the proposed plan.

3. The Old Redwood Highway is also a significant regional historical feature. The retention of the remaining sections should be a policy of this plan.

4. We request that the National Parks and State Parks plan, prior to any final action, undertake a Section 106 consultation with the State Office of Historic Preservation. Such a review will also require consultation with local governments within Del Norte and Humboldt Counties, affording a participatory decision process for the two sites discussed above and any other sites worthy of such considerations.

**268-K** The National Park Service and California Department of Parks and Recreation strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and emphasizes on visitor use and resource protection, as required by law. In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. The agencies also strongly believe that the relative emphasis between visitor use and resource protection is completely consistent with the enabling legislation for the parks. The agencies strongly disagree that there is an "all or none" approach taken in any of the alternatives with regard to visitor use versus resource protection. The agencies strongly believe that all of these alternatives achieve the legally mandated standard, which is expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations" (NPS Organic Act, 16 USC 1 and NPS *Management Policies* 1:3).

**268-L** A new offshore management zone has been established to describe desired resource conditions and visitor experiences in the marine and intertidal areas of the parks. A discussion of the marine environment has been added to the "Affected Environment" section.

**268-M, N, & O** Although specific actions for many historic structures are not included in the management plan, the following information is pertinent to your comments:

**M** The facility is listed on the National Register of Historic Places and managed as an interpretive site that is accessible to RNSP visitors.

**N** The "Requa radar base" was determined to be ineligible for listing on the National Register of Historic Places by the National Park Service, in consultation with the California Department of Parks and Recreation, Office of Historic Preservation (state historic preservation officer).

268-K-L

268-M

268-N

268-O  
268-P

**COMMENTS**

**RESPONSES**

- Specific Items
  1. Historic Resources – see comments above.
  - 268-Q 2. Stout Grove – The construction of pedestrian access from adjacent sites, including a permanent bridge across the Smith River should be considered in alternatives 1, 3, and 4.
  - 268-R 3. Endert's Beach Road – The conversion of Endert's Beach Road to day use is a foregone conclusion in this document. None of the alternatives allow any other consideration. No effort is expended to explore or list other considerations. Again the document lacks a reasonable range of alternatives.
  - 268-S 4. Crescent Beach – The beach itself has historically been used for commercial and sport fishing. The County currently has a permit system for vehicular access. The permit system is recognized, but not clarified as to who will issue these permits. Is the Park proposing its own permit system, another permit system, or one permit?
  - 268-T 5. Howland Hill Road – Paving of Howland Hill Road is proposed only in Alternative 4. This road immediately parallels a major spawning stream, Mill Creek. The discussion of alternatives and actions should reflect this consideration and reflect actions to reduce sedimentation directly and indirectly from the road surface and ditches into the stream and its feeder streams. Paving and/or regrading and surface treatment should be considered in all alternatives.
  - 268-U 6. Coastal Drive – This is a former section of Highway 101 and should be recognized as such. This section of road and the old section of Highway 101 through Prairie Creek Redwoods State Park need to be retained in all alternatives for emergency access purposes to Del Norte County in case of an interruption of use of the existing alignment of Highway 101.
  - 268-V 7. Highways 101 and 199 – Each of the proposed alternatives has some discussion regarding circulation including "Objectives" indicating that the existing federal highways (101 and 199) provide access to the Park. There is an "Issue" statement the RNSP needs to develop a long-term strategy for roads in the Park and various "Action" statements as well. However, there are no statements acknowledging that Highways 101, 199 and, to a lesser degree 197, provide the only through local, regional, and interstate traffic for the Northcoast area. Nor does this plan address any means or criteria to widen or relocate these highways as may be necessitated by increased use or a natural disaster. The primary focus regarding these highways is to "protect RNSP resources that are adjacent to the roadways." In summary, this plan does not adequately address these major highways, except with unclear policies that are, at best, vague.

○ The Old Redwood Highway is listed on the National Register of Historic Places. Portions of the Coastal Trail and Coastal Drive in the parks are retained as part of this highway.

**268-P** The California Department of Parks and Recreation, Office of Historic Preservation (state historic preservation officer), was consulted throughout the planning process for the management plan (see section entitled "Consultation with the California State Historic Preservation Officer and the Advisory Council on Historic Preservation"). Also, local agencies, including Del Norte and Humboldt Counties, were provided with copies of the draft management plan for their review and comment (see section entitled "List of Agencies and Organizations to Whom Copies of the Draft General Management Plan / General Plan/Environmental Impact Statement/Environmental Report Were Sent.")

**268-Q** Public access, including pedestrian access and possibly a bridge, would be considered during more detailed planning for the Stout Grove area.

**268-R** The parks prefer and intend that Enderts Beach Road be left open for public use without overnight closures. Gating the road and/or converting to day use would occur only as a last resort if efforts to resolve criminal activity, vandalism, and public use conflicts that occur at night at the overlook and at Nickel Creek Campground are unsuccessful, and only after thoroughly exploring available alternatives with local officials.

**268-S** Depending on the outcome of discussions with county officials, the permit system for vehicle access to Crescent Beach for commercial fishing could be either a county permit or an NPS permit. NPS and CDPR managers believe that some type of permit system is essential to manage restricted vehicle access on the beaches effectively.

**268-T** - See summary comment F.

**268-U** The National Park Service and California Department of Parks and Recreation intend to maintain the Coastal Drive so that is it accessible

**COMMENTS**

**RESPONSES**

268-W

8. Interdependence of Parks and Community – This section mentions support and limited participation in the development of a destination lodge. Participation by the RNSP is limited to providing trail links to the singular facility. The discussions within the document are anti-lodge or destination facility. Neither alternative nor any other discussion proposes such a facility within the Park boundary. The discussions are also in the singular not multiple voice. This leads to the conclusion that only ONE project would be given any consideration, no matter its location. Since the Park will not (emphasis added) consider any such facility within the Park boundary, what happens if more than one such facility is proposed adjacent to the Park? Would only one receive “links” to the Park? What if sites are proposed in Crescent City, Orick, Klamath, or Hiouchi? The language of the document should be clarified or rewritten to clearly state that “one or more appropriate destination facilities or lodges would be considered.”

• Socioeconomic Profile

268-X

1. This analysis has some serious deficiencies. Table 19 is not consistent with published information and documents prepared by the State of California, Employment Development Department (EDD). The source of the information contained in Table 19 is an “unpublished computer printout” from the U. S. Department of Commerce, Bureau of Finance. The problem with the information on Table 19 is that it is incorrect. Table 19 lists a total of 9,769 jobs for 1994 in Del Norte County. EDD’s published reports for 1995 lists 7,450 jobs in Del Norte County. Where are the additional 2,319 jobs?

268-Y

2. While hinted at within the subject document, it should be clearly noted that the largest single employer in Del Norte County is the Department of Corrections with approximately 1,400 jobs. The economic spin-off from this employment center has been the primary source of the increase in retail and other sales in Del Norte County.

268-Z

3. The draft document should include a comparison of economic expectations based on the proposed alternatives and the economic expectations contained in the Arthur D. Little Report prepared for the National Park Service in 1966 as an economic justification for the establishment of the Redwood National Park. As an example, the Arthur D. Little Report stated that “(t)he National Park Service estimated that there would be 1.2 million visitor days at the proposed Redwood National Park in 1978 and 2.5 million in 1983.” Actual counts by the RNP were 256,705 in 1978 and 277,389 in 1983. The subject document should include some explanation as to why the actual visitor days for 1983 are only 11% of the original projected number of visitor days.

4. This section on page 229 incorrectly gives the impression that our local airport at Crescent City only has “...some commuter air service connections to Arcata”. The writer has misled a reader from outside of this area. Our airport has direct flights to and from San Francisco and has connecting flights

to motor vehicles as long as it is feasible to do so from an engineering and safety standpoint and reasonable to do so from the standpoint of responsible expenditure of public funds. The road was constructed on steep, unstable terrain and is subject to frequent damage from storms; certain sections are in danger of slipping into the ocean.

268-V The preferred alternative indicates that, if major realignments of portions of Highway 101 or 199 that pass through the parks are required during the life of the approved plan, RNSP staff will work with Federal Highway Administration and Caltrans staff to protect the resources and values of the parks. NPS and CDPR staff are unable to anticipate the location, scope, or potential impacts of future realignment proposals and their alternatives to address them in greater detail in this plan.

268-W The plan has been revised to indicate that the agencies would consider more than one proposal to establish an appropriate lodge or destination resort in the vicinity of the parks.

268-X Table 19 of the draft management plan (p. 219) contains information obtained from the U.S. Department of Commerce, Bureau of Economic Analysis (BEA) Regional Economic Information System. The information refers to employment by sector with employment defined using a broader definition than used by the California Employment Development Department (EDD), which is based on U.S. Department of Labor, Bureau of Labor Statistics data. BLS employment data refers to nonagricultural wage and salary workers covered by unemployment insurance, and this would account for lower total employment than indicated in table 19. Proprietors, self-employed workers, and others not covered by unemployment insurance are included in the BEA data. We believe that the BEA data provides a more comprehensive indication of employment conditions in the two-county region than available from the EDD data. Text in the final plan has been modified.

268-Y It is stated in the draft management plan that Pelican Bay Prison (with approximately 1,200 jobs) is an important source of employment growth in Del Norte County. As stated in the draft plan (p. 218), state and



## COMMENTS

through Arcata to Sacramento. Our local airport also has charter service and a full time fixed base operation.

- Coastal Zone Management Act

268-AA

The Index lists no discussion regarding the Federal Coastal Zone Management Act. Please be advised that the subject document includes significant land and water areas which are within the California Coastal Zone and are therefore subject to the provisions of the Coastal Zone Management Act and its implementing Commission's and plans.

## RESPONSES

local government employment accounted for more than half of the overall increase in employment during the 1989-94 period (for which employment data was recorded by the U.S. Department of Commerce, Bureau of Economic Analysis). Pelican Bay Prison accounts for much of the state and local government employment growth. Additional discussion about the benefits from spending by prison staff (and presumably visitors and families of prisoners located in the area) to the county's economy, as suggested by this comment, is not considered necessary for purposes of the management plan.

**268-Z** We did not speculate on the reasons for the overestimation of visitation in the 1966 Arthur D. Little report, although presumably the projections developed in that study were based on expected high growth rates in visitation that would be consistent with a major destination attraction, such as exists for Yosemite or Grand Canyon National Parks.

Most visitors to Redwood National and State Parks are travelers following the coastal route in northwestern California and southwestern Oregon en route to other destinations. Obviously, the authors of the Arthur D. Little report did not have actual historical data on NPS visitation from which to base their projections.

**268-AA** The Federal Coastal Zone Management Act is discussed on pages 241-43 in the draft plan and has been retained in the final plan in the same section. It has been added to the index.

COMMENTS

RESPONSES

GATEWAY ISSUE POINTS  
REDWOOD NATIONAL AND STATE PARKS  
DEL NORTE COUNTY AREA

• GATEWAY ENTRANCES

There should be no artificial limit on the number of lodges or other gateway facilities. There are three or more distinct entry points to the Redwood National and State Parks. The southerly entrance, a north highway 101 entrance and the 199 entrance.

268-AB

We request that the final draft include language that permits the consideration of these three or more such facilities. Such language should be specific that such facilities can be either Park sponsored or public/private partnerships including but not limited to partnership combinations of the private sector, public sector, and/or tribal.

268-AC

- a. Gateway entrances in Del Norte to be considered are Highway 199 at Hiouchi, Highway 101/197 near Smith River, and Highway 101 in the Crescent City area. The Crescent City area will retain a Crescent City information center. Such a center shall be a priority and may not necessarily be at its present location (should the opportunity arise to relocate these functions to a multiagency facility in or near to Crescent City).
- b. Entrance focus points in Del Norte County are to be Hiouchi, Howland Hill, the Crescent Beach area, and the Klamath River area.
- c. Retention of an Information Center at Crescent City is a priority of the County. The existing Hiouchi Information Center at Evergreen Glade should be enlarged and retained, and available for consideration for a public/private partnership operation. The existing and any new Hiouchi Information Center and parking area are to be connected to Stout Grove by a permanent pedestrian bridge.

268-AD

• OPERATIONAL ISSUES RELATED TO GATEWAY COMMUNITIES

The Redwood National Park administration must recognize its responsibility to be helpful to the economic development of the local surrounding community.

- a. The management plan must acknowledge the economic necessity of a fully staffed year round operation. Closure of park facilities is detrimental to attracting visitors to the park. Seasonal closure discourages year round investment in the local economy. The County will support language to secure the appropriate funding level for year round operation of the RNSP.

268-AE

- b. Trails:
  - 1. The final draft must include clarifying language that specifically provides that all existing trails in all management zones will continue to be maintained and available to use year-round.
  - 2. The final draft must include a policy which supports and advocates trail connections to private lands, when developed as visitor facilities adjacent to the Park.
  - 3. The final draft must include a policy to integrate the Park trail system into a regional trail system which includes County and Smith River

**268-AB** The proposed action under the "Information, Orientation, and Interpretive Centers" section on page 56 in the draft plan has been changed to incorporate public comments regarding visitor center facilities. The new language considers three facilities and includes the development of these facilities through public sector, private sector, and/or tribal partnerships.

**268-AC** In the new language under the "Information, Orientation, and Interpretive Centers" section for alternative 1, the services provided at the Crescent City information center would continue until incorporated in a multiagency information center in the Crescent City area. No change has been made to the proposed action for Hiouchi. The agencies feel that a combined facility in the Hiouchi area is needed to improve operational efficiency and increase both visitor understanding of and access to significant resource areas. The new facility would also eliminate a variety of safety issues along Highway 199.

Entrance points to the parks are currently being addressed through a comprehensive wayside exhibit plan. Phase 1 of the plan, which includes the design and fabrication of 25 new exhibits, will be completed in 1999.

**268-AD** Staffing and operations costs for implementing the proposed action were included in appendix E in the draft plan and appendix B of the final plan. Development costs are included in appendix A of the final plan. Adequate funding for RNSP operations is needed to maintain year-round operation of RNSP facilities. The agencies are currently seeking additional funding to develop outdoor exhibits that will also be available to RNSP visitors year-round.

**268-AE** See summary comment C.

COMMENTS

RESPONSES

268-AF

- National Recreational Area trails, equestrian trails, and bicycle paths and routes.
4. The current practice of the Park system in closing roads which provide trail connections (or are access to trailheads) by gate or other methods will be ended.
  5. Crescent Beach Trail is missing from the trail mapping on the draft plan maps and is to be included.
  6. Other trails not included on the draft plan mapping are the Wellman Trail, Little Bald Hills (shown as a road on map), Old Stage Road, Stagecoach Trail, Skid Road Trail, and Footsteps Rocks Trail.

c. The County will support the phasing out of unrestricted vehicular use of Crescent Beach within the boundaries of the Park except those that have existing permits may retain such permits. Permits for the physically handicapped and the elderly shall continue as well as permits for traditional Native American uses and commercial fishing uses.

268-AG

d. Concessions are an integral part of economic development for gateway communities and to the revenue stream of the Park itself. If the Park chooses not to provide such services and facilities, then the private sector or private/public partnerships must be advocated. The draft plan must therefore acknowledge this and include a more proactive recognition of concession activities. The suggested wording regarding concessions in Alternative 4 is a good beginning but needs to be built upon and expanded. Concessionaire potentials with the local tribes must also be recognized.

268-AH

UNFULFILLED PROPOSALS IN THE 1980 NATIONAL PARK MANAGEMENT PLAN WHICH SUPPORT GATEWAY ACTIVITIES

- a. Camp Lincoln - Retain and maintain historic structure.
- b. Hiouchi Flat - Continue seasonal bridge (until replaced with a permanent pedestrian bridge).
- c. Boy Scout Trail - Connect to Hatton Trail.
- d. Damnation Creek Trailhead - Retain.
- e. Mill Creek Campground - Establish activity site (and operate as year round facility).
- f. DeMartin House - Study for potential uses (including retaining large house as a hostel and using the adjacent cottage as an accompanying facility).
- g. Requa Radar Station - (Retain this historical facility and consider potential uses such as a conference center and/or organizational use including the potential use by the Yurok Tribe.)
- h. Coastal Drive - (Retain.)
- i. Little Bald Hills Road - Provide 10 -vehicle-parking area at trailhead.
- j. Little Bald Hills Area - Provide 10 primitive campsites.

- COUNTY'S REQUESTED LANGUAGE REGARDING ALTERNATIVE POLICY'S BY TOPIC WHICH DEVIATE FROM THE PREFERRED ALTERNATIVE OF RNSP (ALTERNATIVE I)

268-AF Trails illustrated on maps in the plan are to provide general orientation only and were not intended to show all existing trails.

268-AG The plan has been revised to include a variety of appropriate commercial services that might be authorized by the National Park Service or California Department of Parks and Recreation in gateway communities to support visitor use of the parks. The opportunity for local American Indian tribes to provide such services has also been addressed. The process for authorizing concessions or commercial services in the parks and the fees that are charged are based in federal and state laws and agency policies that have nationwide and statewide applicability, respectively.

268-AH The approved *General Management Plan/ General Plan* supersedes the 1980 NPS *General Management Plan* and the 1985 CDPR *General Plan*. Any uncompleted actions or projects contained in the former plans that were not carried forward into the approved management plan would not be completed. Hiouchi, Mill Creek Campground, the Coastal Drive, Requa, and the DeMartin house are addressed in the new management plan. Camp Lincoln is addressed generally under historic structures. The trail projects identified will be revisited during the development of the new joint agency trail plan. The Little Bald Hills projects listed have been completed.

## COMMENTS

## RESPONSES

Alternative Concepts – Combine Alternatives 1 & 4, and modify as follows: To achieve a balance between resource protection and visitor use, the parks' natural and cultural resources would be preserved and protected, but restoration would be emphasized more than currently where sensitive resources were at risk. In-depth interpretation would be provided both in facilities and onsite. Orientation would help visitors easily access both facility-based and resource-based interpretation and visitor opportunities. Major developments would be focused along U.S. Highways 101 and 199. Facilities removed from sensitive areas will be replaced in-kind in the same vicinity. New uses might be allowed in sensitive resource areas and other areas of the parks, with mitigation. New visitor services and facilities would be provided in and near the parks by the federal and state governments and in partnership with others.

Watershed Management and Restoration within and upstream of the Parks – Alternative 1 (Proposed Action) as written.

Watershed Management and Restoration in Redwood Creek Estuary – Alternative 1 as written or otherwise amended to support anadromous fishery restoration.

Vegetation Management –

Managing Second Growth Forests – Alternative 1 as written.

Prairie Restoration – Alternative 1 as written.

Fire Management – Establish a fire management plan to support resource management objectives, including restoration of fire in old-growth forests, prairies, oak woodlands, and coastal shrub communities as a natural process. Reestablish natural fire regimes to the greatest extent possible when it would not reduce visitor enjoyment or visitor use.

Historical Resources-Structures – Combine Alternatives 1 and 4 together. Adaptive rehabilitation is essential to the long-term maintenance of any historic structure. Please see other comments regarding historic and other structures.

Historic Resources-Cultural Landscapes – Alternative 1 as written.

Ethnographic Resources – The County supports the traditional gathering activities of the Tolowa or Yurok people within the Park boundaries and on Parklands.

Collections – The County defers to any comments or concerns of the Tolowa or Yurok people.

Orientation/Information – Alternative 1 as written.

Interpretation – Alternative 1 as written. We suggest that you replace the phrase "...and sites related to American Indian culture" with "...and sites related to local Native American cultures."

COMMENTS

RESPONSES

Information, Orientation, and Interpretive Centers – This section requires additional work to reflect our comments above regarding Gateway Entrances. We are available to continue discussing this section as we have done previously. As previously stated there should be no artificial limit on the number of lodges or other gateway facilities. There are three or more distinct entry points to the Redwood National and State Parks. The southerly entrance, a north highway 101 entrance and the 199 entrance. We request that the final draft include language that permits the consideration of these three or more such facilities. Such language should be specific that such facilities can be either Park sponsored or public/private partnerships including but not limited to partnership combinations of the private sector, public sector, and/or tribal.

- a. Gateway entrances in Del Norte to be considered are Highway 199 at Hiouchi, Highway 101/197 near Smith River, and Highway 101 in the Crescent City area. The Crescent City area will retain a Crescent City information center. Such a center shall be a priority and may not necessarily be at its present location (should the opportunity arise to relocate these functions to a multiagency facility in or near to Crescent City).
- b. Entrance focus points in Del Norte County are to be Hiouchi, Howland Hill, the Crescent Beach area, and the Klamath River area.
- c. The existing Hiouchi Information Center at Evergreen Glade is to be enlarged and retained, and available for consideration for a public/private partnership operation. The Hiouchi Information Center and new parking area is to be connected to Stout Grove by a permanent pedestrian bridge.

Outdoor Schools – Alternative 1 as written.

Visitor Use Levels – Alternative 1 except as modified as follows:

Enderts Beach Road – All of the alternative are the same in the draft Plan. The County is opposed to night closure of Enderts Beach Road. We are willing to discuss alternative measures to day use only.

Crescent Beach – The revision to this “policy” should be an combination of alternatives 1, 2, and 4; permitting the retention of this viable beach access, picnic area, parking, trails, and restrooms. The relocation of any portion out of areas previously wetlands should be in-kind and at the same location or proximity. We recommend that other alternatives are explored prior to relocation such as a culvert or bridge crossing of the wetland which is not bisected by the access road. This beach access is a popular facility providing direct beach access to all people and especially to the physically limited or impaired.

Recreational Activities-Camping – Prepare backcountry management plan to specify location of camping areas and describe rules for backcountry use. Provide a greater number and variety of developed campsites in existing campgrounds and add new campgrounds in state parks. Provide an increased number and variety of primitive camping experiences. The Park should establish procedures and a process for referrals

268-AI The parks prefer and intend that Enderts Beach Road be left open for public use without overnight closures. Gating the road and/or converting to day use would occur only as a last resort if efforts to resolve criminal activity, vandalism, and public use conflicts that occur at night at the overlook and at Nickel Creek Campground are unsuccessful, and only after thoroughly exploring available alternatives with local officials.

268-AJ The plan calls for relocating the primary facilities that serve the picnic area and beach access at Crescent Beach to protect wetlands. The parks intend to retain the picnic area and beach access at that site, relocating only the support facilities, and will consult with local officials before planning specific changes to the facilities or the access.

268-AK Procedures for referring visitors to private sector facilities such as motels and campgrounds in gateway communities are in place and being used at the parks.

268-AI

268-AJ

268-AK

COMMENTS

RESPONSES

of visitors to private sector facilities including but not limited to private sector campgrounds.

Hiking – Maintain existing hiking trails, and construct trails called for in the existing trail plan. Develop a regional trails system. Emphasize connections between major existing trails plus develop additional hiking trails and trail connections to a regional trail system including links to privately or publicly operated visitor serving facilities.

Equestrian Use – Alternative 1 as written.

Mountain Biking – Alternative 4 as written.

Freshwater Spit Visitor Use – Alternative 4. While this site is within Humboldt County its current operation is unfair to the private sector and is unfair competition to similar private sector operations. To that end we recommend that the RV camping be limited to a single row on the north end and tent camping be limited to the south end. The site should be operated as a concession and charge fees similar to the private sector. Until sanitation collection and treatment facilities are in place and a concessionaire chosen to operate this site, the area should be day-use only.

Vehicles on Beach – See our previous comments to clarify our position regarding alternative 1.

Concessions – See comments above. Alternative 4 except add “supporting interpretation programs, bus and hiking tours, and shuttle services” from alternative 1. Language should be included that specifically recognizes public/private partnerships including (but not limited to) partnership combinations of the private sector, public sector, and/or tribal. We also recommend that you have a policy to develop a streamlined concessionaire process to encourage new concessionaire development.

Bald Hills Road – The County supports the position of the Yurok Tribe.

Newton B. Drury Scenic Parkway – Alternative 1.

Davison Road – Refer to our comments regarding Howland Hill Road.

Cal-Barrel Road – No comment.

Jedediah Smith Redwoods State Park Entrance – Alternative 1.

Stout Grove – Alternative 1. The access road is already paved. See comments below regarding Howland Hill Road.

Howland Hill Road – Alternative 1. Plus additional language that would permit the exploration of other management options. A concession could be considered for this road (but not limited to) a seasonal use of a glass roofed shuttle from the Elk Valley

268-AL See previous comment F in this letter.

268-AM See summary comment F.

268-AL

268-AM

COMMENTS

RESPONSES

Rancheria area to and from Stout Grove. This shuttle would also be accessible to persons who park at the Hiouchi Center and walk to Stout Grove. These persons would than board the shuttle for a round trip on Howland Hill. The County would be willing to discuss other considerations on vehicular limits during the hours of operation of the shuttle.

Tall Trees Grove – No comment.

Del Norte Coast Redwoods State Park Entrance Road – Alternative 1.

Greater Coastal Drive – Alternative 1 as modified. Keep two-way road with drainage improvements.

Enderts Beach Road – See comments above. Do not limit to day use only.

Lodge/Accommodations – Combine Alternatives 1 and 2. See comments above. Cooperate with the private sector and or tribal governments in the development of destination lodges or resorts near or adjacent to the parks with access and thematic links to the parks.

Viewshed Protection – As a County that has federal ownership of approximately 75% of our land base, we are in general opposed to additional land purchases of the Park or granting external jurisdiction to the Park. We are willing to discuss specific locational issues on a case by case basis.

Adjacent Land Uses – Alternative 1.

Gateway Communities – Alternative 1, plus our previous comments above.

268-AN

Operations Facilities – Alternative 1 with the notation that the County is opposed to the removal of Schoolhouse Peak fire lookout and request the deletion of the last sentence of this section in its entirety.

Housing – Alternative 1.

Federal Lands – Alternative 1.

State Park Lands – Alternative 1.

268-AO

Wilderness Proposal – We are awaiting information from State Parks on the impacts, if any, of this proposed area designation.

268-AN The California Division of Forestry and Fire Protection has declared Schoolhouse Peak fire lookout to be excess to its fire protection needs. The parks currently operate the lookout for fire protection purposes. If the lookout becomes no longer essential for NPS fire protection needs, options would be explored for other administrative or public uses of the structure. If no appropriate use is found, the parks would remove the structure as an unnecessary intrusion on the Bald Hills landscape.

268-AO Impacts would be determined by activities that are allowed in the zones that are encompassed in the designated wilderness areas (see description of backcountry nonmechanized and primitive zones in table 1). Proposed areas that are designated as wilderness would limit future zoning of those areas to zoning that is compatible with state wilderness requirements.

State wilderness classification is completely described in appendix C (draft plan) or F (final plan) of the *California Public Resources Code*, section 5019.68. Semi-improved campgrounds and trails are allowed in state wilderness.

State wildernesses are to be administered for the use and enjoyment of the people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness. Wilderness is recognized as an area where the earth and its community of life are untrammled by man and where man himself is a visitor who does not remain. State wilderness area is further defined to mean an area of relatively undeveloped state-owned land which has retained its primeval character or influence or has been substantially restored to a near natural appearance, without permanent improvements of human habitation, other than semi-improved campgrounds and primitive latrines. Such wilderness is managed to preserve its natural conditions and appear generally to have been affected by the forces of nature, with the imprint of man's work substantially unnoticeable. Wilderness has outstanding opportunities for solitude or a primitive and unconfined type of recreation. Except as specifically provided under state statute, no commercial enterprise and no permanent roads are permitted within a wilderness area and, except as necessary in emergencies involving health

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and safety of persons within the wilderness area, there shall be no temporary road, no use of motor vehicles, motorized equipment, or motorboats, no landing or hovering of aircraft, no flying of aircraft lower than 2,000 feet above the ground, no other form of mechanical transport, and no structure or installation within any wilderness area. Special provisions are that measures may be taken as necessary for the control of fire, insects, and diseases, subject to such conditions as the state agency with jurisdiction over wilderness may deem desirable. (*California Public Resources Code*, sections 5093.30B-5093.40.)



COMMENTS

RESPONSES



BOARD OF SUPERVISORS

COUNTY OF DEL NORTE

588 "G" Street, Suite #1  
CRESCENT CITY, CALIFORNIA 95531  
PHONE: (707) 464-7204

October 16, 1998

FAX: (707) 466-1166

Redwood National and State Parks  
Superintendent Andy Ringgold  
Superintendent Rick Sermon  
1111 Second Street  
Crescent City, CA 95531

RE: PUBLIC COMMENTS

Dear Superintendents Ringgold and Sermon:

In addition to the letter that the Chairman sent to you on October 6, 1998, the enclosed copies are the public comments that the Board of Supervisors received regarding the proposed general plan.

Thank you for the opportunity to respond to the plan and for extending the deadline for comments.

Please feel free to call if you have any questions.

Very truly yours,  
*Karen L. Walsh*  
Karen L. Walsh, Clerk of the Board  
Del Norte County Board of Supervisors

/klw

Enclosure

COMMENTS

RESPONSES

15 Sept 1998

Martha McClure  
Supervisor, Del Norte Co.  
583 G St., Suite 1  
Crescent City, Cal. 95531

RECEIVED  
SEP 17 1998

Board of Supervisors  
County of Del Norte

Dear Ms. McClure:

I read your comments in the Trip on 26 Aug 1998 regarding the proposed Redwood National Park master plan. Normally I would address my comments to my District 3 supervisor (I am a land owner on the North Bank Road just south of the golf course), but I understand she is retiring and a new supervisor has not yet been elected.

I support the option 1 recommended in the report. I believe it provides a good balance between preserving the unique character of the last surviving old growth redwood stands in the world (setting aside Headwaters of course), while still encouraging substantial additional development to increase tourist visits. It emphasizes restoration of second growth lands (hopefully heading in the direction of a return to old growth characteristics) formerly owned by private industry, which I believe is vital to the long term survival of old growth stands in California. Their efforts to maintain and restore habitat for endangered plants and animals are also vital to the survival of many threatened species. The fire management program, including prescribed burns, is essential to the long term goals listed by park management. I am a registered professional forester and a forest disease researcher at the University of California, Davis, so I also believe that I have some professional standing to make such statements. I have done considerable research in Yosemite Valley, so I am familiar with some of the difficulties of managing natural resources in the presence of considerable numbers of people.

I agree with you that the plan doesn't allow enough room for additional

465-A  
tourist-friendly developments. I believe that such developments should be increased, but that they should be concentrated in areas of the park where there would be the least impact on lands occupied by old growth stands of redwoods. There is one parcel of park land labeled "front country" in Del Norte Co. which I think would be ideal for such additional development. It is located directly across the North Bank Road from the golf course, between the road and the Smith River, with over 100 acres of flat land and some additional acres of river flood plain. I have personally walked through this portion of park land while investigating the Peacock Creek channel. It would be appropriate for future tourist-based development because it borders the Smith River, is flat and slightly above the floodplain, is immediately adjacent to a major highway (North Bank Road), and is occupied by cutover, second growth timber and hardwood pioneer species, with very few large redwoods.

I believe this area could be developed and be very attractive to tourists if some imaginative ideas were incorporated into the master plan. Below are a few:

465-A The National Park Service and the California Department of Parks and Recreation agree that additional development for visitor use would be most appropriate in those areas where such development would not adversely affect resources such as old-growth forests. Site-specific implementation planning of this *General Management Plan / General Plan* will include public participation so that local residents with knowledge of the parks can provide suggestions for appropriate locations for facilities.

COMMENTS

RESPONSES

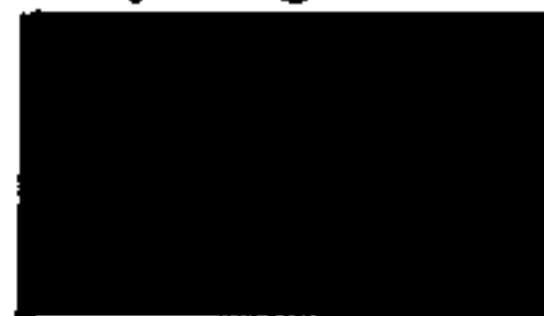
465-B

1. Visitor center - Option 1 talks about building a new visitor center facility somewhere near Hiouchi. This location would be only a couple miles down the road from Jed Smith Park. It would allow for considerable room to build a spacious facility and large parking lot on flat ground without felling any old growth redwoods.
2. Ferry - an old-fashioned ferry could be constructed at the same location as the Peacock ferry which used to cross the river from the old Walker plank road until 1881. It could be built and operated in historically-accurate style and operated by people in old-fashioned clothes who would talk about the history of the area while crossing the river. It would be a link between the new visitor center and nature trails in the old growth stands across the Smith. The old plank road could be partially restored as another historical exhibit.
3. Peacock Creek - this potentially beautiful little creek runs right through the front country parcel, and could be restored so that anadromous fish habitat was returned once again to the healthy conditions existing before logging of the surrounding area. It would be a lesson for the public in what it takes to restore a salmon and steelhead stream to healthy conditions, and then would provide an opportunity for a nature trail so tourists could observe spawning immediately adjacent to the new visitor center. As a nearby land owner controlling about 500 meters of Peacock Creek, I would be happy to participate in any fish habitat restoration activities, as, I believe, would my neighbors.
4. Native American village - an authentic village could be constructed on the banks of the Smith.....similar to other developments I have visited in other parts of the country. Historically accurate native American dwellings could be built, occupied by people in authentic costumes, who demonstrate native skills and culture to visitors. Admission could be charged. It would be a real tourist attraction, and could be expanded if successful.
5. Option 1 mentions a destination resort. This would be an ideal location, as it is right on the river, has good access, and is right across the street from the golf course. I realize the park service says this should be built outside park lands, but perhaps they could be convinced otherwise. Think of all the housing now available in Yosemite Valley.

Clearly, all of these suggestions would not be possible on the same front country parcel, but I believe they would all make Del Norte Co. a more interesting place for people to stay a few days while visiting Redwood National Park. I do hope some of these ideas have sparked your interest in developing portions of the park where old growth redwoods would not be impacted.

Sincerely yours,

Garey Slaughter



*Garey Slaughter*

465-B These proposals for development, resource protection, and restoration in the vicinity of Hiouchi and Jedediah Smith Redwoods State Park will be considered during the site-specific implementation planning of this general management plan / general plan.

COMMENTS

RESPONSES

Gentlemen,

9-17-98

My wife and I recently met our relatives in recreational vehicles at our annual campout at Orick Beach in Northern coastal Humboldt County, California. We park our R.V.'s adjacent to Hwy. 101, about 100 yards from the beach, with a clear view of the surf. At this time, the Redwood National and State Parks (RNSP) provides garbage pickup and chemical toilets along the parking area without any cost.

Now we find that the RNSP wants to reduce this overnight parking area to day use only, eliminate the adjacent ranches, and needlessly change several other things in the area. We Senior Citizens cannot use the hiking trails and back woods camping areas that are so common in the Redwood area of Northwestern California. We gain much pleasure just being able to camp adjacent to the beach and use it as it is so we would not mind paying for the service the RNSP provides us. But, if the thousands of Senior Citizens who stop by Orick are to be herded into the crowded little R.V. parks in the area, we will not be going to Orick anymore, which saddens us. It seems there is a continuing attempt by the State and Federal agencies to control us more and more, taking away our use of the Public Lands that have been available for so many years.

The RNSP is now accepting public comment on their 20 year Draft Management Plan until October 9, 1998. The RNSP is now recommending Alternative #1 which we feel is a great mistake. We ask you to support Alternative #4 which would improve visitor and recreational opportunities without harming the environment.

Thank you,

Walter B. Williams



RECEIVED  
SEP 21 1998

Board of Supervisors  
County of Del Norte

COMMENTS

RESPONSES

Dorothy Easley



CC: Parks & Public Record  
9/29/98

RECEIVED  
SEP 14 1998

Board of Supervisors  
County of Del Norte

Del Norte Co. Board of Supervisors  
583 G. Street  
Crescent City, Ca. 95531

To Whom It My Concern:

On our last trip to the ocean we were informed that our favorite spot is to be done away with and turned into a day-use only area. This upset me to no end.

My husband and I have driven the Pacific Coast from Los Angeles through most of Oregon. There are many day use places not being used very much. The only property that people may stay the night and see the ocean is across from Fresh Water Lagoon just south of Orick, Calif.. known as the Freshwater Spit.

This property belongs to the people and is used at maximum most of the time as opposed to only a few cars stopping for a few minutes at a day use facility. There is very little littering and the environment is respected. Most of the people that use this property are SENIORS. There are a few young people in tents at the south end and a few camping out of the back of their pickups. There is not a private campground where you can be so close to the ocean and watch the sunset then turn around to watch the moon come up and listen to the ocean as you fall asleep and wake up in the morning. PLEASE DO NOT TAKE THIS AWAY FROM THE PEOPLE.

If you want to make it prettier that is fine. Even a small charge instead of volunteer pay is OK.

BUT PLEASE DO NOT TAKE IT AWAY FROM US. There is no other place on the Pacific Coast for the people to have this special experience.

Thank you.

Dorothy Easley

Reference: Page V, RNDP 1998 General Management Plan.

COMMENTS

RESPONSES

**The Butler Family**



September 21, 1998

Superintendent  
Redwood National and State Parks  
111 Second Street  
Crescent City, CA 95531

RECEIVED  
SEP 24 1998

Board of Supervisors  
County of Del Norte

RE: GENERAL MANAGEMENT PLAN/GENERAL PLAN

Dear Superintendent:

Having reviewed the GMP/GP Summary, I could not help but comment on several things therein. The first thing that I realized is that the people who wrote this summary are total environmentalists. You started with some good ideas and ended up with an Eco Pipe Dream of some Utopian world that cannot possibly exist in this day and age. In all of your alternative plans you list logging as the main reason for watershed problems, loss of habitat etc., and yet many stream rehabilitation projects have had to be reversed, the logs and stumps put back to form pools and back eddies to protect the fish. Even if you restored every stream on the West Coast, to your version of perfect, it would not insure the survival of Salmon and Steelhead. Because of mans intervention sea lion populations have gone off the scale, and we both know what sea lions eat! Next you have to ask yourself how many Native Americans had Nylon fishing line to make gill nets with a hundred years ago? Add all of this to Russian and Asian net boats that sweep up anything in their mile long nets and one begins to see things with a slightly different perspective. I believe your money, A.K.A., my tax dollars could be better spent elsewhere.

465-C

Another thing that worries me is the proposed "Re-introduction of Fire" to the parklands. After at least two generations of fire suppression, underbrush and dead vegetation are thick enough to cause extreme heat. In the event of an uncontrolled burn, even old growth redwood bark and high moisture content in the coastal forests may not be enough to protect the trees. Inland areas like Bald Hills or Hiouchi will be virtual tinderboxes. If a fire gets started in one of these areas it would more than likely spread to private forestland, as fire has no respect for park boundaries. Private timber companies and landowners may well be devastated if one of your little natural occurrences goes awry outside the park boundaries. As private timber company lands border the east side of the park from Orick to Little Bald Hills, these areas are more dry and arid than the coast, chances are that timber companies will bear the burden of your ill thought out and misguided proposals.

By now I am sure you have noticed that I am leaning ever so slightly towards private landowners and timber company interests, this has not happened overnight I assure you! As a small child I have many fond memories of camping at Freshwater Lagoon, and one of my first experiences with O.H.V. vehicles occurred on this beach. And now as I go over your GMP/GP I see a rock solid bias towards any type of recreation involving O.H.V. vehicles. The only exceptions being "1" having a fishing permit in 1996 [paltry and over regulated] and "2" use by Native Americans [unfair and reverse discrimination]. I am sure that when Jed Smith was exploring the area he observed many Native Americans harvesting fish with

465-C The National Park Service and the California Department of Parks and Recreation appreciate the concerns of adjacent landowners over the potential problems created by years of fire suppression. All fires in the parks are managed under strict guidelines that have been developed to ensure human safety and protect private property. All prescribed fires are planned and conducted in cooperation with the California Department of Forestry. All wildland fires that have any potential for hazard to public safety or damage to private property are aggressively suppressed, with firefighter and public safety being the first priority in all fire management activities.

## COMMENTS

## RESPONSES

nylon gill nets and hauling them home in willow baskets on the back of a Honda Four Trax A.T.V  
.....NOT !!!

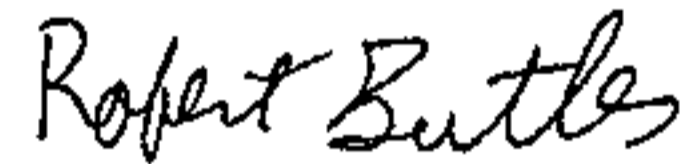
Now lets talk about restricting or eliminating camping on Freshwater Spit and other areas in the park, for many visitors this is one of the main attractions of the park! I doubt if the majority of people who visit could care less about some brightly lit, majestic looking, not to mention out of place and expensive visitor center. People who visit the park are trying to get away from the hustle and bustle of civilization. They don't want any more reminders of the everyday rat race than are absolutely necessary! Camping in a grove of large trees or on the beach, or by a stream is what makes the experience unique. Closing Freshwater Spit to camping means one of the very few easy access overnight camping areas will disappear, further restricting public access. People like easy access to beaches and camping areas. Still fewer spots combine both beach and lagoon access with drive up camping, really neat if you want to launch a small boat, or fish a large body of fresh water.

Something else I noticed in one of the proposals is the addition of a wilderness area. You already have a park; you can't hunt or drive vehicles anywhere. There are plenty of rules and regulations in place to insure the place stays pristine without the additional truckload of restrictions that comes tacked on to a wilderness area.

When you look at the big picture, it becomes obvious that proposal number two is the only one that begins to make some sense, and then only if you have a very good plan to combat out of control fires. So, when giving final consideration please remember that less is better, and proposal number two is the lesser of the four evils.

Sincerely,

Robert Butler



COMMENTS

RESPONSES

My comments concerning the Redwood National and State Park General Management Plan, Humboldt and Del Norte Counties - California (Draft)

Walter Popenuck, September 11, 1998

I have 1/3 ownership in the Orick Valley Guildhall in partnership with my son and his wife and we are residents of Orick. We depend in part on the tourist trade and would lose business if Freshwater Spit did not have overnight camping.

Freshwater Spit is a very unique form of nature. There are not many places, if any, that have the Pacific Ocean on one side, Highway 101 in the middle, and a freshwater lagoon on the other side of the highway with camping directly adjacent to the ocean side. Presently Freshwater Spit hosts many tents, campers, trailers and RV's during the vacation season with overnight camping.

Many of the people in the campers and RV's are elderly. Some are physically disadvantaged. In their younger days they were "rough riders" and enjoyed the primitive stuff. Now they must resort to more comfortable means of being next to nature. Some with limited mobile abilities enjoy being close to the ocean. The Freshwater Spit provides this opportunity. Please do not shut down overnight camping at the Freshwater Spit. Federal law requires that proper facilities be provided for the physically disadvantaged person. Freshwater spit is a rare place and can provide unique, enjoyable activities for the physically impaired.

The south entry to the Parks is an important visual area. But, which is more important? The people in vehicles that zip across the Spit at 65 miles an hour and view the beautiful entrance scenery for less than a minute or the people that are camping there who can sit or walk around or boat and fish and enjoy the visual effects for several days? Overnight camping gives them that opportunity.

RECEIVED  
SEP 28 1998

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Board of Supervisors  
County of Del Norte



## COMMENTS

## RESPONSES

The Redwood Information Center, it is said, must be salvaged (removed). An argument for removing the Center from Freshwater Spit and moving it further inland is life safety. It may be wiped out by a gigantic, 500 year frequency tsunami. It is predicted a 10 foot high wave would rush inland (run-up) 50' to 75'. If this occurred the Information Center would be destroyed. On pg 233 of the Report it mentions 50' to 75' high tsunami waves. This is misleading. It should be a 50' to 75' run-up of waves.

The run-up distance of waves is very variable, even in a very local area which exists at the Redwood Information Center. On the north side of Redwood Creek is a nearly vertical rock hill. The run-up against this rock face would be almost zero. The run-up at the mouth of Redwood Creek may be several hundred feet because of its funnel shape and configuration at the mouth and nearly sea level elevation. The USGS topography map indicates that the creek estuary and Redwood Creek are very flat for a distance of approximately 3000 to 4000 feet.

In front of the Redwood Information Center building a different topography exists. Between the ocean and the building two major land terraces exist. Each with an approximately 6' vertical face and 200' of flat land. A 10' high wave would hit these vertical faces and flats and its surge energy would be greatly diminished. If it arrived at the building there is a "picket fence" of 12" round logs, deeply imbedded into the ground and very closely spaced which would further decrease the wave energy and stop the beach litter. Finally, the floor level of the building is 6' above the ground.

The building is constructed to resist tsunami waves, wind loads, earthquakes and soil liquification. Before the Redwood Information Center is condemned and removed, the site and building should have a specific review by a hydrologist, geologist and structural engineer to determine if it can withstand the ravages of nature.

COMMENTS

RESPONSES

Alternative 1 - Proposed Action, a draft of the management and use of the Redwood and State Parks in my opinion does not comply with the spirit or requirements of : Public Law 95-250, march 27, 1978 - 92 STAT 166, Economic impact study 16 USC 97K, Sec 102(a) and Sec 102 (b). It does not describe a realistic, adequate plan to implement the above law. The economic hardships being imposed upon the town of Orick are dismissed in 1/4 of a sentence in Alternative 1 - Proposed Action on pg 59, Freshwater Spit Visitors Use and the quote of the sentence is:

"This camping is perceived to provide inappropriate competition for nearby privately owned facilities and services although its users do contribute to the economy of the town of Orick"

The socioeconomic profile of Freshwater Spit Users, pg 225, is detailed and it states "The town of Orick accounted for half of the total purchases." Elimination of overnight campers would impose a substantial negative economic impact on the small town of Orick.

Too many times in the past Orick has been given the short-end of the Parks development. It is time for a change.

Parks are for all the people, especially for less advantaged people. It is an opportunity to see unique things that are not available in their ordinary lives. The Freshwater Spit is one of these things, one of the many in the Park.

Alternative 4 - Visitor Use Emphasis is my choice for the proposed action instead of Alternative 1.

Nature and people can live together.

Dated: September 11, 1998

  
Walter Popenuck

## COMMENTS

## RESPONSES

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1111 Second St.  
Crescent City, CA 95531  
phone: 1-800 423-6101 or: 707 464-6101  
Email: redw\_superintendent@nps.gov

✓ Humboldt County Board of Supervisors  
825 Fifth Street  
Eureka, CA 95501

✓ US Dept. of Interior  
attn: Office of Inspector General  
849 NW Mail Stop 5341  
Washington, DC 20240

✓ CA Dept. of Parks & Recreation  
Attn: Northern Chief  
Room 1413-23  
Sacramento, CA 95814

✓ US Dept. of the Interior, NPS  
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Denver, CO 80255-0287

✓ CA Assemblyperson, Virginia Strom-Martin  
510 O St.  
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✓ Senator Dianne Feinstein  
1700 Montgomery St. ste 3670  
San Francisco, CA 94105  
senator@feinstein.senate.gov

**COPIES SENT TO:  
MARKED WITH ✓**

✓ Del Norte Co. Board of Supervisors  
583 G Street  
Crescent City, CA 95531

1-800 424-5081 is the complaint line  
of the Office of Inspector General  
USDI (National Park headquarters)

✓ CA Dept. of Parks & Recreation  
Attn: John Kolb, Northern District  
600 W. Clark St  
Eureka, CA 95501

✓ CA State Senator, Mike Thompson  
317 3rd St.  
Eureka, CA 95501  
senator.thompson@sen.ca.gov  
707 445-6511

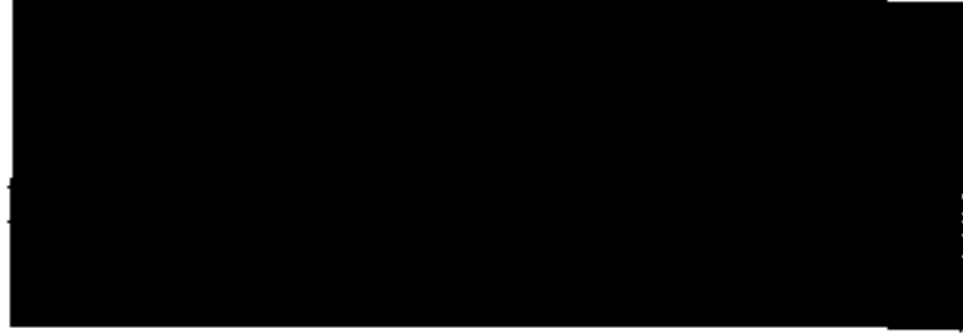
✓ US Congressman, Frank Riggs  
710 E St. Ste. 100  
Eureka, CA 95501  
rriggs@hr.house.gov  
707 441-8701

✓ Senator Barbara Boxer  
1700 Montgomery St. ste 240  
San Francisco, CA 94105  
senator@boxer.senate.gov

COMMENTS

RESPONSES

KAREN L. WALSH



August 31, 1998

RECEIVED  
SEP 2 8 1998

Board of Supervisors  
County of Del Norte

Andy Ringgold, National Parks Superintendent  
Rick Sermon, State Parks Superintendent  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

RE: GENERAL MANAGEMENT PLAN/GENERAL PLAN

Dear Superintendent:

This letter is written to address the "Draft General Management Plan/General Plan" which, as you know is being proposed for adoption. After reading through a stack of files from the early 1960's at which time the National Park was being rammed down the throats of Del Norte and Humboldt County citizens by the Sierra Club, Save the Redwoods League, President Johnson, Governor Brown and various and sundry senators, I found that I needed to make several comments to the proposed plan. While I understand and agree with the need for the park, and I enjoy having it literally in my front yard, I feel that you did not listen to us then and you are perhaps not lending an open ear at this time. We do not want any more restrictions on the use of the park

465-D During the time the park was being proposed, citizens testified that the placing of more than 90% of Del Norte County in public lands would cause the downfall of the community. This fact has come to fruition. You are now proposing to us that you will further restrict the use of these lands while at the same time somehow magically increasing tourism to our area. Your proposal surely leads to less of a tax base via more restricted tourism and visitation. I feel that this was attitude was wrong in the sixties and it is wrong today.

First and foremost, the parks were and still are set aside for preservation and use as presented in H.R. 11722 and 11705 on October 20 and 21, 1965 "In order to preserve a significant example of coastal redwood forest in association with stream and seashore for purposes of public inspiration, recreation, and scientific study..". I am angered that the Parks Service feels the need to further restrict access and the enjoyment of our parklands and backyards by designating areas wild and scenic and by destroying (reforesting) trails and closing access to many historical and familiar areas. I am a responsible user of our parks. I pack out what I pack in, I am courteous to the animals and plant life, I do not drive or walk off paths and roadways, and I pay the fees required to use our parks and I take my family and children to visit our parks to teach them about the animals, plants and local

465-D The plan does not call for major acquisitions, and certainly none above the statutory maximum land area that can be included within the national park boundary as set by the U.S. Congress. Only lands that are needed for estuarine restoration or that would provide uniquely beneficial qualities to the parks would be acquired on a willing-seller, willing-buyer basis, subject to RNSP funding authorization. Under the proposed plan it is anticipated that visitation to the parks would increase above no-action alternative levels, thereby increasing tourism activity in the two-county region.

## COMMENTS

## RESPONSES

geography. In this nation, we have approximately 369 federal parks. These areas are designated so that they can be preserved for the enjoyment of future generations as stated by the Organic Act of 1916. Since I was born in 1961, almost half a century after the "Act" was written, I feel that I am one of those "future generations" and I honor my access to the parks as a right given to me as a citizen of this mighty nation. The beauty and splendor in which we are surrounded is already protected by government control over some 80% of the county. When the parks were formed the citizens of this county were promised that the parks would promote tourism and economic development. How can you promote tourism when you are proposing to further restrict access, the very thing people come here for? The parks in our county have enough restricted access and wilderness areas as they cannot be accessed due to our rough geography, and then only at risk of life and limb.

I think that you need to look at the definitions of "access" and "enjoyment" when discussing any further restrictions to our parklands. Webster's Dictionary defines access, enjoy and enjoyment as:

"...permission, liberty, or ability to enter, approach, communicate with, or pass to and from; freedom or ability to obtain or make use of; a way or means of access..."

"To take pleasure or satisfaction in; to have for one's use, benefit, or lot." and

"The action or state of enjoying; possession and use"

To me, these definitions mean that we should all have at least the same ability to access and enjoy our parks that we currently enjoy. Your argument may be that the Organic Act states that the parks are "... to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations". These areas were set aside by past generations so that WE might enjoy them as well as our children and their children. Portions of the parks are totally un-accessible and therefore set aside forever without being impaired by human hands. We do not need to set aside more areas for this purpose. We have enough "wild" areas in this county. We need to use our developed parklands for the purpose for which they were intended when the picnic tables and barbecues went in; for use by the people and for the education of citizens about the scenic beauty, flora, fauna and wildlife that abound in these areas.

Finally, the thought of moving the park office to Hiouchi is great; IF you are the one who owns commercial property there. How can the parks tell us that we should leave the parkland untouched, undeveloped and undisturbed and then they turn around and place a new facility right in the middle of one of the most beautiful park meadows? Seems just a little hypocritical to me! The park building in the downtown area is sufficient and serves more people by remaining downtown near the Chamber of Commerce and the main highway in and out of our community.

If you need to implement any of the proposals, I urge you to chose proposal #2 as it has the least impact on our lives.

Thank you for your consideration of my concerns.

Very truly yours,

Karen L. Walsh

COMMENTS

RESPONSES



## COMMENTS

My name is Chub Morris. My wife, Judy and I own and operate Riverwoods Campground in Klamath, which is surrounded by RNSP.

Thanks for allowing me to express my views on the long term Park Plan and alternatives.

I realize that there are many people here today to express their views, so I will summarize briefly the letter I plan to submit to RNSP and my elected officials.

Apparently the RNSP has forgotten that they are a Park and not a wilderness area.

465-E The Park was formed for the "purposes of public inspiration, enjoyment and scientific study".

On the contrary, their policy has been to close roads, beach access, charge outrageous fees, and limit in general the ability of the visitor to enjoy the Park.

They have established a preservationist attitude that has prevented them from attracting the visitors to our area that we were promised 30 years ago.

465-F In general, I would like to see the RNSP improve and pave all roads within the Park and make them RV accessible. Retain the existing visitor centers and move Eureka and Arcata offices to some of the vacant buildings within Park boundaries.

465-G I would like to see RNSP refer their campground overflow to the many private campgrounds and RV parks adjacent to the Park, rather than enlarging and adding new campgrounds of their own.

I am in favor of making Freshwater Spit a day use only area. It is now ugly, unsanitary, and competes unfairly with campgrounds in the area that have to provide facilities and meet standards, that this operation does not.

465-H I do not see the need for a lodge, as again, it would compete unfairly with the existing motels and cabins that already have a high vacancy rate.

I cannot comprehend why RNSP would recommend removing the levees

## RESPONSES

465-E See summary comment B.

465-F Alternative 4 includes paving many of the existing public roads. Under the proposed action, some of these roads would remain unpaved to offer a more primitive experience to some visitors. The terrain of the parks and the construction standards for the unpaved roads that were not intended for public use or for older roads that have been upgraded gradually rather than constructed to standards appropriate for large modern vehicles have resulted in roads that are not suitable for modern recreational vehicles without extensive reconstruction. Reconstruction would result in substantial impacts on RNSP resources in some cases. Wherever possible, the National Park Service and California Department of Parks and Recreation will attempt to provide access to a wide range of visitors as long as resources can be protected and the visitor experience maintained as described in the management zones for each alternative. All but one of the existing visitor centers will be retained. Redwood National and State Parks do not have an office in Eureka. The CDPR Eureka office serves as the headquarters for the entire North Coast Redwoods District and will remain there to serve all CDPR sites in Humboldt and Del Norte Counties. The proposals in this plan cover only those three units of the state park system included in the congressionally designated boundary of Redwood National Park.

465-G NPS and CDPR staff currently inform visitors about camping opportunities outside the parks, including private facilities. Before the development of any additional camping opportunities, NPS and CDPR staff will evaluate and analyze visitor demand for a specific type of camping experience that can only be provided in the parks. The potential effects on the parks' resources must also be considered before any new visitor facilities would be added. If there is sufficient demand for a type of facility that is more appropriately provided on private lands outside the parks in the gateway communities, NPS and CDPR staff will encourage visitors to use those facilities rather than construct such facilities in the parks.

465-H The proposals for development of a lodge all envision the facility to be outside the parks and privately developed and operated. Before proceeding, interested private sector developers would complete market

**COMMENTS**

**RESPONSES**

**in the Orick area. Can you imagine what the winter of 1996-97 would have done to Orick?**

**In conclusion, I favor making the RNSP more accessible and user friendly. Not only for the hikers and back-country buffs, but to the senior or disabled visitor who may be limited to enjoying the beauty of the Park from their vehicle.**

**And again, I would like to see the RNSP cooperate with rather than compete with local businesses and individuals.**

surveys and feasibility studies to determine demand and competition and whether such a venture would be economically successful.



## COMMENTS

## RESPONSES

September 29, 1998

**TO:** Board of Supervisors, Del Norte County  
**FROM:** Natalie Schaefer, M.S.  
 Board Member, Friends of Del Norte County

**RE:** RNSP Draft General Management Plan

First, we want to acknowledge the tremendous effort that has gone into this undertaking. It is obvious that the alternatives were thought out using careful analysis of the needs and projected needs of the park facilities. We appreciate the extent to which the State and National Parks' personnel considered conservation of our national treasures.

As an organization, the Friends of Del Norte County is dedicated to the healthy, safe, and careful use of our region. We support area businesses and their efforts to make the county an aesthetically pleasing stop for tourists. We appreciate the natural beauty of our home, and wish to share its splendor with others. We encourage ecotourism and the potential international dollars that may flow into this region - if we grow with thought. Too often, developing communities are overrun by illogical and wasteful planning, which does nothing to help the community grow. It is the plan of our organization to watch that growth, coming from all angles, public and private.

We are entirely in favor of any and all restoration that occurs. We support the relocation of picnic and parking facilities out of the wetlands in Fern Canyon and at Crescent Beach. We would like to keep these areas accessible to visitors, through maintaining Davison Rd. and allowing traffic on it, and by rebuilding the picnic area on Crescent Beach. As for vehicles on the beach, we fully support the Parks' prohibiting off-road vehicle use. Continuing off-road vehicle use for commercial surf fishing by nontransferable annual permit only, and reviewing only permits issued in 1996, and issuing no new permits works for us. We support continuing permits for American Indian traditional uses, because preserving old ways is the right thing to do. Restoration of Redwood Creek is high on our list. Finally, we are in favor of designating parts of our parks to wilderness areas.

As for the Freshwater Spit area, we would like to see restriction of RV camping to a single row along the highway on the north end of the beach, and allowing tent camping on the south end of beach. We would like to see Parks' maintain a separation between the camping areas, providing a viewshed along the highway. Parks' should charge a use fee, provide a part-time ranger, and designate and enforce length of stay limits. Parks' should research composting toilets for the area. In addition, we do not support the use of jet skis on any lagoon in the park.

The present buildings for maintenance and visitor services should be retained, except for the Visitor Center in Crescent City, which should be relocated to the Cultural Center. This is a beautiful building in an idealic setting, currently underutilized, creating wasted space. Besides being a book store selling maps and stuffed animals and giving away trip planning for free, the RNSP Interpretive program could provide year-round recreational opportunities (i.e. Jr. Rangers, nature crafts, speaker forums) for local citizens as well as tourists, utilizing the park and beach area adjacent to the center. This facility can also be a starting point for traveling interpretive tours, and a gateway for the entire region.

Rather than building a new VC in Hiouchi, Parks' should enlarge the present one, and maintain the State Park VC. Don't salvage the VC in Orick - all the money recently spent on upgrading that facility would be wasted, even if the displays could be moved. It, too, is a lovely center, and it should be used as long as possible. Use the dollars saved by not building new facilities to upgrade current facilities, and spend money refurbishing or replacing the interpretive signs which have faded or been vandalized throughout the park. Install better signage in and near Crescent City, making the signs visible and attractive to tourists.

## COMMENTS

## RESPONSES

Put some money and strategizing into the Welcome Center proposed for the border with Oregon, making it more than just what they can see and do in our parks, with a few books for sale.

As for the proposed new primary VC in the Prairie Creek area, we support the idea of tribal governments or a private entity, in cooperation with RNSP staff, constructing a new visitor center near the park. However, we do not support the concept of a lodge constructed in any of our Redwood Parks. Not only will a lodge add congestion and pollution to the area, it will also compete with local businesses already established.

If camping is to be increased by adding new sites in present campgrounds, or entirely new campgrounds are added, we suggest they be primitive in nature, avoiding any unnecessary tree removal. Those sites presently located within sensitive areas should be removed, and the site rehabilitated. Preserving the rural integrity of our county is imperative. Any unpaved roads in the parks should remain so, and those to be removed should be converted to trails or returned to pristine conditions. Controlling erodible areas presenting sedimentation to the rivers and streams they are adjacent to is paramount.

In summary, the Friends would like a conservative, more moderate approach to the Parks' plan. We value the reuse of materials where possible, but don't support waste. We support restoration where possible, and would like to see more camping in the parks. We value using the facilities currently in use, enlarging or upgrading them to serve the ever-increasing tourist population. We would like to preserve the rural flavor of our area while providing healthy, low-impact eco-activities year round. Adding interests to the park that compete with already established local businesses will only add to the distrust many locals have for the entities that oversee our beautiful parks.

Thank you for the opportunity to share our ideas and concerns with you.

Sincerely,



Natalie Schaefer, M.S.  
Board Member, Friends of Del Norte County

## COMMENTS

## RESPONSES

(Comments to Redwood National and State Parks regarding the Draft General Management Plan, submitted by the Friends of Del Norte County. We agree with many suggestions in Alternative One, but have made notations to the proposals within. Changes to Alternative One are noted in italics.)

**North Area**Jedediah Smith Redwoods State Park

- Park Entrance: Maintain as is.
- Campground: More sites are amenable, *but they should be primitive sites. Those sites presently located within sensitive areas should be removed, and the site rehabilitated.*
- Howland Hill Rd.: Maintain as is. *Control erodable areas.*
- Aubell Ranch Operations Area: Maintain as is, relocating other operations as necessary.
- Stout Grove: Make minor improvements to access road and parking. *Do not enlarge the road, or develop new parking areas.*
- State Park Wilderness: Create.

Visitor Facilities

- Hiouchi Information Center: *Build onto present site. Provide a pedestrian culvert to shuttle visitors safely across the road.*
- Jed Smith Visitor Center: *Maintain as is.*

Camping

- New campgrounds and new sites should be primitive and located out of sensitive areas, and avoid unnecessary tree removal.*

**Prairie Creek**

- Elk Prairie Campground: More sites are amenable, *but they should be primitive sites. Those sites presently located within sensitive areas should be removed, and the site rehabilitated.*
- Cal-Barrel Rd.: *Obliterate road and convert to a trail.*
- Vehicles on Beach: Enforce regulations prohibiting off-road vehicle use. Continue off-road vehicle use for commercial surf fishing by nontransferable annual permit only. Renew only permits issued in 1996, and issue no new permits. Continue permits for American Indian traditional uses.
- Fern Canyon: Move the parking area out of the wetlands, but *keep the road accessible to all traffic.*
- Newton B. Drury Parkway: Moving road to another area will only damage another area. Maintain as is.
- State Park Wilderness: Create.

Camping

- New campgrounds and new sites should be primitive and located out of sensitive areas, and avoid unnecessary tree removal.*

## COMMENTS

## RESPONSES

### **Pralie Creek, continued**

Primary Visitor Center: Tribal governments or a private entity, in cooperation with RNSP staff, should construct a visitor center near the parks. Do not build a lodge, as it will compete with businesses already established, and will add congestion and pollution to the area.

Davison Rd.-Gold Bluffs Beach: Maintain as is. Control erodable areas.

Greater Coastal Drive: Maintain as is. Control erodable areas.

CDPR Facilities: Remove out of the prairie if moving to an area of low sensitivity, or combining with another facility.

### **Bald Hills Area**

Redwood Creek Basin: Restore parklands disturbed by commercial logging and associated road building, mostly in the Redwood Creek Basin.

Tall Trees Grove and Lady Bird Johnson Grove: Maintain as is.

Tall Trees Access Rd.: Keep as unpaved road, with access only by permit.

Bald Hills Rd.: Develop and maintain as low-speed, unpaved gateway to diverse natural and cultural landscapes.

Camping: Construct no vehicle accessible campgrounds in Bald Hills. Provide primitive campsites located out of sensitive areas. Avoid any unnecessary tree removal. Do not build a road into this area.

### **Del Norte Area**

#### Del Norte Coast Redwoods State Park

-Access Road: Provide alternative road access.

-Campground: New campgrounds and new sites should be primitive and located out of sensitive areas.

Camping: New campgrounds and new sites should be primitive and located out of sensitive areas, and avoid unnecessary tree removal.

Visitor Center: Do not build a small VC near Mill Creek campground.

Ender's Beach Rd.: Convert to day use to resolve public use and resource degradation issues.

Requa Maintenance Facility: Maintain primary NPS maintenance facilities at Requa.

Crescent Beach: Relocate road, parking, trails, and restrooms out of wetlands.

Maintain existing numbers of such facilities. Construct an amphibian culvert connecting pond areas.

Vehicles on Beach: Enforce regulations prohibiting off-road vehicle use. Continue off-road vehicle use for commercial surf fishing by nontransferable annual permit only. Renew only permits issued in 1996, and issue no new permits. Continue permits for American Indian traditional uses.

Crescent Beach Education Center: Retain for interpretive offices.

Crescent City Cultural Center: Move information center presently located in the main RNSP building to the Cultural Center. Provide year-round recreational opportunities (i.e. Jr. Rangers, nature crafts, speaker forums) utilizing the park and beach area

## COMMENTS

## RESPONSES

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**Prairie Creek**

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Camping

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## COMMENTS

## RESPONSES

### Prairie Creek, continued

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Crescent City Cultural Center: Move information center presently located in the main RNSP building to the Cultural Center. Provide year-round recreational opportunities (i.e. Jr. Rangers, nature crafts, speaker forums) utilizing the park and beach area

## COMMENTS

## RESPONSES

*adjacent to the center, and use this facility as a starting point for traveling interpretive tours.*

### **South Area**

#### **Freshwater Spit**

*-Visitor Use: Restrict RV camping to single row along highway on the north end of the beach. Allow tent camping on south end of beach. Maintain a separation between the camping areas, providing a viewshed along the highway. Designate and enforce length of stay limits. Charge a use fee, provide a part-time ranger, and research composting toilets for the area.*

*-Vehicles On Beach: Enforce regulations prohibiting off-road vehicle use. Continue off-road vehicle use for commercial surf fishing by nontransferable annual permit only. Renew only permits issued in 1996, and issue no new permits. Continue permits for American Indian traditional uses.*

*Jet Skis: Do not allow jet skis on any lagoon in the park.*

*Redwood Information Center: Retain the center. Consider partnering with a private entity.*

*Redwood Creek Estuary: Partially restore the Redwood Creek estuary ecosystem while maintaining, to the extent possible, current land uses.*

*South Operations Center: Retain.*

COMMENTS

RESPONSES

cc: BOS  
RISP

October 1, 1998

Del Norte Co. Board of Supervisors  
587 A Street  
Crescent City, Ca. 95531

Re: Redwood Nat'l & State Parks  
Draft Management Plan

Dear Sirs:

Even though I do not live in California, I feel that the issue of the Redwood Nat'l & State Parks will affect the whole country. My husband and myself, who are both retired, would like you to consider Plan Alternative #4 instead of the other plans for this area.

We visit the Redwood Nat'l Park and always camp at the Freshwater Lagoon Spit each time that we are in Northern Calif. The year 1994, we spent a week in the Nat'l Park. This year 1998, we went out of our way coming home from Alaska, just so we could spend several days in the area.

While camping at the Freshwater Lagoon, we walked the whole camping area one evening. We counted 97 camping units, this included campers from 14 states and British Columbia. In talking with the campers close to our rig, most of them were returning visitors. This is quite a few states that will be affected by this decision.

Again my husband and I feel that only Alternative #4 would be acceptable for this area.

Thank you for considering our request.

RECEIVED

OCT - 6 1998

Board of Supervisors  
County of Del Norte

Ms. & Mrs. David E. Morris





## COMMENTS

## RESPONSES



BOARD OF SUPERVISORS  
**COUNTY OF HUMBOLDT**  
 825 5TH STREET  
 EUREKA, CALIFORNIA 95501-1172 PHONE (707) 445-7471

November 9, 1998

Superintendents  
 Redwood National and State Parks  
 1111 Second Street  
 Crescent City, CA 95531

RE: PRELIMINARY COMMENTS ON DRAFT GENERAL MANAGEMENT  
 PLAN/GENERAL PLAN/EIS/EIR ON THE REDWOOD NATIONAL AND  
 STATE PARKS

Messrs Ringgold and Sermon:

The Humboldt County Board of Supervisors reviewed the Draft General Management Plan and held a public hearing on November 3, 1998 to receive additional comments from interested groups, communities, organizations and tribal councils. The Board requests that you give these preliminary comments serious consideration.

At our informal meeting on November 2, 1998 at the Prairie Creek State Park Office, you stated comments were due November 9, 1998 and there would be no extension of this due date. At our public hearing on November 3, 1998, Supervisor Martha McClure of Del Norte County, along with Tim McKay, Director of the Northcoast Environmental Center, Vic Taylor of the Trinidad Chamber of Commerce, and Marla Powell of the Orick Chamber of Commerce requested that the Humboldt County Board join them in an effort to obtain a three to six month extension of the due date for comments.

In response, our Board approved a motion to join Del Norte County in requesting a six month extension, be a part of a task force, and continue to develop the Board's comments until November 9, 1998. The Board further directed a letter be sent to you requesting a six month extension.

On Friday, November 6, 1998, Supervisor John Woolley attended a meeting in Crescent City. Those in attendance included representatives of the Del Norte County Board of Supervisors, Northcoast Environmental Center, Elk Valley Rancheria, Redwood National Park, California State Parks, and Yurok Tribe.

NOV 10 PM 12:04

## COMMENTS

## RESPONSES

Supervisor Woolley reported on this meeting during a special continued public hearing held at 9:00 a.m. on Monday, November 9, 1998. Following his report our Board directed Kirk Girard, Planning Director, to prepare a letter to you requesting an extension on the due date for comments based on the policy statements made by Secretary of the Interior Bruce Babbitt in Tacoma earlier this year.

In that light, the Board offers the following preliminary comments and recommendations:

466-A

1. In the future, consider holding workshops on the plan in a more traditional format. Some Humboldt County residents were intimidated and uncomfortable with the format used whereby all comments had to be written and people had to move from table to table.

2. Major developments be focused on 101 and 199.
3. Increase efforts to restore the Redwood Creek watershed so it can be completed in 17 years inside the park.
4. Establish a fire management program for the prairies, oak woodlands, and old growth forests.
5. Study and inventory the cultural landscapes followed by the development of a management plan.
6. Construct a new visitor center on the B Mill site off Davison Road.

466-B

7. The National Park Service and California Department of Parks and Recreation support the private sector and/or tribal partners in the development of a destination lodge linked thematically to the park's resources.

8. Retain the Prairie Creek Visitor Center and Jedediah Smith Visitor Center. Develop a small visitor center at the Mill Creek campground. Change the Hiouchi Information Center to a visitor center.

466-C

9. The National Park Service and the California Department of Parks and Recreation continue to work with the Orick Chamber of Commerce to ensure information services are provided at the Redwood Information Center. If it becomes necessary to remove the Redwood Information Center, the National Park Service and California Department of Parks and Recreation will provide space for the Orick Chamber of Commerce in the new visitor center for tourist information.

**466-A** The public process used to develop the plan and accompanying environment impact documents was similar to those used by many public agencies and incorporated significant opportunities for public involvement. Development of the draft plan included five public scoping meetings conducted in local communities; a scoping workshop with local American Indian tribes and groups; individual scoping meetings conducted with local focus groups such as environmental organizations, chambers of commerce, government agencies, and commercial fishermen; two newsletters produced and distributed to a mailing list of more than 500 persons and organizations; and a number of informal meetings with a variety of individuals and groups. Public review of the draft plan involved distribution of 475 copies of the plan; production of 15,000 copies of a summary of the draft plan, distributed to the mailing list and as insert in the two local newspapers; and four public meetings and a number of focus group meetings and informal meetings conducted during the public review period, which was extended from 60 days to 90. The National Park Service, California Department of Parks and Recreation, and many other agencies use the open house style of public meeting rather than a public hearing because they have found the former format to be much more conducive to high-quality communications and information exchange with the public than the latter. The final opportunity for formal public involvement will take place when the California State Park and Recreation Commission holds a public hearing on the plan in 1999.

**466-B** The plan has been revised to indicate that the agencies would consider more than one proposal to establish an appropriate lodge or destination resort in the vicinity of the parks.

**466-C** The parks intend to continue its cooperative relationship with the Orick Chamber of Commerce at the Redwood Information Center and will incorporate similar space in any new facility developed to replace it.

COMMENTS

RESPONSES

466-D-F	10. <u>Campgrounds:</u> Add additional sites in State Parks. Construct new campgrounds in State Parks. Construct a new campground on Bald Hills Road. Cooperate with the Yurok Tribal Council in developing a new campground west of Requa. Allow camping at the north end of Freshwater Spit. Add new camp sites to the area around the new restrooms at the north end of Freshwater Spit. Explore the feasibility of using the fairground in Orick as an overflow campground.
466-G	11. Coordinate the Redwood National Park trail system with other agencies for a regional system.
466-H	12. Off Road Vehicle Use - Continue to allow vehicle use for commercial fisherman and Indian fishing through an annual permitting process. It should be noted that commercial fishing is a coastal dependent use that is a priority use protected under the Coastal Act and needs to be continued to be consistent. Monitor the ratio of pedestrian/vehicle and camping/vehicle incidents. Revisit and evaluate in three years. Map and define 'use' areas clearly.
	13. Set aside state wilderness areas in Jedediah Smith, Prairie Creek, and Del Norte State Parks.
466-I	14. <u>Road Improvements:</u>
	a. Park take over the maintenance of Bald Hills Road from Tall Trees Trail Head turn-off to eastern park boundary.
466-J	b. Bald Hills Road be rehabilitated and paved.
	c. Cal Barrel Road be paved. Add picnic tables at the end of the road.
466-K-L	d. Enderts Beach Road be converted to day use only.
	e. Davison Road and Gold Bluffs Road be paved.
466-M-N	f. Consider paving the short access road up to School House Peak and adding a small gravel parking lot at the top. Install regional interpretation signs and restrooms.
	g. Retain Greater Coastal Drive as a road.
466-O-P	h. Pave the Tall Trees Grove Access Road.
	15. Restore the lower part of the Redwood Creek Estuary and initiate discussions with the COE, NMFS, USFWS, DFG,

**466-D** The preferred alternative provides for the evaluation of the need for additional campgrounds. If the need exists, facilities would be provided outside sensitive resources areas.

**466-E** Although the plan specifies that no vehicle accessible campgrounds would be developed in the Bald Hills, this does not preclude the development of walk-in or primitive campgrounds in the area.

**466-F** See summary comment A.

**466-G** See summary comment C.

**466-H** The preferred alternative regarding vehicles on the beach is consistent with the local coastal plan in that the plan requires that vehicle access for commercial fishing and coastal-dependent industrial uses should be maintained consistent with RNSP regulations. The management plan points out (page 60 in the draft plan) that there are both CDPR and NPS regulations that prohibit off-road vehicle use in national and state parks.

**466-I** NPS and CDPR staff will continue to work cooperatively with Humboldt and Del Norte Counties to address maintenance of county roads within the parks and to seek funds to upgrade them structurally. However, as long as a significant proportion of the traffic using certain county roads is unrelated to the parks, (e.g., heavy equipment, commercial vehicles, commuter traffic), the agencies will not consider assuming maintenance responsibility for those roads.

**466-J** See summary comment F.

**466-K** The parks prefer and intend that Enderts Beach Road be left open for public use without overnight closures. Gating the road and/or converting to day use would occur only as a last resort if efforts to resolve criminal activity, vandalism, and public use conflicts that occur at night at the overlook and at Nickel Creek Campground are unsuccessful, and only after thoroughly exploring available alternatives with local officials.

COMMENTS

RESPONSES

Yurok Tribe and Humboldt County on the feasibility of removing the westerly ends of the levees.

We recognize this is a complex multi-year issue, and we wish to remain closely involved. The EIS/EIR should note that acquisition and inundation of productive agricultural lands creates adverse impacts, and should propose mitigation measures to offset the loss of agricultural lands. Beyond the agricultural concerns, many species are dependent on these lands as they are currently managed. There are some flood plain management issues that need to be addressed during any restoration efforts.

16. Relocate the Southern Operations Center in the Orick area.

466-Q

17. Work with Caltrans to develop vista points along the 101 bypass at points that look east into the Klamath watershed and west over Prairie Creek State Park to the ocean.

18. Consider housing park employees at the rehabilitated radar site at Requa.

The Board sincerely appreciates the opportunity provided by you to comment on the Draft General Management Plan. This plan and the Redwood National Park and State Parks have a significant economic and environmental effect on the communities surrounding these parks. The Board desires to continue working closely with you and your staff.

Very truly yours,

*Paul Kirk*

PAUL KIRK, CHAIRMAN  
BOARD OF SUPERVISORS

466-L See comment J above.

466-M. The California Division of Forestry and Fire Protection has declared Schoolhouse Peak fire lookout to be excess to its fire protection needs. The parks currently operates the lookout for fire protection purposes. If the lookout becomes no longer essential for NPS fire protection needs, options would be explored for other administrative or public uses of the structure. If no appropriate use is found, the parks would remove the structure as an unnecessary intrusion on the Bald Hills landscape.

466-N The National Park Service and California Department of Parks and Recreation intend to maintain the Coastal Drive so that is it accessible to motor vehicles as long as it is feasible to do so from an engineering and safety standpoint and reasonable to do so from the standpoint of responsible expenditure of public funds. The road was constructed on steep, unstable terrain and is subject to frequent damage from storms; certain sections are in danger of slipping into the ocean.

466-O See comment J above.

466-P The section of the plan that addresses the restoration of the Redwood Creek estuary has been revised to emphasize the fact that any NPS land acquisition that would take place in connection with that effort would be limited to willing seller situations. It has been revised also to reflect the need for a strong interagency approach to identifying and implementing restoration strategies.

466-Q One of the objectives under the "Visitor Access and Circulation/Roads" section on page 61 of the draft plan is to work cooperatively with the agencies having primary jurisdiction on the roadways through the parks to enhance opportunities for travelers to enjoy scenic vistas. The section along the 101 bypass will be considered in future planning for the development of additional scenic viewpoints and exhibits.

## COMMENTS

## RESPONSES



November 5, 1998

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Re: Public Comments regarding the Draft General Management Plan  
for Redwood National & State Parks

Dear Superintendents Ringgold and Sermon:

The Arcata Chamber of Commerce is herewith submitting its comments on the Draft General Management Plan for the REDWOOD NATIONAL & STATE PARKS (RNSParks). I personally attended two RNSParks' public meetings about the plan, conferred with Jim Kimbrell at Arcata Economic Development Corporation, and discussed this issue at a Humboldt County Chamber Boards Association meeting. We did our best to try to understand the alternatives proposed in the actual draft plan document, which was difficult even in the extended time period for review. With more time we could have done a much more thorough job of evaluating the proposed plans as well as other options. Six to nine months would have permitted a much more adequate review period.

Since the inception of the RNSParks planning process, Arcata Chamber of Commerce has received approval from the California Trade & Commerce Agency's Division of Tourism for a designated California Welcome Center in Arcata. The Chamber will open and operate a California Welcome Center representing the North Coast region (including both Humboldt and Del Norte Counties) beginning in the summer of 1999. Because of this new regional focus for our organization, we are particularly interested in the future plan of the Redwood National & State Parks, which we see as a tourism magnet for our regional attractions.

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THANK YOU FOR YOUR GOOD WORK

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First, we applaud the foresight of the two park systems (the National Park Service and the California Department of Parks and Recreation) to draft this comprehensive management plan as a joint venture. Second, we especially approve of the plans to consolidate your facilities, staff, services, and other resources wherever cost-effective. Third, we realize your staff had a difficult task in balancing resource protection with public use in formulating the four proposed alternatives. Fourth, we hope you will be open to incorporating workable alternatives suggested by the public.

1062 G Street, Arcata, CA 95521-5816 • 707 822-3619 • FAX 707 822-3515

## ORGANIZATIONS

## COMMENTS

Superintendents, Redwood National & State Parks  
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### GENERAL FINDINGS

We do not believe that any one of the four alternatives represents a perfect plan. We would prefer a hybrid Alternative 5 plan, combining a number of the preferred features from the various options presented as well as incorporating other unmentioned features.

Alternatives 1 and 4 are generally preferred because they have the most favorable impact on increasing visitor services through major infrastructure investment in interpretation, orientation, and visitor facilities. However, it does not make sense that it should automatically reduce environmental protection efforts. It would seem likely that, if visitor impacts were to increase, a more aggressive restoration management plan would be needed to offset those impacts; e.g. rotation of sensitive access areas over a 20 year period would be advisable for giving selected ecosystems a break, as well as restricting autos where shuttle services can effectively be established.

### THE SOCIOECONOMIC PROFILE

463-A The Socioeconomic Profile of the region is lacking in a number of areas. The community of Orick's population data is conspicuously absent. Of all the communities listed, Orick has suffered the greatest loss of population in the region. The extent of Orick's economic loss needs to be documented before this plan is credible to the public.

In addition, tourism growth is listed in terms of visitors to the Parks. But, tourism is not mentioned as a major contributor to service sector employment in the region, which it is. Tourism employment statistics are readily available for both Humboldt and Del Norte Counties from the California Division of Tourism. This information would be particularly important in gauging expansion of the tourism economy.

### PUBLIC ACCESS

Public access is far too restrictive in Alternative 3. We do not want to see the parks turned into a place where only the physically fit can enjoy their benefits. Improved access for the physically handicapped should be an ongoing goal. However, we see no problem in developing a workable shuttle system, particularly to Fern Canyon and the Lady Bird Johnson and the Tall Trees Groves. It would make sense to have cars park in Orick. Then people could shop in town if they wanted. And the Redwoods would not be subject to more auto pollution. We also are not adverse to the proposed relocation of the Newton B. Drury Scenic Parkway road to restore the integrity of the prairie as long as new easy access, public viewing areas were created. To preserve its historic nature, Cal Barrel Road should remain unimproved; if it had a one-way outlet (out only) onto Highway 101, it would reduce the double impact of travel on the road. We do not know about the Del Norte County roads proposed for improvements. Efforts should be made to link and loop hiking and biking trails wherever possible.

## RESPONSES

463-A See summary comment E and comment K in Marna Powell's 8/20/98 letter. Also, tourism growth is discussed in the draft plan (pp. 220-21), and employment changes for the retail trade and service sectors (the industrial sectors most affected by tourism) are presented (table 18, p. 218).

## COMMENTS

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Page 3

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 WATERSHED MANAGEMENT
 

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A number one imperative, no matter what option prevails, would be the complete watershed restoration of Redwood Creek and its estuary ecosystem, including areas upstream of the park. This would probably entail an ongoing process of restoration, extending beyond 20 years, to achieve and maintain Redwood Creek's natural state of water quality and to restore its previous wildlife habitat. We do have some remaining concerns about the number of farms and amount of agricultural production that would be displaced by the floodplain and how these property owners would be adequately compensated for their losses.

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 FRESHWATER SPIT CAMPGROUND
 

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Alternatives 1 and 3 also state that "Freshwater Spit would be designated for day use only, and overnight camping would be eliminated." Currently, closing the Spit for overnight camping would certainly create a huge adverse economic impact for the town of Orick, which has suffered enough economic setbacks already. We would prefer a combined Alternatives 2 and 4 approach of restricting camping to a single row of RV parking, tent camping at the south end, limited stays, and providing *permanent* chemical toilets housed in attractive facilities, with water for improved sanitation, and with fees. The proposal of making the Spit a private campground concession would also be an acceptable solution.

If Orick develops its tourism infrastructure successfully during the next twenty years and achieves satisfactory economic recovery, then it might be appropriate to designate the Spit as a day use area.

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 REDWOOD INFORMATION CENTER & PUBLIC SAFETY
 

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Alternatives 1 and 3 state that the Redwood Information Center would be "salvaged" once the new primary visitor center was operational. This action does not make sense, other than the fact that it reflects new scientific evidence as well as a change in current agency policy. While public safety is definitely of concern, our region is constantly at possible peril from earthquakes, floods, and other natural disasters. Life is full of risks. No one knows when these disasters might happen. Hawaii does not permanently close down its tourism facilities because of occasional volcano eruptions, or potential tsunamis and storms.

The Plan's public safety section cites that there is a 35 percent chance of an earthquake with an 8.0+ magnitude occurring within the Cascadia Subduction Zone between 1995-2045, (p. 231). Given that the RIC is open during the day (9 am-5 pm), exposures to such dangers at this site would appear to be lessened somewhat.

This facility is only about 15 years old. It is attractive and visible from the 101 corridor, and it has the highest annual public use of any of the existing visitor centers. Certainly this building was built to last more than 35 years. We would hope that this facility could be maintained

## RESPONSES

463-B See summary comments E and H and responses to comments D in Janis Crandall's letter and comment A in Mona Nolcken's letter.

463-C See summary comment A.

463-B-C

## COMMENTS

## RESPONSES

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Page 4

properly so that its useful life can be fully realized. Only when its useful life has expired should it be decommissioned and salvaged. Finally, we would assume (hopefully, correctly) that if an aggressive watershed restoration of Redwood Creek were undertaken, then the migration of the creek towards the facility could be corrected naturally.

### SATELLITE VISITOR CENTERS

We support the development of satellite visitor centers only when other visitor services are adversely impacted. Your Public Use Statistics (p. 222) indicate that the **Redwood Information Center (RIC)** on Highway 101 serves a significantly higher volume of visitors than any other of the visitor facilities. The RIC is also the most visible and accessible information center on the 101 corridor. Therefore, we recommend that any satellite visitor center should be visible and accessible from 101 or 199. The proposed satellite operations area at **Mill Creek** seems too remote to serve a large enough number of visitors to be a viable investment and counters other consolidation efforts, so we would not support this development.

### PRIMARY VISITOR CENTER

We support Alternative 4's proposal to allow private interests (e.g. private entities and/or tribal governments in cooperation with the RNSParks) to construct a Primary Visitor Center as well as destination lodging near the Parks (preferably in the vicinity of Orick).

### INTERDEPENDENCE OF COMMUNITY AND THE PARKS-ALTERNATIVE 4

#### Objectives

- Support sustainable economic development and the availability of appropriate visitor services in local communities that serve as gateways to the parks.
- Participate as partners with those communities and local organizations in projects and initiatives that have mutual benefit or that enhance the quality of the overall experiences of visitors to the parks.
- Encourage the development of visitor service facilities in local communities and in environmentally suitable locations in the parks' vicinity.
- Actively participate in local educational and public safety programs and cooperate with local agencies and private interests in tourism development and in land use and transportation planning for areas adjacent to the parks.

The objectives quoted above are too general and not measurable. There is no mechanism to insure community buy-in. The RNSParks need to demonstrate their commitment to proactively and cooperatively work with the local communities to develop the necessary tourism infrastructure to attract more visitors to the area. First, efforts should be made to reconcile past differences with the community of Orick. Second, the RNSParks need to have an active plan to seamlessly integrate its infrastructure to support tourism infrastructure and concessions within the adjacent communities.



## COMMENTS

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## OTHER PUBLIC - PRIVATE PARTNERSHIPS

The relocation of national and state park resource management functions to a new facility in Orick does mean that Arcata will lose jobs of its staff now located at Stewart School. Having some representatives nearer to the Arcata Welcome Center might serve as an important resource on the Parks. Space could possibly be sublet from the U.S. Fish & Wildlife Service that will be co-located with the Welcome Center and the Bureau of Land Management on Heindon Road.

We need the proactive involvement of RNSParks, Humboldt County, Del Norte County, the communities of-Orick, Klamath, Requa, Hiouchi-local tribal governments, local economic development agencies, chambers of commerce, concerned citizens, and even Humboldt State University to achieve a buy-in on the great potential for developing an economic partnership with our park services. Our greatest fear is that without a substantial investment of additional time in a buy-in process, the very agencies you are trying to engage will feel disenfranchised once more.

The possibility that once the plan is done it will end up on our shelves collecting dust and we will all go back to business as usual is unacceptable. In reviewing the plan, we became excited about creating a new cooperative vision. However, it was at once obvious that there was no mechanism in place or being proposed for bringing these agencies to the table. Meeting separately with the key partners will preempt a cohesive plan.

The fact remains that the North Coast is remote and tourism infrastructure is lacking. Orick, Klamath and Hiouchi are blighted communities that somehow need to be reinvented as attractive villages. Arcata Economic Development Corporation will assist Orick with the necessary resources to start the process of infrastructure building. But, the citizens of Orick first need to have the desire to transform their community into totally new image, and they need to reestablish their faith in the Parks to do this.

Humboldt State University is a great resource that should be utilized in innovative problem solving. Could the shuttle buses utilize alternative energy technology that is being developed at HSU's Schatz Energy Laboratory? How else can alternative energy be used?

We support Alternative 4's expansion of concession services to include a broad range of services, such as guides, hostels, bike rentals, bus tours, river running, and Freshwater Spit campground operations. Having concessions run outside the RNSParks will have positive economic benefits for the gateway communities. Developing an eco-tourism niche featuring "education vacations" would be a natural for the area. Plenty of HSU grads would be interested, if we provided the interface with the Parks' interpretive teams.

## RESPONSES

**463-D** RNSP staff are involved in several cooperative projects with Humboldt State University, including the Schatz Energy Research Center. As the proposals in this plan are implemented, the National Park Service and California Department of Parks and Recreation will actively seek out potential partners such as Humboldt State University that can contribute to achieving the goals of this plan.

**463-E** The plan has been revised to include a variety of appropriate commercial services that might be authorized by the National Park Service or California Department of Parks and Recreation in gateway communities to support visitor use of the parks. The opportunity for local American Indian tribes to provide such services has also been addressed. The process for authorizing concessions or commercial services in the parks and the fees that are charged are based in federal and state laws and agency policies that have nationwide and statewide applicability, respectively.

463-D

463-E

## COMMENTS

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Page 6

463-F

There is no plan for what happens when local economic development efforts are successful and more visitors come to the area, how will the Parks support higher maintenance and environmental restoration costs? How will Orick deal with increased impacts of sewage and waste? Could another innovative marsh project work here? Perhaps partnering is needed here too. Sustainability is the key for any of these plans to work.

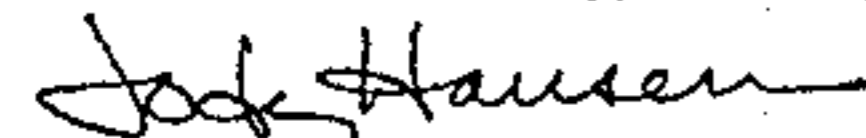
### CONCLUSION

463-G

We recognize that the Redwood National & State Parks want to have this plan in place by 2000. However, we urge you to get more input from the local leaders of the communities that will be most effected by your final plan. The vision is yet not complete. Given some more time, you will have a much more complete planning tool and willing partners to help realize your plan.

Please call on us if we can assist you in any way.

Best regards,  
ARCATA CHAMBER OF COMMERCE



Jody Hansen  
Executive Director

JH:st

cc: U.S. Senator Barbara Boxer  
U.S. Senator Dianne Feinstein  
State Senator Mike Thompson  
State Assembly Member Virginia Strom-Martin  
5<sup>th</sup> District Supervisor Paul Kirk, County of Humboldt  
Donna Hufford, President, Orick Chamber of Commerce  
Don Leonard, Exec. Dir., Eureka/Humboldt Co. Convention & Visitors Bureau

## RESPONSES

**463-F** The section of the plan addressing the relationships between the agencies and gateway communities has been revised to elaborate on the types of activities or projects that could be addressed cooperatively. The plan also indicates that RNSP staff would provide technical assistance and advice to individuals interested in developing appropriate/complementary visitor services in gateway communities.

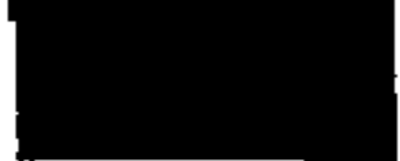
**463-G** The public process used to develop the plan and accompanying environment impact documents was similar to those used by many public agencies and incorporated significant opportunities for public involvement. Development of the draft plan included five public scoping meetings conducted in local communities; a scoping workshop with local American Indian tribes and groups; individual scoping meetings conducted with local focus groups such as environmental organizations, chambers of commerce, government agencies, and commercial fishermen; two newsletters produced and distributed to a mailing list of more than 500 persons and organizations; and a number of informal meetings with a variety of individuals and groups. Public review of the draft plan involved distribution of 475 copies of the plan; production of 15,000 copies of a summary of the draft plan, distributed to the mailing list and as insert in the two local newspapers; and four public meetings and a number of focus group meetings and informal meetings conducted during the public review period, which was extended from 60 days to 90. The National Park Service, California Department of Parks and Recreation, and many other agencies use the open house style of public meeting rather than a public hearing because they have found the former format to be much more conducive to high-quality communications and information exchange with the public than the latter. The final opportunity for formal public involvement will take place when the California State Park and Recreation Commission holds a public hearing on the plan in 1999.

COMMENTS

RESPONSES

PG. 1

C.C. 377, 4



Nov. 3, 1998

Dear Superintendents;

This is a letter in response to the General Management Plan, RNSP for Del Norte and Humboldt Counties.

The California Commercial Beach Fishermen Association (CCBFA) has been involved in this plan from the beginning. CCBFA has asked from the beginning that a impact analysis be made on the industries that will be directly affected by this plan.

We have took the time to show up for meetings, scoping, etc., to give them information on the fishing industry. We gave you information on how the draft will directly effect this industry.

Yet despite time after time of requesting that they take responsibility for their actions. They do not discuss in the plan about adverse effects on the smelt industry, it also fails mentioning any effects on the community or local communities. It also fails to show how much economic structure will be effected. Both Regional and national.

2 million pounds of smelt are sold to local fisheries by local fishermen annually. (See Exhibit #1). Economists frequently refer to those industries which sell their goods and services outside the county or community as export employment.

Thus, the level of employment and income is determined, both by the amount and kinds of goods sold to non-residents and by the culture. Multiplying effects that are created

556-A The points raised relative to direct and indirect economic effects at the regional level are generally valid. (It is important to note that a 1/3 share (approximately) of the total catch value may be attributed to Orick fishermen, based on CDPR permit-holder by residence percentages, which is a significant percentage of the total.) At the regional level, the loss of economic activity associated with the cessation of commercial beach fishing would represent a very small component of the total economic activity (including both direct and indirect effects). At the local level, however, such as for Orick, the loss of economic activity associated with this industry could be a detriment to the town's economy. Nonetheless, termination of permitted off-road vehicle use for commercial beach fishing is likely to be far off in the future, and effects will be gradually incurred. Existing permit holders will continue to receive access permits as long as they renew them. Ultimately, however, as permits expire and are not renewed, commercial beach fishing, as done now, will cease. Unless other methods of transporting fish from the beach to markets are developed, the commercial beach fishing industry that is concentrated in the RNSP area could cease to exist. See also summary comment H and responses to comment J in the Klamath Chamber of Commerce letter and comment T in Charles Wilson's initial letter.

A-955

COMMENTS

RESPONSES

PG 2

by local purchases of goods and services produced in the county. Both of these factors must be kept in mind when evaluating the employment and income impact of a change in existing export employment of which the smelt industry has historically been felt as one of the most important industries in the town of Orick!

Also, existing fisheries have been developing new and important export markets, both national and world-wide. They have spent lots of time and energy getting these markets.

National and State Parks are missing the whole point about how to manage the parks. The fishermen are on the beach as free hospitality hosts to the tourists. We tell them things that most park personnel doesn't know, and help them when park personnel are not around!

We pull tourists out of the sand when they are stuck, broke down, lost, looking for something, and answering general information questions asked by hundreds of tourists in a season.

We have an Annual Beach Clean-up, we help in all kinds of emergency situations. We patrol these beaches, and because of our presence, there is much less illegal activity, such as poaching, off-road driving in sensitive areas, etc.

We as a whole, are tired of justifying our existence and our right to fishing!

Organizations

COMMENTS

RESPONSES

76.3

and feeding our families.

We have been vastly concerned since January 20, 1997, when we received a leaked draft of the plan. I immediately called Andy Ringold and Rick Sernon about the draft. I asked them why were they trying to put me out of work. Andy Ringold said not to worry, that it was just a draft and it had changed many times in the past and would change in the future. In the Jan. 20, 1997 draft plan, there were 4 alternatives, 2 of them wiped out the small fishermen. Wouldn't you know when the plan finally came out in August 1998, it still wipes out the small fishing industry in two alternatives?

Rick Sernon told me he couldn't discuss the plan while it was still in planning. But despite in being in planning, he was limited the amount of permits being issued, saying that if we do get the AXEO there will be less fishermen to deal with. This is done despite the fact he is not to act in any part of the plan until approved. (SEE EXHIBIT 2)

When asked why there has been no resource management plan developed on traditional user groups. No answer! (SEE EXHIBIT K-19)

When asked why county planning includes wood gathering and beach fishing. They do not comply - No answer!

When asked if under the State Constitution, Article X, (See exhibit 3) we have the undeniable right to access to our fishing grounds - No answer!

556-B The General Management Plan/General Plan for Redwood National and State Parks is not in conflict with the California Constitution with regards to fishing from public lands. The agencies recognize that the California Constitution states "The people shall have the right to fish upon and from the public lands of the State and in the waters thereof." The constitution does not however, provide or guarantee vehicular access across public lands.

556-B

COMMENTS

RESPONSES

Pg. 4.

556-C

When asked did you follow your own park plan policy, when you did not study what effects you will have on our industry directly - No Answer

The Park has a history of painting a picture that looks good on paper. The reality of today in Orick, isn't a pretty picture as promised, in the 1976 Park expansion plan.

556-D

They said on paper that affected workers would be hired to rehabilitate Redwood Creek or other park related industries created by the expansion of the park. Orick has suffered ever since the loss of population, housing, and jobs, that the park has directly caused. Now we are hearing the same line of B.S. again. Our economy is going to be like they say. But what you read 49 1/2 pages later and understand, how many industries will be wiped out or temporarily affected, you will see why we are so upset.

When you make good money logging, why work for the park? The last time I worked on a log loader machine, I made \$14.75 (in 1993) an hour. If you work for the park as a laborer, you might get \$8.00 an hour. That's just an example of how their jobs relate with local wages. If they insist on taking our jobs away, then take responsibility for your ACTIONS!

556-E

Rehabilitate displaced fishermen or buy them out. It takes years to become a good fisherman, and lots of hard

**556-C** See summary comments G and H and responses to comment J in the Klamath Chamber of Commerce letter, and comment J in Marna Powell's 8/20/98 letter. Also, to reiterate the point made in summary comment G, a special effort was made to study the extent of the commercial smelt and ocean perch industry. We appreciate that this industry is important to Orick's economy and that the proposed plan reflects the need to mitigate the impact of NPS and CDPR policy to enforce the prohibition on off-road vehicle use on RNSP beaches. Allowing phased termination of such off-road vehicle use to current CDPR permit holders is a form of mitigation, although it does not resolve the issue of providing long-term job opportunities to residents of Orick.

**556-D** Federal and state law and regulations govern NPS and CDPR hiring practices; these practices cannot be changed through a planning document. The 1978 legislation that expanded the national park contained a number of provisions that authorized benefits, including hiring preferences and training programs, for timber industry workers affected by the national park's expansion. The National Park Service implemented those programs successfully — all of which expired in September 1984 under a provision of the same legislation. Approximately 33% of the current NPS permanent staff was hired locally, and a large percentage of the seasonal staff hired each year comes from local communities. Local contractors are used extensively by both agencies for a variety of projects, including watershed restoration.

**556-E** The plan proposes to phase out vehicle access for commercial beach fishermen over the lives of current permit holders. Therefore, current permit holders would not be adversely affected. The National Park Service and the California Department of Parks and Recreation believe that this long-term approach provides sufficient time for others to prepare for, seek, and obtain alternative employment opportunities in the future.

## COMMENTS

## RESPONSES

PG.5

work. We want the right to fish! But if we are grandfathered out, or phased out, what will our grandchildren do for a living? We have third generation fishermen that have worked all of their lives smelt fishing!  
When you put families out of work and add to welfare, unemployment and loss of homes in a town of 350 people, we say it will be disaster created by Park Management!

Sincerely,

Norm Carr

Norm Carr, President  
C.C.B.F.A.

COMMENTS

RESPONSES

Exhibit 411

Data received from the (RNSP) General Management Plan 1998. Estimations are made from 50% profit and price of shipping.

A Report from the C.C.B.F.A. :  
Smelt Price - Per lb. - Estimated by RNSP  
(Gross sales at 35¢ per lb.)

2 million lbs. to fishermen           \$ 700,000

2 million to annual gross           1,700,000

Fisheries - Buying + Selling Smelt  
2 million lbs. in sales + Gross  
estimate in sales for  
Supermarkets, bait shops, zoo's  
and aquariums                   4,500,000



COMMENTS

RESPONSES

Exhibit #2

Refered

<p>6. FRESHWATER SPILL VEHICLE USE</p>	<p>3. Recreational vehicles (RV) camping would be restricted to a single row deep along the highway. Tent camping allowed on south end of the beach. There are now length-of-day limits. No water or shower facilities would be provided; porta potties would be provided.</p>	<p>1. Overnight camping would be eliminated and the area would be designated as day use area only. Recreations would be provided at the picnic area.</p>	<p>1. The camping area would be restricted to the south end of the spit. Tent camping would be restricted from the beach. 15 year and tent systems would be provided on-site. Capital improvements require the NPS to obtain a sufficient interest in the lands.</p>	<p>1. Develop and manage shore as a "managed" Water, wetlands, and streams would be provided on-site. Capital improvements require the NPS to obtain a sufficient interest in the lands.</p>
<p>7. VEHICLES ON BEACH/COMMERCIAL FISHING a. Freshwater Spill</p>	<p>1. Continue to allow controlled vehicle access to the beach at Freshwater Spill. No permits would be required for noncommercial beach users.</p>	<p>3. Vehicle access to the beach at Freshwater Spill for recreational purposes would be eliminated. Vehicle access for commercial fishing would be eliminated after 3 years.</p>	<p>2. Commercial fishing vehicles on the beach at Freshwater Spill would be allowed by permit only and placed out after 20 years. Vehicle access for recreation would be eliminated after 3 years to protect these and beach resources.</p>	<p>1. Same as Alternative 1.</p>
<p>4. Cold Staff Beach</p>	<p>2. Continue the current CDFW permit system for Cold Staff beach for commercial fishermen.</p>	<p>3. Vehicle access to Cold Staff beach for commercial fishing would be phased out within 7 years. Only existing permits would be converted to this policy.</p>	<p>2. Commercial fishing vehicles access to Cold Staff beach would be phased out as new permits would be issued and all permits would expire after 20 years.</p>	<p>2. Hold commercial fishing vehicle access to Cold Staff beach to 1996 for its</p>

Copy of leaked JAN. 14. 1997.

COMMENTS

RESPONSES

FROM  
STATE REDWOOD PARKS  
GENERAL  
PLAN  
NOVEMBER 1985

EXHIBIT  
K

ular access through the dunes to the wave slope is now allowed ;  
ified location. Vehicular travel on the beach has created some ;  
uding conflicts with other recreationists, poaching of elk, and  
ge to sensitive dune ecosystems.

ching of elk, which is done more often along Gold Bluffs Beach than  
where in the park, occurs in conjunction with vehicle access gained along  
the beach. Poachers can drive to the remote northern end of the beach, where  
detection of the illegal activity is very difficult.

Some four-wheel-drive and other vehicle operators have not remained below the  
mean high tide line. Instead, they have driven into the dune complex, and  
disrupted ground-nesting animals and dune vegetation.

Policy: The department shall maintain the unique recreational opportunities  
and cultural, historical, and natural resource values of Gold Bluffs Beach  
by managing recreational activities and vehicular access. Commercial  
fishers and Native Americans have had traditional vehicular access to the  
beach, and these uses will continue without jeopardizing the very special  
park values. A resource management plan shall be prepared for the purpose  
of providing guidance in the long-term protection and enhancement of the  
recreational, cultural, historical, and ecological values at Gold Bluffs  
Beach. The plan shall include provisions for long-term monitoring of  
impacts and year-round 24-hour-a-day access for traditional user groups.  
The plan would also include consideration of providing at least two accesses  
from Gold Bluffs Beach Road down to the wave slope of the sandy beach.

Access to Redwood National Park lands along the beach to the south should be  
maintained.

Visitors reach the Gold Bluffs Beach area from U.S. Highway 101 via Davison  
Road, which traverses private, national park, and state park lands. Such  
access is uncontrolled at this time. An alternate route crossing only  
national park land could be used with only minor improvements. Such a route  
would offer park control and regulation.

Policy: The department shall cooperate with Humboldt County and the  
National Park Service to provide an alternate route from U.S. 101 to Gold  
Bluffs Beach which allows 24-hour-per-day access over lands managed by  
the department and/or the National Park Service.

ALLOWABLE USE INTENSITY

The California Public Resources Code, Section 5019.5, requires that a land  
carrying capacity survey be made before preparation of a development plan for  
any park or recreation area. Section 5001.96 further requires that attendance  
be held within limits so established. Allowable use intensity is a refinement  
of the carrying capacity concept, and is prepared in fulfillment of the above  
code section. This evaluation serves as a guide indicating areas in which the  
sensitivity of natural or cultural resources will affect development planning  
and acceptable visitor use levels.

Allowable use intensity is determined by analysis of three components:  
1) management objectives; 2) visitor perceptions and attitudes; and 3) the  
impact of any development and use on natural and cultural resources.

**SAVE THE  
ENDANGERED  
SURF  
FISHERMEN**

## COMMENTS

## RESPONSES

### PROLOGUE

For many of us, our jobs are usually structured or routine. We report every day to the same place and the same time, usually to a work site that gives us comfort and safety, such as an office, building, garage, warehouse, or any kind of covered shelter. Some of us are fortunate to have sick leave provided by our employers so that if we are ill, we continue to have an income. And if our company or business entity goes under, for whatever reason, usually those who feel the weight of the business closure are the owners and the employees.

The surf fishermen do not have these luxuries. They often "go to work" when tidal conditions and the cyclical spawning seasons are right. Their work hours and location are always unpredictable and they often work under dangerous conditions due to the elements and the changing tides. They have no protection against extreme adverse weather conditions. And if they are sick or conditions prohibit them from fishing, then they have no income to rely on. Their catch not only provides for the livelihood and survival of their families, but also for universal subsistence of people and animals. If they lose their fishing business, many will feel the weight of their loss.

The following is their story and how the political system threatens to endanger this special breed of fishermen to a point of extinction.

## COMMENTS

## RESPONSES

INTRODUCTION

This report is not about wage increases. It is not about plotting an informational picket for better benefits or work conditions. This is about survival...survival of a small but special work force and a community whom they represent. It is about the special services they perform for the public and how their product, smelt (small fish), serves the needs of people worldwide and not to mention the zoos, aquariums, bird sanctuaries, and wildlife care centers designed for the enlightenment and enjoyment of our citizens nationwide; the fish is also a prime food source for endangered and exotic species at the wildlife care centers. It is a story of Northern California's surf fishermen who are in danger of "extinction" due to the political and ideological agendas of the administration of the Redwood National and State Parks. Their motives are based on the ill-conceived and misplaced idealism of the Sierra Club, the Save the Redwoods League, and the Park Rangers Association, in terms of human value.

It is not the intent of this report to repudiate, denigrate, or devalue the mission of any organization; however, in this case, with reference to the Redwood National and State Parks Service, to do so otherwise would serve to mitigate the reality of the potential loss and suffering of the surf fishermen, their families, and their community.

So who cares about a small group of people who can find jobs elsewhere; and what about focusing on our nation's indigent and impoverished?

The surf fishermen provide tons of smelt annually and their harvest is deemed essential as food source for people and animals around the world. Eliminating the availability of smelt will result in a significant negative impact in the provision of food as previously stated.

Additionally, if the surf fishing industry meets its gradual demise as a result of government-imposed cessation of motorized vehicles on our beaches, and other restrictions, many will lose the ability to earn an income, resulting in more families added to our nation's welfare, AFDC (American Families with Dependent Children), or various entitlement lists at an expensive cost to taxpayers. But most importantly, these families, particularly the children, will suffer due to the loss of income. The community, including businesses and schools will suffer as well. As a democratic society, we must actuate our sense of duty and compassion by helping promote stability and longevity of the surf fishing industry.

Let's take a look at the facts.

557-A See response to A in the previous California Commercial Beach Fishermen's Association letter.

## COMMENTS

## RESPONSES

### The CALIFORNIA COMMERCIAL BEACH FISHERMEN ASSOCIATION

For three generations, the surf fishermen/women fished the beaches independently, and with much effort; their small harvests sufficed for meager income. Then in the early '80's, environmental activists, in concert with the Park Services attempted to ban commercial and sport fishing for the sake of conservation of natural resources.

In 1984, the surf fishermen/women formed a coalition to usurp the conservation groups from taking their livelihood and dignity; thus, the formation of the California Commercial Beach Fishermen Association.

Members of the Association meet monthly and share their concerns relative to their plight. They also plan fund-raising events to establish a legal defense fund in order to secure legal representation. Equally important, they develop plans for fellowship with their families and community by conducting community service details and following them with picnics, BBQ's, or fun/leisure activities.

Members of the Association benefit in their membership by:

- Fostering a sense of fellowship and community.
- Working together toward shared goals.
- Working collaboratively on the beaches to increase their harvest of fish...and ultimately, their income.
- Assisting in stabilizing gas and oil prices and other local business commodities.
- Working cohesively toward performing community services.
- Ensuring future economic stability for the organization and each member.

The California Commercial Beach Fishermen Association exemplifies an organization committed to the challenges of fighting the "big boys" for their right to fish on beaches endowed for the people, and for the survival of themselves, their family, and their community. Their spirit of unity and determination is reminiscent of the type of groups who fought tenaciously for their freedom and rights in this country.

COMMENTS

RESPONSES

SMELTS

The smelts are family of small fishes highly prized for their delicate flavor. They are schooling fish and are usually found in waters close to shore. There are two types of smelt which provide the mainstay for members of the California Commercial Beach Fishermen Association:

SURF SMELT (*Hypomesus pretiosus*) has an elongated body. The mouth is rather small and the lower jaw is somewhat protruding. The color is light olive green to brownish above, silvery and iridescent on sides and below. There is a bright reflecting band along the sides. The body may be nearly transparent. Surf smelt are probably the dominant species in the commercial smelt catch.

Female surf smelt mature at 1 to 2 years. Surf smelt live to about 3 years for males and 5 years for females, and reach a maximum size of about 10 inches in length. They feed on plankton. Predators include marine mammals, birds, and other fishes.

NIGHT SMELT (*Spirinchus starksi*) also has an elongated body. The mouth is moderate and the lower jaw protrudes. The eye is moderate. Canine teeth are present on the tongue. The color is green above, silvery on sides and below.

Female night smelt spawn repeatedly during the January through September spawning season. Night smelt are small, rarely exceeding 6 inches in length. They feed on plankton. Predators include marine mammals, birds, and other fishes.

Smelt is relied upon commercially not only for human consumption worldwide, but for zoos, aquariums, bird sanctuaries and wildlife care centers as well. The fish is also a prime food source for endangered and exotic species at the wildlife care centers. A prominent reason for the smelt's popularity and preference for feeding marine mammals, birds, and endangered and exotic species is its high protein content. The following is a breakdown of contents by Michelson Laboratories, Inc.:

20

Moisture (air oven 125 C)	80.56	%
Protein (nitrogen analyzer)	15.00	%
Fat (Soxhlet)	.94	%
Ash	2.88	%
Carbohydrates	.62	%

Smelt come to shore to spawn in the surf by the millions, annually, from May to October. The eggs are deposited in the sand and gravel to be hatched out during the next high tide, and then return in one to two years to start the cycle over again.

"THE FISH ARE RUNNING!" is what's heard on the CB's of local commercial beach fishermen parked around Orick, California.

## COMMENTS

## RESPONSES

What that means is that the smelt are spawning. If you are a fisherman, the first thing you look for are lots of pelicans and seagulls, seals, arctic terns, and, of course, other fishermen on the beaches and you have found a "smelt run".

You immediately drive on the beach to reach the spawning grounds (reaching the spawning grounds can only be accomplished by motor vehicles since you have equipment to carry, you have a long distance to travel in the sand, and you need to get to the area rapidly). Fishing is accomplished with hand-held nets in the surf for smelt. These nets are strictly utilized manually with no type of mechanical devices to facilitate catches of larger quantities; therefore, the amount of smelt caught is at controlled levels. Fishermen (and women) drive close to the water and follow the smelt as they move up and down the beach spawning.

To the California Commercial Beach Fishermen, the commercial smelt industry has been important to their local economy for many years. But will there be enough smelt for years to come? The present third generation smelt fishermen have conducted studies that indicate the fish have many beaches to spawn on, that there are many beaches where no commercial fishing is allowed, and there are beaches that are inaccessible. Additionally, the total length of United States western coastline is approximately 1100 miles; the total length of beaches in which surf fishermen are allowed to fish for smelt encompasses approximately 21 miles. This represents only less than 1/10 of 1% of actual beaches available for commercial surf fishing. Lastly, the fishermen catch less than one percent of the bio mass. For these reasons, they have a renewable resource; thus, allowing for plenty of smelt fishing for years to come.



## COMMENTS

## RESPONSES

ORICK, CALIFORNIA

Orick is a rural, California town, sixty miles south of the Oregon border. Once a thriving lumber community, it is now a welfare-dominated place in severe economic decline. Present-day Orick is characterized by poverty, unemployment, substance abuse, and illegal drug production. The majority of its youth are malnourished, poorly clothed and physically ill. Many display the emotional and social afflictions of those coming from poverty and dysfunctional families.

Orick School District constitutes a one-school, kindergarten through eight grade district. The school is located on the beautiful, north portion of Highway 101, which winds through Redwood National Park along the Pacific Ocean in Humboldt County. Local residents feel connected to their rural setting, but the natural beauty of the town is in stark contrast to the poor housing and isolation that families must endure as they struggle with the extreme poverty that continually threatens their most basic needs for food and shelter.

Since the expansion of Redwood National Park, coupled with the pullout of the timber industry, Orick has experienced a severe economic decline. The national media covered the expansion in the late 80's as a positive event, but the citizens of Orick live with the residual negative impact. Once a town with six lumber mills, the timber industry has so collapsed that there is but one existing mill. In 1986, only 14% of Orick's students lived below the poverty level; now it is an astounding 71%. With the mills gone, there are no longer viable employment opportunities for the vast majority of adults. As the economic base has declined, local housing has deteriorated. Some Orick children are living in homes without water and electricity.

A survey of local families indicated that needed health care was too far away and too expensive for Orick families to access. Roads are too winding and often hazardous, compounded by no public transportation and few reliable private vehicles. On a recent medical outreach visit, of the 21 elementary school students seen, 90% were seriously anemic. This was such an unusual occurrence that clinic medical providers had the centrifuge re-calibrated to confirm these results. Even with these desperate medical care needs, outreach site visits are limited, with only a small percentage of children able to receive services. There is no hospital, clinic, pharmacy, medical provider, licensed counselor, social worker, youth organization, child care provider, or public library in Orick. All of these services and opportunities are a minimum of thirty-five miles away and are needs of this community.

Despite all of the trials this community faces, Orick has many strengths. With historical roots in fishing, ranching, and

## COMMENTS

timber, the community has many independent, hardworking individuals. When the mills disappeared, many of the former timber industry employees set up cottage industries. If the National Park Service were to develop the tourism aspect of the park, these people might someday earn more than subsistence wages. Another strength to be found in Orick is the natural surrounding which can serve as an educational laboratory as well as a source of economic development. There is a very civic-minded senior citizenry, who is dedicated to the welfare of Orick's children. They have contributed long hours trying to revitalize the community and are key stakeholders in the success of the Orick Healthy Start Initiative. The school has long been seen as the hub of the community. This is a primary strength upon which they can build this program. Orick families do not have to be sold on the idea of coming to Orick School for services. Although independent by nature, they have overwhelmingly welcomed the limited outside medical/dental services that have been provided; because of time limitations, families have had to be turned down when they try to schedule appointments. Many are eager to see adult education at the school site.

557-B

Although there are active efforts in the community to revitalize Orick, it would be extremely difficult at best if its population drops significantly; and a major cause of this would be the loss of the surf fishing industry.

## RESPONSES

557-B Other opportunities for employment would result from implementing the proposed plan; however, in the absence of economic restructuring through other means, i.e., the development of the tourism industry, other forest craft industries, or other industries, the economy of Orick would be adversely impacted by the loss of the commercial beach fishing industry.

## COMMENTS

## RESPONSES

TAKING CONTROL OF ORICK'S ECONOMIC FUTURE  
(Excerpts were taken from the Strategic Plan  
Report prepared by the Orick Economic Development Corporation,  
Orick Chamber of Commerce, and Orick Community Services District)

In May 1996, concerned members of the Orick community came together in a series of meetings to take control of the town's economic future. The objective of the meetings was to create a strategic plan---a document which can be used to guide citizen activism, seek assistance from public and private agencies, and inspire the community to assert control over the direction of its development.

The process was sponsored by the above-referenced organizations and meetings were facilitated by the Arcata Economic Development Corporation and the Center for Environmental Economic Development, both located in Arcata. Funding came from Rural Community Assistance program of the USDA Forest Service, with funds which are part of the Northwest Economic Adjustment Initiative. The meetings were attended by numerous members of the community, including surf fishermen.

During the meetings, it was determined that Orick has several thriving businesses, a small host of struggling enterprises, and a vast number of untapped economic opportunities. These existing and potential businesses could provide a diversified employment base which would give Orick economic stability into the foreseeable future; however, without the help of the community, significant work forces such as those in the surf fishing industry could easily fold due to developing conditions created by the National Park Services. The residual effects of surf fishermen folding their business could prove quite detrimental to the growth of Orick's economic future.

One of the goals of Orick's strategic planning process is to provide the needed support for the surf fishermen by making recommendations to the Park Service relative to maintenance and longevity of the surf fishing industry.

## COMMENTS

## RESPONSES

### PROBLEM

Sometime in the late spring or early summer, 1997, Norman Carr, President of the California Commercial Beach Fishermen Association, received a draft of proposed Redwood National and State Parks management plan changes by a confidential source who purportedly leaked it to the Orick community. The plan, dated January 14, 1997, included some drastic changes such as closing Redwood Information Center at Freshwater Spit and eliminating commercial fishing on Orick beaches. When the park officials heard about the leak, and the resulting anger created in the Orick community, they went public, via Del Norte County's Triplicate, to say that the Orick residents have been misinformed and that the draft document was never intended for the public to see; they also said the park employees were ordered not to discuss it with the public.

The Orick community was enraged. Marna Powell, Vice President of the Orick Chamber of Commerce, told Triplicate staff writer, Andy Martin, that "the document contains far-reaching ramifications for visitors, tourists, and residents of Humboldt, Del Norte, and neighboring counties."

Andy Ringgold, Redwood National Park superintendent, said the draft is a compilation of notes from Parks planning sessions and was not intended for public review. He further stated he was disappointed because he knew it would result in a misunderstanding, and that "it was a brain-storming summary. It's just gotten people stirred up for no reason."

The problem is, people are stirred up for a reason. The document described the virtual elimination of their livelihood and their ability to make a modest living for them and their families. Specifically, it states that the Parks Service would allow access of commercial surf fishing vehicles on the beach at Freshwater Spit and Gold Bluffs beach by permit only and such access will be phased out in three or twenty years.

According to Richard Sermon, State Parks superintendent, the issue is eliminating vehicle access to Gold Bluffs beach but not eliminate fishing. "The issue is access. It's a vehicle access issue. It's not a fishing issue at all," states Sermon.

It is every bit a fishing issue! Mr. Sermon's obvious lack of knowledge in the methodology of surf fishing allows him to make such a brash statement. In order to transport fishermen and nets to where smelt are spawning requires a motorized vehicle to get them there...and fast! Smelt move rapidly up and down the beach, necessitating the vehicles to follow them. When surf fishermen transport their catch to the fisheries, they must do so in pickup trucks. A full truck bed of smelt can weigh up to a couple thousand pounds; thus, a physical impossibility for a fisherman to carry over long distances of

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sand. To eliminate vehicle access to the beaches for the purpose of surf fishing eliminates the ability to surf fish. It should also be noted that to eliminate motor vehicle access to the beaches would deny sport fishermen the ability to enjoy their sport and handicapped or older visitors would not be able to enjoy the scenic beauty our beaches provide.

NATIONAL GEOGRAPHICS July 1966

TODAY AND TOMORROW IN OUR NATIONAL PARKS

by Melville Bell Grosvenor, L.L.D., Sc.D. President/Editor  
 ..."I stress 'use and enjoy'; that, after all, is the fundamental purpose of our parks as Congress established them. I cannot agree with those who maintain that any improvement of a park --an access road, a modest lodge--violates the principles of conservation...But what of our older visitors, and equally, the very young? Without proper facilities such as access roads, food, and lodging, these millions can never fully enjoy the wonders set aside for them."

Article I, Section 25, of the Constitution of the State of California states, in part, "The people shall have the right to fish upon and from the public lands of the State and in the waters thereof, excepting upon lands set aside for fish hatcheries, and no land owned by the State shall ever be sold or transferred without reserving in the people the absolute right to fish thereupon; and no law shall ever be passed making it a crime for the people to enter upon the public lands within this State for the purpose of fishing in any water containing fish that have been planted therein by the State..."

Article X, Section 4, of the Constitution of the State of California also states, "No individual, partnership, or corporation, claiming or possessing the frontage or tidal lands of a harbor, bay, inlet, estuary, or other navigable water in this State, shall be permitted to exclude the right of way to such water whenever it is required for any public purpose, nor to destroy or obstruct the free navigation of such water, and the Legislature shall enact such laws as will give the most liberal construction to this provision, so that access to the navigable waters of this State shall be always attainable for the people thereof."

The Sierra Club

Why is the Redwood National and State Parks Service doing this? First, let's talk about a powerful organization known as the Sierra Club. Members of this club include attorneys, doctors, professionals of all levels, senators, congress persons, judges, and many others with a myriad of titles. These folks have ill-conceived and misguided idealism, in terms of human value. They have a fervent desire to promote the preservation of pristine forests and waterways, including beaches. They have an almost fanatical desire to preserve animals and birds in their natural habitat, such as the Western Snow-breasted Plover. In so doing, they become so aesthetically inclined that they

## RESPONSES

557-C The *General Management Plan / General Plan* for Redwood National and State Parks is not in conflict with the California Constitution with regards to fishing from public lands. The agencies recognize that the California Constitution states "The people shall have the right to fish upon and from the public lands of the State and in the waters thereof ." The constitution does not, however, provide or guarantee vehicular access across public lands.

557-C

## COMMENTS

turn a blind eye to the growing welfare and suffering of the impoverished citizens in depressed communities, such as Orick, whose sole means of survival is the timber or fishing industries.

### Destruction of Beaches by Surf Fishermen?

Do surf fishermen give the Sierra Club a reason to be concerned by either causing wanton, flagrant, and malicious destruction of the natural beauty of our beaches or do they destroy our beaches unknowingly through their regular course of business? The reality is, they do neither; conversely, they protect the beaches---almost to a fault! These fishermen not only police after themselves, they hold annual beach cleanup events amongst themselves and the community, and they participate in organized county beach cleanup efforts (with other organizations such as the Stone Lagoon Action Committee).

557-D On January 10, 1985, a public hearing was held in Eureka, California, for presentation of the draft of the ten year general plan by the Redwood National and State Parks. During this hearing, it was determined by the California State Park and Recreation Commission, along with the opinion of the State Attorney General, that, with regard to the surf fishing industry, there is no threat of damage to the dunes, plants, or wildlife; and there is no legal conflict with the State of California.

Not only are surf fishermen known for their cleanup of beaches and for their protection of the ecosystems and environment, they are lauded by the community and visitors for:

- Serving as tourism hospitality docents; they're the guys who take the time to tell tourists about local areas: where to go, what to see, and how to go about it. They even give out free fish and recipes to many of the visitors.
- They're the health and safety guys. In addition to picking up and hauling off garbage from the beaches, they tell careless drivers to slow down and watch out for people on the beaches. They also ensure sensitive areas are left alone.
- They're the neighborhood watch. They're the guys with CB radios who actually patrol our beaches most of the time. The rangers can't be everywhere, particularly in remote beaches, and the Humboldt County Sheriff's Department is already spread too thin; but the surf fishermen are down there to call for help with their CB's day and night, good weather and bad.

There are only approximately 65 surf fishermen/women, a relatively small number to create havoc on the beaches or be a detriment to the surrounding environment. But to take away their industry and force them to leave will create a significant negative impact, not only in their community, but with the

## RESPONSES

557-D California State Park and Recreation Commission Resolution 1-85 addresses the *State Redwoods Parks General Plan* dated November 1985 and provides policy guidelines for vehicle access to the beach for commercial fisherpersons and Native Americans. The policy was an attempt to address the conflict between state park users identified in the 1985 plan. The current draft joint plan suggests an alternative to eliminate this continuing conflict between commercial vehicle and traditional RNSP users.

## COMMENTS

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following, as well:

- a) Local businesses would suffer loss of income, particularly the burl shops which constitutes the largest sector of the Orick business community. Owners of the burl shops depend on driftwood, which they gather from the beaches or from surf fishermen who gather the wood for them, in order to operate their businesses.
- b) Loss of product for processing plants...consequently resulting in down-sizing of their work force.
- c) Regional fishing equipment supply houses will suffer.
- d) Local gas and oil sales will decline dramatically, forcing operators/owners to close.
- e) Trucking lines/shippers will suffer.
- f) The Orick school will be forced to close.
- g) Zoos, aquariums, bird sanctuaries, and wildlife care centers will not be able to provide subsistence for its animals.
- h) People around the world who eat smelt will suffer.
- i) State and National Parks will suffer loss of revenue.

## COMMENTS

## RESPONSES

### SOLUTION

It has been said that there is always STRENGTH IN NUMBERS. By enlightening as many people as possible of the plight of the commercial surf fishermen and women, perhaps we can evoke and implore the necessary help to ensure their survival and continued existence, in terms of industry, for many generations. You can help.

For these men and women, commercial surf fishing is their chosen field, their livelihood, their mainstay, their way of life. Their "career" has been a culture and tradition that has been introduced to them by the Yurok Indians three generations ago, tantamount to the many traditions in the United States.

You can keep this tradition alive by acting now. Your voice will not only serve to defend the survival of the surf fishing industry, but the very lives of the men and women, and their families, who depend on surf fishing for survival as well. Your voice will also have far-reaching effects to include the many others who depend on the surf fishing industry.

Please write or lobby the politicians, a strong force who can sway the decisions of the Redwood National and State Park Service. The following page is a list of politicians whom you may contact. Tell them to SAVE THE COMMERCIAL SURF FISHING INDUSTRY in Northern California. Please request that the public comment period be reopened for Redwood National and State Park General Plan and should that come to fruition, please attend for support.

If you need further information or wish to share your concerns, please contact:

The California Commercial Beach Fishermen Association  
P.O. Box 188, Orick, CA 95555 Attn: Norm Carr at  
(707)488-2675 or "Buck Cook" at (707)488-3005

or

Orick Tomorrow  
P.O. Box 93, Orick, CA 95555 Attn: Marna Powell at  
(707)488-

Thank you for your support!



## COMMENTS

## RESPONSES

HERE ARE SOME GREAT RECIPES FOR COOKING SMELT:

## PAN FRIED SMELT

Day or night smelt (4 to 5 day or 6 to 8 night) per serving. First, clean and wash smelt (butterflying them works best). Make flour mix with flour, salt, pepper, and garlic powder.

Wash and clean smelt (kitchen shears work great). Cut off head and then slit down the belly; remove guts.

Heat oil in frying pan. Combine the flour mix, roll the smelt in the mixture. Fry the smelt in hot oil until golden brown on each side.

## Variations

You may also use cornmeal instead of flour or mix 1/2 corn meal and 1/2 flour.

You may also dip the smelt in a mixture of beaten egg and milk; and then roll in flour.

Smelt can be used in a variety of ways. The night smelt (the smaller of the two varieties) may be canned the same way as sardines. Both varieties of smelt can be smoked; they can be smoked cleaned or whole. Each variety has a distinct flavor of its own.

ENJOY!

COMMENTS

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..."Congress, in establishing the national parks, stipulated that they were to be administered for the use of the people. The people should be free to visit them and, through them, understand the history of our Nation, our way of life, and the natural processes which have given form to our land. I reaffirm my belief in this wise mandate: Parks are for people. People are picnickers, hikers, devotees of skiing and swimming, fishermen, bird watchers, and lovers of the lonely wilderness..."

Quote by Melville Bell Grosvenor, LL.D., Sc.D.  
from National Geographics, July 1966

## COMMENTS

## RESPONSES

EXHIBITS

(In sequential order based on chronology)

Exhibit A: Letter from Humboldt County Board of Supervisors, dated December 19, 1983, to State Parks and Recreation, wherein they oppose closure of Gold Bluffs Beach and barring of commercial fishing. Response from State Parks and Recreation, dated January 11, 1984, indicating accommodation of fishing interests.

Exhibit B: Resolution No. 84-04 from the Del Norte County Board of Supervisors, dated January 3, 1984, opposing the State Parks Department plan to eliminate surf fishing and wood collecting at Prairie Creek State Park and Gold Bluffs Beach. Response from State Parks and Recreation, dated February 2, 1984, indicating accommodation of surf fishermen's needs for beach access.

Exhibit C: Letter from Lucille Vinyard, Redwood Chapter, North Group, Sierra Club, dated January 26, 1984, to the director of State Parks and Recreation, strongly suggesting access of commercial fishermen to only those portions of beaches that are considered good fishing points and closure to the rest of the beaches. Local Sierra Club leaders reluctantly agree to limited, permitted-use-only for commercial fishermen, along with more restricted vehicle access to beaches. Response from the director of State Parks and Recreation stating the Draft General Plan incorporates a policy proposal to accommodate the commercial fishing interests.

Exhibit D: Letter from John Mott, President, Calif. State Park Rangers Association, dated February 9, 1984, to the director of State Parks and Recreation, supporting seasonal closure of Gold Bluffs Beach for vehicles and recommends year round closure consistent with State Park classification. Letter of response from the director, dated March 15, 1984, acknowledging economic interest involved in allowing beach access to commercial surf fishermen and the relatively minor impacts imposed on park environment.

Exhibit E: Letter from Ms. Dorothy Aiken, Secretary, Commercial Fishermen, Wood Gatherers and Beach Users Group of Northern California, dated April 6, 1984, to Governor George Deukmejian, expressing concern regarding closure/restrictions of Gold Bluffs Beach use to the general public, including commercial beach fishing and wood gathering, by the State Parks Department. Letter of response from Gordon K. Van Vleck, Secretary for Resources, dated May 10, 1984, indicating continued use of Gold Bluffs Beach by the public except for off-highway vehicles.

Exhibit F: Letter of response from William S. Briner, Director, California State Parks Department, dated July 17, 1984, to Ms. Dorothy Aiken (see Exhibit E), confirming Secretary Van Vleck's position relative to continued use of Gold Bluffs Beach by the general public.

## COMMENTS

## RESPONSES

Exhibit G: Minutes of meeting of the California State Park and Recreation Commission and the general public, on January 10, 1985; conducted at Eureka, California. Emphasis is placed on areas in the minutes pertaining to commercial beach fishing (highlighted in yellow). Of significance is the strong opposition to allow vehicle access for surf fishermen at Gold Bluffs by the Sierra Club and the California State Park Rangers Association (refer to pages 8, 10, 11, 12, and 14).

Exhibit H: Statement from "Save-the-Redwoods League" which was presented at the State Parks and Recreation Commission hearing, at Crescent City, on January 11, 1985. The League expressed its opposition of vehicles having access to the beach at Gold Bluffs for wood gathering and commercial fishing. The League further reminded those at the hearing that it contributed 1.2 million dollars of its funds raised from concerned citizens across the country toward the purchase of the beach, bluffs, and forests in several tracts of land for addition to Prairie Creek.

Exhibit I: Memorandum from the Superintendent, Redwood National Park Service to the Regional Director, State Redwoods Parks, dated October 6, 1984, indicating that during the review process of the Preliminary General Plan, discrepancies were noted and needed to be abated. National Park Service declared that it will continue to allow vehicle access to Gold Bluffs Beach south to Mussel Point for commercial fishing and that it would manage vehicular beach use in concert with state parks and provide a uniform policy along the entire beach. Attached to Exhibit I are other memoranda from National Park Service with additional comments.

Exhibit J: Survey of "late season migrants" and other shore bird species, taken at Stone Lagoon and Gold Bluffs Beach to determine impact of surf fishermen on their beach and dune habitats. Dated summer 1985. Of concern were presence of the Snowy Plover, a protected species. None were encountered.

Exhibit K: Page 89 of the State Redwood Parks General Plan, dated November 1985, allows for vehicular access to Gold Bluffs Beach by commercial fishermen on a 24-hour-a-day basis. The plan would also include consideration of providing at least two accesses from Gold Bluffs Beach Road down to the wave slope of the sandy beach.

Exhibit L: Letter from Norman Carr, President, California Beach Fishermen Association, dated February 4, 1997, to Congressman Frank Riggs expressing concern that the California State and National Parks were denying fishermen access to commercial beach fishing grounds.

Exhibit M: Letter of response from Congressman Riggs to Norman Carr, dated February 6, 1997. Congressman Riggs expressed his

## COMMENTS

## RESPONSES

willingness to intervene with the National Parks Service on behalf of the California Commercial Beach Fishermen Association.

Exhibit N: Letter of response from Andrew T. Ringgold, Superintendent, Redwood National and State Parks, dated February 14, 1997, to Congressman Riggs.

Exhibit O: Letter from James R. Frey, Staff Counsel, to Norman Carr, dated February 24, 1997, explaining the Public Trust Doctrine as it relates to right to fish, engage in commerce and navigate public waterways. In essence, fishermen have no right of access across the state and national parks to the beaches unless from the waterward side.

Exhibit P: Letter from Marna Powell, Vice President, Orick Chamber of Commerce, to Mr. Reed Hansen, dated April 21, 1997, providing a true economic picture of the town of Orick. Mr. Hansen has been contracted by the Redwood National and State Parks to write an economic impact report for the new RNSP ten year general plan. Reference made by Ms. Powell to an editorial she wrote regarding commercial surf fish industry. Editorial attached.

Exhibit Q: Letter from ORICK TOMORROW to the Humboldt County Board of Supervisors, dated June 3, 1997, expressing concerns regarding the economic future of Orick. Questions were posed regarding vehicle access for commercial beach fishermen, eradication of the local surf fishing industry by the Redwood National and State Parks, and differences between current policy and that of the 1985 10-year General Plan by the RNSP (see pages 4 and 5).

Exhibit R: Letter from the Humboldt County Board of Supervisors to Andy Ringgold, Superintendent of National Parks, and Rick Sermon, Superintendent of State Parks, dated June 26, 1997, requesting future input in the planning process and allowing an opportunity to make appropriate comments regarding Humboldt County concerns to the 10-year General Plan. The Board also recommended that the parks services need to "spend more time in talking to their neighbors, the people of Orick, to explain your intentions and to listen to their concerns and make adjustments to eliminate adverse effects". This was prompted by the letter from Orick Tomorrow to the Humboldt County Board of Supervisors (see Exhibit Q).



▲ CALIFORNIA INDIAN BASKETWEAVERS ASSOCIATION ▲

16894 China Flats Road, Nevada City, CA 95959 (530) 292-0141

November 9, 1998

Park Superintendents  
 Redwood National & State Parks  
 1111 Second Street  
 Crescent City, CA 95531

Dear Sirs,

Thank you for this opportunity to comment on the Redwood National and State Park (RN/SP) General Management Plan/General Plan (GMP/GP). The 900+ member California Indian Basketweavers Association works to preserve, promote and perpetuate California Indian basketweaving traditions while providing a healthy physical, social, spiritual, and economic environment for basketweavers. California Indian basketweavers and gatherers are highly dependent on public lands to continue their traditional cultural practices, such as basketweaving, and many of our constituents have ancestral and contemporary ties to the RN/SP area.

Regrettably, the National Park Service (NPS) is the most restrictive of the federal agencies with regard to gathering by California Indians. It is the only federal land management agency that prohibits gathering by Native Americans who lack treaty rights. NPS resource regulations and policies seek to preserve lands and resources in their natural state. Fortunately, this "steady state" approach is giving way to resource management based on a growing awareness that ecosystems are dynamic systems that include fire and human intervention as fundamental historical components. The idea that Indian people, as proprietary wildland stewards, were--and still are--integral components of natural systems is gaining recognition, but more slowly.

We have reviewed most of the GMP/GP as presented in the RN/SP webpage. Since the plan will have significant long term implications for our constituents in your area, we ask that you give serious consideration to the following comments and prepare a final plan that will allow traditional gathering and encourage a greater involvement by California Indian basketweavers and gatherers in resource stewardship.

**The NPS Gathering Policy**

Current NPS regulations specifically prohibit the collection of plants, wildlife (including seashells) and other renewable resources for religious or ceremonial purposes, unless specifically authorized by federal law or treaty rights.<sup>1</sup> There is no authority under current NPS regulations to permit the gathering of renewable resources by American Indians for religious or other cultural purposes.

1. 36 C.F.R. § 2.1(d). There are no ratified treaties in California, so it is up to NPS to conduct an official rulemaking to allow for gathering by California Indians.

NOV 16 4 17:59  
 NATIONAL PARK SERVICE  
 CRESCENT CITY, CA

## COMMENTS

## RESPONSES

Park Superintendents  
Comments on Draft Management Plan

Page 2

In 1995, a modification to the NPS regulations was proposed, but no action was taken on the proposal. The proposed modification would have allowed for the taking of certain seashells, plants, plant parts, and mineral resources for traditional cultural practices<sup>2</sup>, following a determination by the superintendent that the harvesting would not adversely affect park wildlife or the reproductive potential of a plant species, or otherwise adversely affect park resources. However, since the proposal did not move forward, the NPS continues to have a "no-gathering" policy.

#### Cultural and Ethnographic Landscapes

Failure of the proposed regulations notwithstanding, we believe aboriginal gathering practices can be accommodated under the NPS Organic Act because such practices were responsible in large measure for creating and maintaining the historical ecosystems and "cultural landscape" present within RN/SP. According to the GMP/GP, the NPS Cultural Resource Management Guideline (NPS-28) defines a cultural landscape as:

A reflection of human adaptation and use of natural resources and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built. The character of a cultural landscape is defined both by physical materials, such as roads, buildings, walls, and vegetation, and by use reflecting cultural values and traditions.

Scientists now recognize that the landscapes encountered by Euro-American settlers in California evolved with and were adapted to the land use and resource management practices of Native Americans. The landscape was intensively managed to produce an optimum and continuing supply of plants for food, medicines, teas, and basketry, among other things. Plant gathering areas were tended by families who dug, pruned, coppiced, burned and sometimes irrigated sites to maintain and enhance the abundance and vigor of the plant populations. It would be no stretch of the imagination to recognize that a gathering area that has been tended by Yurok people for hundreds of years could be a cultural landscape by NPS's definition. Indeed, that term could easily be applied to the entire park.

However, the GMP/GP, does not allow for identification of an area as a cultural landscape unless it is potentially eligible for listing in the National Register of Historic Places.<sup>3</sup> We believe that this standard is unduly restrictive and the process for nomination excessively burdensome to be useful. We urge you to include in the final GMP/GP a policy that would allow for designation of cultural landscapes under broader criteria.

2. *Id.*

3. Redwood National and State Parks, General Management Plan/General Plan.

**471-A, B, C, and D** In the new "Relationships with American Indians" section of the final plan, see the subsection entitled "Traditional Activities on Park and Aboriginal Lands." The *General Management Plan / General Plan* and this section in particular reflect the parks' commitment to the traditional gathering of plants by Native Americans and to the collaboration with Native Americans in managing traditional plant resources, in conjunction with the management of cultural landscapes. Furthermore, these landscapes will be designated and defined in consultation with local tribes, using broad criteria.

Park Superintendents  
 Comments on Draft Management Plan

Page 3

As used in the GMP/GP, it is difficult to understand the basis for the separate categories of cultural landscape or resource and ethnographic landscape or resource. Do different management guidelines apply? What difference, if any, in protection and management is afforded under the different designations?

471-B

We believe that gathering of plants and management of plant populations by Indian people is a significant component of the RN/SP landscape, no matter how it's categorized. We feel strongly that this should be acknowledged as such by RN/SP and recognized in the GMP/GP. Further, we strongly recommend that the GMP/SP include policies and guidelines that allow for "reintroduction" of the aboriginal land management practices by their contemporary California Indian practitioners.

**Conflict Between NPS and California State Park Gathering Regulations**

In California, there is an interesting situation regarding California Indian gathering rights. California Indian tribes recognized by statute or treaty, even if non-ratified, as well as those California Indians identified by the Native American Heritage Commission as being indigenous to a unit or general area of the California Department of Parks and Recreation (DPR), may collect with approval. The DPR policy does not give any particular group or individual exclusive rights or uses to any part of the state park system. However, management policies covering gathering are to be regularly incorporated into park general plans.<sup>4</sup>

The DPR gathering policy, although also limited in scope,<sup>5</sup> conflicts with the NPS policy as applied to California Indians. Since California tribes do not have ratified treaties with the federal government, they are prohibited from gathering on National Park lands. However, there is some overlap of park properties in California, such as in the case of RN/SP.

During consultation for the GMP/GP, members of the Indian community suggested that the regulations should be consistent within the RN/SP. Unfortunately, even with the firmly established relationship between the RNP and the Yurok Tribe, there is still much resistance to the notion of allowing gathering on RNP lands to the same extent as the state park lands. CIBA

4. See Department of Parks and Recreation, State of California, Resources Agency, Departmental Notice No. 88-18, Issued March 23, 1988.

5. Current DPR regulations limit the access afforded to California Indians for traditional gathering activities. Gatherers must go through a permit process prior to approval, must pay to enter the Park, and then are allowed to gather materials only in underdeveloped areas. In addition, gathering must be done away from roads, trails and developed areas unless otherwise specified in the permit. Moreover, the gathering must be conducted in an "inconspicuous manner". These requirements are regarded both as odious burdens and obstacles to resources that enable continuance of traditional cultural practices— which allow the native cultures themselves to continue. The DPR permit regulations demean and degrade the people who are the aboriginal caretakers of the land very lands in question.



## COMMENTS

## RESPONSES

Park Superintendents

Comments on Draft Management Plan

Page 4

471-C

recommends that these inconsistencies be addressed in the GMP/GP by a commitment to pursue either an amendment of NPS gathering regulations, an exception from the regulations for RNP, or by allowing for gathering for cultural and religious use under the guidelines for Cultural Landscapes or Ethnographic Landscapes.

**Conclusion**

471-D

As trustee for Indian tribes, the federal government is obligated to protect cultural resources. In 1988, the U.S. Department of Agriculture (Forest Service) and the United States Department of Interior (BLM and NPS) entered into an Agreement in Principle that established a mutual and beneficial partnership with Indian tribes.<sup>6</sup> This partnership is founded on maintaining the government-to-government relationship with tribal governments, and implementing programs that honor Indian rights and fulfill legally mandated trust responsibilities. This relationship is acknowledged and furthered by the *Memorandum of Understanding Among National Park Service, Redwood National Park; California Department of Parks and Recreation, Prairie Creek Redwoods State Park, and the Yurok Tribe*. In light of the long-standing, continuous use of the Park's natural and cultural resources by Yurok and other tribes, CIBA strongly recommends that the final GMP/SP RNP include a unified, consistent mechanism to allow for their gathering and management of plant resources.

Thank you again for this opportunity to comment on this important document. Please do not hesitate to contact Michelle LeBeau (530/758-9118) Resource Protection Associate, regarding these comments, and please let us know how we can work with you to draft specific language or develop mechanisms to implement our recommendations.

Sincerely,



Sara Greensfelder  
Executive Director

cc: Michelle LeBeau

6. United States Department of Agriculture, Forest Service Manual, Title 1500, § 1563.

COMMENTS

RESPONSES

# California Native Plant Society

PO Box 1067 Arcata, CA 95521

2 November 1998

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

RE: Comments regarding the Redwood National and State Parks General Management Plan EIR/EIS.

The North Coast Chapter of the California Native Plant Society thanks Redwood National Park and California State Parks [N&SP] for the opportunity to comment on the Draft General Management Plan EIR/EIS.

In general we support the goals and objectives of the two park services in protecting and managing for natural resources, particularly native plant communities. These goals and objectives are demonstrated in several proposed management actions in the draft plan.

Protecting Threatened and Endangered plants is an important mission of the N&SP. Intensive rare plant inventories and surveys should be conducted in potential rare plant habitats. Many rare plant populations are known to occur just outside the park boundaries. Potentially numerous unknown rare plant populations occur within the park but surveys of likely habitats have not been conducted. A separate Rare Plant Management Plan should be developed for the park. Management plans and activities should take into consideration all CNPS listed species not just State & Federal listed or candidate species. Potential impacts on rare plants, rare vegetation types, and sensitive habitats from increased visitor use should be identified and mitigated.

472-A

We commend the N&SP for limiting off road vehicle use on coastal dunes. The proposed closures of Gold Bluffs beach and Freshwater Spit to vehicles, camping, and parking will result in the protection of fragile dune communities and rare plants. However, the current EIR/EIS makes no mention of the management of dune vegetation in its discussion of vegetation management. The dune systems within the park are currently under severe threat by the spread of exotic vegetation, especially European beachgrass. We strongly recommend that the park implement a separate dune management plan to address these issues.

472-B

The reintroduction of fire as a natural component of the ecosystems will greatly assist in maintaining and restoring natural plant communities and help to prevent large, destructive wildfires. We support the proposed prescribed burn program in maintaining the Bald Hills prairies.

We are open to the idea of second growth stand manipulation to accelerate processes which will lead a diverse old growth forest, but feel this manipulation could be more innovative. We are, however, concerned regarding how this will be accomplished and look forward to commenting on specific second growth management plans for particular forested stands within the parks. Opening the stands up too much may lead to many unintended outcomes such as an invasion of exotic species along roads and skid trails, increased likelihood of blowdown of exposed thinned stands from severe winds events and the increased fire danger from significant fuel load of thinned material. We would like to see more detailed thinning prescriptions, i.e. specifics on stand entry options and take and leave specifications. The plan should include not only structural manipulation, but species composition manipulation, with a goal of creating a landscape of diverse structural and species composition.

Our chapter supports the creation of state wilderness areas in Jed Smith and Prairie Creek.



Dedicated to the preservation of California native flora

472-A RNSP botanists are aware of the possibility that previously unknown populations of rare plants may occur within RNSP boundaries. The plan has been updated to reflect reports received in summer 1999 (but not yet confirmed) that two rare plants have been reported within RNSP boundaries. Appendix I (final plan) lists all sensitive plants in the parks, or in the vicinity of the parks, and describes the known or potential location in the parks. All management plans and implementation proposals are reviewed by RNSP botanists. Before ground disturbance, areas that contain habitat suitable for rare or sensitive plants are inspected are by RNSP botanists, and any populations of sensitive plants encountered are protected to the greatest extent possible. If sensitive plants inhabit locations where increased visitor use is likely to adversely affect these plants, RNSP staff will take steps to ensure that the sensitive plants are protected.

472-B European beachgrass is being removed from dune systems in accordance with the approved Exotic Plant Management Plan. The management of the dune communities at Freshwater Lagoon Spit, Gold Bluffs Beach, and Crescent Beach has been a consideration in the proposals for limiting off-road vehicle access as described in this management plan. A plan for managing day use at Freshwater Lagoon Spit and any subsequent development would be prepared that would include protection of dune communities.

COMMENTS

RESPONSES

PAGE 2 CNPS Comments the Redwood National and State Parks General Management Plan EIR/EIS

The North Coast Chapter of CNPS strongly supports the restoration of Redwood creek estuary and adjacent creeks to a naturally functioning pre-levee, pre-breaching condition. We feel that Alt 3 is much more optimal in restoring the natural estuary processes and functions and will more quickly enhance Redwood Creek riparian and marsh vegetation.

We are very concerned about the expansion of equestrian and bicycle trails in the park. These activities have potential to spread many types of noxious plants and pathogens ranging from yellow star thistle to Port Orford Cedar root rot. Therefore, we urge you to limit the development of equestrian and biking trails.

We support native American use of traditional plants and gathering areas and believe that they should be granted greater flexibility and accessibility to their traditional botanical resources so long as those resources are monitored and overuse is prevented.

Thank you again for the opportunity to comment on the draft plan. We support the parks in their continuing efforts to protect resources, provide recreation, and to educate the public to the wonders of California's native plant communities. CNPS would like to continue to be considered for comment in the creation of management plans or wherever our expertise is relevant.

Sincerely yours,



Gordon Leppig,  
President North Coast Chapter  
California Native Plant Society

COMMENTS

RESPONSES



Del Norte County  
Historical Society

577 H Street,  
Crescent City, Calif. 95531

Battery Point Lighthouse

Main Museum  
(707) 464-3922

Lighthouse  
(707) 464-3089

PROJECT PROPOSAL

269-A

**WHAT:** Trail for hiking, bicycling, and/or horseback riding.

**WHERE:** Section of the old Pioneer Stage Road to Oregon – from Camp Lincoln to the Smith River at the Peacock Ferry crossing. (California Registered Historical Landmark #645. The Pioneer Stage Road to Oregon was constructed in 1858. This was the route of the Crescent City Turnpike. Following the present Elk Valley Road to Old Camp Lincoln, it then crossed the ridge, forded the Smith River to Low Divide and continued to Jacksonville, Oregon by way of various gold camps).

**WHY:** Interest expressed to Historical Society to open this section for public use.

**GOOD IMPACT:** Opening of new area of Park.  
Public lands.  
Accent, interpret, and preserve early historical development of area.

**POSSIBLE NEGATIVE IMPACT:** Staging area for horses and/or autos on the West End.  
Erosion.  
Habitat disturbance.

**COST:** Pelican Bay State Prison Inmate Program.

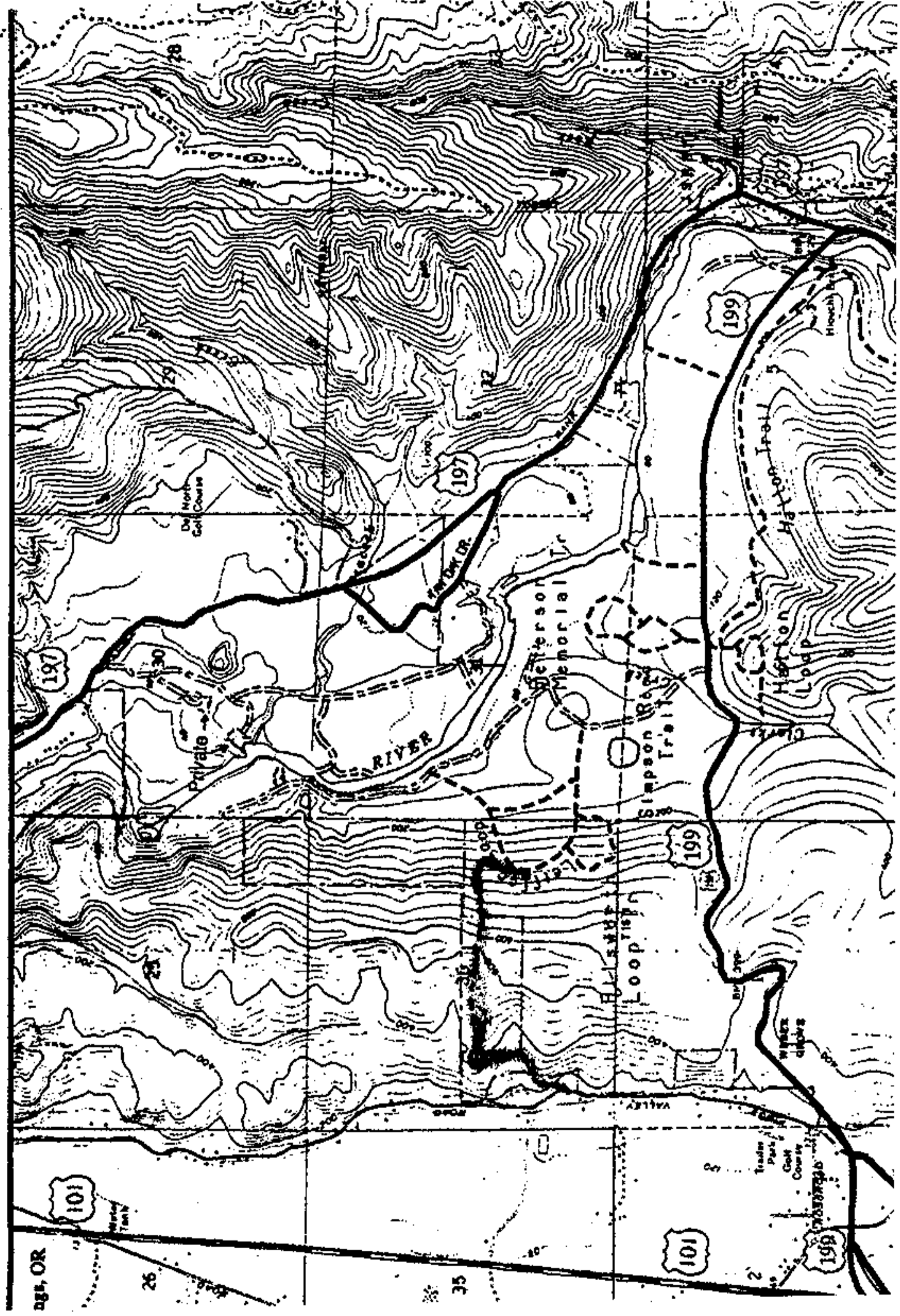
Contact person: Judith A. Knitter  
Historical Society Volunteer  
September 11, 1998

REDWOOD NATIONAL  
AND STATE PARKS  
RECEIVED  
SEP 21 1998  
ARCATA OFFICE  
ARCATA, CA

269-A A trail plan for the parks would be developed in the future, and your proposal will be considered.

COMMENTS

RESPONSES



COMMENTS

RESPONSES



Del Norte Economic Development Corporation

October 2, 1998

Superintendents, Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

05 OCT -6 AM 8:13

NATIONAL PARK  
CRESCENT CITY  
CALIF. 95531

Re: Review Comments on the General Management Plan/General Plan

Dear Sirs:

After a review of the Redwood National and State Parks draft General Management Plan/General Plan, the Del Norte Economic Development Corporation Board of Directors are concerned that the emphasis on preservation at the expense of any kind of economic benefit from visitors in the four alternatives, is counter to the promises made to this County when the National Park was first proposed. A reasonable alternative that should be considered [a fifth alternative], would look at maximizing the economic benefit by making access more available, encouraging and promoting the establishment of National Park related private businesses, and dedicating National Park Service resources in the creation of a truly "destination" attraction [such as a lodge or other attraction that would increase the time of stay of visitors].

From an economic development point of view, the current draft plan has only one alternative to choose from, and that is preservation. By adding a second [fifth] alternative, and extending the public comment period for at least a couple of more months, the Redwood National and State Parks can "test" the will of the people and businesses here in Del Norte County. Without an alternative that addresses the economic benefit and the forgotten promises of 20 years ago, this County will be resigned to continue its unenviable status as dead last [58 out of 58] in per capita income and little reason to hope for the future.

Since this plan will be the "blueprint of planning" for the next 15 years, it is of utmost importance that it reflect the will of the people who live here. Adding a

270-A The National Park Service and California Department of Parks and Recreation strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and emphases on visitor use and resource protection, as required by law. In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. The agencies also strongly believe that the relative emphasis between visitor use and resource protection is completely consistent with the enabling legislation for the parks. The agencies strongly disagree that there is an "all or none" approach taken in any of the alternatives with regard to visitor use versus resource protection. The National Park Service and the California Department of Parks and Recreation strongly believe that all of these alternatives achieve the legally mandated standard, which is expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations" (NPS Organic Act, 16 USC 1 and NPS *Management Policies* 1:3). Also, each of the alternatives addresses the possibility of there being a lodge built with varying respective connections to the parks (see the "Lodge/Accommodations" subsection in the "Interdependence of Community and the Parks" section in each of the alternatives). Also, see summary comment B.

270-A

## COMMENTS

## RESPONSES

new alternative and giving a few more months to review and comment on it, is a small price to pay when considering that we who reside, work and play in this county will be obligated to live with the consequences of the final approved version for many years to come.

Sincerely,

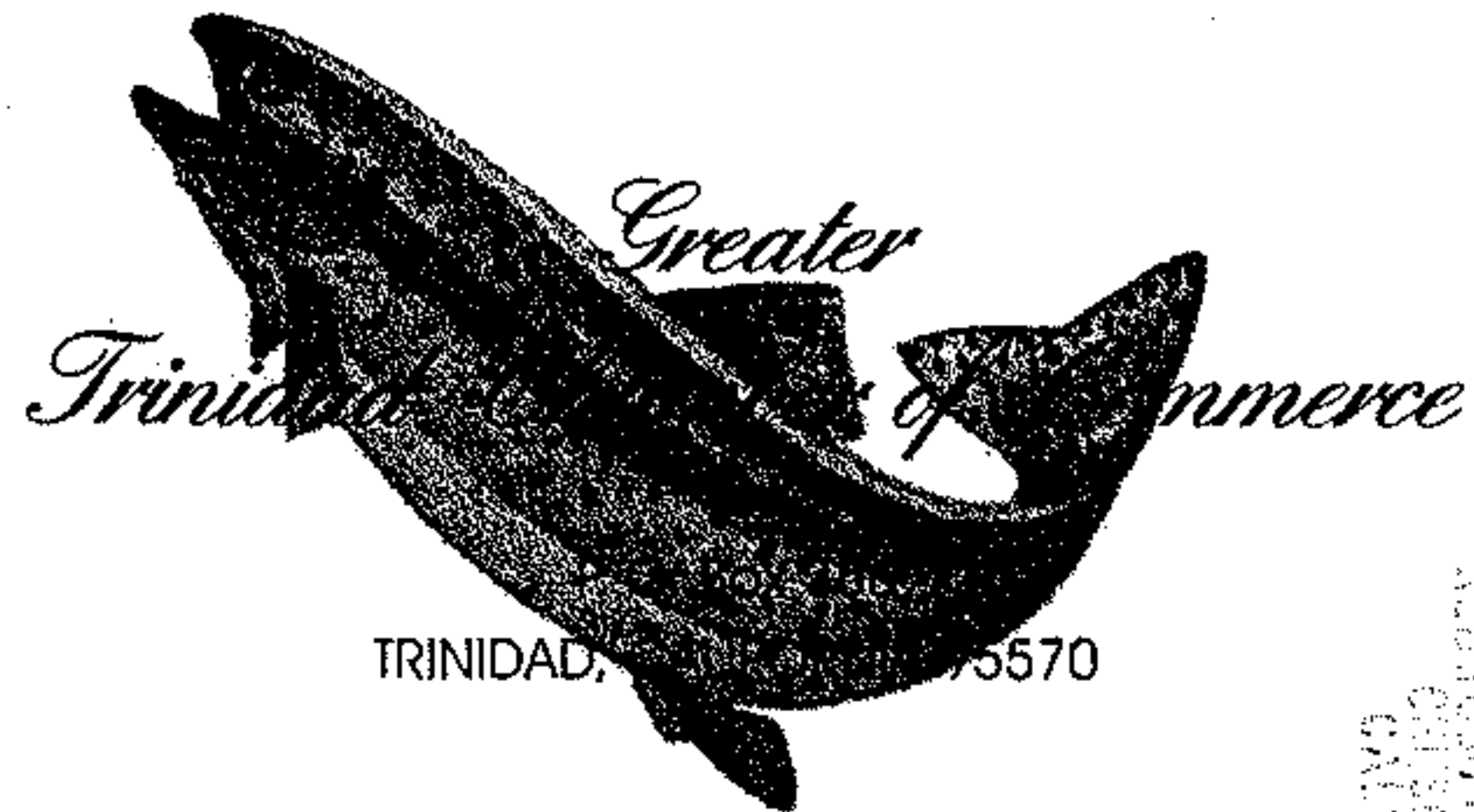


Beverly Westbrook  
President

c: President Bill Clinton  
Director National Park Service  
Regional Director National Park Service, Western Regional Office  
Senator Barbara Boxer  
Senator Dianne Feinstein  
U.S. Representative Frank Riggs  
Governor Pete Wilson  
State Senator Mike Thompson  
State Assemblyman Virginia Strom-Martin

COMMENTS

RESPONSES



TRINIDAD, CA 95570

"WHERE THE WEST ENDS AND THE FISHING BEGINS"

RECEIVED  
 CALIFORNIA DEPARTMENT OF  
 CONSERVATION  
 OFFICE 95531  
 99 NOV -4 AM 9:47

November 4, 1998

Superintendents Redwood National and State Parks  
 1111 Second Street  
 Crescent City, CA 95531

Superintendents Ringgold and Sermon:

Enclosed you will find a seven page document representing the comments of The Greater Trinidad Chamber of Commerce on the Draft General Plan for the Redwood National and State Parks. These comments were approved by unanimous vote of the Chamber's Board of Directors.

We would hope that it would be possible for those of us who are greatly interested in and impacted by what happens to these natural treasures, that belong to and are for the people, to review the comments submitted.

Sincerely,

Victor A.G. Taylor  
 President

cc: Secretary of the Interior, Bruce Babbott  
 Senator Diane Feinstein  
 Senator Barbara Boxer  
 Congressman Frank Riggs  
 State Assemblyperson Virginia Strom-Martin  
 State Senator Mike Thompson



COMMENTS

RESPONSES

**COMMENTS OF GREATER TRINIDAD CHAMBER OF COMMERCE  
ON REDWOOD STATE AND NATIONAL PARKS DRAFT GENERAL PLAN**

October, 1998

**PURPOSE OF PARKS**

Americans have historically understood that parks were acquired and operated with their tax dollars. In exchange for having bought the parks and providing the operating revenues through taxes and other fees, we have a right to visit them and show them to visitors. It is written that "Parks are for people." We believe that parks need to be, to the largest extent possible, accessible to all and affordable by all.

469-A In recent years we seem to be trending away from this basic premise. Questionable proposals to limit access unnecessarily and without sufficient public input based on perceived preservation needs have caused us to grow increasingly concerned about continuing access by the people and their guests. The same people who are footing the bill.

469-B While we continue to make strides in providing access for aged and disabled people outside of the park boundaries, the current draft of the Redwood State and National Parks 20-Year General Plan lacks the same insight. We do not believe this is acceptable to the citizens of this community, state or nation. Focus needs to be returned to parks being for people and our planning should start there.

**BASIS OF COMMENTS**

The Greater Trinidad Chamber of Commerce realizes how important the state and national parks are to this area. The gradual decline of logging has been somewhat supplanted by increasing tourism. Therefore, we feel we must be diligent to protect that fragile portion of our economic base. Our comments are based on review of the published summary of the RSNP Draft General Plan, selected review of some of the sections of the 458 page plan document, attendance at meetings, discussion with our county's 5th District Supervisor, and discussions with members of Orick Chamber of Commerce, Orick Tomorrow and review of the comprehensive material submitted to you by Orick citizen Marna Powell.

**THE PROCESS**

472-C-D Public exclusion is sadly the outcome of the process that is currently utilized in the developing of the Draft General Plan. We say this because the process has not been an interactive one.

There are serious questions about whether the public was informed some two years ago when this process was started about what was actually going on. What is referred to as a "scoping" period was not understood by the public at large to be the beginning of a general plan update.

469-A The National Park Service and California Department of Parks and Recreation strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and emphases on visitor use and resource protection, as required by law. In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. The agencies also strongly believe that the relative emphasis between visitor use and resource protection is completely consistent with the enabling legislation for the parks. The agencies strongly disagree that there is an "all or none" approach taken in any of the alternatives with regard to visitor use versus resource protection. The agencies strongly believe that all of these alternatives achieve the legally mandated standard, which is expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations" (NPS Organic Act, 16 USC 1 and NPS *Management Policies* 1:3).

The public process used to develop the plan and accompanying environment impact documents was similar to those used by many public agencies and incorporated significant opportunities for public involvement. Development of the draft plan included five public scoping meetings conducted in local communities; a scoping workshop with local American Indian tribes and groups; individual scoping meetings conducted with local focus groups such as environmental organizations, chambers of commerce, government agencies, and commercial fishermen; two newsletters produced and distributed to a mailing list of more than 500 persons and organizations; and a number of informal meetings with a variety of individuals and groups. Public review of the draft plan involved distribution of 475 copies of the plan; production of 15,000 copies of a summary of the draft plan, distributed to the mailing list and as insert in the two local newspapers; and four public meetings and a number of focus group meetings and informal meetings conducted during the public review period, which was extended from 60 days to 90. The National Park Service, California Department of Parks and Recreation, and many other agencies use the open house style of public meeting rather than a public hearing because they have found the former format to be much more conducive to high-quality communications and information exchange with the public than the

## COMMENTS

## RESPONSES

After this, using huge amounts of resources, the development process continued behind closed doors where the general public had no idea of what was transpiring. *Absent national security issues such hiding from the public should not be permitted.* In this case, about a year after the process began, a draft was leaked to the citizens of Orick and caused a tremendous uproar. Folks were assured by the National Park Superintendent that these were just talking points and the draft version released to the public would not look anything like it. But, the apparent fact is, it is almost identical. Anyone would wonder why Americans shudder when the government says "trust us"?

Some two years later a huge 458-page draft plan with hundreds of annotated reference materials is released to the public with a 60 day comment period. All of this was reduced to a 20-page "newspaper" summary document. (It does make one a little nervous as to what got left out.) Thousands of hours of governmental planning time have gone into the four alternatives of this document and it is not reasonable to expect interested groups and ordinary citizens to do the study and research necessary to respond in such a short time. On October 6th the RSNP announced it would extend public comment another 30 days from the October 9th previously announced final comment date. *The extension was definitely necessary, but waiting until the 11th hour when the need for this extension has existed since the Draft General Plan was submitted to the public was irresponsible timing.* People and groups who thought they could not respond by the early due date now are still faced with whether or not they can. Others who already responded as hastily as they could, now find that more research was a possibility. In the *News Release* announcing the extension, it stated that "In the following two years, two newsletters were published to seek additional public input...". We, nor the citizens of Orick, can identify these opportunities.

469-E

Also, there was confusion about "public hearing" during the comment period. Many media reports used the term public hearing but when some of us got to these sessions, we found they were only public displays of the Draft General Plan. Staff was available to field questions and "comment forms" were made available for people to provide written comments. We do recognize that the summary report called them "public meetings". However *the importance of this plan development begs for public hearings* with the development of a record. This permits people who may not be able to express themselves in writing, don't have the time to compose something or can't write to have the opportunity of verbally making statements that count in equal standing with written comments. This is a grave exclusion of a part of the public's voice.

469-F

The involvement of interested and affected parties on an ongoing basis--otherwise know as an interactive planning process--would be far more effective. Instead of having to develop four alternatives, three of which are not desired by the parks, one generally acceptable plan could be developed and possibly even save hundreds of planning hours.

Under the current conditions, we believe the RSNP should have to pay for an independent review by a party acceptable to the majority of interested and affected people since the 60-day period is insufficient for the general plan details to be thoroughly investigated by concerned citizens, groups and organizations.

latter. The final opportunity for formal public involvement will take place when the California State Park and Recreation Commission holds a public hearing on the plan in 1999.

**469-B** The plan proposes additional facilities, such as a new interpretive center, that would provide opportunities for people of all ages and abilities. We have added an objective and a general statement that all facilities would meet state and federal standards for accessibility. The agencies are committed to provide facilities and services to persons of all physical abilities.

Freshwater Lagoon Spit would continue to be open to day use, and improvements would be made that would increase this accessibility. Alternate camping opportunities would be required to meet the Americans with Disabilities Act requirements for such facilities.

**469-C, D, E, F** See the second paragraph to response A above.

COMMENTS

RESPONSES

**RECTIFY UNKEPT PROMISES**

It seems to us when the parks were initially created and subsequently expanded at the cost of logging employment, there were promises made to local communities and counties of economic assistance with jobs through preferential treatment. There were also grandiose plans for visitor services and lodging that would also drive the new economy. None of the promises came to fruition. As a result, there was little economic benefit derived for the lost logging production and job displacement.

469-G

**There needs to be a clear explanation in this General Plan that preferential treatment will be given to out of work and retrained workers in Humboldt and Del Norte Counties. Only when the RSNP management can clearly demonstrate through written documentation that a qualified work force does not exist and that they have made a "good faith effort" to secure such qualified workers from the local job pool and the counties themselves concede that the required personnel does not exist may RSNP management proceed with its normal hiring practices. Such a policy would clearly benefit these two counties who are finding it difficult to generate sustained employment for out of work or retrained workers.**

**This policy would also apply to the fullest extent possible to all contractors and subcontractors who do projects (i.e. stream restoration) for the parks.**

**ECONOMIC IMPACTS ANALYSIS DEFICIENT**

469-H

*The glaring omission of Orick as an economic entity suggest that the Socioeconomic portion of this plan needs to be redone and subjected to another review by the public before the final version of the plan proceeds. In response to why Orick was overlooked, we were informed it was because this was a regional study. Yet, we find that other communities were included among them the unincorporated areas of Klamath in Del Norte County and McKinleyville in Humboldt County. Again, we believe the most effective way to rectify this deficiency is through interactive planning sessions.*

469-I

There can be no mistake the number one reason visitors come to the Humboldt and Del Norte areas is to see the redwoods. This was the impetus behind the creation of the parks and remains so today. We think the following guideline for further development of the General Plan should be adopted: **No part of the plan may have any adverse economic impact on any community in either of the counties or the counties themselves in which the parks are located. This includes the acquisition of additional property and removing it from the tax rolls, even as a gift.**

**469-G** Federal and state law and regulations govern NPS and CDPR hiring practices; these practices cannot be changed through a planning document. The 1978 legislation that expanded the national park contained a number of provisions that authorized benefits, including hiring preferences and training programs, for timber industry workers affected by the national park's expansion. The National Park Service implemented those programs successfully — all of which expired in September 1984 under a provision of the same legislation. Approximately 33% of the current NPS permanent staff was hired locally, and a large percentage of the seasonal staff hired each year comes from local communities. Local contractors are used extensively by both agencies for a variety of projects, including watershed restoration.

**469-H** See summary comment E, G, and H and responses to comments K and L in Marna Powell's 8/20/98 letter.

**469-I** Management actions in the parks, including land acquisition, are guided and governed by applicable federal and state laws. Generally, these statutes specify that RNSP management actions should focus on protecting resources and providing for their enjoyment by the public.

COMMENTS

RESPONSES

FRESHWATER SPIT

Perhaps one of the most contentious parts of the General Plan is the Freshwater Spit. Since about the end of WWII and prior to Highway 101 running through it, this has been used as a public camp site. For as long as many of us can remember the camping has been done by people

469-J

driving a variety of Recreational Vehicles and a few tent campers. Most RVs we observe are modern, expensive and well maintained perhaps quite different from what once used the spit. Most of us have never observed a serious trash or sanitation situation. Yet the park service views this as a view shed blight. Most of us feel this is an incorrect and unfair characterization of the people and their vehicles that use this area and an attempt to impose a distorted perspective of what constitutes a blight.

The RSNP's desire is to eliminate the use of the area by RVers and tent campers because they constitute a blight on the southern entrance to the parks. We would argue that the beach, ocean and lagoon though spectacularly beautiful in their own right are an incongruous entrance to a redwood park. Couple this with the fact that before you actually get into the "redwoods park" you still must drive through the town of Orick which has been devastated over the decades since the parks creation.

469-K

The problem is further compounded by the contention of privately owned RV parks in Humboldt and Del Norte counties that the availability of virtually free camping along the spit cuts into their opportunities. While recent litigation apparently failed to resolve the issue, the lack of an interactive process where parties review and comment on each other's positions to provide more insight to planners, has put those planners in the position of being the judge and jury here with a potential no-win solution.

469-L

Some talk has been given to improving campsites, bringing in water, reducing the number of overnight camping spots available, imposing and collecting fees. While we agree water and sanitation should be carefully monitored, *we are not sure any justification exists for not allowing what has been happening historically to simply continue* without further capital outlays. Further, it seems to us monitoring and enforcing of existing laws against dumping of sewage or trash along with collection of fees falls into the preferential hiring category previously discussed.

Keeping the present use of the spit is vital to Orick. It is estimated campers spend upward of nearly a million dollars a year here. Therefore we would oppose elimination or substantial reduction of overnight camping along Freshwater Spit. *We would further recommend if the RSNP continues to press for elimination of the present use of Freshwater Spit, efforts be made to have Cal-Trans revoke the permit it has provided for RSNP to have this right-of-way included in the park and issue the permit to Humboldt County or the Orick Economic Development Corporation.*

469-J, K See summary comment A.

469-L See the second paragraph to response A above.

COMMENTS

RESPONSES

**SENSITIVE AREAS AND RESTORATION PROJECTS**

Sensitive areas should be identified and classified as to their ability to withstand visitors. If the number of sensitive areas in the aggregate conflicts with improved accessibility desired then additional interactive planning needs to take place with interested and affected parties to address this imbalance and determine if all parties could arrive at a better classification plan. *Every effort must be made to provide the maximum visitor enjoyment.*

Restoration projects should be developed where an area needs "time out" from visitors by opening up equivalent areas. Creation of rotating access areas planned throughout the 20-year life of the General Plan would provide well thought out protection balanced against visitor access. We would not envision that all areas of the parks would require such protection.

Restoration projects (i.e. stream restoration) that do not negatively impact access or economic conditions should be done as currently planned or even accelerated using preferential hiring practices previously described.

**Projects which have negative impacts due to limited access or have an adverse effect on economic conditions in communities or the counties must develop zero impact alternatives.** We would again suggest that the interactive process is the best way to work toward achieving this.

**RECREATIONAL, EDUCATIONAL AND INTERPRETIVE IMPROVEMENTS**

At the southern entrance to the park, the Orick Visitors Center has some wonderful exhibits including the beautiful relief map, access to videos and a viewing room as well as a small bookstore and brochure center. In Crescent City the northern entrance to the park, there is information available at the park headquarters, but no exhibits. Since the predominant flow of visitor traffic is South to North we believe RSNP would benefit from the *construction of a visitor center along the 101 corridor in Crescent City.*

469-M

How well can visitors find points of interests as they are driving through the park should be reviewed. If they have not stopped at either entrance and obtained a map, there is little to tell them what they can find. Signs need to have a short descriptor of what a visitor can find by turning on this road or parking and hiking here or there.

469-N-O

*We believe there is enormous potential for increasing the recreational, educational and interpretive opportunities that would enhance the visitors' time spent in these beautiful parks and truly implement the idea that "parks are for people". This includes additional park staff as well as collaboration for outside parties to provide these opportunities. For example, the park service or an outside party could provide an interpretive shuttle to Tall Trees Grove or many other destinations throughout the park.*

**469-M** The proposed action under the "Information, Orientation, and Interpretive Centers" section on page 56 (in the draft plan) has been changed to indicate that the services provided at teh Crescent City information center would continue until incorporated in a multiagency informatin center in the Crescent city area. Redwood Information Center near Orick would continue to serve as the primary facility providing information on and orientation to the parks. Exhibits would also be included in the facility at Hiouchi.

**469-N** Orientation signs, information signs, and interpretive signs for the parks are being addressed through a comprehensive wayside exhibit plan. Phase 1 of the exhibit plan will be completed in 1999, when 25 new informational and interpretive signs will be installed throughout the parks. Additional signs are planned as part of phase 2. Funding for phase 2 is currently being sought through various government funding sources.

**469-O** The agencies feel that implementing the proposed action would provide for greater recreational, educational, and interpretive opportunities in the parks. The proposed action in the final plan includes projections for additional staff (appendix B) and opportunities for providing additional services through outside parties (see the discussion of commercial/ concession services for visitors in the "Public Use, Recreation, and Visitor Safety" section and the "Interdependence of Parks and Communities" sections in alternative 1).

## COMMENTS

## RESPONSES

Other improvement opportunities would include bike trails so bikers could get off the highway corridors and enjoy the park. Improvements in hiking trails and providing horse-back trails are other recreational opportunities that beckon an even more diverse group of visitors.

469-P

RSNP should provide cooperation and assistance in sharing knowledge and advice with businesses that want to establish complimentary or theme related projects in areas and communities adjacent to the parks.

Here again we reiterate how valuable interactive planning can be in accomplishing improvements to recreational, educational and interpretive uses of the parks.

### STRUCTURES

*We believe that sound, serviceable buildings should be fully utilized.* There must be a sensitivity to the fact that taxpayer monies have been expended to construct these facilities. We would not see the replacement of the Orick Visitor Center within the 20-year plan as being reasonable even though it would not be built in the present location under today's guidelines because of tsunami exposure. Such rare acts of nature do not constitute an immediate need to replace facilities. We all realize that just living involves risks.

However, should a building suffer significant damage due to a natural event or other catastrophic event it would be reasonable to consider relocation at that time. So we would be comfortable if the 20-year plan targeted the area for relocation. We would hope that structural relocations be within the parks current boundaries rather than loose more private property to governmental, non-tax status although we concede in the case of a siting a single building this would have less impact than acquiring many acres more of parkland.

### SUMMARY

We are greatly concerned that this process is not designed to be interactive over time and therefore excludes the people from the largest part of the planning process. Initial notification of the scope and importance of the project appears to have been done rather unsatisfactorily. Giving the general public only sixty days to digest thousands of hours of staff time and hundreds of referenced material is unreasonable. The eleventh hour 30 day extension, while necessary, probably created more difficulties than assistance. At this point, it seems to us, the public can only protect its interests if an independent review of the draft general plan is undertaken and paid for by the RSNP. At the very least, the review period should be extended by four months.

The exclusion of Orick from the socioeconomic analysis is a fatal flaw that must be rectified before even a final draft of the plan should be considered. Public comment should be obtained once rectified. Additionally, there is mistrust of the planning process due to assurances that a leaked matrix was just brainstorming and the final alternatives wouldn't look anything like it when in fact it turned out to be just like it.

In summary, relative to the four alternatives offered by the draft general plan, we would select virtually all of Alternatives 1, 2 and 3 as being negative impactors to park access and the local economies while recognizing that improvements in Alternative 4 that could be best made through the interactive planning process would make it acceptable and workable plan.

469-P The section of the plan addressing the relationships between the agencies and gateway communities has been revised to elaborate on the types of activities or projects that could be addressed cooperatively. The plan also indicates that RSNP staff would provide technical assistance and advice to individuals interested in developing appropriate/complementary visitor services in gateway communities.

COMMENTS

RESPONSES

**KLAMATH**  
CHAMBER of COMMERCE



P.O. Box 476  
Klamath, Ca. 95548

Redwood National & State Parks  
1111 Second Street  
Crescent City, Ca. 95548

Thank you for giving me the opportunity to comment on the draft Redwood National & State Parks General Management plan.

None of these alternatives meet the needs of the visitors or the community. The most effective way to respond is to give you my thoughts and ideas as a business person, community member and a tourist.

271-A

**Purpose of the Park:** The original legislation dated October 2, 1968, states this clearly in black & white : "That, in order to preserve significant examples of the primeval coastal redwood (Sequoia sempervirens) forests and the streams and seashores with which they are associated for the purposes of public inspiration, enjoyment, and scientific study..."

The park was established in 1968 for the purpose of public inspiration, enjoyment, and scientific study. I have not seen in the legislation where it states that it must be preserved "in a condition of unimpaired ecological integrity"

In 1978 the Redwood National Park amended the legislation to read : "in accordance with the original intent of Congress, and to establish a more meaningful Redwood National Park for the use and enjoyment of visitors".

Alternative 4:

Cultural Resource Management and Protection:

271-B

The Cal-Barrel, Howland Hill & Davidson/Gold Bluff Beach roads and Tall Trees & Stout Grove access roads should be improved & paved. Pull outs & parking should be improved widen and paved. The Greater Coastal Drive should be realigned, widen and paved.

Ethnographic Resources:

The Brush Dance site is subject to erosion by the Klamath River, actions should be taken to protect the site from flooding and erosion. This is a Cultural site and is an asset to our community. This site should be maintained and efforts should be made to develop the site for increased visitor use.

REDWOOD NATIONAL  
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271-A See summary comment D.

271-B See summary comment F.

COMMENTS

RESPONSES

Education and Interpretation:

271-C

Partnerships with others outside the park system need to be strongly improved. Currently the park gives no information to the visitor concerning attractions, things to do or additional camping information unless it is PARK ONLY!!!!

271-D

Information Center: Until visitation improves a "destination lodge" seems to be far out. With all the empty buildings in Crescent City the Parks should look into leasing or developing one of the empty buildings on the 101 corridor and include (Forest Service, Chamber, RNSP, etc...) so the visitor could have all their needs met in one stop. This would eliminate the visitors in the Administration Building.

The need to keep the Information Center on the 101 corridor is important as many visitors travel 101. Relocating the northern Information Center to Hiouchi would not benefit the Northern part of the Park.

Freshwater Spit:

271-E

Close off to day use only. The site is currently an eye sore as you enter into the RNSP. By doing this Orick would be able to develop a private campground and the existing campgrounds would have a fighting chance to survive.

Gateway Communities:

RNSP should actively support and assist local communities in efforts to foster appropriate and sustainable economic development. The parks promise when it was formed was to bring millions of visitors to our area. This has not been done. RNSP needs to work with local government, chambers and businesses in order to assist in the economic development and the gateway partnerships.

Operation Facility:

271-F

The Wolf Creek fire cache and equipment should remain in current location. The Schoolhouse Peak fire lookout should remain. How can you say "it would be removed when no longer needed" Fire danger is a top priority and all lookouts should be maintained and operated during peak fire seasons. As you never know when mother nature will strike.

Housing:

Housing should be provided for seasonal staff and volunteers essential to the management and protection of the parks.

271-C Procedures for referring visitors to private sector facilities such as motels and campgrounds in gateway communities are in place and being used at the parks.

271-D The proposed action under the "Information, Orientation, and Interpretive Centers" section on page 56 in the draft plan has been changed to indicate that the services provided at teh Crescent City information center would continue until incorporated in a multiagency informatin center in the Crescent city area.

271-E See summary comment A.

271-F The California Division of Forestry and Fire Protection has declared Schoolhouse Peak fire lookout to be excess to its fire protection needs. The parks currently operate the lookout for fire protection purposes. If the lookout becomes no longer essential for NPS fire protection needs, options would be explored for other administrative or public uses of the structure. If no appropriate use is found, the parks would remove the structure as an unnecessary intrusion on the Bald Hills landscape.



## COMMENTS

## RESPONSES

271-G	Emphasize partial landform restoration, with complete removal all major logging roads and limited removal of minor logging roads would pose a greater threat than maintaining them. The current logging roads should be maintained for fire protection. This would give emergency vehicles access to the threaten area and could also provide a fire break.
271-H	The Prairie Creek Fish hatchery, located off Hwy 101 near Orick, should be reopened to improve the sport and commercial fishing in the area. At the same time, the hatchery could be used as a research and interpretative center. <u>Have a working site.</u>
271-I	Removing the Orick Information Center to B-Mill is not a very smart idea. Not only will it be off the 101 corridor it will also interrupt the elk habitat and activity.
271-J	Gold Bluff - If the surf fishing is shut down you will be disrupting the lives of 60 families that make their living fishing and selling the catch to the Eureka Zoo.
271-K	<b>FRESHWATER SPIT USERS:</b> You state in your plan "There are 10 RV campgrounds in the Klamath area (four recently closed due to flood damage) with about 530 RV spaces with hookups and 311 tent sites". This information is not correct. Klamath currently has 17 working RV Campgrounds with over 1600 sites.

The purpose for forming the Parks in 1968 was to "preserve significant examples of the primeval coastal redwood (*Sequoia sempervirens*) forests and the streams and seashores with which they are associated for purposes of public inspiration, enjoyment and scientific study".

As a Gateway Community this needs to be reminded so that we do lose touch with reality. Gateway partnerships with outlining communities and outside the park system will boost morale and community spirit. Giving the visitor a more enjoyable visit while learning about our cultural history, historical sites and enjoying the natural beauty of our community and surrounding areas.

Respectfully,



Debbie Thompson  
Pres. Klamath Chamber  
OEDP Committee  
Gateway Partnership Committee

**271-G** The preferred alternative is partial landform restoration. When roads are prioritized for erosion control work, administrative uses, including fire protection, are considered. Access for fire suppression activities would be by use of existing and proposed trail systems, as well as roads.

**271-H** It is NPS policy to preserve or restore natural aquatic habitats and the natural abundance and distribution of native aquatic species including fish. Stocking in a national park will only be allowed where there is congressional intent expressed in a law or a House or Senate report accompanying legislation (NPS Management Policies 4:8). Under NPS policy, fisheries restoration refers to increasing the density of native fish species to historic levels through the application of scientifically based habitat protection and/or habitat rehabilitation (reconstruction) techniques. Fisheries enhancement activities are prohibited in natural zones such as Redwood Creek and other national park streams. Enhancement activities include the artificial production of fish through systems such as fish hatcheries (NPS Natural Resources Management Guideline, 1991, pp. 40-42.) RNSP staff are working with the Yurok Tribe and the Redwood Creek National Watershed Center staff to develop an appropriate use of the Prairie Creek Fish Hatchery facilities to the mutual benefit of the involved parties.

The agencies support the proposed action under the "Historic Resources -- Structures" section on p. 52 of the draft plan, that Prairie Creek Fish Hatchery would be available for adaptive use through the historic leasing program. This facility could be developed into a working site that features regional resource management activities. The agencies feel that a working research center with an educational component alone would not fulfill the need for a multifaceted visitor center for the parks.

**271-I** The proposed action under the "Information, Orientation, and Interpretive Centers" section on page 56 in the draft plan has been changed to indicate the following: All functions at the Redwood Information Center would remain at that site. If the facility were to be damaged significantly in the future, the functions of Redwood Information Center will then be

**COMMENTS**

**RESPONSES**

relocated to a new primary visitor center that would be located out of the tsunami hazard zone between Orick and Prairie Creek and adjacent to U.S. Highway 101. Opportunities for constructing a new facility through public, private, and/or tribal partnerships would be sought. Redwood Information Center would be salvaged, and the site would be converted to day use with interpretive opportunities to include beach access, boardwalks, and wayside exhibits.

**271-J** The draft plan (p. 220) states that there were 57 California Department of Parks and Recreation (CDPR) permit holders accorded access to Gold Bluffs Beach for commercial beach fishing. The proposed action would limit continuation of vehicular access to Gold Bluffs Beach to those who renew CDPR permits acquired between March 1996 and September 1999. The permits would also be nontransferable. Thus, for those engaged in beach fishing the impacts of the proposed action on existing permit holders would be negligible during a lengthy transition period, but could be substantial in terms of foreclosing opportunities for others not currently engaged in beach fishing. The impacts are described in the draft plan (p. 299).

**271-K** In October 1997, private campgrounds in the Klamath area were surveyed by telephone to determine the available capacity — RV hookups and tent sites — and estimated occupancy or use rates of RV campgrounds for the summer, fall, winter, and spring seasons. A total of 15 RV campgrounds were identified based on a list of private campgrounds developed by RNSP staff to assist travelers requesting information on such accommodations and by reference to the Del Norte telephone book (Yellow Pages). Four of the campgrounds had recently closed due, in part, to flooding. Nine were contacted and completed a short telephone interview. Of the nine contacted, there were 530 RV sites with hookups and 311 tent sites indicated. It is possible, however, that some of the closed campgrounds have re-opened, which might account for the much higher count indicated in the comment (17 working RV campgrounds with more than 1,600 sites). Text in the final plan has been modified, based on anecdotal information, to reflect fluctuations in RV and camping site capacity.

COMMENTS

RESPONSES

**NATIONAL COAST TRAIL ASSOCIATION**

5124 NE 34th Avenue      Portland, Oregon 97211      (503) 335-3876

November 9, 1998

Superintendents Ringgold & Sermon  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Hello:

The purpose of this letter is to comment on the draft document regarding the overall general management plan and environmental impacts of the four alternatives presented for Redwood National and State Parks. The goal of this letter is to provide both ideas to hopefully stimulate more thinking about various specifics of the alternatives and recommendations that if implemented would be in accordance with our mission as an organization. Some recommendations come easily, whereas others bring many issues into play, and are, to say the least, difficult ones to grapple with. They are offered in a spirit of friendly cooperation between a non-profit and government agencies sharing similar goals related to trail development, recreation, public access, wildlife/habitat protection and restoration, and public education. Finally, the following comments provide an outside perspective removed from local influences and whatever social, political, or economic realities that exist either within a government agency or the communities closely connected with the development of any management plan. I hope the perspective provided serves you well in hammering out your final management plan to carry out your mission in the best way possible.

The California Coastal Trail represents the common thread conceptually linking together coastal areas from the Oregon to the Mexican borders. Of course, the lands of Redwood National and State Parks (RNSP) are an integral part of this and related coastal trails branching off of it. Therefore, since our mission is "Keeping The Coast For Everyone through public access, recreational trails, and the preservation of historic and natural environments," the following comments will reflect this mission relative to the California Coastal Trail, spur trails, and related environments in RNSP.

**Watershed Restoration**

Expand this goal to include restoring/enhancing salmon runs in the Redwood Creek estuary ecosystem, by including in-stream approaches as well, such as log placements and hatchery fry introduction. Perhaps this would also mean extending resource protection into immediate ocean areas along the coast, especially at the mouth of the creek itself, with a no-fishing restriction there. Could the California Coastal Conservancy work cooperatively on this specific project and perhaps provide some of the needed funding? Could this be a cooperative project involving the Yurok Tribe?

475-A

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475-A See response to comment H in the previous Klamath Chamber of Commerce letter. Also, RNSP staff are working with the Coastal Conservancy and the Yurok Tribe to restore fish habitat. RNSP fisheries staff have undertaken some in-stream fish habitat restoration in conjunction with watershed restoration projects. Under NPS policy, fisheries restoration refers to increasing the density of native fish species to historic levels through the application of scientifically based habitat protection and/or habitat rehabilitation (reconstruction) techniques. Fisheries enhancement activities are prohibited in natural zones such as Redwood Creek and other national park streams. Enhancement activities include the artificial production of fish through systems such as fish hatcheries (NPS-77, pp. 40-42).

## COMMENTS

### Habitat Preservation

Develop a fire management strategy that would not use prescribed burns, but would focus on where to control wildfires to preserve habitat and protect natural resources. This recommendation can actually enhance visitor experience, mimic natural ecosystem processes in a more natural way, and even preserve/develop Native American traditional/cultural landscapes. The issue here essentially is should we continue to use prescribed burns versus wildland fires as a future management practice? I will attempt to answer why is this being suggested and how would it work.

First, we need to begin to reframe how we look at what enhances a visitor's experience. The assumption is that if a visually appealing area is allowed to burn then it simply won't look good anymore. However, as resource managers, we know the important role of fire in ecosystems, and such a burned landscape offers a visitor the opportunity to learn about this process and a burned habitat's subsequent recovery and rebirth. The idea here is that burned areas need to be looked at as enriching visitor experience, not as detracting from it.

Second, wildfires (caused by either natural or accidental human initiated processes) provide more of the randomness truly found in nature versus prescribed burns. For example, if fire from a lightning strike burned down a forest area which recovered as a prairie, then that's the natural process of the ecosystem. Over time this prairie would probably be restored to a forest as the edges slowly crept back into the center. However, to keep this prairie open through prescribed burns essentially does not represent a land management strategy which mimics the natural ecosystem processes. The idea here is that wildfires alone mimic natural ecosystem processes best and will therefore create a more genuine landscape than prescribed burns do.

Third, if Native American landscapes/habitats developed by traditional land use practices are of value, then wildfires alone can be controlled to preserve existing areas and create new ones. This would mean that each area of the park would need a fire management plan which knew what type of habitat has primary importance for that area. The idea here is that wildfires would either be suppressed or allowed to burn in a controlled way to maintain or create the desired habitat. The recommendation made here is partly based on both the assumption that as visitor use and area population increase in the future then so does the probability of accidental fires caused by humans (so why not control them versus starting your own), and on the value of an environment created by natural versus cultural processes (with a bias for natural versus cultural landscapes no longer utilized).

### Historic Structures Preservation/Natural Resource Traditional Uses

Expand these goals to include the re-creation of historic structures and integrate traditional use gathering and craft processes to enhance interpretive, research, and visitor opportunities. For example, perhaps a seasonal Yurok coastal village could be built (similar to the one in Patrick's Point State Park) to provide live cultural experiences with demonstrations by Yurok tribal members in cooperation with RNSP to educate both tribal youth and the general public about traditional Yurok culture. Perhaps this could be done in conjunction both with other park interpretive programs and "The Lodge."

### Visitor Centers

Expand the goal of establishing themes unique to each center to also integrating these themes as well. A visitor could thereby be encouraged to visit all the centers because each one would represent an important chapter of the entire story of RNSP. However, each center should also provide a person with the primary information needed if only one center is visited. These centers' themes could also be integrated with both Yurok cultural experiences and opportunities provided by "the lodge" for additional education and recreation.

## RESPONSES

475-B The RNSP current approved *Fire Management Plan* and the *Bald Hills Vegetation Management Plan* include resource management objectives and conditions under which prescribed burning is conducted in the Bald Hills. The next revision of the *Fire Management Plan* will consider whether wildland fire may be used to achieve the desired resource management objectives in the Bald Hills and other areas where Native American burning traditionally occurred. The revised plan will also consider whether wildland fire might be an appropriate tool to achieve resource management objectives in the full range of vegetation types in the parks.

475-B

COMMENTS

RESPONSES

475-C

**Redwood Information Center**

The existing center should be retained and adapted to other uses versus tearing it down and salvaging it.

It could become a facility serving many new purposes. Could part of it become a youth hostel like the Redwood Hostel further north? Could a public-private partnership be developed to provide services for tourism such as serving a starting point for daily shuttles to the tall trees grove area? Could part of it become offices for archeological research? Could a meeting room be available in connection with "the lodge?"

It could become a facility serving one primary purpose. Perhaps the center could become the "Yurok Cultural & Research Center" operated in cooperation with the Yurok Tribe and RNSP. Perhaps a coastal village could be located adjacent to the site as well. The transformed visitor center could thereby provide a stronger emphasis for cultural interpretation, demonstrations, and visitor experiences. Research opportunities and other archeological collections would also be more readily available to the public. Maybe it could serve some other purpose.

**Campsites and Trails**

Primitive campsites should be developed to provide backpackers hiking the entire California Coastal Trail through RNSP with realistic opportunities to camp. These sites need to be spaced out along its length at appropriate distances.

New "civilized" campsites, either developed in existing or new areas, need to be developed to provide a quality camping experience for everyone. The overall question of what makes for a quality campsite depends on many variables including distance between sites, vegetation between sites, noise levels, light levels at night, type of camper (tent, motor-home, camper, hiker-biker), etc., and these should be seriously considered when campsites are designed. Another type of facility to consider in developing new campsites would be to incorporate "cabins" and "yurts." Oregon and Washington state parks have successfully integrated "yurts" in some of their existing campsites (with great success), and these could enhance and encourage those without tents or an RV/camper to have another kind of camping experience. Yurts have also been adapted to provide wheelchair accessible campsites.

Eliminate camping in the Freshwater Spit area for reasons of negative visual impact on visitor experience from the road or the beach, public safety for both campers and vehicle traffic, and concerns related to both visual and environmental impacts involving litter and human waste.

Create an integrated network of trails primarily for recreation and secondarily as preparation for low-impact fire management strategies not only within RNSP but also in consideration with nearby state and federal public lands. Trail development within RNSP should be considered in relation to maintaining the California Coastal Trail and linking it with other trails in the park. Perhaps a major loop trail incorporating the California Coastal Trail and a new inland "California Redwoods Trail" incorporating existing trails and roads with the development of new links could be created (a similar trail loop exists in southeast Australia). The potential for actual trail connections with adjacent public lands outside of RNSP jurisdiction or establishing trailheads to provide access to nearby lands would include Jedediah Smith Redwoods State Park (JSRSP) with Redwood National Park (RNP), Lark Earl Area with JSRSP and RNP, JSRSP with the Smith National Recreation Area, and Tall Trees Grove area trails connecting at some point along the coast to the beach below Orick and above Patrick's Point State Park. Trails could also be developed as part of an overall fire management strategy to provide easy access for faster control and possibly mitigate potential environmental impacts of more aggressive fire management techniques using heavy machinery versus ground crews.

A standard system of trail signage should be developed that includes mileage and difficulty ratings. Their placement should be chosen so that they are not easily destroyed or removed by vandalism. Also, they should be made of materials that are relatively inexpensive and can be easily and quickly replaced if are vandalized.

475-D

475-C The proposed action under the "Information, Orientation, and Interpretive Centers" section on page 56 in the draft plan has been changed to indicate the following: All functions at the Redwood Information Center would remain.

If the facility were to be damaged significantly in the future, the functions of Redwood Information Center would then be relocated to a new primary visitor center that would be located out of the tsunami hazard zone between Orick and Prairie Creek and adjacent to U.S. Highway 101. Opportunities for constructing a new facility through public, private, and/or tribal partnerships would be sought. Redwood Information Center would be salvaged, and the site would be converted to day use with interpretive opportunities to include beach access, boardwalks, and wayside exhibits.

475-D See summary comment C.

## COMMENTS

## RESPONSES

### Off-Road Vehicle Use

All off-road motorized vehicle use on the beach should be eliminated. Emergency and other essential/official park business would be the only exception. All fishing/gathering activities would need to be carried out without the use of any motorized vehicles on the beach. The primary reason involves maintaining a quality visitor experience and also includes visitor safety. It never has been and never will be either a natural or even a traditional native cultural practice to have motor vehicles on the beach. Off-road vehicle use makes the beach a road and not an opportunity to experience infinity along the sandy edge where land meets sea! The beach is the smell of fresh salt air and the sounds of surf and seabird. It is violated with the smell of exhaust and the roaring of a noisy motor as it passes you on the beach leaving its tire tracks scarring the sandy smoothness. The only human marks left on the beach should be footprints or the poke of a hiking stick. There are places other than RNSP for those who find enjoyment through off-road vehicle use.

### Road Improvements

Keep the "Coastal Drive" as a gravel road -- that is, do not improve this road with pavement. Since it forms an important segment of the California Coastal Trail its paving would probably increase motor vehicle speeds along this stretch and pose a safety threat to those using the road for hiking or mountain biking forms of recreation.

### Development of "The Lodge"

Encourage the development of a lodge that would create a model for future park lodges around the world, and that would truly serve visitors. Encourage a lodge which minimizes environmental impact, conserves both open space and wildlife habitat, is energy efficient, uses ecological building materials, operates on a socially and environmentally responsible basis, provides public access, considers providing shuttle bus/van service for recreational transport versus individual car use, and offers accommodations for budget travelers as well as for those of greater wealth. Thematic links and access with visitor centers/tribal educational programs would definitely enhance visitor opportunities and need to be strongly encouraged by high involvement of RNSP staff in both planning and implementation stages.

### Creation of State Wilderness Areas

Del Norte Coast Redwoods State Park should be included in addition to portions of Jedediah Smith and Prairie Creek Redwoods State Parks for the proposed alternative.

### Inclusion of Nearby State and Federal Lands

The state public lands of Lake Earl and Patrick's Point State Park and the federal lands of the Smith National Recreation Area should be considered in the final plan. Of course, the suggestion being made here is not that the final plan "manages" these land areas but considers how RSNP goals could be integrated with existing and future plans for these nearby lands, especially in relation to recreation/visitor use.

Overall, I would view Alternative 1 -- "the proposed alternative" -- as being generally acceptable, however, at the same time would encourage you to expand your goals and stretch your vision for RNSP in accordance with the recommendations presented in this letter.

If I can be of any further assistance, or if you believe our organization could contribute to implementing your final management plan, especially in regard to the California Coastal Trail, please contact me personally. Thank you for your consideration.

Respectfully,



Al LePage, Executive Director

475-E The plan focuses only on the four parks that comprise Redwood National and State Parks. However, there are numerous sections of the plan that reflect the need to address issues or programs on a regional or ecosystem management basis in cooperation with other agencies and/or gateway communities.

475-E

COMMENTS

RESPONSES

National Parks and Conservation Association

PACIFIC REGIONAL OFFICE

5 November 1998

Andrew Ringgold and Richard Sermon
Superintendents
Redwood National and State Parks
1111 Second Street
Crescent City, CA 95531

NOV 11 1998 11 25 AM

RE: GENERAL MANAGEMENT PLAN / GENERAL PLAN EIS / EIR

Dear Messrs. Ringgold and Sermon:

The National Parks and Conservation Association (NPCA) is pleased to respond with comments to the above referenced document. As you know, NPCA is the only private non-profit citizen organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System. We have nearly 400,000 members nationwide, including more than 70,000 in California.

In general, we believe the park has prepared a thoughtful document which incorporates much of the input received during the scoping and alternative development processes. For example, planners have been able to articulate the need for the National Park Service and the California Department of Parks and Recreation (Park Service) to address resource management on a more holistic basis -- such as watershed restoration and second-growth forest management. These and other actions have the potential to advance resource protection and promote the fundamental purposes for which the parks were created.

476-A

NPCA would like to point out, however, that certain elements of the plan have the potential to undermine this comprehensive approach by inferring that providing visitor services inherently conflicts with park resource protection. This is most clear in the description of alternatives. They offer a spectrum of management approaches ranging from Alternative 3, the preservation emphasis, to alternative 4's visitor use emphasis. The prescriptions seem to indicate that if NPS were to focus on resource preservation, the visitor experience will be somehow impaired. Conversely, if NPS emphasizes visitor uses, the development necessary to support these uses will undermine resource protection. This bracketing necessarily advances the Proposed Action which seeks to "balance" these competing goals.



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476-A The agencies have redescribed the alternative concepts in the final plan to make it clear that all actions proposed would be consistent with the two agencies' missions.

COMMENTS

RESPONSES

National Parks and Conservation Association

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NPCA respectfully submits that this notion of a competing mandate is false (please see the enclosed Forum by Robin Winks from National Parks, July/August 1996). Winks' analysis leads to the conclusion that "The act of 1916 makes it clear that resource protection overrides all else. Where access may be provided, where an enriched interpretation may be offered, without damage to the resource, it may -- indeed, perhaps should be -- provided: but never at the cost of risk to the resource for which the unit was created." Thus, by using this false dichotomy as the basis for the Proposed Action, park resources will not be afforded the highest level of protection. Moreover, the park has lost the opportunity to advance the ideal of providing appropriate park use and access which is complementary to resource protection.

When taken together, the alternatives seem to equate visitor use and enjoyment to recreational use. If we accept the preceding argument, the management of recreational use over resource protection violates the Organic Act. For this reason, NPCA recommends that the final draft eliminate this bias and reinforce resource protection by incorporating certain elements of Alternative 3 into the Proposed Action. By the same token, Alternative 4 should not be included in the document. The alternative's emphasis on visitor use would by its definition derogate resource protection.

Our specific comments follow.

Issues Beyond the Scope of the Joint Plan

476-B In general, NPCA agrees with the planners' recommendations in this section with two exceptions. First, and most importantly, transit is an issue which cannot be ignored. With few exceptions, parks will continue to see increasing levels of visitation. Increasing numbers of private vehicles, and the infrastructure required to support them, will cause corresponding increases in resource degradation. While the park may not currently feel the need to address this issue, advance planning will allow for greater options and reduced costs. Further, by planning in advance of a problem, the park can avoid the kind of controversy Yosemite is experiencing in implementing transit solutions. Finally, as access and circulation issues are already controversial, the addition of transit planning and analysis will help inform these management decisions.

476-C Second, we do not understand why the parks have chosen not to develop consistent policies for dogs on hiking trails. The lack of coordination between state and federal parks will no doubt cause confusion and, as managers intend to develop linkages between state and national park trails, the public will not be well served. In addition, as dogs do represent the potential for visitor use conflicts and negative interactions with wildlife, the GMP/GP is the obvious vehicle to establish appropriate regulations.

Actions Common to all Alternatives

476-D Carrying Capacity: While NPCA understands the complexity of developing carrying capacity levels, NPS policies do require that all GMPs be based on such studies. All alternatives should therefore include the establishment of carrying capacity standards for all management zones and areas.

476-B The final plan has been revised to include an alternative transportation plan as one of the action plans to be developed in the future.

The plan has been revised to commit NPS and CDPR staff to working cooperatively with Caltrans and regional/local transportation planning agencies to address issues related to future traffic needs and improvements in tourism and travel information.

476-C The National Park Service and the California Department of Parks and Recreation have identical policies regarding dogs on hiking trails — they are prohibited. The agencies believe that these policies are appropriate and essential for the protection of wildlife and the safety of hikers. The agencies considered requests to change these policies as part of the planning process to be outside the scope of the plan.

476-D Specific carrying capacities expressed as numbers of visitors are not required in general management plans. The management zones are used to describe the general levels of visitors and amount of development that will be allowed in each zone. When the resource conditions and visitor experiences described in each zone cannot be achieved because of increased use, management techniques suitable to each zone will be employed to return the resource condition and visitor experience to the prescribed condition.



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**Restoring Disturbed Lands:** All alternatives should emphasize overall ecosystem restoration and protection in selecting treatment prescriptions. As this document will guide management over the next two decades, NPCA urges that landform restoration be emphasized over road decommissioning.

**Wetlands:** Given the overall decline in wetland habitat, and the parks mandate to preserve threatened ecosystems, NPCA supports the restoration of all impaired wetlands in the parks. As a way to underscore their importance, we further advise that any wetlands impacted from this plan be mitigated on no less than a 3:1 ratio.

476-E

**Future Action Plans Needed:** We notice that a Land Protection Plan is neither referenced as a contributing document to the plan nor recommended in the list of required plans. Do the parks currently have or intend to develop an LPP?

Alternative 1 - Proposed Action

476-F

**Alternative Concepts:** As noted above, the description of alternatives must reflect the parks' mission to preserve the resources. NPCA understands that a Director's Order is pending which underscores this mandate by requiring a renewed emphasis on resource protection and ask that the alternatives anticipate the order's release. We again assert that the provision of an appropriate visitor experience is dependent upon how well it protects park resources, rather than how well accomodates the visitor.

**Natural Resources Management and Protection:** While noted in the Objectives, the plan does not make the inventory and monitoring of park resources a high priority. Specified actions are limited to active management of watersheds, vegetation, and artificial impoundments. Absent is any specific plan for the development of baseline resource inventories or ongoing monitoring. Given that this data is vital for making informed management decisions, we urge that a comprehensive I&M program be developed for incorporation into the final plan.

- **Watershed Management:** NPCA generally supports the Proposed Action and requests that landform restoration be the primary management prescription as it will lead toward more complete ecosystem protection.
- **Redwood Creek Estuary:** NPCA supports Alternative 3 as it improves protections for threatened and endangered species and the parks' under-appreciated marine resources (see marine resource discussion).
- **Second Growth Forest Management:** Though a second-growth forest management plan will be prepared, we are still concerned by the lack of clarity in management direction. For example, the document states that "managing second-growth that would contribute to visitor use and enjoyment would also be considered." How would this be different from managing for ecosystem restoration? As the preservation and restoration of old growth redwood forest ecosystems are a primary purpose of the park, it would appear that the greatest visitor benefit would come from as complete a restoration as possible. As such, we request that the language in Alternative 3 be used.

**476-E** The plan has been revised to include a land protection plan as one of the action plans to be completed by the parks following approval of the *General Management Plan / General Plan*.

**476-F** The development and implementation of an inventory and monitoring plan for the parks is one of our highest priority new areas of emphasis. Our goal will be to acquire and assemble baseline inventory data to determine the nature and status of the natural resources under RNSP stewardship. We will monitor selected resources and environmental factors to detect change and to distinguish natural variation from local and bioregional human-induced resource threats. The discussion on page 38 of the draft plan has been modified in the final plan to clarify the role of inventory and monitoring.

## COMMENTS

## RESPONSES

National Parks and Conservation Association

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- **Prairie Restoration:** NPCA supports the Proposed Action, however care must be taken not to overemphasize maintenance of prairies over natural succession of a redwood/Douglas fir forest ecosystem.
- **Fire management:** NPCA supports the Proposed Action.

Cultural Resources Management and Protection: NPCA supports the Proposed Action.

476-G Education and Interpretation: The Objectives for interpretation would be greatly enhanced with the addition of a goal articulating the need to develop in the visitor a broad understanding of their role in preserving park resources. NPS and CDPR need to recognize and exploit the important role interpretation can play in developing an active constituency of citizens dedicated to park protection. All interpretation, therefore, should incorporate this component.

- **Information, Orientation, and Interpretive Centers:** NPCA is reluctant to support the development of visitor centers in the parks, particularly absent any information about possible locations outside the park boundary. Depending on the location, visitor centers outside the park would serve a number of important functions in addition to the obvious reduction of impacts. First, by capturing visitors prior to their entry into the park, interpretive and trip planning services can orient visitors and provide direction for a rewarding park experience. Second, early orientation can result in better dispersal of visitors throughout the park, reducing crowding and resource impacts. Finally, visitor centers outside the park can serve to improve relations between the Park Service and neighboring communities through enhanced economic opportunities and a greater sense of ownership for resource protection. NPCA supports the salvage of Redwood Information Center and conversion to day use provided that maximum restoration of the natural environment is the priority.
- **Outdoor Schools:** NPCA supports the continuation of the outdoor schools for K-12 students. We are concerned about the potential for impacts related to expanding operations and generating revenues from the use of the facility. Though we appreciate the beneficial impacts of increased educational opportunities, we request that further analysis be provided on the potential for negative impacts.

476-H Public Use, Recreation, and Visitor Safety: NPCA generally supports the Objectives. However, as is the case with interpretation, public use must be managed so as to underscore the importance of *appropriate* forms of visitor use and recreation. Incorporation of interpretive themes which articulate the role of visitors in resource protection will serve to reduce user conflicts and increase understanding as to why certain activities are not appropriate within the park.

- 476-I
- **Visitor Use Levels:** NPCA supports the development of carrying capacity analyses. We would have liked to see this analysis completed up front, as this process would better inform alternatives development. As such, the Proposed Action should reflect that modifications to the plan may be required, particularly in the areas of access and circulation, road closures, and protection of sensitive areas.
  - **Camping:** We support the Proposed Action provided that no new camping facilities are allowed in sensitive areas.

476-G An interpretive objective under the "Education and Interpretation" section has been added that states, "Develop opportunities for visitors to participate in a variety of interpretive programs and activities to learn more about the parks' resources and to gain a broad understanding of visitors' roles in preserving those resources."

476-H The current RNSP management policy for the outdoor schools states that, "The outdoor school/education centers will be reserved for use and rented to external nonprofit organizations, government agencies, community service groups, and educational institutions for environmental education purposes only. Use of the facilities will be reserved for workshops, seminars, retreats, meetings, and other educational purposes." Any proposed expansion to either of the outdoor school/education center programs will be required to meet the intent of this management policy as well as to meet the parks' goal of increased public understanding and support of RNSP resources and issues through the operation of these onsite environmental education facilities.

476-I See response D above.

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National Parks and Conservation Association

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- **Hiking:** NPCA supports the Proposed Action and are glad to see that connections between parks will be established. As with any development project, we request that care is taken to protect sensitive resource areas.
- **Equestrian Use:** While equestrian use is a traditional form of recreation in our national parks, research has shown that horses cause between 5 and 10 times greater resource impacts than hiking. NPCA supports continued access of the parks by equestrians provided that existing trails are not suffering from significant resource damage and that no new trails are constructed in sensitive areas.
- **Mountain Bikes:** Due to the tremendous increase in mountain bike use, the level of impacts they can cause, and the potential for accelerating user conflicts, NPCA cannot support the development of trails not already approved under existing plans. We also request that the language from Alternative 3 regarding the removal or relocation of trails in sensitive areas be incorporated into the Proposed Action
- **Freshwater Spit:** NPCA understands that the long tradition of camping along Freshwater Spit makes this decision difficult and extremely controversial. The Park Service is therefore to be commended for moving to eliminate this inappropriate use of park lands. The haphazard nature of the use, impacts to the sensitive dune community, lack of sanitation, and visual intrusion all reflect the need to restore this otherwise spectacular section of coastline. NPCA strongly supports the Proposed Action and will help in any way possible in the acquisition of the area from Caltrans.
- **Vehicles on Beach:** NPCA supports Alternative 3 as the minimum approach necessary to control impacts caused by vehicles accessing beaches for recreational or commercial fishing purposes. (see marine resources discussion)
- **Concessions:** NPCA supports the Proposed Action in light of the recently passed legislation which reforms the concession process.

Visitor Access and Circulation/Roads: As noted above, NPCA believes that the management of access and roads would be better informed by the establishment of carrying capacities throughout all park management zones. Further, the development of a transportation plan which relies on mass transit opportunities would go far in reducing congestion and limiting the impacts of private vehicles. Provided that a greater effort is placed on this type of long range planning, NPCA supports the Proposed Action for the following roads: Bald Hills Road, Newton B. Drury Scenic Parkway, and Stout Grove. We support the treatments in Alternative 3 for the following roads: Davison-Gold Bluffs Beach Road to Fern Canyon, Cal-Barrel Road, Jedediah Smith Redwoods State Park Entrance (provided that the information center can be located outside the park), Howland Hill Road, Tall Trees Grove Access, and Del Norte Coast Redwoods Entrance Road, Grater Coastal Drive, and Enderts Beach Road.

Interdependence of Parks and Community: NPCA is pleased to see that the parks recognize the role communities play in achieving park protection. As with interpretation, the development of community relationships must be undertaken in conjunction with strong educational themes related to the responsibility neighbors share in protecting the park. The location of visitor centers outside of the park and supporting community efforts to develop lodging and camping facilities will not only take pressure off of sensitive park resources, but also serve to build sustainable regional economies. The Park Service should also consider ways to incorporate development of

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National Parks and Conservation Association

Page 8

its Land Protection Plan as an outreach tool for local planning and zoning activities. Organizations such as the Sonoran Institute provide exceptional consultative work for gateway communities and parks working to establish better relationships based on park protection values. NPCA would be happy to assist the park in making this connection.

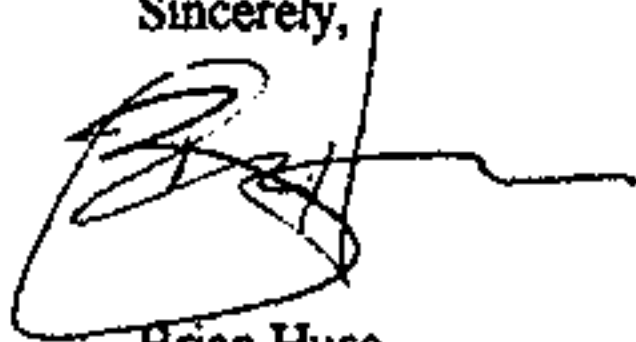
Affected Environment

476-J

**Marine Resources:** NPCA is concerned over the lack of analysis and consideration of the marine resources found within the parks' boundaries. While estuarine resources are considered within the Wetlands and Aquatic Habitat discussion, the intertidal zone is barely mentioned and ocean waters out to the park boundary are not mentioned at all. Many decisions within the plan have implications for the parks' marine environment, including beach access by vehicles, road closures, and estuarine and watershed restoration projects. As such, more thorough analysis is required for the document to be able to quantify impacts. Further, we expect that marine resources are the least documented of park resources. Therefore, the inclusion of an and inventory and monitoring protocol is a necessary component of the document.

Thank you again for the opportunity to comment on the Draft General Management Plan / General Plan for Redwood National and State Parks. Please keep us informed as planning efforts continue.

Sincerely,



Brian Huse  
Director

476-J A new offshore management zone has been established to describe desired resource conditions and visitor experiences in the marine and intertidal areas of the parks. A discussion of the marine environment has been added to the "Affected Environment" section.

# Dispelling the Myth

Many believe the Park Service must balance two incompatible missions: to protect resources and to provide public access.

BY ROBIN WINKS

FOR YEARS, advocates for and employees of the National Park Service have complained that Congress, and through Congress the American people, created a contradictory mandate for the national parks. The contradiction comes, they claim, from requiring the Park Service to balance two incompatible missions: to preserve the resources placed in its charge and to provide public access—and by extension, opportunities for outdoor recreation—throughout the National Park System.

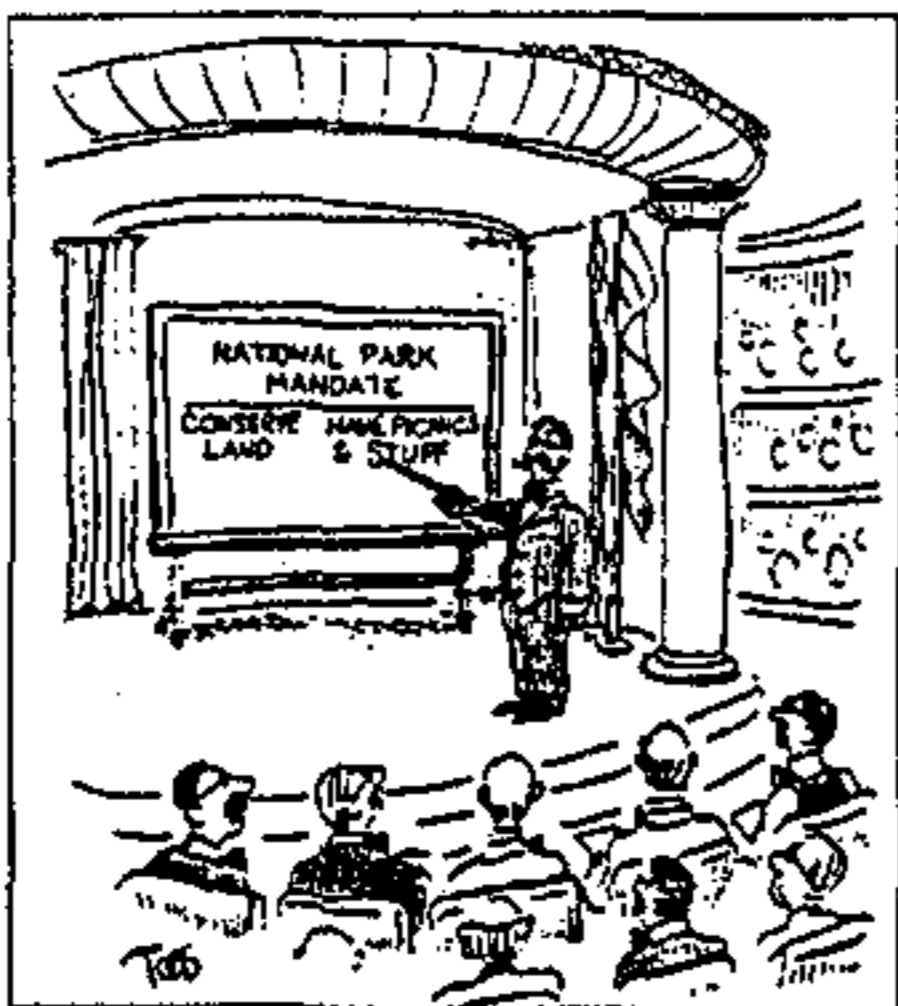
Almost always, friends and critics of the Park Service point to the Organic Act of 1916 as the source of the contradictory mandate. This argument is false on three grounds. The act of 1916 did not provide for two opposing goals; it is not the only legislation by which the goals of the Park Service were defined; and it did not refer to public outdoor recreation as a goal of the National Park System.

The Organic Act established the nation's first professional park service to promote and regulate the use of federal areas known as "national parks, monuments, and reservations." The service was to conserve the scenery and the natural and historic objects and the wildlife within these units and to provide for the enjoyment of the same

ROBIN W. WINKS, a member of NPCA's board, is professor of history and chairman of studies in the environment at Yale University. He is completing a book, *The Rise of the National Ethic*, that traces the distinctive nature of the park system.

in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

Though the mandate contains no reference to recreation, those who favor large-scale access to the national parks and who wish to promote outdoor recreational agendas invariably argue that the second charge in some



AJ-1008

manner overrides the first. To test whether this was the intent of Congress, in the act of 1916 or in subsequent generic acts, requires a legislative history. Such a history attempts to understand the intent of Congress by examining the act in question, all previous bills (including drafts where obtainable), all House and Senate debate, all committee hearings, and any other printed records of the U.S. Congress by which the act became law. One must also understand the intent of the legis-

lators who served on the committees, and thus one must obtain access to and examine the private papers of those committee members.

The act refers to enjoyment by future generations, which arguably introduces an expectation of changing definitions of enjoyment by reference to the future. At no point is enjoyment equated with recreation, and it is clearly circumscribed by "unimpaired." The private papers of the members of the Committee on Public Lands and of other relevant committees make it clear that the two goals to which the act of 1916 refers were listed in order of importance. Further, the prevailing rules of rhetorical style, at which several members of the committees were past masters, called for listing desirable goals in a descending order of significance unless there were many goals, in which case the most important would be placed first and the second most important might be used in conclusion.

The first substantive discussion of the purposes of a National Park Service took place in the House of Representatives during hearings in April 1912. Representatives discussed how national parks would differ from national forests, whether all 12 existing national parks were truly of national significance, and whether duplication of "scientific exhibits" was permissible or desirable in a genuinely systemic park system. Throughout testimony, members of Congress demonstrated a desire to see lands administered by a park service as unique, nationally significant, and forming a coherent whole

rather than a mere accumulation of more-or-less desirable land forms. Representatives also discussed the "automobile question," and the park point of view was to manage so as "not to destroy the scenic effect."

Although the bill introduced in 1912 never made it out of committee, Congress would consider legislation to establish a park service in each of the next four years.

During the 1914 discussion, representatives suggested the purpose of the parks was to protect scenery. They discussed what constitutes "scenery," drawing clearly on the accepted definitions of the word as used in the *Century Dictionary and Cyclopedia*, the favored reference of Congress at the time. This discussion put considerable distance between the goals of the U.S. Forest Service and the proposed Park Service. Even Chief Forester Henry S. Graves testified that national parks should be held to higher standards of protection and scenic values than any other public lands. He also testified that they must be of clear national significance and that areas of "a special scenic character" might begin as national monuments within the Department of Agriculture and then, upon further study, become parks. The intent quite clearly was to provide a far more stringent form of protection to any area that would be administered by a park service.

During the 1916 hearings, the phrase "national park system" was used for the first time, evoking the image of a systematic inventory of the nation's grandest scenic landscapes and natural and scientific curiosities. For the first time, the notion of the parks as great educational enterprises, places to which the public could come to learn about nature, geology, fossils, and sedimentation, was also discussed. In the end, this bill prevailed. It contained a preamble framed by Frederick Law Olmsted, Jr. Olmsted's draft language was unequivocal: "The fundamental object of these aforesaid parks, monuments, and reservations is to conserve the scenery and the natural and historical objects therein and to provide for the enjoyment of said scenery and objects by the public in any manner and by any means that will leave them unimpaired (ital-

ics added) for the enjoyment of future generations." During hearings on this bill, many references were made to access, good roads, "national playgrounds," and recreation, but none of these references is in the bill, and all are contradicted by the actual language of the act.

Congressman William Kent of California had introduced the Organic Act, and his understanding of the purposes of national parks is quite clear from his private papers, his diaries, his manuscript autobiography, and his many public statements. In 1915, in speaking

**T**he act refers to enjoyment by future generations. At no point is enjoyment equated with recreation, and it is clearly circumscribed by "unimpaired."

in the House in favor of Rocky Mountain National Park, and in 1913, when proposing a Redwood National Park, he declared the preservation of scenery to be a "most valuable purpose," drawing a distinction among national forests, national monuments, and national parks, asserting that the last must be held "in a state of nature" where animal life must be "forever free from molestation." Had Kent intended recreational purposes for the parks, he surely would have said so, for he was a vice president of the Playground and Recreation Association of America.

In 1922 Kent commended the statement that national parks must be maintained in a natural state "and not be marred by artificiality of any avoidable kind." The act of 1916 was debated fully in the House, only briefly in the Senate, and an abundance of evidence exists that Congress understood, in its endorsement of the "governing sen-

tence," that it was listing priorities for management in the order of their importance, with no contradictory intent.

To be sure, the act of 1916 does list two duties. The Park Service has allowed them to become contradictory practice. Congress has confused itself and the public as to the purpose of the national parks, and both Congress and the service appear to have forgotten the original intent, so that units that do not attain genuine national significance have been created to help with tourist development or to offer recreational opportunities. But these are mistaken management decisions not in keeping with the intent of the act. Directors of the Park Service have interpreted the act from time to time, and Congress has amended its intent, as expressed in 1916, in other omnibus bills involving the park system, most especially in 1970, 1976, and 1980. The act of 1970 remarked upon the "increased national dignity" both "individually and collectively" that the national parks enjoyed, so that an infringement upon one was an infringement upon all. Congress may have muddied the waters somewhat, but the intent of the original act remains quite clear.

Recently the National Parks and Conservation Association has undertaken the compilation of all the acts by which each of the 369 units of the National Park System was created. Park superintendents who profess to be confused as to their mandate, who find it difficult to make management decisions (whether to pave a road, to build a new visitor center, to approve the use in a national park of some shiny new toy, whether snowmobile or powered boat), have two documents to which they should turn and on which they should base their decision. The bill by which an individual unit is created invariably states the primary resource that the Park Service has been charged with protecting. The act of 1916 makes it clear that protection overrides all else. Where access may be provided, where an enriched interpretation may be offered, without damage to the resource, it may—indeed, perhaps should—be provided; but never at the cost of risk to the resource for which the unit was created.

## COMMENTS

*Orick Chamber of Commerce*

P.O. Box 234, Orick, CA 95555 [707] 488-735

November 5, 1998

Redwood National & State Park  
 Superintendents  
 1111 Second St.  
 Crescent City, Ca 95531

Dear Sirs:

Orick, the Southern Gateway to the Redwood National Park has been greatly affected over the past thirty years. Prior to RNP and the Orick levee, the population was 2500+ with 300 children in the Orick School.

Today the census lists about 340 people and we have 70 children enrolled in Orick School with an 82% count of free and reduced meals.

Can we blame this demise on the development of RNP? Or was it coincidence that the town lost 85% of its population and most of its economic base? I guess only history will write the answers but we are close to being a deserted town.

Orick's viability continues because highway 101 runs through the middle of the Orick valley and the reason for RNP is just 8 miles up our own Redwood Creek. We are not going away, but we need to be considered in the plans and brought to the table. The citizens and business community need to be considered as all these plans are developed.

We certainly support any development that RNSP can advance. But we do not support the removal of Redwood Information Center on the north end of Freshwater Lagoon.

If plans are approved to develop a visitor center at Mill B we support that but see no reason to completely abandon the beach site and encourage the Park to use the facility in another way. After all, millions of dollars were already spent to develop this site and even this past summer the inside was renovated to be more visitor friendly.

Southern Gateway to The National & State Redwood Parks



470-A

NOV 5 PM 1:21

## RESPONSES

**470-A** The proposed action under the "Information, Orientation, and Interpretive Centers" section on page 56 in the draft plan has been changed to indicate the following: All functions at the Redwood Information Center would remain at that site.

If the facility were to be damaged significantly in the future, the functions of Redwood Information Center will then be relocated to a new primary visitor center that would be located out of the tsunami hazard zone between Orick and Prairie Creek and adjacent to U.S. Highway 101. Opportunities for constructing a new facility through public, private, and/or tribal partnerships would be sought. Redwood Information Center would be salvaged, and the site would be converted to day use with interpretive opportunities to include beach access, boardwalks, and wayside exhibits.

COMMENTS

This might be a good site for a campground the building could be a recreation center/interpretive site. It has the public toilets all visitors are looking for. We need to think how best to use the place not how to demolish it! This is a beautiful Gateway Spot...

Camping at Freshwater is important to the Orick business community. The Chamber supports continued use of this area. We recognize it has a fiscal impact to the park and we encourage them to develop services so that a small charge might be made.

Perhaps the Park could explore a limited use of the area during the late Fall and winter months. Certainly visitor use is down during this time and monitoring would be easier in a smaller area.

No mitigating suggestions were made with regards to where these campers might stay. I mean within the Orick area. From Freshwater to Prairie Creek State Park! When a tourist locks up RNP he sees ORICK not Trinidad, Arcata, Eureka or Klamath. They want to stay in the Park and they perceive that to be Orick. The numbers shown in the Plan in regards to campers is very low. We have seen as high as 200 campers there and mitigating the campsites would be a major project for the Orick Area.

If all Park related activities are moved north of Orick that will have a big economic impact on our already fragile state. Where is the mitigation???

The item of beach fishing is abhorrent to us. The fishermen are well received by the tourists. The Park people may not like to see their vehicles on the beach, but this is a business that is important to the fisherman families, to zoo animals and gives the tourist an insight on something new for them.

We are totally against the plan of attrition supported by the parks alternatives. We hope you too will support continued use of the beach by the fishermen.

There are many items I could address here, but the preceding items are of general concerns in our community. Of course everything the park does or doesn't do greatly affects the lives of Orick residents. We need more visitor services provided by Park and private enterprises. Our community has experienced a dis-investment of money and people. What we

470-B  
470-C

RESPONSES

470-B-C See summary comment A. The number of RVs and tent camping vehicles noted referred to counts made on specific days (a weekday, Thursday, August 22, and a weekend day, Sunday, August 25) during the peak visitor season. On certain days during the summer season, there may be greater or fewer numbers of vehicles. During the off-season, there are very few vehicles that overnight at Freshwater Lagoon Spit. See also summary comment E and response to comment D in Janis Crandall's letter regarding mitigation suggestions as to where RV users might stay.



## COMMENTS

## RESPONSES

need is a re-investment. Before this can happen the park must make a committed effort to provide year round activities. Provide trails and road accessible at all times to all kinds of visitors. We have a Park that requires people to be pretty physically fit to even see. We need to consider access for everyone to almost all areas of the park. As we plan for the next 10, 20, 30 or more years let us consider that the touring public is getting older and not necessarily more mobile.

We do not support further Park lands acquisition. We realize the lands acquired are generally gifts, but once received the Park does not have increased general fund income to support these lands. Plus our valley is very finite and the tax land base dwindles and we no longer have the tax dollars to support schools and or community services.

In lieu tax dollars look good up front but as Orick School sees oh so clearly they do run out. Seventy thousand per year to begin with has dwindled to \$19,000 this year and will completely run out in the year 2003. Of course our need for the money has not dwindled.

We do appreciate the wording on page 63 which states that the "RNSP staff would actively support and assist local communities in efforts to foster appropriate and sustainable economic development..." These are encouraging words and ones we will remember as we continue to make Orick a more economically viable community in which to live, recreate and conduct business.

Sincerely,

  
Donna Hufford, President

COMMENTS

RESPONSES

Redwood National & State Parks  
1111 Second Street  
Crescent City, CA 95531

Orick Tomorrow Committee  
PO Box 93  
Orick, CA 95555

August 24, 1998

Dear Superintendents Ringgold and Sermon,

As you know, the Orick Tomorrow Committee is a committee of Orick Economic Development Corporation. In prior meetings and correspondence the Committee has voiced its position on a number of issues concerning the RNSP Draft

279-A Management Plan. Our position has not changed on any of the issues. We believe the proposed plan, Alternative 1 (one), would devastate the economic viability of Orick, heavily impact neighboring towns, and fail to provide recreational enjoyment for visitors to the Redwood Parks.

Although none of the other alternatives meet with our approval, we believe that Alternative 4 (four) would be the best option economically, recreationally, and environmentally. We are therefore taking a position of support for Plan Alternative 4. We are asking Redwood National and State Parks to abandon Alternative 1 and in its place adopt Alternative 4.

Sincerely,

*Norman Carr*  
Norman Carr, Chairman

*Marna Powell*  
Marna Powell, Media Relations

*Gloria Zuber*  
Gloria Zuber, past Chair

*Philip Messet*  
Philip Messet, Liaison

cc  
Humboldt Co. Supervisors  
Frank Riggs  
Mike Thompson  
Virginia Strom-Martin  
City of Trinidad  
CA Dept. of Parks & Rec.  
US Dept. of the Interior  
Eureka, Humboldt Co. Convention & Visitors Bureau

279-A See summary comments E, G, and H and the response to comment L in Marna Powell's 8/20/98 letter.

99 AUG 25 PM 1:31

COMMENTS

RESPONSES



SMITH RIVER ALLIANCE

P.O. Box 252, Trinidad, CA 95570 707 / ~~822-1355~~ 677-3324

~~670 Market Street, Suite 859, San Francisco, CA 94102~~  
Nov. 7, 1998

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- Bradlee Walton  
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Director  
Sierra Club\*
- Bradlee Walton  
Attorney
- Grant Werschkull  
Environmental Consultant

\*Organizations listed for identification purposes only

Andy Ringgold and Rick Sermon, Park Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Dear Andy and Rick,

These comments on the General Management Plan/General Plan supplement the comments our organization provided orally to you earlier this fall.

In general our organization supports Alternative 3 which would emphasize restoration, protection, and preservation of natural and cultural resources.

We are particularly interested in restoration of the Redwood Creek estuary, along with the adjacent creeks and sloughs, to pre-levee and pre-breaching conditions. We think that restoration of the estuary is required by the general provisions of the legislation which established and expanded RNP. Estuary restoration is also a necessary response to the listing of coho salmon as threatened and steelhead as a candidate species under the ESA.

Wilderness designation should be effected in the three State Parks and a wilderness reserve established for appropriate lands in the Redwood National Park. We recognize that on-going restoration work precludes wilderness designation in areas of RNP at the present time but a substantial portion of RNP could and should be designated wilderness in the future. These lands should now be identified and placed in wilderness reserve.

We wish to have the two items outlined above given particular attention within the framework of alternative 3.

Best  
*Larry E. Moss*  
Executive Director

cc/ Tim McKay

1998 11 07  
11:10 AM  
NOV 10 1998  
60:11:30 01:00:00

479-A RNSP staff would endeavor to restore estuarine function to the extent practical by patterns of private land ownership. Estuary research, management, and restoration have been a priority for management since 1980 and will continue to be so in the future.

479-A



COMMENTS

RESPONSES

2020 Economic Development Committee  
of the Del Norte County Chamber of Commerce  
207 Price Mall  
Crescent City, CA 95531  
707/464-3000

November 9, 1998

Andrew T. Ringgold  
Superintendent, Redwood National Park  
1111 Second Street  
Crescent City, CA 95531

Regional Director  
National Park Service  
Western Regional Office  
600 Harrison Street  
San Francisco, CA 94107-1372

Dear Sirs,

The Crescent City -Del Norte Chamber of Commerce Economic Development Committee is composed of approximately 30 business owners and representatives of city and county government. At the October meeting the Committee unanimously agreed that we should respond to the proposed Redwood National and State Parks

468-A **General Management Plan. We believe the entire document is deficient, does not meet the legal requirements for which it was drafted and uses faulty information to support its claims. None of the proposed alternatives are acceptable to the members of the Economic Development Committee. Currently, the "no change alternative" (keeping the existing 1980 plan) is the best choice.**

We believe Redwood National and State parks has a unique opportunity through its Master Plan process to gain the support of the local community in planning the park's future. However, local Park management has so far failed to do this resulting in galvanized opposition to the plan options as submitted.

468-B-C **Park management failed to actively seek and pursue community input into the process of developing the plan during the two year development period resulting in a flawed plan which is contrary to the interests of those who live and work in the region as well as visitors. The plan ignores promises made to the region when the land was taken off the tax rolls and ignores the Park's responsibility in being a good neighbor and contributing to the economic health of a region it directly removed hundreds of family wage jobs from.**

Working in partnership with the community to develop plans is a process specifically promoted by the Secretary of the Interior, yet has been ignored and actively resisted by park management in this instance. Park management added insult to injury by setting a 60 day comment period. During that comment period, park management heard

468-A The agencies disagree. We are confident that the document fully complies with Council on Environmental Quality regulations for implementing the procedural provisions of the National Environmental Policy Act (40 CFR Parts 1500 0 1508). Furthermore, the Environmental Protection Agency, which reviews environmental impact statements for document adequacy and environmental quality of the proposal gave this document their highest ratings — "Adequate" and "Lack of Objections," respectively. They also said, "EPA commends the National Park Service and the California Department of Parks and Recreation for its excellent analysis of potential impacts."

468-B The public process used to develop the plan and accompanying environment impact documents was similar to those used by many public agencies and incorporated significant opportunities for public involvement. Development of the draft plan included five public scoping meetings conducted in local communities; a scoping workshop with local American Indian tribes and groups; individual scoping meetings conducted with local focus groups such as environmental organizations, chambers of commerce, government agencies, and commercial fishermen; two newsletters produced and distributed to a mailing list of more than 500 persons and organizations; and a number of informal meetings with a variety of individuals and groups. Public review of the draft plan involved distribution of 475 copies of the plan; production of 15,000 copies of a summary of the draft plan, distributed to the mailing list and as insert in the two local newspapers; and four public meetings and a number of focus group meetings and informal meetings conducted during the public review period, which was extended from 60 days to 90. The National Park Service, California Department of Parks and Recreation, and many other agencies use the open house style of public meeting rather than a public hearing because they have found the former format to be much more conducive to high-quality communications and information exchange with the public than the latter. The final opportunity for formal public involvement will take place when the California State Park and Recreation Commission holds a public hearing on the plan in 1999.

468-C See summary comment B.

COMMENTS

RESPONSES

numerous calls for a time extension: specifically 6 months to work to develop a regional plan acceptable to all parties, counties, business, environmental and park management. Park management instead gave a 30 day extension for comments on the draft only and refused to include communities in the process of developing options that will be acceptable to everyone. That time extension is inadequate. The community needs time and cooperation to work with Park management to craft a plan that meets the needs of the park, the local residents and out of the area visitors.

The Chamber Economic Development Committee supports park managers working with the community and other users of the park to craft a plan that ensures a park that we all can enjoy. Without active public involvement, any park master plan is doomed to fail.

We believe preservation of the park and the enjoyment of the park by visitors is intertwined. We believe the park should be able to be enjoyed by people of all ages, no matter what their physical condition. There must be areas to drive through the park, areas to park, and well-maintained trails to hike. Closing off access to many areas of the Park, as recommend in the various plan alternatives, does not meet Congress' intended goals for the park.

Redwood National and State Parks makes up a huge percentage of the land mass in Del Norte County. The park is a vital component of the economic life of the county and must accept that responsibility based on federal officials' promises made when the park was formed. In fact, the Park should play a role that is in relationship to the percentage of Del Norte County land it has taken off tax rolls. One way it can do this is by bringing people to the community. However this plan, if implemented, would do just the opposite.

For instance, this plan ignores a previous park study, the Visitor Services Project Report 59 for Redwood National Park. That study stated "the most important services were the Crescent City Information Center." However the Park's preferred alternative calls for the elimination of this vital visitor resource. This Center brings about 50,000 visitors a year to downtown Crescent City.

We believe the park must be a good neighbor, a cooperative neighbor, and a supportive neighbor. We do not see these elements within the plan. Right now the community is telling the Park Service how important we feel the park is to our community. It is time to for you to listen and respond positively by including the public's active participation in the entire process of creating a Master Plan alternative.

Yours truly,

Fran Clark, co-chair  
Economic Development Committee  
Del Norte Chamber of Commerce

Not really too huge.

RNSP is 3.5%  
of the land mass  
in Del Norte County.

37 sq. mi. - RNSP  
1,067 sq. mi. - DNC

COMMENTS

RESPONSES

83

- 1. The timeline for comments to be extended at least six months and immediately begin #2 below to prepare a new Draft.
- 2. Redwood National and State Parks conduct facilitated meetings locally to provide for community involvement. Develop a new Draft document consistent with our community's goals as well as the legislation of Redwood National Park and the California State Parks, National Environmental Protection Act (NEPA), and California Environmental Quality Act (CEQA).

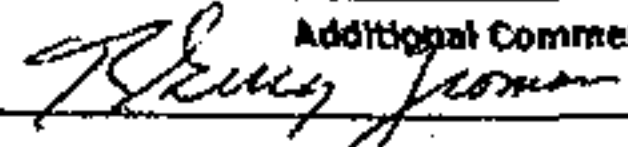
The following are reasons for my request:

283-A-C

- The purpose of the Parks as stated on page 8 of the document is not consistent with the actual legislation for the park's creation. This inconsistency has laid the groundwork for a document without "the most fundamental criterion for determining the appropriateness of actions proposed in this joint plan." (Page 8 of the Plan)
- There is not a reasonable range of alternatives as required by NEPA and CEQA. Comparing the alternatives side by side reveals very little range in the proposed alternatives.
- The existing use (Alternative 2, No Project) is not clearly defined thereby precluding a reasonable comparison with the other alternatives.
- The general public has not been provided a reasonable opportunity to fully understand the document because it does not read or flow well.
- The recommendations and alternatives presented are not consistent with the information contained in the document.

283-C

Additional Comments:

Signed: 

Name: Budget Automotive

Address: 1672 Northcrest Drive  
Crescent City, CA 95531  
707-464-7813

BUSINESSES

283-A See summary comment D.

283-B The National Park Service and California Department of Parks and Recreation strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and emphasizes on visitor use and resource protection, as required by law. In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. The agencies also strongly believe that the relative emphasis between visitor use and resource protection is completely consistent with the enabling legislation for the parks. The agencies strongly disagree that there is an "all or none" approach taken in any of the alternatives with regard to visitor use versus resource protection. The agencies strongly believe that all of these alternatives achieve the legally mandated standard, which is expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations" (NPS Organic Act, 16 USC 1 and NPS *Management Policies* 1:3). Also, we disagree that alternative 2 is not clearly defined.

283-C The organization of an environmental impact statement is, in large part, dictated by the Council on Environmental Quality regulations (40 CFR Parts 1500-1508). Furthermore, this document also had to meet the requirements for a California environmental impact report and the requirements for both NPS general management plans and the CDPR's general plans. We believe that, given all these constraints, the document is an acceptably clear presentation of a complex array of material and that the alternatives and other information in the document is consistent.

COMMENTS

RESPONSES

Superintendents, Redwood National and State Parks

10-10-98

After studying the General Management Plan I do not find any one of the four plans acceptable.

I do agree that the spit should be closed completely to over night camping and should be for day use only. If this is not enacted their campers should at least be charged the going rate for such a facility so the area can pay for itself which it has never done in the past.

I also believe the Redwood Information Center should be retained. If in the future it is destroyed, then build one in a safe zone. I also feel that a Visitor Center should be retained in Crescent City, not moved to Hiouchi. This would accomodate visitors coming down the Oregon Coast on Hwy 101 and those coming west on Hwy 199.

I feel that Davidson Road and Gold Bluff Beach Road should be upgraded to facilitate easy, non dangerous access to

284-A Gold Bluff Beach and Fern Canyon. I understand that Gold Bluff Beach Road, at one time went through to (what is now called Newton B Drury Scenic Pkwy). It would be a great improvement if this were reconstructed to eliminate the backtracking by providing a continous loop.

Also many visitors want to see "the biggest tree" but many cannot hike to the site, in my opinion the road should be extended to include this phenomenon.

Before building a lodge and expanding camping facilities in the parks, I feel the park staff should be knowledgable of the many private accommodations within a short drive from the parks. Also the state and national campgrounds should have to comply with the same environmental regulations as the private sector.

Thank you for allowing us to contribute our feelings on these issues.

Respectfully,

*Joan Isenburg*  
 Joan Isenburg,  
 Proprietor,  
 Chinook R. V. Resort.

RECEIVED  
 NATIONAL SYSTEMS  
 15 OCT 1998  
 1:22 PM

284-A In the past, the Gold Bluffs Beach Road connected back to the Newton B. Drury Scenic Parkway (Highway 101) at Ossagon Road. The decision to terminate the road at Fern Canyon was made for various reasons but was primarily to control illegal activities on the beach such as elk and wood poaching. These activities have been mostly eliminated due to this early decision.

COMMENTS

RESPONSES

8 OCTOBER 1998

TO : SUPERINTENDENTS, REDWOOD NATIONAL AND STATE PARKS  
1111 SECOND STREET  
CRESCENT CITY, CA. 95531

FROM : ROBERT C. CRAMBLETT  
GREEN VALLEY MARKET & MOTEL  
P.O. BOX 67  
ORICK, CA. 95555

30 OCT -9 PM 1:05  
RECEIVED  
CALIFORNIA STATE PARKS  
CRESCENT CITY, CA 95531

DEARS SIRs,

THIS LETTER IS IN REGARDS TO YOUR DRAFT GENERAL MANAGEMENT PLAN, YOU ARE CONSIDERING FOR ADOPTION.

287-A

I MUST STATE THAT IF YOU CHOOSE ANY ALTERNATIVE OTHER THAN NUMBER TWO, IT WILL BE THE FINAL BLOW TO SMALL BUSINESSES LIKE MINE, FROM TRINADAD TO KLAMATH. I HAVE LIVED IN ORICK AND BEEN IN BUSINESS FOR THE PAST THIRTEEN AND A HALF YEARS. I AM STILL AMAZED AT HOW LITTLE ATTENTION IS GIVEN TO PEOPLE COMING TO SEE OUR REDWOODS. I HAVE ALWAYS SAID TO PEOPLE TRAVELING THROUGH ORICK THAT 90% OF THE PEOPLE THAT COME HERE MISS 90% OF WHAT THERE IS TO SEE. ORICK AND THE SURROUNDING STATE AND NATIONAL PARKS ARE JUST A PLACE TO DRIVE THROUGH. WE ARE NOT A DESTINATION POINT FOR 99% OF THE TOURISTS WHO WANT TO SEE THE REDWOODS. ALL ORICK IS NEEDED FOR IS TO PROVIDE RESTROOM FACILITIES AND GRAB A SODA POP. DURING THE SUMMER, HUNDREDS OF PEOPLE A DAY, THINK THAT THEY HAVE SEEN THE REDWOOD PARKS FROM THE BYPASS FREEWAY. I KNOW THIS FOR A FACT, I HAVE TALKED TO THOUSANDS OF THEM.

FOR TWO YEARS I OPERATED THE SHUTTLE BUS SERVICE TO THE TALL TREES GROVE, FOR THE REDWOOD NATIONAL PARK. SINCE THIS TIME, OVER THE YEARS I HAVE TALKED WITH HUNDREDS OF PEOPLE THAT WANTED TO GO TO THE TALL TREES GROVE AND DIDN'T; EITHER THEY DIDN'T HAVE TRANSPORTATION OR DIDN'T WANT TO GO ALONE OR WAS FROM ANOTHER COUNTRY AND DIDN'T UNDERSTAND THE COMPLICATIONS IN GETTING THERE.

UNFORTUNATELY THERE ARE GOOD IDEAS IN ALL FOUR PLANS. AFTER READING ALL FOUR, I FEEL LIKE THE PARKS, JUST WANT TO MAKE A SLIGHT IMPROVEMENT; OTHERWISE WHY WOULD ALL THE GOOD IDEAS BE DIVIDED IN TO FOUR SECTIONS. JUST TO MENTION A FEW FOR THE SOUTH AREA, ONLY.

287-A Under the proposed action, visitor centers would be developed; possibly a new destination lodge would be developed by private sources; campsites would be improved and expanded; and visitation would be expected to increase at a greater rate than under the no-action alternative. These actions should result in additional opportunities for local tourism-oriented businesses. On the other hand, as stated in the draft plan (pp. 299 and 300), eliminating overnight camping at Freshwater Lagoon Spit might result in adverse impacts, particularly on retail and service businesses in the town of Orick, although these impacts might be offset, at least partially, by people staying at the new privately owned RV park, if it is developed, buying goods and services in Orick and by increased visitation to the parks and higher total tourism-related spending in the area.



## COMMENTS

## RESPONSES

- #1. PAVING CAL-BARREL ROAD IS A COMMON SENSE IMPROVEMENT THAT IS BADLY NEEDED, AS LONG AS THERE IS A READABLE DESCRIPTIVE SIGN, TELLING OUR VISITORS HOW BEAUTIFUL THE DRIVE IS.**
- #2. PAVING THE ROAD TO GOLD BLUFFS BEACH & FERN CANYON SHOULD HAVE BEEN DONE YEARS AGO.**
- #3. A REDWOOD PARK LODGE IN THE REDWOODS WOULD BE GREAT, EXCEPT IT COULD ONLY OPERATE FOR SIX MONTHS ON A PROFITABLE BASIS; DUE TO THIS FACT IT WOULD HAVE TO BE RUN AS A GOVERNMENT OWNED ASSET AND CONTRACT A VENDER TO OPERATE IT. (QUOTE: THIS WOULD STIMULATE VISITORS TO MAKE THE REDWOODS A DESTINATION POINT.)**
- #4. LADY BIRD JOHNSON GROVE : IF LOGGING TRUCKS CAN GO UP AND DOWN BALD HILLS ROAD, TOURIST BUSES SHOULD BE ALLOWED TO DO ALSO, WITH TURN AROUND AND PARKING FACILITIES MADE AVAILABLE.**
- #5. CAMPGROUNDS ARE BADLY NEEDED.**
- #6. SCENIC COASTAL DRIVE TO THE MOUTH OF KLAMATH RIVER : I HAVE TAKEN THIS DRIVE A COUPLE OF HUNDRED TIMES. THIS DRIVE IS THE BEST KEPT SECRET IN NORTHERN CALIFORNIA., IF ONLY A DECENT READABLE EXPLANATORY SIGN WAS INSTALLED TO TELL EVERY ONE WHAT THEY COULD SEE. TO EMPHASIZE MY STATEMENT, THERE HAS NOT BEEN A TIME THAT I HAVE BEEN ON THIS ROAD THAT I WOULD PASS MORE THAN FIVE OR SIX CARS IN EACH DIRECTION. REPAIRING IMPROPER DRAINAGE AND PAVING THIS ROAD WOULD BE A POSITIVE IMPROVEMENT FOR VISITORS TO THE STATE AND NATIONAL PARKS.**
- #7. PLEASE LEAVE THE FRESHWATER SPIT ALONE. THIS IS THE BEST ON THE WEST COAST. PRIVATE BUSINESS COMPLAINTS FROM RV PARKS DOESN'T WASH, ANY MORE THAN ME COMPLAINING OF A LODGE BEING BUILT IN THE REDWOODS.**
- #8. THE PRESENT INFORMATION CENTER ON THE BEACH SHOULD BE A RESTAURANT. I DON'T KNOW HOW MANY HUNDREDS OF PEOPLE I HAVE SENT BACK TO THE R.I.C. BECAUSE THEY COULDN'T FIND IT. PEOPLE ARE NOT THINKING REDWOODS, WHEN THEY ARE LOOKING AT THE OCEAN AND BEACH. THE INFORMATION CENTER FOR THE REDWOOD STATE AND NATIONAL PARKS SHOULD BE IN THE REDWOODS, NEXT TO A BEAUTIFUL LODGE. ORIGINALLY WHEN R.I.C. WAS PUT ON THE BEACH, IT MADE AS MUCH SENSE TO ME AS PUTTING REDWOOD NATIONAL PARK HEADQUARTERS IN CRESCENT CITY.**
- #9. PAVING THE ROAD WITH EXPANDED PARKING TO TALL TREES GROVE SHOULD HAVE BEEN DONE YEARS AGO. A SHUTTLE SERVICE SHOULD BE PUT BACK IN SERVICE.**

COMMENTS

RESPONSES

I KNOW THAT THE FIRST TEN YEAR GENERAL PLAN HAD TO EMPHASIZE EXPENDITURES ON ELIMINATING OLD LOGGING ROADS AND RESTORING PROPER DRAINAGE INTO THE REDWOOD CREEK BASIN. THIS HAS MOSTLY BEEN ACCOMPLISHED. THE NEXT 10 YEAR PLAN SHOULD HAVE AGGRESSIVELY VISITOR ORIENTED IMPROVEMENTS. I READ IN MEDIA REPORTS THAT ALL OTHER STATE AND NATIONAL PARKS ARE OPERATING AT BEYOND MAXIMUM. BY DOING THE ABOVE SUGGESTIONS IN A STRAIGHT FORWARD AGGRESSIVE MANNER WOULD HELP ALL THE OTHER PARKS, BY EVENING THE TOURIST INTEREST IN MAKING THE REDWOOD AND STATE REDWOODS PARK A DESTINATION.

"NOT A PIT STOP!"

I SINCERELY HOPE THAT YOU DELAY A FINAL DECISION ON THIS PLAN AND GO BACK TO THE DRAWING BOARD WITH A ALTERNATIVE FIVE.

I REALIZE THAT THIS WILL PROBABLY NOT HAPPEN. PLEASE CHOSE ALTERNATIVE TWO. AT LEAST THIS WILL KEEP THINGS CLOSE TO THE WAY IT'S BEEN THE LAST FIFTEEN YEARS, WHERE "NOTHING REALLY HAPPENS TO BRING VISITORS TO OUR PARKS".

SINCERELY YOURS,



ROBERT C. CRAMBLETT

COMMENTS

RESPONSES

MEMBER CAMP COAST TO COAST

KLAMATH RIVER R.V. PARK

P.O. BOX 656  
KLAMATH, CA 95548  
(707) 482-2081

September 10, 1998

REDWOOD NATIONAL  
AND STATE PARKS  
RECEIVED

SEP 16 1998

ARCATA OFFICE  
ARCATA, CA

Superintendents  
Redwood National and State Parks  
1111 2nd Street  
Crescent City, CA 95531

Dear Superintendents:

Thank you for the opportunity to enter some comments on the proposed General Management Plan for the redwood park areas. I was a Recreation Planner II for California State Parks and Recreation from 1965 to 1970 and worked primarily on the State Water Project. I empathize with your planners as they try to please everyone while preparing a viable management plan for the RNSP area. My other 17 years with the State of California was with Fish and Game, Governor's Office and the North Coast Coastal Commission. I am a Fisheries graduate of Humboldt State University (1957) and have worked with natural resources and the people using those resources ever since.

My comments will be limited primarily to overnight use, with a short side step to an item proposed for the Prairie Creek prairie.

290-A There was a suggestion in one of the alternatives to re-route Newton Drury drive around the edge of the prairie to restore the integrity of the prairie. While this may be biological sound, it is not good people management. Along with the redwoods, people will be thrilled to see the elk that frequent the prairie. At this time in the life of the redwood parks, visitors must have a reason to come to RNSP. If they have enough reasons, they will support park programs and some real management work can be accomplished. Let the visitors get as close to the elk (and trees) as possible without impacting or hurting the species. If necessary, put speed bumps or other speed reduction methods on the drive, but let the visitors get close now. Ten or twenty years in the future, the numbers of visitors may cause management to take another look.

290-B All alternatives said no charge for Newton Drury Scenic Drive. Why not charge? Local folks using the drive could get a seasonal pass. Seventeen Mile Drive in Monterey County charges and everyone seem to feel it is a normal and proper requirement. I haven't got heavy feeling about this, but would support a fee for the drive.

Several alternatives suggested some amount of additional camp sites be constructed in the various park areas. Why expand overnight use in the parks, impacting the scenic and biological resources of the park land, when this should be the realm of private enterprise. There has always been a strong feeling in the state and federal legislative bodies that "government" should not provide services that can readily be provided by the private sector. There are very few (I don't know of any) government operated gas stations. Certainly public servants can pump gas as easily as they can sell

290-A This alternative does not impact the ability of the public to see elk. If the Newton B. Drury Scenic Parkway were rerouted along the edge of the prairie, the elk would be still be visible. They are a mobile species that wander throughout the parks and are often seen throughout this prairie area.

290-B The plan sets the overall vision and direction for the parks and also identifies future planning needs. During the planning process it became evident that the Newton B. Drury Scenic Parkway is an area that will require future detailed planning. In the section entitled "Future Action Plans Needed," the plan entitled "Circulation and Access Plan at Prairie Creek Redwoods State Park" was identified as the place where such issues such as parkway relocation, circulation, and entrance station location would be explored and alternatives developed. Day use fees for entrance to the state park on the Drury Parkway could be charged and would be valid throughout the parks' complex.

COMMENTS

RESPONSES

campground tickets. The big reason there aren't any government operated gas stations is that Big Oil wont let that happen. Big Oil has the money, power and influence to make sure that gas supplies in parks are handled by private operators in the form on concessionaires. Just because us folks in the camping industry can't swing as big a stick as Big Oil in the various legislative houses is not a good reason, or good business, for parks to compete us out of business. The private sector is providing good camp and RV sites for reasonable prices. This is a great cooperative service to the parks and its visitors. I strongly urge that "government" does not expand camping services in RNSP to the detriment of the struggling and cooperative private sector located in the RNSP service area.

290-C

Regarding the Freshwater lagoon spit. I propose that camping be permitted at that location, and that it be provided by a private enterprise concession. By doing so, Orick businesses would not be drastically hurt, RNSP would receive some revenue while using less personnel in the operation and control of the area, private enterprise would be handling the camp ground, and the visitors would still be able to camp awhile at that area.

When night approaches, many vacationing travelers want a place to park (camp) that is safe. In this instance, a "safe park" would be provided. No amenities would be provided and only a nominal fee would be charged (\$6 to \$10). The concessionaire would provide at least two separate living quarters at each end of the area for employees. These employees would be provided radios, telephones and be deputized by the Humboldt County Sheriff's Office if possible. They would keep the area clean, have the toilets cleaned when needed, collects fees and keep order in the area as any private campground would.

The physical layout would be to place telephone sized logs lengthwise along the middle of the dirt area west of the highway and breaking this chain of logs every so often to let vehicles pass through. The overnight area would be on the ocean side of the logs and day use on the highway side. There would be no fee for day use and day use would be curtailed at 10PM.

By charging for the overnight use of the "safe park", many of the current and future campers would go to the numerous private campgrounds where water, sewer and electricity are provided. This reduction in the numbers of overnights currently utilizing a facility provided free by government would go a long way in showing the local campground owners that RNSP recognizes their position in supporting services to the visitors of RNSP and this entire Humboldt, Del Norte coastal area.

I would be willing to spend some time with your staff if any of my ideas have merit and more information from me would be beneficial.

Best wishes with the planning project.

Yours truly,

*Richard Laursen*

Richard Laursen  
Owner

290-C See summary comment A.

COMMENTS

RESPONSES

OCT 05 1998

My comments concerning the Redwood National and State Park General Management Plan, Humboldt and Del Norte Counties - California (Draft)

Walter Popenuck, September 11, 1998

I have 1/3 ownership in the Orick Valley Guildhall in partnership with my son and his wife and we are residents of Orick. We depend in part on the tourist trade and would lose business if Freshwater Spit did not have overnight camping.

Freshwater Spit is a very unique form of nature. There are not many places, if any, that have the Pacific Ocean on one side, Highway 101 in the middle, and a freshwater lagoon on the other side of the highway with camping directly adjacent to the ocean side. Presently Freshwater Spit hosts many tents, campers, trailers and RV's during the vacation season with overnight camping.

Many of the people in the campers and RV's are elderly. Some are physically disadvantaged. In their younger days they were "rough riders" and enjoyed the primitive stuff. Now they must resort to more comfortable means of being next to nature. Some with limited mobile abilities enjoy being close to the ocean. The Freshwater Spit provides this opportunity. Please do not shut down overnight camping at

the Freshwater Spit. Federal law requires that proper facilities be provided for the physically disadvantaged person. Freshwater spit is a rare place and can provide unique, enjoyable activities for the physically impaired.

The south entry to the Parks is an important visual area. But, which is more important? The people in vehicles that zip across the Spit at 65 miles an hour and view the beautiful entrance scenery for less than a minute or the people that are camping there who can sit or walk around or boat and fish and enjoy the visual effects for several days? Overnight camping gives them that opportunity.

PROBATION DEPT  
CALIF 95531

SEP 11 1998

291-A

291-A Freshwater Lagoon Spit would continue to be open to day use, and improvements would be made that would increase this accessibility. Alternate camping opportunities would be required to meet the Americans with Disabilities Act requirements for such facilities. A general objective for providing increased access for persons of all abilities has been added to the "Public Use, Recreation, and Visitor Safety" section of the document.

## COMMENTS

291-B The Redwood Information Center, it is said, must be salvaged (removed). An argument for removing the Center from Freshwater Spit and moving it further inland is life safety. It may be wiped out by a gigantic, 500 year frequency tsunami. It is predicted a 10 foot high wave would rush inland (run-up) 50' to 75'. If this occurred the Information Center would be destroyed. On pg 233 of the Report it mentions 50' to 75' high tsunami waves. This is misleading. It should be a 50' to 75' run-up of waves.

The run-up distance of waves is very variable, even in a very local area which exists at the Redwood Information Center. On the north side of Redwood Creek is a nearly vertical rock hill. The run-up against this rock face would be almost zero. The run-up at the mouth of Redwood Creek may be several hundred feet because of its funnel shape and configuration at the mouth and nearly sea level elevation. The USGS topography map indicates that the creek estuary and Redwood Creek are very flat for a distance of approximately 3000 to 4000 feet.

In front of the Redwood Information Center building a different topography exists. Between the ocean and the building two major land terraces exist. Each with an approximately 6' vertical face and 200' of flat land. A 10' high wave would hit these vertical faces and flats and its surge energy would be greatly diminished. If it arrived at the building there is a "picket fence" of 12" round logs, deeply imbedded into the ground and very closely spaced which would further decrease the wave energy and stop the beach litter. Finally, the floor level of the building is 6' above the ground.

The building is constructed to resist tsunami waves, wind loads, earthquakes and soil liquification. Before the Redwood Information Center is condemned and removed, the site and building should have a specific review by a hydrologist, geologist and structural engineer to determine if it can withstand the ravages of nature.

## RESPONSES

291-B Dr. Lori Dengler of Humboldt State University and Dr. Gary Carver, formerly at Humboldt State University, have estimated the vertical height of a tsunami wave generated by a magnitude 8 earthquake on the fault offshore of Freshwater Lagoon Spit to be 50 to 75 feet. The run-up, or the horizontal distance that a wave travels inland, is indeed affected by topography. A 50-foot-tall wave may travel inland up Redwood Creek for a distance of several thousand feet. The tsunami run-up distance differs from storm surges, which typically occur at high tides during intense winter storms. These storm surges would generate a 10-foot-high wave that may extend horizontally 50-75 feet farther inland than typical high tides. Storm surges used to overwash Freshwater Lagoon Spit on a regular basis before the elevation of the spit for construction of Highway 101 in the 1950s. The 1964 tsunami that damaged Crescent City was generated by an 8.3 magnitude subduction earthquake in Alaska, demonstrating that a wave can travel inland for a substantial distance and cause damage even though the wave is not very tall vertically. A locally generated earthquake could produce a much higher wave that may travel inland a much longer distance.

## COMMENTS

## RESPONSES

Alternative 1 - Proposed Action, a draft of the management and use of the Redwood and State Parks in my opinion does not comply with the spirit or requirements of : Public Law 95-250, march 27, 1978 - 92 STAT 166, Economic impact study 16 USC 97K, Sec 102(a) and Sec 102 (b). It does not describe a realistic, adequate plan to implement the above law. The economic hardships being imposed upon the town of Orick are dismissed in 1/4 of a sentence in Alternative 1 - Proposed Action on pg 59, Freshwater Spit Visitors Use and the quote of the sentence is:

"This camping is perceived to provide inappropriate competition for nearby privately owned facilities and services although its users do contribute to the economy of the town of Orick"

The socioeconomic profile of Freshwater Spit Users, pg 225, is detailed and it states "The town of Orick accounted for half of the total purchases." Elimination of overnight campers would impose a substantial negative economic impact on the small town of Orick.

Too many times in the past Orick has been given the short-end of the Parks development. It is time for a change.

Parks are for all the people, especially for less advantaged people. It is an opportunity to see unique things that are not available in their ordinary lives. The Freshwater Spit is one of these things, one of the many in the Park.

Alternative 4 - Visitor Use Emphasis is my choice for the proposed action instead of Alternative 1.

Nature and people can live together.

Dated: September 11, 1998

  
Walter Popenuck

COMMENTS

RESPONSES

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MARKED WITH ✓**

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COMMENTS

RESPONSES

TREES of MYSTERY

"A Place of Wonder"

P.O. Box 96  
15500 HWY 101 NORTH  
KLAMATH, CALIFORNIA 95548

Thank you for the opportunity to comment on the draft Redwood National and State Parks General Management plan. It is difficult to know where to begin as this "Draft" has been two years and many 100's of thousands of dollars in the making.

There is no single proposed alternative that meets the needs of the visitors, the community, and the mandates of the Park. The easiest way for me to provide input is to choose in general one of the alternatives, discard those elements that are objectionable, add elements of other alternatives, then add a few suggestions of my own.

PURPOSE OF THE PARK: The original legislation is very clear on this. "That, in order to preserve significant examples of the primeval coastal redwood (*Sequoia sempervirens*) forests and the streams and seashores with which they are associated for the purposes of public inspiration, enjoyment, and scientific study..."

295-A I believe it is important to note that the park was established for the purpose of public inspiration, enjoyment, and scientific study. Nowhere in the legislation is it stated that it must be preserved "in a condition of unimpaired ecological integrity" as the draft proposes.

The National Park was expanded in 1978 to preserve and protect existing resources "in accordance with the original intent of Congress, and to establish a more meaningful Redwood National Park for the use and enjoyment of visitors".

295-B The Draft appears to a very large degree to minimize the original purpose of the park, that it exists solely for the enjoyment, inspiration, and study by the public. This is why during the formation of the Park the public officials promised the park would bring millions of visitors and tourism would replace timber in our economy. This has not happened yet. Our towns and communities are economically devastated with the loss of resource based industry and nothing to replace it, as promised.

ALTERNATIVE 4: Given the above purpose, Alternative 4 is the only proposal that starts to go in the right direction, but is still off base on several points.

Access Roads: Howland Hill, Stout Grove, Gold Bluffs Beach, AND Greater Coastal Drive, etc. should all be realigned and widened as necessary and most importantly, be paved.

Gold Bluff Beach Road should be reopened North of Fern Canyon to reconnect with Newton B. Drury Parkway. This could then form a one-way loop drive thereby maximizing traffic flow and safety.

All access roads should be RV accessible whenever possible.

REDWOOD NATIONAL  
AND STATE PARKS  
RECEIVED

SEP 14 1998

ARCATA OFFICE  
ARCATA, CA

## COMMENTS

## RESPONSES

Page 2

**Visitor Center:** Until some one is foolish enough or visitation improves enough, that a "lodge" be built, the primary Visitor Center should be in Crescent City. There are many empty buildings available to the Park in Crescent City. A Primary visitor/ information center should be developed, perhaps by leasing and renovating the Square Deal building. It has a great location on Hwy 101 with plenty of parking. That would remove visitors from the Administration Building. Even better would be the multi-agency (RNSP, Forest Service, Chamber, etc.) one stop visitor center that we have already spent \$100,000 studying and which everyone decided they didn't want to participate in.

**Information Centers:** DO NOT put the northern information center in Hiouchi. That would only serve traffic on Hwy 199 and many visitors traveling Hwy 101 would miss it and wonder, "where is the Redwood National Park". It is fine as a more minor or perhaps more focused info center in Hiouchi.

**Redwood Information Center** was in the tsunami zone when it was built. It is ludicrous to use that as an excuse to relocate to a site well off the highway and out of sight at B Mill Deck which is subject to flooding from Mill Creek and the large redwoods behind it falling onto the center. The Crescent City headquarters is in a tsunami zone, does that mean it should be moved also? Redwood is a beautiful building in a special location and should be utilized as such.

**Operations/Administration:** I cannot find any reason given for moving the southern Operations facility into the town of Orick. If visitation improves the space in Orick will become very valuable. The Park offices in Arcata and Eureka should be relocated to the Crescent City offices. If there is not room to accommodate every one, again more buildings are available such as the Daly's building.

**Freshwater Spit:** It is very important that this area be changed from a free campground to a day use facility. As it is now it is the worst possible entrance to a National Park that anyone would want, besides all the issues of unfair competition with local businesses and which stops any possibility of a private campground being developed in the Orick area.

**Campgrounds:** It is true that the approximately 350 campsites in the State Parks and a few primitive sites in RNP are not nearly enough, EXCEPT there are about 3,000 campsites in Del Norte Co. and 1,200 motel rooms, all very close to the parks. RNSP, it's agents and it's staff do not actively inform visitors that these facilities exist. It is extremely important that this private sector infrastructure be utilized by the parks before any further expansion of public facilities.

**Beach access:** It is appalling that any proposal would consider eliminating the permits for the commercial fishermen while at the same time preserving access for Native Americans. An estimated 60 families in the Orick area make a living catching smelt off the beaches and selling their catch to Eureka Zoo for the animals. Leave this as it has been since long before the Park was formed.

Page 3

***INTERDEPENDENCE OF COMMUNITY AND PARKS***

First of all, let us define "community" as all peoples, lands and governments from at least Eureka to the South and the Oregon border to the North. This "community" has to varying degrees the same economic problems. The resource based industries that built this "community" have now been severely reduced and/or restricted. We are access challenged for most large industries to relocate here so there is little hope of economic survival that way. Del Norte chose to host the largest maximum security prison in the free world as means to stave off economic collapse. The promise of millions of tourists drawn to the National Park has not come to pass. In fact it seems that the park has done nearly everything it could do to prevent and reduce visitors to the area. The "community" is desperately dependent upon the parks to develop our tourist industry to a level that can sustain its economy. The parks on the other hand have been operating completely separate from the "community", as if it didn't exist. They are not dependent upon our local economy nor on how many visitors visit the area. This is completely wrong. The parks should be utilizing the "community" to fulfill the purpose for which the park was created using the infrastructure already in place as if it were part of the parks, ie. campgrounds, motels, restaurants, and many other visitor services. The local private attractions are also important to visitors and should be thought of as concessionaires by the parks instead of as "you have to pay fee" or "they are just stumps". The Historical Society Museum is an excellent display of our history, including Native Americans. The End of the Trail Museum at the Trees of Mystery is considered by experts to be the finest collection of Native American artifacts on display in the world right in the geographical center of the park yet the best recommendation is "they do have a nice museum". This private museum is free to the public and supported by the operations of Trees of Mystery, which no park person would ever recommend touring. On and on, the same thing applies to the other attractions, Klamath Jet Tours, Tour Thru Tree, Ocean World, etc.

The park information centers have become little more than gift shops with minimal information or interpretation except by getting the attention of the ranger at the counter, if they are not out to lunch. This one on one approach to informing the visitor is extremely inefficient and the loss of an opportunity for interpretation. It is fine for the Association to be selling books and gifts as the money stays in the park but not to the exclusion of the services that must be provided. This entire operation must be changed and improved, such as suggested above, like leasing the Square Deal complex which would provide space for lots of sales area and information and interpretation, on the highway with plenty of parking for cars and RV's and rest rooms and dump stations, etc., etc.

## COMMENTS

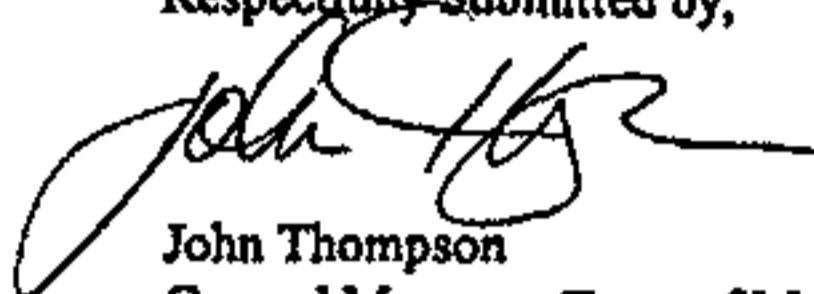
## RESPONSES

Page 4

**CONCLUSION:** There are of course many more details to be considered. It is possible to manage millions of visitors with proper planning and development. The "community" must be an integral part of the park experience.

The Redwood National Park was created to save examples of the coastal redwoods for the sole purposes of public inspiration, enjoyment, and scientific study. To do anything less would be a corruption of the law and the intent of the Congress of the United States of America.

Respectfully Submitted by,



John Thompson  
General Manager, Trees of Mystery Inc.  
President, Redwood Empire Association  
Commissioner, Del Norte Planning Commission

cc: Representative Frank Riggs  
Senator Mike Thompson  
Assemblymember Virginia Strom-Martin  
Del Norte County Board of Supervisors  
Redwood Empire Association  
Secretary of the Interior, Bruce Babbitt  
Don H. Clausen, Retired Congressman  
California Travel Parks Association  
California State Governor Pete Wilson  
Del Norte Chamber of Commerce  
Klamath Chamber of Commerce  
Orick Chamber of Commerce  
Del Norte Triplicate  
K.P.O.D. Radio  
K.C.R.E. Radio

## COMMENTS

## RESPONSES

NOV 11 11:39

10-8-98

THANK YOU FOR THIS OPPORTUNITY TO RESPOND TO THE 1998 RNSP GENERAL MANAGEMENT PLAN PROPOSAL AFTER CAREFULLY REVIEWING IT, I FEEL COMPELLED TO RESPOND WITH MY COMMENTS FROM MY RESEARCH.

I AM PROFOUNDLY TROUBLED BY YOUR DEPARTMENTS CONTINUED ATTEMPTS TO IGNORE THE RULING OF THE STATE PARK COMMISSION IN WHICH YOU WERE DIRECTED TO ALLOW BEACH ACCESS & CONTINUED VEHICLE USE FOR COMMERCIAL FISHING. YOU ARE NOT ALLOWED TO TERMINATE PERMITS AT YOUR WHIM, NOW OR IN 20 YRS. THE PROVISIONS IN THE NATIONAL PARKS LEGISLATIVE HISTORY IS QUITE CLEAR IN THIS AREA.

THE FISHERMEN HAVE A "PRESCRIPTION" TO GOLD BLUFF BEACH & FRESHWATER SPIT. TAKE THE EASEMENTS & SERVITUDES ARE WELL OVER 5 YEARS OLD.

I HAVE FISHED FRESHWATER SPIT SINCE 1958, BUT ONLY UNTIL 1995 DID I COMMERCIALY. IN ALL THE TIME I HAVE AT GOLD BLUFFS BEACH I HAVE NEVER BEEN ISSUED A SET OF RULES OR GUIDE LINES EXCEPT A COUPLE CONCERNING SPEED & LOCATION OF TRAVEL. EACH YEAR THE PRICE CHANGES & SPEED LIMITS CHANGE, INSURANCE PROOF ETC. WHO MAKES THE POLICY ON THIS? AND WHY ISNT IT IN THE GEN. PLAN FOR PUBLIC REVIEW?

## INDIVIDUALS

**558-A** The *California Public Resources Code* (Section 5001.8) generally restricts motor vehicles in state parks to paved and designated roads. The California State Park and Recreation Commission, when it adopted Resolution 185 as part of approving the 1985 *State Redwoods Parks General Plan*, made a determination that offroad beach access for commercial fishing was appropriate in Prairie Creek Redwoods State Park. Each time a general plan is brought before the State Park and Recreation Commission, issues such as vehicle access are reconsidered and may be modified to meet current conditions. In 1985 the commission considered the conflicts that would occur between commercial fishing and other uses of the beach. The current general plan proposal again raises the question of conflicting use and recommends several alternatives to the commission. The preferred alternative conforms to the *Public Resources Code* by granting limited access rights to existing permittees to continue commercial fishing.

**558-B** Many of the policies and regulations found in California state parks are actually state laws and as such are outside of the general management planning process. The requirement to show proof of insurance and speed limits are both state laws found in the California vehicle code.

A-855

558-B

COMMENTS

RESPONSES

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IN MY VIEW THE ISSUE OF MOTORIZED VEHICLES ON THE BEACH IS AN ISSUE OF VALUES. MANAGEMENT VS PUBLIC WILL.

I BELIEVE IN A WORLD OF STARVATION AND UNEDUCATED COUNTRIES, FOOD SOURCES TAKE PRIORITY OVER HIKERS (RECREATION) IF DONE IN A CONSCIENCE MANNER.

THE COMMERCIAL FISHERMEN PLAY A VERY IMPORTANT ROLE TO EVERY HUMAN ON EARTH.

THE SMELT INDUSTRY IS VERY KEY BECAUSE IT BALANCES WITH MAN & NATURE,

OUR RESOURCE REPRODUCES EVERY ONE TO TWO YEARS. WE COULD NEVER DEplete BECAUSE OF OUR LIMITED ACCESS TO BEACHES,

AQUARIUMS, ZOOS, & AVARIES, & HUMANS ALL ENJOY OUR FISH. IN HUMBOLDT COUNTY LAST YEAR, 1,000 LBS OF NIGHT SMELT WERE USED BY HUMBOLDT STATE TO FEED THE BIRDS CLEANED UP AFTER THE OIL SPILL ON HUMBOLDT BAY.

WE ARE THE CLEANEST COTTAGE INDUSTRY IN HUMBOLDT COUNTY. WE HAVE ABSOLUTELY NO BI-PRODUCT, NO SMOKE STACK, NO NOISE, & WE CAN NEVER BE BOUGHT OUT & SHIPPED TO MEXICO FOR CHEAPER LABOR LIKE YAKIMHA PRODUCTS IN ARCATA WAS.

IN THIS DAY & AGE OF CONSTANLY SEARCHING FOR REVENUES TO REBUILD AGING SCHOOL, HIGHWAYS, AND BALANCE CITY & COUNTY BUDGETS WE CANNOT AFFORD TO LOSE THIS TAX PAYING INDUSTRY.

558-C This is a not fisheries management issue but rather one of vehicle use/access. The condition of smelt stock was not a factor in dealing with this vehicle access issue.

558-C

## COMMENTS

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3

I HAVE FOUND IN MY RESEARCH THAT WE ARE A VIABLE TOURIST ATTRACTION TO THE PARKS. ONE COUPLE WHO ARE RETIRED TOLD ME THAT EVERY YEAR THEY TRAVEL TO THE EAST COAST TO WATCH THE LOBSTERS BEING CAUGHT & THEN HEAD WEST TO ORICK TO WATCH SMELT BEING CAUGHT.

IN REGARD TO ELIMINATING RV CAMPING & DESIGNATING FRESHWATER SPIT FOR DAY USE ONLY, I HAVE TO WONDER IF THIS ISN'T JUST A LITTLE COUNTER PRODUCTIVE! IT SEEMS LIKE YOU'RE TRYING TO RUN OFF VISITORS. IT'S KIND OF LIKE THE REVENUE YOU'LL LOSE FROM THE PERMITS FOR COMMERCIAL FISHING AT GOLD BLUFFS BEACH. YOU'LL LOSE \$4,800 A YEAR \$96,000 OVER 20 YEARS FROM THEM, THEN WORD OF MOUTH WILL GET OUT (E-MAIL) FROM THE R.V.'S & THEY WILL STOP COMING, SO IF THERE AREN'T ANY TAXES COLLECTED YOU'LL FOLD LIKE MOST BUSINESSES IN ORICK! AT THE LEAST YOU WON'T BE ABLE TO ACQUIRE MORE LAND OR IMPROVE YOUR EXISTING PROPERTY.

THE FOLLOWING ARE CONCERNS I HAVE ON THE REMAINDER OF YOUR DRAFT.

1. KEEP DAVIDSON ROAD IN BETTER CONDITION IF YOU DON'T PAVE IT OR WIDEN IT. I AM FOR PAYING IT BECAUSE OF THE TURBIDITY ITS RUNOFF CAUSES IN THE WATER. MAYBE STRAIGHTEN IT OUT IN A COUPLE PLACES.

COMMENTS

RESPONSES

4

PERHAPS A COUPLE OF TURN OUTS.  
DONT WIDEN THE WHOLE ROAD. AGAIN  
GRADE IT MORE OFTEN. I BROKE FOUR  
LEAF SPRINGS ALONE THIS YEAR ON IT.

PHIL KNOWS THE AREAS THAT MOST  
NEED ATTENTION.

2. LAND ACQUISITION: IF ANYMORE LAND  
IS DONATED TO THE DEPART. BY ORG. SUCH  
AS, "SAVE THE REDWOOD LEAGUE", I  
THINK YOU SHOULD NOT ACCEPT IT UNLESS  
YOU CAN PROVE YOU CAN MAINTAIN IT FOR  
AT LEAST 20 YEARS WITHOUT BURDENING  
THE TAXPAYERS & ONLY ALLOWING A SELECT  
FEW TO USE IT (HIKERS, BIKERS, ETC).

OTHER WISE THAT ORG. SHOULD MAINTAIN IT.

3. ELK POPULATION: ENCLOSED YOU WILL  
FIND A PHOTO OF YOUR ELK ALL OVER THE  
FREEWAY RAMP. THEY ARE A NUISANCE!  
FIND A WAY TO CONTROL THEM. BEFORE  
SOMEONE GETS KILLED THE SIGN NORTH OF  
THE LITTLE RED SCHOOL HOUSE HEADING SOUTH  
HAS TOO SMALL OF LETTERING & SHOULD HAVE  
CAUTION LIGHTS ON IT. I HAVE WITNESSED  
4 ROADS IN THE SPRING OF THIS YEAR. THE  
OTHER PHOTOS 2 & 3 ARE FROM GOLD BLIFFS  
BEACH KIND OF SHOOT YOUR THEORY ~~OF~~ OF  
US UPSETTING THE NATURAL HABITAT IN THE  
REAR, HUH?

4. EACH ONE OF THESE VEHICLES WILL VIOLATE  
THE LAW WHEN THEY QUIT FOR THE DAY  
AND HEAD BACK TO ELK PRAIRE HOGS BY  
CROSSING THE DOUBLE YELLOW LINE.



## COMMENTS

## RESPONSES

5

FREEWAY RAMP. THEY ARE A NUISANCE. FIND A WAY TO CONTROL THEM BEFORE SOMEONE GETS KILLED. I HAVE WITNESSED 4 RUN OVER THIS LAST SPRING ALONE.

THE OTHER PHOTOS NO 2 & 3 ARE FROM GOLD BLUFFS BEACH. KIND OF SHOTS YOUR THEORY OF US DESTURBING THE NATURAL HABIT IN THE REAR, HUH?

3. EACH ONE OF THESE VEHICLES WILL VIOLATE THE DMV LAW WHEN THEY LEAVE BECAUSE THEY WILL CROSS THE DOUBLE YELLOW LINE TO RETURN TO ELK PRAIRIE HIGGS TO QUIT WORK FOR THE DAY.

AT THE NORTH END OF THE PARKWAY THE PARK SIGN FOR SPEED SAYS IT IS ENFORCED BY RADAR ON THE SOUTH END THERE IS NONE. WHY? I GUESS WHAT I'M GETTING AT, IS THE PARK IS IN NEED OF BEING CONSISTANT IN POLICING ITSELF AS WELL AS VISITORS.

4. LAST BUT NOT LEAST, I THINK PARK SUPERINTENDENTS, LIKE ~~SCHOOL~~ SUPERINTENDANTS OF SCHOOLS SHOULD BE VOTED IN & OUT OF OFFICE. TO INSURE THEY DO NOT GET SO COMFORTABLE THAT THEY BELIEVE THEY OWN THE PARK + CREATE CONFLICTS OF INTEREST.

5. THE PHOTO OF THE PICKUP LOAD OF FISH IS SO YOU MIGHT BETTER UNDERSTAND THE NEED WE HAVE FOR THIS VEHICLE IN RELATION TO ONE DAYS CATCH.

THE ENCLOSED LIST OF SIGNATURES ARE FROM BUSINESS OWNERS + THERE EMPLOYEES

COMMENTS

RESPONSES

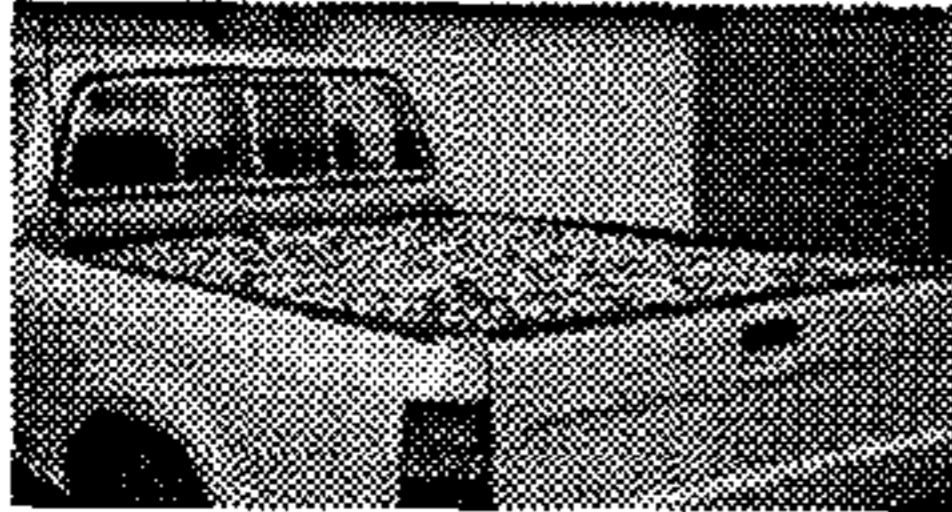
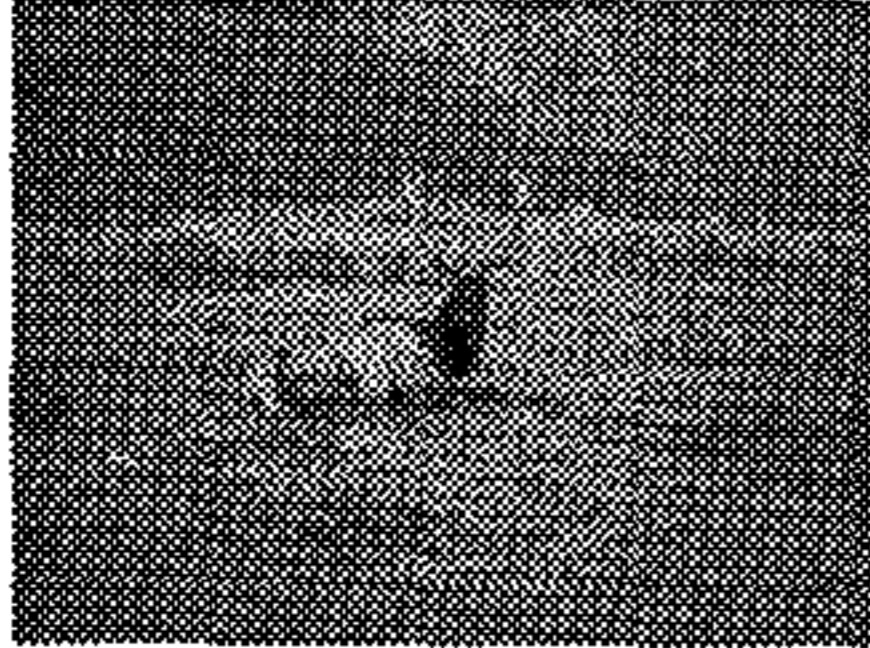
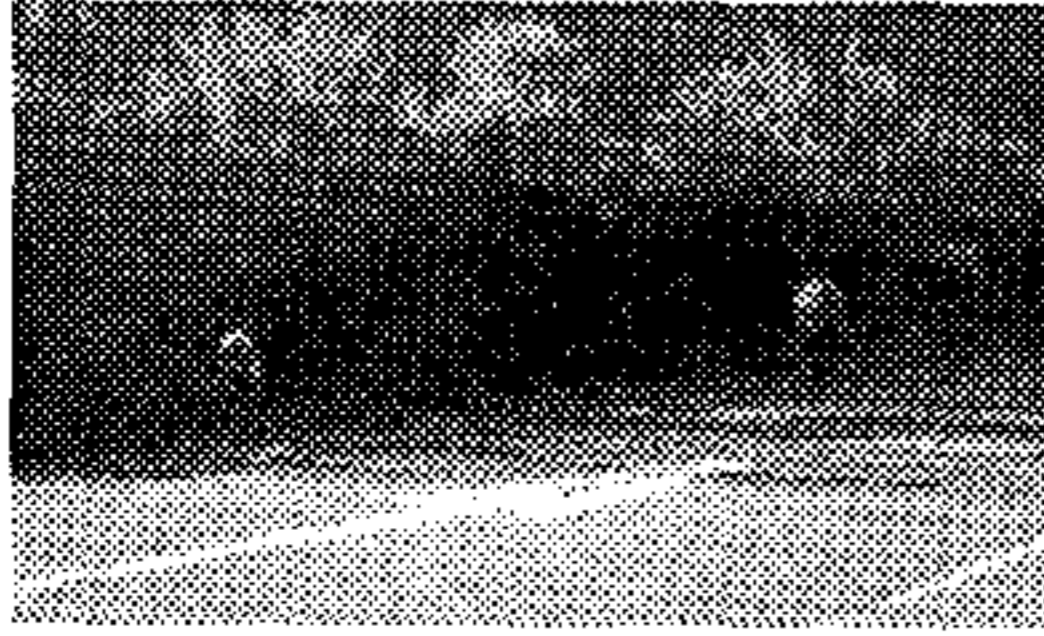
We, the undersigned, do hereby petition Redwood National and State Parks (RNSP) to abandon Alternative 1 (one), the "proposed action" Draft Management Plan, and to adopt instead Draft Management Plan Alternative Four emphasizing visitor use.

Signature	Print name	Address	Date
<i>Roger Koehn</i>	ROGER KOEHN	[REDACTED]	9/2/98
<i>Nancy Koehn</i>	NANCY KOEHN	[REDACTED]	9/2/98
<i>Eileen Woodard</i>	Eileen Woodard	[REDACTED]	9-2-98
<i>D. Meyman</i>	D. MEYMAN	[REDACTED]	9-2-98
<i>Mal Samela</i>	Mal Samela	[REDACTED]	9-2-98
<i>Dale L Warmuth</i>	DALE L WARMUTH	[REDACTED]	9-2-98
<i>John McBeth</i>	John McBeth	[REDACTED]	9-2-98
<i>Debi Johnson</i>	Debi Johnson	[REDACTED]	9-2-98
<i>Dave Creech</i>	DAVE CREECH	[REDACTED]	9-2-98
<i>James L Creech</i>	James L Creech	[REDACTED]	9/2/98
<i>Kevin Brett</i>	Kevin Brett	[REDACTED]	9/2/98
<i>Dave Kaufman</i>	Dave Kaufman	[REDACTED]	9-2-98
<i>Clifford Roberts</i>	CLIFFORD ROBERTS	[REDACTED]	9-2-98
<i>Chris Caskell</i>	Chris Caskell	[REDACTED]	9-2-98
<i>Sony Gage</i>	Sony Gage	[REDACTED]	9-2-98
<i>Mark Shuler</i>	MARK SHULER	[REDACTED]	9-2-98
<i>Doug Frew</i>	DOUG FREW	[REDACTED]	9-2-98
<i>Kristy Norton</i>	KRISTY NORTON	[REDACTED]	9-2-98
<i>Greg McIntosh</i>	Greg McIntosh	[REDACTED]	9-2-98
<i>Kenny Butler</i>	KENNY BUTLER	[REDACTED]	9-2-98
<i>Caris Moulton</i>	CARIS MOULTON	[REDACTED]	9-2-98
<i>Anthony H. Ho</i>	Anthony H. Ho	[REDACTED]	9-2-98
<i>Mark J. Grant</i>	Mark J Grant	[REDACTED]	9-2-98
<i>Jason Bailey</i>	Jason Bailey	[REDACTED]	9-2-98
<i>Shannon Neuman</i>	Shannon Neuman	[REDACTED]	9-2-98
<i>Mike Mills</i>	MIKE MILLS	[REDACTED]	9-2-98
<i>Steve Adams</i>	Steve Adams	[REDACTED]	9-2-98
<i>Mike Giffen</i>	Mike Giffen	[REDACTED]	9-2-98
<i>John R Patton</i>	John R Patton	[REDACTED]	09/25/98
<i>Mike Dal Porto</i>	MIKE DAL PORTO	[REDACTED]	9/1/98
<i>Donna Fauschack</i>	Donna Fauschack	[REDACTED]	9/2/98
<i>Nida Vanni</i>	Nida Vanni	[REDACTED]	9/2/98
<i>Mary L. Bailey</i>	Mary L. Bailey	[REDACTED]	09/02/98



COMMENTS

RESPONSES



COMMENTS

RESPONSES

NOV -5 PM 12:51

Dear Superintendents,

I am a student at Humboldt State University majoring in natural resources and interpretation. I am writing in regards to the Redwood National and State parks management plan. I looked through the four alternatives presented in the plan with preservation and access in mind. Both alternatives three and four where ones that I found interesting. Alternative three seems to be the plan that is the most concerned with preservation of the land and the culture with in its boundaries. Alternative four seems to be more public related.

I agree with alternative three in limiting access in some areas as well as removing and restoring old roads. Visitor information does not have to be right next to the biggest tree or even in the park, outside the parks boundaries is fine. This approach to placing all new information centers outside the park will help cut down on the use of convenience. By convenience I mean the people who just stop off on the side of the road while passing through. This will give the visitor a chance to make an effort in going to see the park thus providing a sense accomplishment and pride. The restoration of fields and valleys by removing old roads and returning the place to its closest natural state is one big step. While we are trying to save and preserve these parks I also do see a need for limited public relations.

Alternative four centers around providing public access and information without going out of the way. This alternative also implies the usage of mountain bikes on trails will be tolerated and new trial will be built. The first three alternatives also deal with mountain biking although number four is the one that proposes the connecting trails with Crescent City. The general public should be restricted in areas for conservation and protection of the environment, but there should be a limited use. I do not want to see tire tracks every where I go but I would like to have to opportunity to go different places.

Mountain biking does have a huge effect on the soil in terms erosion. I am not asking for the creation of trails through the heart of the forest but just along the existing roads. Travel along the road on a separate trial would help increase visitor usage and still keep the impact down. I would also see the creation of bike and hike trails a positive addition. Hike and bike would allow visitors to cover more ground in a shorter time

483-A, B See summary comment C.

483-A

## COMMENTS

## RESPONSES

483-B

frame. Some of the roads scheduled for deconstruction could be mostly removed and some of the road base could be kept for a bike and hike trail. I feel that bikes in general will be a great option for people to see the park.

Of the four alternatives given I still think number three is going to be the most productive in protecting the parks. Number three seems to encompass all the areas including mountain biking and visitor services. The parks are here for use and enjoyment by the people. Preserving and providing are hard areas to work with. I would one day like for my grandkids to be able to walk or bike through the parks being able to see the past and still find hope for the future.

Thank you,



Nathan Aeschleman

Student

## COMMENTS

## RESPONSES

Author: rbecking [REDACTED]  
Date: 11/9/98 7:40 AM  
Priority: Normal  
TO: REDW Superintendent at NP-REDW  
CC: brodstrom@humboldt1.com at NP--INTERNET,  
wunner@mail.northernmountain.com at NP--INTERNET,  
Forest.Stewardship.Initiative@ns2.reninet.com at NP--INTERNET,  
watershed@reninet.com at NP--INTERNET, pfyoon@sprintmail.com at NP--INTERNET  
Subject: DRAFT GMP/GP comments  
Received: from ns2.reninet.com (206.14.153.10) by ccmil.itd.nps.gov with SMTP  
(IMA Internet Exchange 2.12 Enterprise) id 001A9A6C; Mon, 9 Nov 98 02:35:40  
-0500  
Received: from ptp3.reninet.com [ptp3.reninet.com [206.14.153.240]]  
by ns2.reninet.com (2.5 Build 2626 (Berkeley 8.8.6)/8.8.4) with SMTP  
id XAA04529; Sun, 08 Nov 1998 23:23:22 -0800  
From: rbecking@reninet.com (Rudi Becking)  
To: redw\_superintendent@nps.gov  
Cc: brodstrom@humboldt1.com, wunner@mail.northernmountain.com,  
Forest.Stewardship.Initiative@ns2.reninet.com, watershed@reninet.com,  
Forest.Stewardship.Initiative@ns2.reninet.com, pfyoon@sprintmail.com  
Subject: DRAFT GMP/GP comments  
Date: Mon, 09 Nov 1998 07:40:19 GMT  
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X-Mailer: Forte Agent 1.5/32.451  
MIME-Version: 1.0  
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Content-Transfer-Encoding: quoted-printable

## COMMENTS

## RESPONSES

Dear Superintendents of the Redwood Nat./State Parks: Rather belatedly than never, I respectfully submit to you and your staffs my comments on the July 31 1998 DRAFT GMP/GP document. I appreciate your cooperation. Sincerely yours, Rudil  
Nov. 8, 1998

Superintendents  
Andrew T. Ringgold      Richard C. Sermon  
Redwood National Park      Redwood State Parks  
1111 Second Street  
Crescent City, CA 95531

Dear Superintendents:

It has taken much longer to review the DRAFT General Management Plan, dated 31 July 1998. The DRAFT GMP/GP has been voluminous requiring a long time to consider its content and produce thoughtful commentary. I am sure you both will consider these remarks and include them for your revisions in the final GMP/P/EIS/EIR.

Since the fall of 1997, the RNP Staff was consulted about the execution of the second-growth management plan, in particular about the 1978-1979 Holter Ridge Experimental Thinning and its remeasurement in 1996. Excellent cooperation was received from the RNP Staff, Steve Underwood and Tony LaBanca. Stephen D. Veirs made many written promises, but never responded to document his past actions. The 1998 cruise data of the remeasurement of the Holter Ridge plots by David Cussins and Cris Handy were reviewed. Upon request of the RNP staff, a new comprehensive proposal will be submitted separately. The proposal calls for repeated inventory, repeated monitoring, scientific experimentation, and restoration thinnings and plantings to enhance native biodiversity. It intends to document the transformation of the even-aged second growth mixed stands to reach their multi-aged and multi-storied mature equilibrium. This proposal will not duplicate the "Whiskey 40" approved research project. Comments on the second growth GMP/GP will be addressed in the new Holter Ridge proposal.

First, important philosophical comments about the DRAFT GMP/GP are presented for consideration. Following these philosophical comments, specific comments are attached suggesting improvements in the text and maps. It is urgent that the Vision concept will be revisited in this GMP/GP. It would enhance the possibility for improved long-term sustainability of all the PARKS resources, held in public trust. Public involvement and comment are integral components of the decision-making effort. Public involvement will be enhanced by considering the above comments.

The first philosophical criticism is redundancy in text and tables. This redundancy confuses the public in making a considerate and concise decision or choice. Many sections of identical text reproduced more than once within the DRAFT GMP/GP. This creates its voluminous size. It is a waste of space, staff time, resources (trees for pulp) and costs. Redundancy adds little to content. Condensing and effective streamlining of alternatives eliminate duplications. Alternatives could be best compared in a summary tabulation contrasting the alternatives with condensed text information to highlight the options and differences. Consider the detailed Specific Comments portion. A rough estimate is that this volume could shrink to 50% of its



## COMMENTS

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thickness if this editing is prudently applied to text, maps and tabular information. It saves costs and consumptive use of valuable resources! It will greatly enhance clarity!

The second philosophical criticism is that the text has been kept purposely vague and verbose. In many instances, it is impossible to determine what its impact is, what it achieves, or what action is recommended. It also tends to formulate concepts from a lawyer's perspective leaving it "flexible", evasive and imprecise. This makes it very hard for the public to determine what actions or results are intended. It makes an evaluation impossible. Rigorous and unscrupulous editing is needed to reduce this ambiguous and vague language to simple clarity. Readability would greatly improve in using clear and direct expressions of the proposed actions. Report clearly its anticipated desired result. Evaluate its worst-scenario impact! Report its Full-Price \$ costs Consider alternatives inclusive No Action. Condense the most pertinent information. Offer a clear choice!

*Condensing the text and using simple terms would greatly improve readability.* The result would be that the public could provide better comments and become more involved in the decision-making process. This would shrink the volume by at least 10%! If a concept or plan cannot be expressed in simple terms, the public cannot envision nor comprehend its impact! Otherwise, public involvement will be minimized. This is certainly not the EIS/EIR goal!

The third philosophical criticism is that the GMP/GP should *prioritize and recommend specific actions.* If the GMP/GP is THE management tool for the next 10-year period, site-specific activities should be presented with a timetable. Actions should detail site-specific information, manpower and equipment needs, and an estimate of projected man-hours and costs. Management activities are to be budgeted per fiscal year for the 10-year period. The GMP and GP budgets are to be coordinated to secure timely appropriate funding.

The GMP/GP should discuss in clear details: a)- what the problem is, b)- what activity is recommended, c)-what needs to be done site-specific, and d)- what the expected result of the action would be. This would allow for a proper evaluation of the results in terms of effectiveness and impacts by the time the next GMP/GP would be formulated. It would require realistic monitoring for concrete and site-specific results, and enumeration of its Full-Price monitoring/mitigation costs. It would include the additional and unforeseen costs to maintain and mitigate the initial activity during the GMP/GP planning period. This site-specific monitoring is essential to determine effectiveness and economic feasibility of current and future management activities.

The fourth philosophical objective is the overall purpose of a GMP/GP tailored to the demands of the 21st century! In this respect, the DRAFT GMP/GP falls far short of the global environmental concerns and objectives. The GMP/GP should be the official repository and documentation of all the management activities of the previous GMP/GP. The GMP/GP should accumulate all the past information, previous inventory and monitoring results. Assessing the costs and effectiveness of past activities should direct guidance towards improved management activities of the new GMP/GP. It should become the data repository and audit of past management activities! This means that the current GMP/GP should condense and critically review past management experiences. Adopt new perspectives, goals and visions based upon past experiences and proven effectiveness. The accumulated

COMMENTS

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pertinent databases should be added to GMP/GP as an appendix. It should be available for the public, for scientific research, and used in future political resource decisions. It should preferably be formatted in a modern computerized database format. It should be continuously updated to include periodic monitoring results!

What is clearly needed is a compact historic review of the past accomplished management activities. What has been done in the past, where (site-specific) and at what costs in manpower, efficiency and \$costs! For this current DRAFT GMP/GP, the RNP 1980 GMP and the CDPR 1985 GP would be the reference plan. A historic summary of past activities and accomplishments need to be evaluated using the above criteria. The 1968 and 1978 RNP Public Laws, the 1994GMP/GP MOU and all pertinent additional legal mandates (ESA) and court orders should be included in the Appendix for public information. The Appendix

(pages 361-396) contains some of this information. However, annual work plans and their GMP/GP coordination over the past GMP/GP period are missing together with their budgets and manpower allocations. What is actually accomplished on the ground level of resource management? Missing is a critical evaluation of this coordination in meeting the long-term objectives. These long-term objectives are to be summarized with clearly defined results to assess fully all the historical impacts of the intended mitigation, restoration and vision.

The current planned GMP/GP should prioritize which activities will be accomplished within the next 10-year planning period with exact goals. To illustrate the point more clearly, take as an example the restoration and decommissioning of past logging roads causing erosion and sediment deposition into streams. A map should illustrate the original legacy of all the logging roads. Map the mileage of roads restored during the past GMP/GP period and map the newly proposed road mileage for restoration during the new GMP/GP 10-year period. A condensed summary should critically evaluate effectiveness, efficiency and Full-Price \$ costs and the monitoring results of past activities. Thus, the current GMP/GP would serve as the primary repository and documentation of past management activities for the next GMP/GP.

SPECIFIC COMMENTS are indicated with reference to page numbers and maps.

Page I-x too long for a summary, condense drastically.  
Page xi-xvi Table of Content with page Index at right edge of page. This will be greatly reduced in length upon elimination of redundancies.

Page 3-10 Rewrite goals. Condense scope and purpose considering the above Philosophical Criticisms. Consider incorporation of the Visions and the long-term sustainability of resources.

Page 13-152 Reduce redundant text to summarize the various alternatives. Rank alternatives in terms of achieving the long-term goals and sustainability. Revise visions for the next 10-year period. Include condensed annual work plans with site-specific actions, restoration and mitigation. The recommended activities are to be related to historic activities of proven effectiveness. The benefits, negative impacts and long-term effects are best to be discussed under the Affected Environment.

Pages 153-357 Regroup critical affected resources of the alternatives. Edit for redundant information. Use maps tables and graphs to illustrate the various effects. This substitutes for the

485-A The 1968 and 1978 legislation establishing and expanding the national park appear in appendix E in the final plan. The 1994 memorandum of understanding between the National Park Service and the California Department of Parks and Recreation appears in appendix C. This information is provided because it is specific to Redwood National and State Parks. Legislation that does not pertain to the parks is not reprinted because it is available elsewhere. Other legislation or agreements are not appended because they would add substantially to the length and cost of printing this management plan / environmental impact statement without contributing substantially to a reader's understanding and ability to interpret the proposals in this plan. Portions of laws, regulations, policies, and guidelines relevant to the proposals in this plan and needed to understand the alternatives are cited in the text in the section "Regulations, Assumptions, and Methods for Evaluating Impacts" or where most appropriate.

485-B New NPS policies and guidelines for national park planning and decision-making require that the priorities for implementing the proposals in this plan be described in the national park's strategic plan. This plan will set forth a five-year program for beginning implementation of the general management plan, taking into account the park's workload, budget, and staffing allocations. The park's strategic plan will be made available to the public upon completion.

485-A

485-B

## COMMENTS

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EIS/EIR part of the GMP/PC. Incorporate pertinent data of past activities and their outcome. Include manpower requirements and budget costs to accomplish the respective restoration, mitigation and its anticipated effectiveness.

The main emphasis of this section is to assess potential impacts of specific proposed activities under the various alternatives. It is relevant to provide background information about park resources from natural resources to socio-economic resources. It is needed to interpret trends in these records. Tabular or graphic presentations constitute essential background information for planning purposes like:

The past 10-year records of discharge and flood stages of pertinent rivers and creeks, and records of major floods and droughts since 1980.

The past 10-year precipitation and air temperature records of weather stations in or near PARKS boundaries.

The past 10-year list approved research projects and experimentation with their status within PARKS boundaries. List scientific publications published during the past 10-year period about PARKS resources.

The past 10-year record of visitor use for specific campgrounds and visitor centers, and fees collected.

The past 10-year use of the hiking, biking and horse trail uses for the major trails.

The past 10-year law enforcement records, major accidents and arrests, preferably mapped on a base map.

The past 10-year statistics of local timber harvest per county, segregated by major lumber categories, pulp production, and export of lumber, pulp and wood chips.

The past 10-year statistics of local ocean fisheries, smelt fisheries and shellfish harvest per county or per PARKS beach area. Segregate Native American fisheries where feasible. List current permits.

The 10-year county employment and population statistics, lumber employment statistics. Include PARKS employment statistics per park and county.

The 10-year mapping of slides, road failures and other road/bridge repairs during that period.

The past 10-year use of the paved and unpaved roads for vehicular traffic within or near PARKS boundaries.

**ALL MAPS** Indicate on the entire Planning Base maps A, B and C the extent of Federal and State owned lands immediately outside the PARKS boundaries.

**ALL MAPS** Indicate on all the Planning Base Maps A, B and C the recognized locations of the protected archaeological and cultural resources without naming these resources. This includes the following locations, once considered significant for their archaeological or cultural value, irrespective of their current official protective status: a) the Davidson Ranch dwellings, b) the County Fish Hatchery, c) archaeological sites on Gans, Dolason, Count's Hill and Childs Hill prairies and other oak prairies, d) the remnant Trinidad Trail in the Tall Trees Grove, e) the pristine stretch, known as the Emerald Mile along Redwood Creek, f) ancient village sites on Redwood Creek, g) the Lyons Ranch, h) the location of the historic stage coach rest stop at Fern Canyon plus meadows, and i) the gold dredging lagoon site at Espa Lagoon, Gold Beach. If appropriately colored it would indicate that these areas have high intrinsic value in need of protection. No

COMMENTS

RESPONSES

development should occur without a full EIS/EIR consideration. ALL MAPS should indicate localities, roads outside the boundaries of the PARKS. Indicate public access road connections with the roads within the PARKS. For orientation, it would be extremely helpful to identify named localities and landmarks on these maps. All paved and all-season public access roads within the PARKS should be clearly indicated. Indicate road maintenance by CALTRANS, County and PARKS by different shading.

Page 17 Map of Roads. The Humboldt Bay entrance has been grossly exaggerated on the map. Produce a similar companion Road map for the Klamath-Smith River Basin with past logging roads, etc.

Page 62 The Howland Hill Road is receiving increasing tourist and commercial traffic of small trucks, particularly during the wet season. This cause rutting of the graveled road. Frequent grading is needed to maintain the smooth roadbed. During the peak of the tourist season untill the fall, the adjacent forest vegetation is covered by distracting thick dust layers. In order to counter eroslon and negative impacts of local traffic increases. Consider paving the road for a quality redwood experience. The damaged bridge over Mill Creek should be repaired. Improve road safety by signing designated passing areas. Prohibit traffic by large tourist buses and large trailers. Post the road for "headlights on" and maximum 35 miles speed limit to increase public safety. Enforce the above restrictions!

Page 89 Map 3A Mill Creek and Nickerson Ranch trail is poorly indicated on the map.

Page 181 Information is needed about the status of the endangered or threatened plant and animal species of concern discovered within PARKS' boundaries. Tabulate the monitoring reports of individual species during the past 10 years. It should be noted that the construction of the Crescent Beach Overlook eliminated valuable habit of Oenothera wolfii, a CNP-llsted sensitive species. The Crescent Beach Overlook creates undesirable sanitary conditions and unsightly garbage disposal on steep cliffs when not timely serviced. Consider placement of portable unisex toilets and waste disposal facilities on this site.

Page 218 Expand employment statistics per county with improved categories for wood industries, logging, fishing, and tourist industries. For historical purposes, include the same statistics for 1968 (RNP start), 1978 (RNP Expansion), 1988 (Pelican Bay Prison) and 1998 to develop trends in the socio-economic sectors.

Page 248 Table 22. Include noise levels of helicopter logging and the wood-chipper noise levels for impact analysis upon visitors and wildlife.

VISION QUESTS TO BE ADDRESSED IN THIS (NEW) GMP/GP. WHERE THE PLANNERS AND DECISIONMAKERS BITE THE BULLET!

(1) MAJOR TRANSPORTATION PROBLEMS

Several major transportation problems are looming within the GMP/GP Planning Area. It would be imperative for the GMP/GP to develop NOW a considered position statement to guide decision-makers in future decisions

(A) The Hwy 101 Bypass in Del Norte Redwoods State Park. The recommended route should bypass virgin irreplaceable redwood stands and provide a long-term least expensive, cost-effective maintenance of

485-C The scale of the maps makes it difficult to show many things well.

485-D The proposed plan (alternative 1) indicates that, if major realignments of portions of Highway 101 or 199 that pass through the parks are required during the life of the plan, RNSP staff will work with Federal Highway Administration and Caltrans staff to protect the resources and values of the parks. NPS and CDPR staff are unable to anticipate the location, scope, or potential impacts of future realignment proposals and their alternatives to address them in greater detail in this plan.

485-C

485-D

COMMENTS

RESPONSES

485-E

a 4-lane traffic lane. In the past, no serious consideration was given to the Wilson Creek - Mill Creek corridor avoiding steep unstable slopes, with minimal sacrifice of virgin forest acreage. The projected route would follow long-established logging roads along the east bank of Wilson Creek. It crosses over to the East Side of the West Branch of Mill Creek following current logging roads towards the Rellim entrance road with Hwy 101. Although this route is longer it saves in construction and maintenance costs significantly and avoids long steep climbs for heavy trucks. It will best protect the pristine redwood resources. The present Hwy 101 would become a scenic route

(B) The Humboldt Lagoons to Orick Bypass. The bypass was originally planned outside of the narrow strip of old-growth redwoods along the north shore of Big Lagoon. Since 1970, this narrow strip suffered severe wind throw and natural mortality. A better bypass route would be following old logging roads uphill, crossing over the ridge east of Azalea Hill, bypassing Stone Lagoon and Freshwater lagoon, entering the Redwood Creek Valley east of Orick, and ending at the mouth of Prairie Creek with Redwood Creek. Beyond this point, the bypass would follow the current Hwy 101 to the start of the present Redwood Bypass. Recent acquisition of the Davidson Ranch by the RNP would greatly facilitate planning for the least impact route!

(2) MAJOR ECOSYSTEM INTEGRITY PROBLEMS

485-F

(C) Adding the Humboldt Lagoons to the GMP/GP Planning Area. The State of California has acquired significant acreage and the Big Lagoon from private ownership. The State owns the coastline to Patricks Point State Park. Parts of these acquisitions are in watersheds important for anadromous fish runs. Their preservation complements the concept from the Redwoods to the Sea. Land use planning would be greatly impacted with the development of these beaches and lagoons. Legislative affirmative action may be needed to include these lagoons in the current GMP/GP.

485-G

(D) Flushing Freshwater Lagoon. The degradation of Freshwater Lagoon is caused by eutrophication (septic), introduction of non-native fish, turtles and frogs, and lack of thorough periodic flushing. This can be reversed by simply allowing tides to re-enter the lagoon. The overflow drainage at the NW end of the lagoon has to be lowered by excavation. The small culvert under Hwy 101 has to be replaced by a short bridge allowing flushing of the lagoon by natural tidal action. This would restore its saline-fresh aquatic system, unique and limited to the Redwood Region. It would allow periodic closing of the lagoon by a sand bar and periodic flushing of the lagoon by natural tidal actions. This pattern is the natural process in Stone Lagoon and Big Lagoon.

485-H

Allow only small electric motors on the lagoon. Ban water-skiing and water scooters. It would greatly enhance the quality experience of passive recreational opportunities.

485-I

(E) Incorporate the Lacks Creek watershed within the RNP boundaries. The 1978 RNP Expansion Public Law 95-250 already recognized the vital importance of the RNP control over timber harvesting activities in this highly sensitive watershed. Land acquisition would more effectively to protect downstream ancient redwood forest resources on a sustainable basis. Prioritize land acquisition towards this goal.

The RNP already acquired additional oak prairies south of the RNP

485-E, F The plan focuses only on the four parks that comprise Redwood National and State Parks. However, there are numerous sections of the plan that reflect the need to address issues or programs on a regional or ecosystem management basis in cooperation with other agencies and/or gateway communities.

485-G The natural patterns of circulation and exchange of flushing flows between Freshwater Lagoon and the ocean were significantly altered when U.S. Highway 101 was constructed across Freshwater Lagoon Spit. One of the greatest effects was the elimination of flushing marine action as might have periodically occurred when water elevations in the lagoon caused the spit to be breached. The location of Highway 101 severely limits restoration opportunities for Freshwater Lagoon. Without the relocation of the roadway, restoring tidal and marine influences would require careful and detailed planning and engineering and costly modifications.

485-H The agencies consider the issues raised by commentators related to the management of public use and watercraft on Freshwater Lagoon to be too specific to be addressed in detail in this plan. However, the plan has been revised to reflect that public use of Freshwater Lagoon will be managed cooperatively with other jurisdictions. The issue of the use of jet skis in Freshwater Lagoon and elsewhere within the parks can be addressed through agency regulations.

485-I Redwood National and State Parks currently has no mechanism to add these lands to the parks except for them to be acquired from willing sellers.

**COMMENTS**

**RESPONSES**

boundary at Schoolhouse Peak. Opportunities may arise with the possibility of sale of the Stover Ranch. The BLM lands in the headwaters of Lacks Creek can be turned over to the RNP. Logged-over timberlands and prairies may be acquired from private willing sellers. The overall restoration activities of the Lower Basin of Redwood Creek would be greatly enhanced and sustained by such acquisitions.

If there is a need to elaborate on the above topics or more information is desired, do not hesitate to contact me. I wish you success in preparing an exemplary and integrated GMP/GP for the 21st century!

Respectfully yours,

Dr. Rudolf W. Becking  
Concerned Citizen

COMMENTS

RESPONSES

Kimberly Callison

Redwood National & State Parks  
General Plan Draft Comments

To Whom It May Concern:

OCT 15 PM 2:30

318-A

I have been a resident of Orick all of my live, as many generations before me. I am personally involved with many businesses in town as well as most committees and events. I feel that you did not collect enough data and facts about the town of Orick and it's citizens to include in your general plan. You did have a paragraph or two telling about the town but many of the facts were incorrect.

318-B

Closing Freshwater Spit to day use only will hurt the town of Orick economically. The hundreds of campers that park on the spit for free do spend money in town. They buy gas, food and gifts whereas not parking on the beach they would just drive right through. I feel that the National Park should not close the spit down until they can provide another facility to hold that many campers in the Redwood National Park. Prairie Creek does not count because it is too small and in the State Park. Forcing those campers to go to Crescent City, Klamath or Trinidad robs the town of Orick. The RNP is looking at the BIG picture, but not looking at ORICK'S BIG picture. The RNP should be very concerned about the economy of the town since 90% of the park is located in Orick.

318-C

Closing the beach to Commercial Fisherman---I understand that the park has a no vehicle on the beaches policy. Policies can be changed from park to park. A lot of citizens of Orick survive on the fishing. They have made arrangements with the park to receive permits and drive on certain areas of the beach. To my knowledge the fishermen have done a good job of sticking to the rules. Keeping a limited number of permits is a good policy. The part about non-transferable permits is ridiculous. There is no reason why one man can not give up his occupation and turn it over to someone else or to his children. That is saying that the children can not inherit the business/occupation from their family. These fish are not becoming extinct. The vehicle on the beach are not doing long term damage. Morally & economically you can not stop these fishermen from fishing on park beaches!

Moving the information center to Davison Ranch is a good plan. You bought that property and have done nothing with it. Making a large interpretation center is an excellent idea for all of these tourists that come from all over the world to see the park and you have nothing for them to do. Open up more trails. Walking, biking and horseback. The overnight horseback trail has been closed for 2 years now. You have crews just for that called trail maintenance crews. Why are they not up there clearing that trail? Those horses do not damage the trail. I have been up on that trail for many years now and if anything the time that the Tall Trees Outfitters were here was the best thing for the trail and the park.

318-A See summary comment G.

318-B See summary comment E.

318-C The plan proposes to phase out an inappropriate activity while allowing those who currently fish for commercial purposes to continue to do so.

## COMMENTS

## RESPONSES

The National Park does not have enough activities for the tourists to do. The State Park has Fern Canyon, Prairie Creek, Big Tree, The Braille Walk, Cal Barrel Road but what does the RNP have? Walking up & down 1 mile hill to the tallest tree does not satisfy most age categories. There are a lot of older people and handicap people that visit the RNP and cannot see the tallest tree because of the long walk. The NP needs to create more accessible trails for hiking, wheelchairs & bicycles. A bicycle concessionaire would be a great asset to the park as was the horse concessionaire. The NP should be doing all they can to bring another horse concessionaire to the Redwood Creek Trail Head.

Neither Plan 1, 2, 3 nor 4 satisfy me at all. The Park needs to start over with their draft plan. Make alternative 5 more realistic to what the people around the park want and not what the park wants.

Sincerely,

  
Kimberfy Callison

cc: Mike Thompson  
Frank Riggs  
Paul Kirk



COMMENTS

RESPONSES

October 5, 1998

US Dept. of the Interior  
National Park Service  
P.O. Box 25287  
Denver, Colorado 80255-0287

Gentlemen:

The local office of the Redwood National Park in Crescent City has been totally non-responsive to the people of Orick over the 16 month period their Draft Management Plan was under development and in totally intransigent in their policies to destroy the economic base of the community of Orick. Therefore, I am sending you a copy of the letter I have sent them.

Please provide oversight on these issues as the local National Park people modify the draft management plan into a plan which benefits both the park and the people who own (and visit) the park, without destroying the community of Orick.

I would appreciate a response.

Sincerely,

*Donald R. Comstock*

## COMMENTS

## RESPONSES

October 5, 1998

Redwood National Park  
111 2nd Street  
Crescent City, Calif. 95531

Dear Park Superintendent:

I am writing regarding the draft Redwood National & State Parks Management Plan.

I would urge you to adopt a management philosophy closest to alternate 4 in the described plan. The Park is supposed to provide an educational and recreational facility for the people as provided by Congress when they created the Park. The standing joke for years, has been about the tourist who just drove the length of the park on highways 199 and 101, then ask, "where is the Redwood National Park?" Please use every resource and opportunity available to maintain existing visitor services and provide new visitor services. The alternative is to name the area a National Redwood Preservation Area.

I do not believe it is appropriate for the National Park Administration to take credit for the visitor services provided in the three State Parks when those services already existed prior to formation of the Redwood National Park in 1968. The land taken for a National Park, and paid for with public funds, should be developed for public access and enjoyment.

On a specific note, the Plan is a direct assault on the community of Orick which heretofore has provided substantial services to Park visitors. When the Plan was "leaked" to the public in the spring of 1997, the community of Orick formed *Orick Tomorrow* in order to work with the Orick Economic Development Agency and provide input to the Park development plan. The input of this group had been shunted aside or ignored completely. This is so entirely non-responsive on the part of the local Park people that it is necessary to communicate with higher levels in the Agency in San Francisco and in Washington. Not a pleasant situation for local people.

There are four specific requests which I have and I believe they have been presented to you by others throughout this process. Please reconsider your recommendations accordingly. All will have a direct impact on the community of Orick.

1) Do not stop the commercial fishing along the beaches. This activity has been going on since before the Park was formed, it provides direct support for the community of Orick and does absolutely no damage to the Redwood Trees. Fishing does not reduce "park values" in any way.

COMMENTS

2) Do not prohibit overnight parking along the highway on the Freshwater Lagoon sand spit. The area has provided a unique experience to visitors ever since the highway was constructed there in 1949 and again, in no way diminishes "park values." The assertion that RV's create a blight on the view shed is insulting to the many seniors who stop here for fishing, walking on the beach or just to watch the ocean sunset. Again, the visitors service benefits Orick and is sorely needed in a Park otherwise devoid of visitor services.

3) Do not prohibit off-road vehicles from access to the beach. The dune formations on the beaches are not such that off- road vehicles constitute a threat to pedestrian visitors and their use to salvage driftwood, provide fishing access and simply to enjoy 8 miles of beach is a visitor service. Again, these activities support the economic viability of the community of Orick.

329-A

4) Do not remove portions of the Redwood Creek levee westerly of Orick. This levee was constructed in 1967 after three floods devastated the community of Orick and surrounding farm land. It represented an appropriate expenditure of public funds then and its removal now would represent an improper expenditure of public funds. The problem with fish in the estuary was "solved" when Caltrans expended \$250,000 a number of years ago to construct gates in order to let river water flush out the estuary. What is needed, is rain, not removal of the levee. Its removal as proposed in the plan, would create a 100 foot wide Riparian zone from adjacent farm land in addition to the existing channel plus levees, and would expose the entire Orick valley

329-B

to flooding. This action would diminish the value of the adjacent property and as such constitutes "a taking of property" this is not a "willing seller" situation I strongly urge that you not attempt to remove the levee in order to make it one. An "environmental easement," while a fancy phrase, if made under duress is still "a taking of property."

In summary, I would urge your support of alternate 4 in your plan subject to the above considerations. Alternate 1 is not acceptable as it is an exclusively preservationist approach which excludes people.

Most Sincerely,

*OSBA Donald L Comstock*

RESPONSES

329-A Slightly more than 330 acres of land would be flooded by a 100-year flood if the lower 0.6 mile of levee within the national park boundary is removed. As shown on the floodplain map (page 278 in the draft plan), the increased size of the floodplain would not threaten the majority of the Orick valley. The flood threat during a 100-year flood to the portion of the Orick valley from direct flooding of Redwood Creek would continue to be the same because more than 2.5 miles of levee upstream of the national park boundary would remain in place.

The Redwood Creek levees have adverse effects on estuarine habitat for juvenile salmon and steelhead. One of the effects of confining the stream flow between the banks of the levees is that sediment from both upstream and of marine origin accumulates in the backwater areas at low river flows. This has resulted in the filling of productive fish rearing areas with sediment and the isolation of the original last downstream meander (south slough) and northside tributary channel areas (north slough). The culvert installed on the south levee in 1987 was designed to improve water circulation in the estuary. The culvert has increased water circulation in the south slough when operated properly but does not completely restore the circulation patterns and does not restore all the habitat lost by channelizing Redwood Creek. Natural high flows during the winter flush-out accumulated sediment from those portions of the river within the levees but do not flush out sediment in the sloughs, which are isolated from the main river channel by the levees.

329-B The property values of agricultural land adjacent to Redwood Creek are influenced by many factors including the chance of flooding. The National Park Service and the California Department of Parks and Recreation recognize that property values may change if portions of the levees are removed. Any acquisition of property or an interest in property would be only from willing sellers. As described on page 300 of the draft plan, property owners would be compensated at full current market value for any property or interest in property acquired.

COMMENTS

RESPONSES

Redwood National & State Parks,  
1111 Second St.,  
Crescent City, Ca 95531

Oct. 4, 1998

As a concerned resident of Del Norte County I am writing in response to your various alternatives that you are considering for the future of the parks.

None of the alternatives meet the needs completely though all of them have some acceptable plans.

I do not agree with the replacement of the planned removal & or re-location of the Redwood Information Center. It is a perfectly good building and to move it to a flood plain because it is in a tsunami zone (which it was when it was built) is a plain waste of money that could be put to better use, i.e., the reopening of the Prairie Creek Fish hatchery, the training of the RNSP employees to provide the visitors with complete information as to what there is to see & do in our area. There are very few of these people that have suitable answers to the traveler. I myself have visited both centers at various times while picking up literature and maps to give out and on more than one occasion have witnessed very poor handling of the tourist, UNLESS OF COURSE THEY WANT TO MAKE A PURCHASE.

332-A

Changing the location of the Crescent City center to Hiouchi cannot have been thought out very carefully as who would service the many travelers coming in from the north on Hwy 101. They would be completely ignored until they traveled almost 50 miles into our state.

332-B-C

The closing of the "Spit" to overnight camping is a must. It is unsightly and poorly maintained. It is taking money away from the Campgrounds that pay taxes and should be more thoroughly considered in your Alternatives but I see no evidence of that.

332-D

The Gold Bluff Beach Road should be reopened North of Fern Canyon to reconnect with Newton B Drury Parkway to be more accessible to the visitors. But paving and widening the Gold Bluff Beach Road of Howland Hill and Tall Trees roads to accommodate large RV's and Motor Homes is not feasible. Haven't we learned anything in this county about road slippage, re-paving and repairing that goes on all year long and costs go up with every repair. Keep these areas free of congestion to keep them in their natural state.

Sincerely Submitted,  
*Janis J. Crandall*  
Janis J. Crandall.

1998 JUN 10 11:03 AM  
NATIONAL ARCHIVES  
10:08 AM '98

332-A The agencies reviewed public comments regarding visitor center facilities and modified the proposed actions under the "Information, Orientation, and Interpretive Centers" section that was on page 56 of the draft plan to indicate the following:

The services provided at the Crescent City information center would continue until incorporated in a multiagency information center in the Crescent City area. In the interim, NPS staff will work with the Crescent City and Del Norte County staffs to eliminate problems at the current facility.

No change would be made to the proposed action for Hiouchi. The agencies feel that a combined facility in the Hiouchi area is needed to improve operational efficiency and increase both visitor understanding of and access to significant resource areas. The new facility would also eliminate a variety of safety issues along Highway 199.

All functions at the Redwood Information Center would remain at that site. Redwood Information Center was approved for construction at its current site in 1983 based on scientific knowledge current at that time. Since then considerable advances in understanding the earthquake and tsunami potential in the area have been made. It is now recognized that a major 750-mile-long fault zone that runs just offshore of the parks has the potential to rupture along its entire length with a magnitude 9 earthquake. The Redwood Information Center site is within the expected tsunami run-up zone. If an earthquake occurs along this fault zone, a tsunami could occur within minutes, possibly before the ground shaking stops, posing a considerable threat to life and property. The potential hazard at this site limits the style of interior exhibits that can be developed and selection of museum items that can be displayed at this location.

If the Redwood Information Center were to be damaged significantly in the future, the facility's functions would then be relocated to a new primary visitor center that would be built outside the tsunami hazard zone between Orick and Prairie Creek and adjacent to U.S. Highway 101. Opportunities for constructing a new facility through public, private, and/or tribal

## COMMENTS

## RESPONSES

partnerships would be sought. The Redwood Information Center would be salvaged, and the site would be converted to day use with interpretive opportunities to include beach access, boardwalks, and wayside exhibits.

The new visitor center would be constructed in an area that would not impact RNSP resources but that would provide direct access to the primary resources and the opportunity to interpret the park's primary interpretive themes. Services provided at the facility would be expanded and would include museum quality exhibits, a dedicated auditorium for multimedia presentations, book sales, and trip-planning. A number of hiking and driving tours would originate here.

**332-B** See summary comment A.

**332-C** The information in the draft plan (p. 225) indicates that occupancy rates of private RV parks and campgrounds during the summer months are approximately 66% of capacity and much lower during the rest of the year. Thus, privately operated RV park and campground capacity in the area between Trinidad and the Klamath/Requa turnoff is sufficient to accommodate many of the users that would be displaced, as provided under the proposed action. From the survey conducted on Freshwater Lagoon Spit users in August 1996 (noted in the draft plan, pp. 224-25), approximately 75% of current users would seek alternative accommodations in the area. It should be noted, however, that the distribution of economic activity associated with RV user purchases of goods and services would likely change. Spending on goods and services in some communities, such as the town of Orick, would likely be reduced, while other communities, such as Klamath, might benefit from increased spending on goods and services.

**332-D** See summary comment F.

COMMENTS

RESPONSES



REDWOOD NATIONAL  
AND STATE PARKS  
RECEIVED

SEP 28 1998

ARCATA OFFICE  
ARCATA, CA

Superintendents,  
Redwood National and State Parks  
1111 Second Street  
Crescent City, Ca, 95531

Gentlemen/Ms:

While we realize we have no clout with you, we respectfully request to have our opinions and feelings be heard on the subject of the plans for changes to be made to the Redwood National and State Parks.

We are now residents of Del Norte County, but for over 20 years were frequent visitors here more than once a year; and feel we have a more than average knowledge of the parks both here and in Humboldt County.

These Redwood Trees draw thousands of people from all over the world, as you well know. This year alone, we have noticed license tags from all 50 states in the Union. There was even a boat from Hawaii. These people come here, to Crescent City! This is the place that they associate with the Redwood National and State Parks.

These Parks belong to all of us as taxpayers, and we should be as anxious to accommodate these people as well as educate them as to proper behavior and care of our Parks.

We don't understand why anyone would want to bypass Crescent City by eliminating the local Redwood National and State Parks Information Center. We direct visitors to it and to Howland Hill Road on a very regular basis. I'm sure many other people do, too. The demand for information from us about our local wonders is pretty heavy when we are out and about. We are past the Hiouchi Information Center regularly and see the many people taking time to visit it, as we have done on many occasions. It would be so nice if it could be open for a longer period of time each year.

However, since the vast majority of visitors go either North or South on Highway 101, it seems probable that many are not aware of the beautiful drive on Highway 199, nor that there is an Information Center in Hiouchi. Therefore, to make it the main Information Center seems ill advised since it would not be utilized by the majority of visitors.

## COMMENTS

## RESPONSES

333-A

To remove the Information Center downtown, and move it to Orick would have a tremendously adverse effect on the economy here in Del Norte County. We fear that many people would go no further North. We also do not understand why this would take place when Del Norte County offers more access to the forests, fully realizing that the majority of the set aside park lands are in Humboldt County. The accessibility to these, however, are more than limited.

It seems to us that these plans were laid out by the Sierra Club. We canceled our membership in the club when it became so apparent they wanted only the youngest, fairest, most able-bodied, and agile to be allowed in these parks. Since we are over 50 years old, and disabled due to a series of accidents, it would be most disastrous not to be allowed to see these Parks and their flora and fauna. We are already limited and not accommodated in many areas that we would like to see, but are physically not able to hike or climb to. Please don't forget we own these parks as much as anyone. They are the reason we, and many others, moved here.

We drive down Howland Hill Road many times a month. Sometimes every day. We live on the South side of town and enter from the South. If it were made a one-way road from the North, it would eliminate many of our trips into the forest because the mileage would be doubled for us, and we are on a fixed income. We often take our lunch into the forest just to relax, enjoy, and restore.

333-B

To pave Howland Hill Road would be good for the plants which get so covered with dust. However, since speeding is the norm for that road, paving would only allow them to go even faster. Fifteen miles per hour is too fast to really see all that is within these trees. Thirty to forty-five miles an hour which we see so many cars going would be multiplied, we're sure. Perhaps regular patrolling could alleviate part of the speeding, and abuse of the parklands. What effect would the asphalt and paving process have on the plants, trees, animals and birds? Not too good, we're afraid.

It seems that a sizable amount of money has been set aside for improvement to the park system. Perhaps it would be more fiscally responsible to improve and maintain what we already have, and apply some of the money to additional employees and higher salaries of the present ones. Moving and building so many new things, while that would be nice if we could really afford to have it all, appears to be a result of heavy lobbying by Humboldt County to have it all in their pockets.

333-C

We are really concerned about the long-term, and short-term effect your plans would have on the economy. Can we really

333-A Under the proposed action, a primary visitor center would be constructed sometime in the future (if the Redwood Information Center is significantly damaged by some future event) between Orick and Prairie Creek and adjacent to Highway 101. In addition, a new visitor center would be constructed at the north end of the parks at Hiouchi, which would combine the functions of the Hiouchi information center and the Jedediah Smith Redwoods State Park visitor center. The functions of the information center in Crescent City would eventually be transferred to a multiagency information center in the Crescent City area. RNSP headquarters operations would remain at the existing Crescent City facility. It would be speculative to suggest that north-south travel patterns of RNSP visitors traveling on U.S. Highway 101 would be influenced by transferring visitor information functions from downtown Crescent City to a new multiagency center and constructing a new primary visitor center in the central area of the parks. However, it is possible that some RNSP visitors traveling on U.S. Highway 101 from the south would not stop in Crescent City for information, or to obtain other goods and services incidental to a stop at a visitor center there. With essential visitor information facilities in the northern portion of the parks on U.S. Highway 199 at Hiouchi and at the information center (or possibly a multiagency center) Crescent City (under the proposed action), it is possible (but difficult to predict without the benefit of actual experience) that visitor spending would be shifted from the northern portion to the central and southern portion of the parks in Humboldt County. This may result in modest but insignificant impacts on the Del Norte economy.

333-B See summary comment F.

333-C See response to comment A above. Also, there is unlikely to be any short-term economic effects. In the long term, it is possible that some visitor spending would shift from downtown Crescent City to the Hiouchi area, but the extent of this would likely be negligible.

COMMENTS

RESPONSES

afford to by-pass a community so well known as the heart of the Redwood National and State Parks? More is scheduled to be lost than just money, i.e. availability, access, spirit, and survival.

We have enclosed a copy of the letter in the Triplicate by John Thompson. While we are not in total agreement with him, it does make much sense. Please reconsider your plan, and take us, and many others like us, into consideration.

We admit we do not know all of the aspects of each of these proposals, but we feel Plan # has more of the ideas with which we agree. Please keep the parks resident and user friendly.

Thank you.

Crescent City, Del Norte County,  
Redwood National and State Forest  
unofficial, but busy, ambassadors,

Ed and Gloria Craven

enc/cc



## COMMENTS

## RESPONSES

By John Thompson

Thank you for the opportunity to comment on the draft Redwood National and State Parks General Management plan. It is difficult to know where to begin as this draft has been two years and many hundreds of thousands of dollars in the making.

There is no single proposed alternative that meets the needs of the visitors, the community and the mandates of the park. The easiest way for me to provide input is to choose in general one of the alternatives, discard those elements that are objectionable, add elements of other alternatives, then add a few suggestions of my own.

Purpose of the park: The original legislation is very clear on this. "That, in order to preserve significant examples of the primeval coastal redwood (*Sequoia sempervirens*) forests and the streams and seashores with which they are associated for the purposes of public inspiration, enjoyment, and scientific study..."

I believe it is important to note that the park was only established for the purpose of public inspiration, enjoyment and scientific study. Nowhere in the legislation is it stated that it must be preserved "in a condition of unimpaired ecological integrity" as the draft proposes.

The national park was expanded in 1978 to preserve and protect existing resources "in accordance with the original intent of Congress and to establish a more meaningful Redwood National Park for the use and enjoyment of visitors."

The draft appears to a very large degree to minimize the original purpose of the park, that it exists solely for the enjoyment, inspiration, and study by the public.

Alternative 4: Given the above purpose, Alternative 4 is the only proposal that starts to go in the right direction, but is still off base on several points.

Access Roads: Howland Hill, Stout Grove, Gold Bluff Beach and Greater Coastal Drive, etc., should all be realigned and widened as necessary and most importantly, be paved.

Gold Bluff Beach Road should be re-opened north of Fern Canyon to reconnect with Newton B. Drury Parkway. This could then form a one-way loop drive thereby max-

*I believe it is important to note that the park was only established for the purpose of public inspiration, enjoyment and scientific study. Nowhere in the legislation is it stated that it must be preserved "in a condition of unimpaired ecological integrity" as the draft proposes.*

— John Thompson

imizing traffic flow and safety.

All access roads should be accessible to recreational vehicles whenever possible.

Visitor Center: Until some one is foolish enough or visitation improves enough that a "lodge" be built, the primary visitor center should be in Crescent City. There are many empty buildings available to the park in Crescent City. A primary visitor/information center should be developed, perhaps by leasing and renovating the Square Deal building. It has a great location on U.S. Highway 101 with plenty of parking. That would remove visitors from the administration building.

Even better would be the multi-agency (RNRP, U.S. Forest Service, chamber of commerce, etc.) one-stop visitor center that we have already spent \$100,000 studying and which everyone decided they didn't want to participate in.

Information Centers: Do not put the northern information center in Hiouchi. That would only serve traffic on U.S. Highway 199 and many visitors traveling U.S. 101 would miss it and wonder, "Where is the Redwood National Park?" It is fine as a more minor or perhaps more focused info center in Hiouchi.

The Redwood Information Center was in the tsunami zone when it was built. It is ludicrous to me that as an excuse to relocate to a site well off the highway and out of sight at B Mill dock, which is subject to flooding from Mill Creek and the large redwoods behind it falling onto the center. The Crescent City headquarters is in a tsunami zone; does that mean it should be moved, also?

Operations/Administration: The park offices in Arcata and Eureka should be relocated to the Crescent City offices. If there is not room to accommodate every one, again more buildings are available such as the Daly's building.

Freshwater Spit: It is very important that this area be changed from a free campground to a day-use facility. As it is now it is the worst possible entrance to a National Park that anyone would want, besides all the issues of unfair competition with local businesses.

Campgrounds: It is true that the approximately 350 campsites in the state parks and a few primitive sites in RNP are not nearly enough, except there are about 2,000 campsites in Del Norte County and 1,200 motel rooms, all very close to the parks. RNRP, its agents and its staff do not actively inform visitors that these facilities exist. It is extremely important that this private sector infrastructure be utilized by the parks before any further expansion of public facilities.

Beach access: It is appalling that any proposal would consider eliminating the permits for the commercial fishermen while at the same time preserving access for Native Americans. An estimated 60 families in the Orick area make a living catching smelt off the beaches and selling their catch to Eureka Zoo for the animals. Leave this as it has been since long before the park was formed.

Conclusions: There are, of course, many more details to be considered. It is possible to manage millions of visitors with proper planning and development. The community must be an integral part of the park experience.

Redwood National Park was created to save examples of the coastal redwoods for the sole purposes of public inspiration, enjoyment and scientific study. To do anything less would be a corruption of the law and the intent of the Congress of the United States of America.

John Thompson is general manager of Trees of Mystery in Klamath and a member of the Del Norte County Planning Commission.

COMMENTS

RESPONSES



October 6, 1998

Superintendent  
Redwood National and State Parks  
1111 Second Street  
Crescent City CA 95531

98 OCT -8 AM 8:48  
RECEIVED  
CRESCENT CITY  
CALIF. 95531

Dear Sir or Madam,

I am writing in regards to the proposed draft for the Management/ General plan that has been prepared for our local parks. I am strongly opposed to the plans that have proposed for the following reasons:

340-A  
340-B  
340-C  
340-D

- |   |
|---|
| 1. They are inconsistent with the promises that were made to our county residents when the parks were created and then expanded. When the land was taken out of our local tax base, we were promised that the resulting tourism would make up for the losses. That hasn't happened.   |
| 2. The plans proposed would reduce access and would reduce what tourism we do get. Why would someone come all the way to Del Norte County if the facilities, trails, campgrounds, etc. don't allow them to experience the beauty of our redwoods? It makes no sense to reduce access to parks that offer something unavailable anywhere else on the planet. |
| 3. The general public, especially those most affected, has not been provided with a reasonable opportunity to fully understand the documents involved because they are not easy to read.  |
| 4. The purpose of the park as stated on page 8 is inconsistent with the legislation for the park's creation.  |

**THE DRAFT DOCUMENT MUST BE CONSISTENT WITH OUR COMMUNITY'S GOALS, NEEDS, AND THE PROMISES MADE TO US IN THE PAST.**

- A. The timeline for comments needs be extended for at least 6 months.
- B. An option must be offered that doesn't reduce access (it would be terrific to actually increase opportunities to appreciate what we have).
- C. It is essential that local meetings be held to provide for community involvement.

Sincerely yours,

*Mary M. Dorman*  
Mary M. Dorman

340-A See summary comment B.

340-B The agencies feel that the proposed action would provide for increased opportunities for RNSP visitors through new services and facilities. The preferred action focuses major development along U.S. Highways 101 and 199 in an effort to reduce impacts on sensitive resources and provide better access to RNSP resources to the majority of visitors.

340-C The organization of an environmental impact statement is, in large part, dictated by the Council on Environmental Quality regulations (40 CFR Parts 1500-1508). Furthermore, this document also had to meet the requirements for a California environmental impact report and the requirements for both NPS general management plans and CDPR general plans. We believe that, given all these constraints, the document is an acceptably clear presentation of a complex array of material.

The public process used to develop the plan and accompanying environment impact documents was similar to those used by many public agencies and incorporated significant opportunities for public involvement. Development of the draft plan included five public scoping meetings conducted in local communities; a scoping workshop with local American Indian tribes and groups; individual scoping meetings conducted with local focus groups such as environmental organizations, chambers of commerce, government agencies, and commercial fishermen; two newsletters produced and distributed to a mailing list of more than 500 persons and organizations; and a number of informal meetings with a variety of individuals and groups. Public review of the draft plan involved distribution of 475 copies of the plan; production of 15,000 copies of a summary of the draft plan, distributed to the mailing list and as insert in the two local newspapers; and four public meetings and a number of focus group meetings and informal meetings conducted during the public review period, which was extended from 60 days to 90. The National Park Service, California Department of Parks and Recreation, and many other agencies use the open house style of public meeting rather than a public hearing because they have found the former format to be much more

**COMMENTS**

**RESPONSES**

conducive to high-quality communications and information exchange with the public than the latter. The final opportunity for formal public involvement will take place when the California State Park and Recreation Commission holds a public hearing on the plan in 1999.

**340-D** See summary comment D.

COMMENTS

RESPONSES

November 6, 1998

Mr. Peter Keller  
Redwood National Park  
2nd and K Streets  
Crescent City, CA 95531

Dear Mr. Keller:

I am a resident of Del Norte County and am writing to comment on the development of a management plan for the Redwood National Park. I would suggest that a community task force help to write the plan for this County. Local people have a strong interest in preserving the pristine nature of the Park. I appreciated your support for this idea in our phone conversation today.

I believe that careful, ecologically sensitive improvement of the Park for tourism is crucial to the future of Del Norte County. This could play a major role in the revitalization of a community hard-hit by the loss of the timber and fishing industries.

As a pediatrician in this small town, I have noticed that many teenagers here feel isolated and do not have goals for the future. Involvement in improving their local Park could be important to their sense of self-esteem.

493-A

Several improvements come to mind. First, trail access (parking, trail head markers on the roads) could be enhanced. Second, small lodges for hikers could be set up as places to get out of the rain during longer hikes. Third, advertising of the Park could be increased.

In conclusion, I think local involvement in Park planning is crucial. Thank you for your interest and support.

Sincerely,

*Anne Marie Duncan*

Anne Marie Duncan, M.D.



493-A See summary comment C.

## COMMENTS

## RESPONSES

Dear Sirs

RNSP - 9 PM 3:01

Oct. 25, 1998

495-A

I am responding to RNSP report, titled Draft General Management Plan/General Plan, Environmental Impact Statement/Environmental Impact Report for Redwood National and State Parks. After reviewing the document I found it woefully redundant, wordy with out of scope subjects, deficient in continuity, content and consistency. I suppose this comes from too many people with too many different ideas. If a document of this size is to be written, an agreed upon format should be adopted. Each author should follow the format as he discusses his subject.

If I may I would like to remind you that the resources RNSP is discussing, is not RNSP's personal resource. Nor is it's use, to be dictated by RNSP based on RNSP's personal preferences.

As a tax payer, I am your customer. RNSP needs to understand that concept. I pay the taxes, fees, for the privilege to use the resource. It is RNSP's task to provide access to the resource and to protect the same. The idea of charging outrageous fees to use a park that I have already paid for doesn't make sense. If the apparent cost of running the parks is getting higher than the budget, find ways to do things that are more cost efficient as opposed to closing the parks. Closing the parks indicates clearly that RNSP can't manage the parks and sorely needs to make management changes from the top down.

495-B

It would seem to me that RNSP should support the sounding area of concessionaires. That was a promise that has not been kept. As RNSP looks forward to the Baby Boomers, the park system will not be able to serve everyone. These concessionaires can take care of the overflow and provide services that will keep the customer in the area for a longer time, which will help everybody. If the park can not provide the services asked for, provide a directory to the customer that accurately lists all of the services available in the surrounding areas.

495-C-D

In reviewing the alternatives I find that moving the visitor centers a waste of money. The costs of replacing the centers is way out of line. If the rest of RNSP's costs reflect those described in the document, RNSP needs an audit immediately. Keep the visitor centers where the visitors are! Remember the visitor centers are for the convince of the customer not that of RNSP.

One point of interest. In your document there was a concern about tsunami and flood plain threat to the Orick and Crescent visitor centers. That kind of information has been available for years. Long before the centers were even thought of. RNSP of all people should be well aware of this kind of threat. This kind of thinking and decision making does not reflect well for our forest and park management.

There should be more local meetings that discuss the local concerns. What RNSP does has far reaching effects that can not be identified without the local meetings.

Please know that RNSP has an awesome responsibility. That responsibility demands that interaction with the community is imperative. RNSP is not a separate entity. It is part of a vast common resource that includes everyone.

Thanks for listing, and taking care of my forests and parks.

Sincerely Bob and Shirley Edmonds.



Bob Edmonds  
Shirley Edmonds

**495-A** The organization of an environmental impact statement is, in large part, dictated by the Council on Environmental Quality regulations (40 CFR Parts 1500-1508). Furthermore, this document also had to meet the requirements for a California environmental impact report and the requirements for both NPS general management plans and CDPR general plans. We believe that, given all these constraints, the document is an acceptably clear presentation of a complex array of material.

**495-B** The plan has been revised to include a variety of appropriate commercial services that might be authorized by the National Park Service or California Department of Parks and Recreation in gateway communities to support visitor use of the parks. The opportunity for local American Indian tribes to provide such services has also been addressed. The process for authorizing concessions or commercial services in the parks and the fees that are charged are based in federal and state laws and agency policies that have nationwide and statewide applicability, respectively.

**495-C** Construction costs are based on the cost for similar size and type of facilities built in the region under government contract, with some allowance for inflation. As the facilities are designed, efficiencies will be sought, cost-effective architectural and engineering options will be evaluated, and more accurate cost estimates will be developed.

**495-D** See comment C above and response to comment A in Janis Crandall's letter.

COMMENTS

September 26, 1998

SEP 29 11:27

Elliott

Redwood National & State Parks  
1111 Second Street  
Crescent City, CA 95531



Attn: Superintendents

To Whom It May Concern:

This letter is a formal record comment regarding the Redwood National and State Parks General Management Plan/General Plan/EIS/R. I am opposed to it and request the following:

1. The timeline for comments be extended at least six months.
2. The Redwood National and State Parks conduct facilitated meetings locally (minimum of three) to provide for community involvement. And that input is then used to draft a General Management Plan that meets our community's goals as well as the legislation of Redwood National Park and the California State Parks, NEPA, and CEQA.

The following are reasons I make this request:

345-A-E

- |   |
|---|
| 1. The purpose of the Parks as stated on page 8 of the document is not consistent with the actual legislation for the park's creation. This inconsistency has laid the groundwork for a document without "the most fundamental criterion for determining the appropriateness of actions proposed in this joint plan." |
| 2. There is not a reasonable range of alternatives as required by NEPA and CEQA. Comparing the alternatives side by side reveals very little range in the proposed alternatives.  |
| 3. The existing use (Alternative 2, No Project) is not clearly defined thereby precluding a reasonable comparison with the other alternatives.  |
| 4. The general public has not been provided a reasonable opportunity to fully understand the document because it does not read or flow well.  |
| 5. The data contained in the report regarding Del Norte's economy is inaccurate. Table 19 is not consistent with data published by EDD and over-reports the number of employed by several thousand.   |

I urge you to consider the words of the Secretary of the Interior Bruce Babbitt speaking about the National Park Service "The Park Service must undertake the hopeful process of coming together. The process of visioning and listening and inviting every single person to be heard." And the words of Denis P Galvin, Acting Deputy Director, National Park Service "We must move... to a new era that recognizes the shared interest of parks and their neighbors in promoting outstanding environmental quality and sustainable economic development."

For all these reasons, please grant my requests.

Sincerely,

Susan Elliott

Employment: Six Rivers National Bank, Branch Manager/Assistant Vice-President

RESPONSES

345-A See summary comment D.

345-B The National Park Service and California Department of Parks and Recreation strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and emphases on visitor use and resource protection, as required by law. In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. The agencies also strongly believe that the relative emphasis between visitor use and resource protection is completely consistent with the enabling legislation for the parks. The agencies strongly disagree that there is an "all or none" approach taken in any of the alternatives with regard to visitor use versus resource protection. Both agencies strongly believe that all of these alternatives achieve the legally mandated standard, which is expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations (NPS Organic Act, 16 USC 1 and NPS Management Policies 1:3).

345-C The National Park Service and the California Department of Park and Recreation disagree that alternative 2 "is not clearly defined."

345-D The organization of an environmental impact statement is, in large part, dictated by the Council on Environmental Quality regulations (40 CFR Parts 1500-1508). Furthermore, this document also had to meet the requirements for a California environmental impact report and the requirements for both NPS general management plans and CDPR general plans. We believe that, given all these constraints, the document is an acceptably clear presentation of a complex array of material.

345-E Table 19 of the draft plan (p. 219) contains information obtained from the U.S. Department of Commerce, Bureau of Economic Analysis (BEA) Regional Economic Information System. The information refers to employment by sector with employment defined using a broader definition than used by the California Employment Development Department (EDD), which is based on U.S. Department of Labor, Bureau of Labor Statistics data. BLS employment data refers to nonagricultural wage and salary

**COMMENTS**

**RESPONSES**

workers covered by unemployment insurance, and this would account for lower total employment than indicated in table 19. Proprietors, self-employed workers, and others not covered by unemployment insurance are included in the BEA data. We believe that the BEA data provides a more comprehensive indication of employment conditions in the two-county region than available from the EDD data. Text in the final plan has been modified.

COMMENTS

RESPONSES

11/4/1998

To whom it concerns,

I have read the Redwood General Management Plan draft and I feel that alternative 3 should be implemented or at least integrated into the final plan. The best way to heighten the visitor's experience is to make the park as beautiful and natural as possible. I think your objective should be to convert the highest percentage of the land to its natural state as you can, and allow people to enjoy it on hiking and biking trails and in

497-A

primitive campsites. Information booths can serve their purpose in the cities and towns that are already developed. If people want to learn about a park it would even be easier if the info centers were nearby. Facilities in Crescent City and Eureka would be available to a great number of people, and it would free up space for things to grow in the parks. I

understand that some development is unavoidable so I urge you to keep it to a minimum and do it with the absolute minimum impact to the environment. This approach will probably lessen the number of visitors but the vast untouched wilderness will be even more majestic for those who go. I know that many will greatly appreciate a plan along these lines, human and otherwise. Thank you for listening.

Concerned citizen,

Russell Enriquez

NOV 11 1998  
11:32 AM  
NOV 11 1998

497-A See comment A in Janis Crandall's letter.



COMMENTS

RESPONSES

REDWOOD NATIONAL AND STATE PARKS  
Fax 707-464-1812  
e-mail: redw\_superintendent@nps.gov

Comments Due October 9, 1998

I am opposed to the Draft General Management Plan/General Plan, Environmental Impact Statement/Environmental Impact Report for Redwood National and State Parks as prepared and request the following:



1. The timeline for comments to be extended at least six months and immediately begin #2 below to prepare a new Draft.
2. Redwood National and State Parks conduct facilitated meetings locally to provide for community involvement. Develop a new Draft document consistent with our community's goals as well as the legislation of Redwood National Park and the California State Parks, National Environmental Protection Act (NEPA), and California Environmental Quality Act (CEQA).

The following are reasons for my request:

46-A-C

- The purpose of the Parks as stated on page 8 of the document is not consistent with the actual legislation for the parks' creation. This inconsistency has laid the groundwork for a document without "the most fundamental criterion for determining the appropriateness of actions proposed in this joint plan." (Page 8 of the Plan)
- There is not a reasonable range of alternatives as required by NEPA and CEQA. Comparing the alternatives side by side reveals very little range in the proposed alternatives.
- The existing use (Alternative 2, No Project) is not clearly defined thereby precluding a reasonable comparison with the other alternatives.
- The general public has not been provided a reasonable opportunity to fully understand the document because it does not read or flow well.
- The recommendations and alternatives presented are not consistent with the information contained in the document.

46-D

Signed:   
 Name: SANDRA FERNANDES  
 Address: 

Additional Comments: THERE NEEDS TO BE MORE INPUT FROM DEL NORTE COUNTY. SOME OF YOUR FACTS ARE INCORRECT.

46-A See summary comment D.

46-B The National Park Service and California Department of Parks and Recreation strongly believe that the various alternatives presented provide a reasonable and appropriate range of alternatives and emphases on visitor use and resource protection, as required by law. In some alternatives there is greater emphasis on visitor use and lesser emphasis on resource protection, while in other alternatives the reverse is true. The agencies also strongly believe that the relative emphasis between visitor use and resource protection is completely consistent with the enabling legislation for the parks. Both agencies strongly disagree that there is an "all or none" approach taken in any of the alternatives with regard to visitor use versus resource protection. Both agencies strongly believe that all of these alternatives achieve the legally mandated standard, which is expressed as "conserving resources while providing for their enjoyment by today's citizens in a manner that will leave them unimpaired for future generations" (NPS Organic Act, 16 USC 1 and NPS Management Policies 1:3). Also, we disagree that alternative 2 is not clearly defined.

46-C The organization of an environmental impact statement is, in large part, dictated by the Council on Environmental Quality regulations (40 CFR Parts 1500-1508). Furthermore, this document also had to meet the requirements for a California environmental impact report and the requirements for both NPS general management plans and CDPR general plans. We believe that, given all these constraints, the document is an acceptably clear presentation of a complex array of material.

46-D Extensive Del Norte County documentation was obtained and evaluated for purposes of describing the affected socioeconomic environment and evaluating environmental impacts.

COMMENTS

RESPONSES

November 4, 1998

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

RECEIVED  
SUPERINTENDENT  
CRESCENT CITY  
NOV 9 1998  
10 07 AM '98

Dear Sir or Madam:

I'd like to take this opportunity to present my position regarding the General Management Plan for the Redwood National Park. After reviewing the plan and associated cost benefit analysis I feel that alternative 3 is by far the most appropriate course of action for the future of the park.

Primary emphasis should be placed on protection, restoration, and preservation Alternative 3 espouses these important areas much more aggressively than the other alternatives.

Alternative 3 also appropriately addresses the commercial fishing issue. I appreciate the constructive arguments of those who may be adversely affected by the new restrictions but the coastal section which includes all flora and fauna thereof should be managed with the same vigilance as their land based counterparts.

New development as spelled out in alternative 1 would run contradictory to protection. It is understood that the interpretation process is vital to public education and support, but we should not be overzealous to the point of degrading that which we are striving to protect. That being said I feel that any increased intrusion within the park boundaries would be contrary the viability of the parks fragile ecosystems. The encroachment of other deleterious activities will continue to pressure the boundaries of the park, we should be steadfast in our protection of every inch of the parks real estate. Visitor centers outside the parks boundaries may be able to perform the same natural and cultural interpretative processes.

Understanding that one of the mandates of the NPS is to promote and provide access to all individuals this topic deserves extra scrutiny so as to not turn RNP into another

## COMMENTS

## RESPONSES

- 2 -

November 4, 1998

498-A

Yosemite. Other approaches to access should be considered such as horses, mules, even horse drawn carriages for those mobility challenged. The reduction of paved roads and restriction of motor vehicle should be high priority. Campsites in sensitive resource areas should be removed or relocated.

I feel that alternative 3 also as best as politically possible addresses the issue of fire control or lack of, and watershed restoration. Both of which are vital to what should be the primary focus of the GMP, that of protection and restoration based on the least amount of human influence possible on the natural processes within the park.

Sincerely,



Dennis Flaherty

498-A Both the National Park Service and California Department of Parks and Recreation are committed to providing access to the parks' facilities and programs for visitors with disabilities. An objective has been added to the "Public Use, Recreation, and Visitor Safety" section, and a general statement has been added to the "Actions That Are Common to All Alternatives" section. Freshwater Lagoon Spit would continue to be open to day use, and improvements would be made that would increase this accessibility. Alternate camping opportunities would be required to meet the Americans with Disabilities Act requirements for such facilities. Several of the parks' trails are accessible, and the possibility of developing others will be evaluated during the development of the joint agency trail plan. Although a means of providing trail access for the mobility impaired, horses are restricted to certain trails to limit resource impacts and avoid public use conflicts.

COMMENTS

RESPONSES

To whom it may concern,

I have read through the Redwood National and State Parks General Mgt. Plan and I would like to put in my two cents on which option I deem to be the most appropriate. As a life-long resident of Humboldt County I have had significant exposure to the parks through years of hiking, backpacking, birding, and beachcombing.

In my opinion, the best option for management of the parks is Alternative 1. It achieves a good balance between visitor use/ interpretation and protection of the parks' resources. Alternatives 3 and 4 put too much emphasis on a single focus. I believe that by focusing too much on one sector of management, all other sectors suffer as a result. Alternative 4 doesn't put enough emphasis on improving management of the parks' outstanding natural resources (these resources are responsible for the parks' existence in the first place). Although I believe Alternative 1 is the best option, there are still a few items I think could be improved or changed.

In regards to the restoration of Redwood Creek I think it would be better to be a bit more aggressive in decommissioning the roads upstream from the park. By incorporating Alternative 3's goal of decommissioning 54 miles of road per year, both the upstream and downstream targeted roads would be completed in 17 years. I also think it would be wise to remove the levees on the lower portion of Redwood Creek and, while protecting the immediate vicinity of the visitor center, let the surrounding areas function as a natural estuary. The amount of damage/ inconvenience caused to the livestock areas by periodic floods would be offset by the new layer of nutrient rich silt that would be left as the waters recede. These floods are responsible for the productive nature of the fields and the cycle could continue without the levees.

Another suggestion that I would make that differs from Alternative 1 is to keep Marshal Pond and the Lagoon Creek Ponds intact. Marshal Pond is a wonderful place to observe wildlife. It's an example of a fairly rare habitat on the Northcoast, an acid pond. Three species of birds use this habitat (also Lagoon Creek Ponds) that occur only sparingly elsewhere. These species are Ringed-necked Duck, Hooded Merganser, and Wood duck. Anyone who has seen a Wood Duck in the wild would appreciate the importance of leaving these two areas alone. The Lagoon Creek Ponds also provide easy fishing access.

My last suggestion is to place a destination lodge on the east side of Freshwater Lagoon. This would be a beautiful, unobtrusive location that is close to the parks. It would be a wonderful thing to watch the sunset over the lagoon/ocean from a comfortable room within the lodge.

I hope you will give consideration to my suggestions and choose Alternative 1 as the best management plan for the parks.

Sincerely,

Daniel Gamson

NOV -5 PM 12:48

501-A The plan has been revised to indicate that the agencies would consider more than one proposal to establish an appropriate lodge or destination resort in the vicinity of the parks.

501-A

COMMENTS

RESPONSES

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

October 25, 1998

NOV -9 7:41

RECEIVED  
NATIONAL SYSTEMS  
7/18/98

Ref. Draft Fire Management Plan  
Humboldt and Del Norte Counties

Dear Mr. Ringgold:

In reviewing the Draft General Management Plan/General Plan/Environmental Impact Statement/Environmental Impact Report for Redwood National and Parks, I would like to offer the following comments and concerns specifically directed to wild fire pre-suppression planning:

\* With the exception of the proposed prescribed burn program, pre-suppression planning is non-existent beyond recruiting and training personnel, and the procuring and maintenance of fire related equipment.

\* The referenced 1995 Fire Plan is silent on the need for pre-establishing incident support sites for fires within the park. I was unable to find mention of how Park forces will be supported at initial attack and beyond for fires that require a prolonged effort to control. Incident Base and Helicopter operation sites are not pre-identified.

503-A

\* Neither the Draft Plan or the Fire Plan identify a pre-suppression plan for a fire that will extend beyond the initial attack stage. What is missing is the reality that fires will occur whether started by man or natural causes(lightning) and that access will be needed to the incidents. Disturbing is that roads are being pulled, put to bed, decommissioned in the interest of land reform with out consideration for the safe Ingress/Egress of fire forces. I would suggest that without the ability to reach a fire in a timely fashion, that the fire will soon expand beyond the initial attack stage and soon develop into a fire that will require intense management. Fires beyond initial attack have the ability burn up or do long term damage to a resource that is the recipient of a lot of invested rehab dollars.

\* There is a general sense from the Draft that except for rare occasions, that Redwoods do not burn. The fire control expertise of neighboring wildland fire control agencies was not consulted both for fires burning trespassing into the park or for fires burning out from the park boundary.

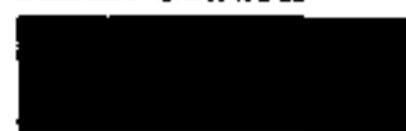
503-B

In general, the Draft document and Fire Management Plan as it relates to resource protection and a fire plan, are weak and grossly understated. I am asking that Fire Management input be solicited and appropriately included in this Management Document.

Overall, my concern is that these and similar past comments have been offered to at least two previous management plans, without reply.

I appreciate the opportunity to comment on this Draft Management Plan.

Allan Gradek



503-A The current approved *Fire Management Plan* will be revised in 2000. The revised plan would consider fire suppression strategies for different areas of the parks, along with public safety and resource management strategies. The watershed restoration program is planned and conducted with full consideration for access needed for management and administration of the parks, including fire access.

503-B It is beyond the scope and general nature of a general management plan to provide detailed information on a specific resource management program such as fire management. Input from all interested and affected agencies and the public will be solicited during the preparation of the next revision of the *Fire Management Plan*, scheduled for 2000. The *Fire Management Plan* revision will be accompanied by an environmental compliance document, which will include public involvement as required under the National Environmental Policy Act and NPS and CDPR policies.

COMMENTS

RESPONSES

Author: REDW Superintendent at NP-REDW
Date: 8/10/98 11:03 AM
Priority: Normal
Receipt Requested
TO: Aida Parkinson at NP-REDW-ARCA
Subject: Public Comment, Draft General Management Plan.
Per Andy's instructions, you're "Keeper of the GMP
Comments:
B

REDWOOD NATIONAL AND STATE PARKS
RECEIVED
SEP 14 1998
ARCATA OFFICE
ARCATA, CA

Forward Header

Subject: Public Comment, Draft General Management Plan...
Author: Steve and Mary Hackett
Date: 8/10/98 9:54 AM

8 August 1998

Re: EIS/EIR Public Comment, Redwood National and State Parks

Dear Superintendent:

I am a resident of Humboldt County, a Ph.D in Economics with specialized knowledge of environmental and natural resources economics, and a frequent visitor to the Redwood National and State Parks. I have had the opportunity to review the Draft General Management Plan and the four alternatives described therein. My comments are provided below.

1. I generally support alternative 1, the proposed action. First, I am strongly opposed to any additional road or campground development in the Bald Hills area. I strongly support enhanced protection of the cultural resources and the primitive character of the Bald Hills. Fire has been an important tool used by the Indian residents of the area for at least hundreds of years to maintain the culturally and aesthetically valuable prairies and oak savannas of the Bald Hills and similar areas. Alternative 1 is consistent with those values, in that it explicitly provides for the use of fire as an important management tool for the Bald Hills. Second, I think it is very important to the economy of northern Humboldt County and southern Del Norte County that a destination lodge be developed. Alternative 1 seems to provide a good plan for such a lodge. Third, I support restoration of the Redwood Creek estuary, and alternative 1 provides at least partial restoration. Fourth, I think that the current trailer camping arrangement along the Freshwater Spit area is both dangerous to traffic and aesthetically vile, and alternative 1 quite properly calls for elimination of trailer camping in this area. Fifth, I find ORV use along the wave slope of RNSP to be inconsistent with the park experience, and would like to see their use reduced as much as possible. Alternative 1 takes a step in the right direction.

2. I am strongly opposed to alternative 4. First, alternative 4 calls for the development of campgrounds in the Bald Hills area, and in my opinion that sort of development would substantially degrade this fragile wild area. Second, alternative 4 subordinates proscribed fires as a management tool, yet fires are necessary in order to maintain the culturally and aesthetically important prairies and oak savannah balds and openings in the park. It is imperative that fire continues to be a central management tool in the Bald Hills, and alternative 4 is inadequate in this area. Third, alternative 4 deemphasizes watershed restoration, which should be of central focus for the park.

3. I am disappointed that none of the alternatives includes seeking federal wilderness status for the roadless areas of Redwood National Park. I would very much like to see alternative 1 modified to include federal wilderness designation for the core roadless areas of at least the Redwood Creek basin, including roadless areas of the Bald Hills.

355-A The draft plan contained no proposal for federal wilderness designation because the agencies believe that until watershed rehabilitation efforts are completed (beyond the life of this plan) there will be no roadless areas of federal land within the parks suitable for wilderness designation. However, the primitive zones proposed in the plan were defined and intended to reflect most of the conditions and values found in designated wilderness.

COMMENTS

RESPONSES

I hope that these comments are taken into account in the development of a Final General Management Plan.

Sincerely,

Steven C. Hackett  
Associate Professor  
School of Business and Economics



COMMENTS

RESPONSES

02 NOV -9 11:21

My name is Ralph Hirt and I live at [redacted]. I spend some part of 200+ days per year on trails north of the Klamath River. I feel that the following comments are both factual and represent the opinions of the many other trail users I have talked to. I choose to limit my remarks to the area north of the Klamath River.

505-A

Trail construction: There are a number of trails in the north park area. What is lacking is any kind of a plan linking these trails into a system. Trail connections are needed in the following areas:

1. Mill Creek horse trail to Nickerson Ranch Trail.
2. Coastal trail (old McNamara Ranch house) to Crescent City vista overlook on 101 (hook up with Miller/Rellim ridge trail)
3. Coastal trail (above Nickel Creek) to Mill Creek campground trail system.
4. Mill Creek Campground to Miller/Rellim Ridge trail.
5. End of Boy Scout Tree trail to Howland Hill Road at top of hill (turnoff for outdoor school).
6. Major trail along east edge of Park to connect the end of Mill Creek Horse trail to Little Bald Hills trail (winter crossing of Mill Creek needed).
7. A trail from the end of Mill Creek Horse trail up to Miller/Rellim ridge trail would be nice. Currently I sneak through Miller/Rellim property.

Obviously, not all of these can be built at one time; my listing is by my priority with #1 being the highest priority. Stop spending money building trails parallel to existing ones.

505-B

Trail maintenance:

State parks: Generally, trail maintenance is pretty good. Tree removal is not always timely but gets done at least annually.

RNP: Although Dick Maley is good about doing something if I yell enough and is always courteous, I have to rate RNP trail maintenance only fair to poor. Trails need to be checked at least once per year and some areas need work several times per year. Part of this plan update needs to be on a regular schedule of trail maintenance and the money to do it.

I am available to talk at any time.

  
Ralph Hirt

505-A, B See summary comment C.



COMMENTS

RESPONSES

Mr. Andrew T. Ringgold  
National Park Superintendent  
Redwood National Park  
1111 Second Street  
Crescent City, CA 95531

98 OCT -9 PM 1:03  
RECEIVED NATIONAL PARK  
SUPERINTENDENT CITY  
CRESCENT CITY  
CALIF. 95531

October 8, 1998

Re: Public Comment: Draft General Management Plan/General Plan

Dear Mr. Ringgold:

I would like to voice my support for Alternative #4 for management and use of Redwood National and State Parks (RNSP). I believe an alternative that enhances and encourages visitor experiences and use will be the best use of government funds for the citizens of both the region and the entire United States.

My primary reason for placing the highest priority on visitor use is my belief that the RNSP is extremely under-utilized. It is a shame that this world renowned park is visited so relatively rarely. I believe it stems from the lack of visitor facilities making it a poor destination for travelers. I have heard many times from friends and family visiting the Park that they were disappointed in lack of facilities and lack of even adequate trail signs.

By promoting more use of the Park, you will be also helping the residents of northern California and southern Oregon by bringing tourist money into the area. This is essential to our local economy given the jobs lost as a result of removing land from timber production in the region as a result of Park establishment and expansion.

359-A

A significant factor compounding the ideas presented in the other alternatives is that there has been shown no cost effective or measurable benefits from the funds spent on past erosion restoration within the Park. I believe it is a waste of taxpayer money to expend funds on restoring lands outside of the Park with the objective of reducing erosion when there are no quantitative method of assessing the benefits from those expenditures. I do, however, support the use of taxpayer funds for restoring the aesthetic values within the Park that may be affected by the past logging on lands now owned by the Park.

503-B

Until the Park undertakes studies to make a quantitative assessment of the current status of the fisheries in Redwood Creek, then expenditure to enhance the fishery is ludicrous. Because this has not been done using proper methodology in Redwood Creek, conducting projects to enhance

359-A We disagree that a cost-benefit analysis would be a useful tool to use in evaluating effectiveness of watershed rehabilitation, especially when, as the author noted, there are "no quantitative methods of assessing the benefits." However, increases in efficiency, over time, would greatly enhance the results of a cost-benefit analysis, should one be conducted. For example, techniques employed by RNSP staff have resulted in a dramatic increase in efficiency — as evidenced by a continuing decrease in the cost per yard of sediment moved by heavy equipment. The average cost has decreased from approximately \$9.70 per yard in 1981 to approximately \$2.93 per yard in 1998. These efficiencies were achieved even in light of inflation and other costs commonly associated with any project of this type.

The RNSP program is based on the generally accepted premise that excessive sediment is detrimental to aquatic systems. Impacts on aquatic communities from excess sedimentation contributed by human-induced erosion are well documented in the scientific literature, although not quantified for Redwood Creek. When Congress passed the Redwood National Park expansion legislation in 1978, it directed that a watershed rehabilitation program be implemented and that this program focus on reducing human-caused increases in erosion and sedimentation throughout Redwood Creek. As of 1998, the total volume of road crossing fill that has been removed from stream crossings on haul and skid roads in the parks exceeds 1 million cubic yards. Other erosion has also been prevented by road removal — by precluding stream diversions and landslides that would have deposited sediment in RNSP streams had the roads not been removed. It is estimated that an additional 20%–40% of additional sediment was prevented from entering streams by removing road benches and approximating the original topography to the greatest extent possible. Following the 1997 storm, treated roads within the parks produced significantly less sediment than untreated roads (A. Bloom, USGS-BRD geologist, pers. comm., 1998)

Based on inventories of road-related erosional problems inside the national park, the total erosion potential from all roads in the Redwood Creek basin is estimated at roughly 5,185,000 cubic yards of sediment. Of this total,

COMMENTS

RESPONSES

Mr. Andrew Ringgold

2

October 8, 1998

the fishery is premature. A proper methodology must seek to determine the fish species populations and determine the actual productive capacity of Redwood Creek for fish by actually measuring fish and their populations. Only then can cost efficient restoration activities at specific locations be evaluated.

359-C

I believe all of the alternatives are misleading in their attempt to determine the time until watershed restoration upstream of the Park. The alternatives presented appear to assume that the only watershed restoration that will occur upstream of the Park will be done by the Park. This is not the case, as many private landowners for many years have been conducting erosion prevention on their roads and lands. This private initiative will continue into the future as well without regard to government funding or Park participation. There are many regulatory mechanisms that will both require and encourage this restoration, including the forest practice rules and proposed regulation required by the State Water Resources Control Board.

If any alternative that proposes restoration outside of the Park is chosen, then a detailed environmental impact report must be prepared to describe both the short term and long term effects that may result from conducting restoration activities within the Redwood Creek basin. Any environmental impact report must evaluate the cumulative impacts that might result from implementation of the restoration practices and provide for evaluating the potential of future activities to contribute to significant cumulative impacts. One obvious potential adverse impact that could be associated with decommissioning roads is the potential failure of roads following decommissioning, necessitating re-establishing roads to reach failing sites for additional restoration.

Please adopt Alternative 4. If other alternatives are to be adopted, then a cost benefit analysis and environmental impact report must be presented to the public to justify the alternative chosen.

Sincerely,

Stephen R. Horner  
Registered Professional Forester #2441

85% is associated with roads on upstream private lands and represent the greatest human-influenced threat to RNSP resources along the mainstem of Redwood Creek. We believe that minimizing human- or management-caused erosion and sedimentation results in the long-term protection of aquatic habitats and species.

The intent of our erosion control program is to minimize future erosion rather than to simply repair erosion scars, especially as it relates to upper basin lands. Inventories conducted to date have focussed on evaluating the volume of potential future erosion. Treatments focus on management-caused erosion as opposed to natural erosion processes. In some cases, the differentiation between the management-caused and natural erosion is difficult to discern. For example, where a mass movement or landslide is not obviously influenced by road building or other human disturbance, no activities would be undertaken to interfere with the mass movement process. However in the situation where a road or other disturbance is influencing the stability of the hillslope, corrective actions would be considered and undertaken as appropriate.

359-B RNSP efforts are not directly focussed on trying to increase production of one or more species of aquatic organisms. Rather our efforts are directed at protecting aquatic resources as a whole, including natural features and processes, so that habitat is available for the variety of species that depend on stream resources.

RNSP staff have conducted studies of the fish populations in those portions of Redwood Creek and its tributaries within RNSP boundaries using currently accepted scientific methods. Studies include spawning surveys, carcass surveys, fish counts, and habitat surveys for steelhead and coho salmon. Some basic information on fish populations in Redwood Creek was obtained from research done for graduate studies at Humboldt State University. Discussions with Orick residents and local residents upstream in the Redwood Valley, historical accounts of fish populations, and the inclusion of Redwood Creek populations of coho salmon, chinook, steelhead, and coastal cutthroat trout among populations listed, proposed for listing, or as candidate species for listing under the federal Endangered

## COMMENTS

## RESPONSES

Species Acts strongly suggests that these populations are at levels far below what previously existed in Redwood Creek. Based on this evidence, the agencies believe that the current status of the fisheries in Redwood Creek is very depressed, and that stream restoration projects can effectively contribute to restoring fish populations.

**359-C** We recognize that landowners have undertaken some erosion prevention activities and that cooperative efforts are occurring, but they are occurring slowly. The time line in the alternatives is based on past and current levels of progress, and we believe represent a fair estimate of the time required to effectively control erosion in Redwood Creek without additional funding. An environmental analysis will be completed for all projects proposed outside Redwood National and State Parks that involve the expenditure of federal funds before the project would be implemented.

The potential for impacts to occur from decommissioned roads exists, but it is much less than for untreated roads. The potential for impacts from roads that are not completely removed is described on pages 280-81 of the draft plan.

COMMENTS

RESPONSES

Nov. 4, 1998

Andy Ringgold, Superintendent  
Richard C. Sermon, Superintendent  
Redwood National & State Parks  
1111 Second Street  
Crescent City, CA 95531

AK 11/6

ps 11/13

NOV 11 11:33 AM '98  
FBI - CRESCENT CITY

Dear Sirs:

Following are a few thoughts and comments related to the Draft General Management Plan. Your team has certainly been thorough and conscientious in compiling the alternatives and background information. It is extremely interesting to those of us who are local to re-visit the past through the history here and look into the future with your plans.

I could be in general agreement with Alternative One if the following items were changed and addressed:

1. Beach access for the fishermen, private and commercial needs to remain at today's levels. As you have pointed out on page 60 "...language in the legislative history of the park's enabling legislation states...'fishing, both sport and commercial, will be allowed to continue in the area...'. We contend that by limiting the vehicle use and then limiting the permits allowed for commercial fishermen will definitely disallow the fishing to continue. We request that the fishing access remain as of today and that commercial permits continue to be given out, in perpetuity. The State and Federal Governments recognized the need of the fishing industry to have access to the beach and waters and we respectfully request that you continue to honor their charge.
2. As one great statesman has said, "Parks are for the People". We need people to have parks, we need to provide for the people that do make the great effort to come up this far to enjoy the beaches and the trees. We feel that your survey and numbers regarding Freshwater Spit Camping are very low. Your survey may have been taken in the mid day or early morning, when campers are at a minimum. We all know that July is the best month for campers and many locals have counted 200

508-A

508-A The National Park Service and the California Department of Parks and Recreation believe that complying with federal and state statutes and regulations that require the agencies to protect resources and provide for their enjoyment by the public takes precedence over provisions of legislative history that may conflict with those mandates.

## COMMENTS

508-B

or more campers on any given day. Your survey of 50 campers is extremely inadequate.

508-C

Having said that you have given us some information to work with and even in your small numbers we extrapolate and find that hundreds of thousands of dollars will be lost to the community of Orick and more to the surrounding area if you eradicate the camping at Freshwater Spit.

This very unique spot is important to the economy of our very small community and to the campers enjoying its use. I am thankful the Park has managed the use along the Spit for the past few years for we have had control over amount of time spent there and no longer have permanent residents. What happens if you stop managing, the land use reverts back to Cal-Trans (the owner) and they do not want to manage it as a road side stop and use reverts to what it once was? After all the wide parking area will continue to remain and people will stop there to view the ocean.

Another point about the uniqueness of this area is in the fact that people can have a wonderful Beach experience without having to have the ability to hike or even walk...

508-D

As you must have need to provide for the handicapped, in the Parks, I would think this is a perfect place to fill that need. A few boardwalks built there would even be better.

Many people around retirement age are not as nimble as the 30-50's and being able to park so close to the beach and enjoy the campfire at night with the smell of the ocean breezes is a wonderful experience.

The Park has often told us of the expense they have to maintain this area and they are not compensated by the users. The story told to us is that if water were made available to the campers then charges could be made. It has come to our attention that other areas bring in a water truck on a daily basis and provide this amenity and then can charge.

508-E

As a compromise could we consider blocking out a smaller area for camping during the late Fall and Winter months. Your need of toilets and garbage cans could be lessened and vagrant tenters would be eliminated.

As for the economic affect to Orick, I want you to realize that this community has done nothing but decline in the last thirty years. That has a direct correlation to the birth of Redwood National Park. The one hope we have here is that RNSP will attract more and more visitors, giving them a great

## RESPONSES

**508-B** The surveys were conducted on two days — a weekday, Thursday (August 22) and a weekend day (August 25). They were administered over the course of the day, not just in the morning or midday. Interestingly, most of the RV users remained during the four-day interval covered by the survey; only 15-20 of the vehicles were "newcomers," including replacements for those who were at the spit on Thursday and subsequently departed. Although the survey was informal, we feel that it reflected the characteristics and behaviors of occupants in terms of a variety of issues, including origin of trip, purpose of stay, length of stay, frequency of visits, and amount and geographic distribution of purchases made by community within the region. We also believe that the populations interviewed were representative of RV users and tent campers at Freshwater Lagoon Spit.

**508-C** See summary comment E and response to comment D in Janis Crandall's letter.

**508-D** Freshwater Lagoon Spit would continue to be open to day use, and improvements would be made that would increase this accessibility. Alternate camping opportunities would be required to meet the Americans with Disabilities Act requirements for such facilities. A general objective for providing increased access for persons of all abilities has been added to the "Public Use" section of the document.

**508-E** See summary comment A.

COMMENTS

RESPONSES

visitor experience and finding ways to make it viable for people to stay two and three days. Then Orick will have a reason to build a motel, provide more gift shops, build some housing, upgrade existing buildings have restaurants that are not only open all day, but all year!

The Park must recognize the fishermen as a great asset to the park. They are one of the last non-government businesses in town. They are on the front line with the tourists, while out on the beach. They provide an educational experience to the curious visitor as well as helpful advice, tourist information and in many cases safety help when people are in need.

Please refer to page 377, Public Law 98\5-250 Sec. 102(a) that states: " The Secretary ... shall conduct an analysis of appropriate Federal actions that may be necessary...to mitigate any adverse economic impacts to public and private segments of the local economy...(b) the Secretar(ies) shall apply such existing programs as are necessary and appropriate to further mitigate identified employment and other adverse economic impacts on public and private segments of the local economy."

In reading this section one would think that Orick, the most affected area of land, would be a thriving community since so much must have been done to protect its economic base!! Look again folks... Dilapidated housing, businesses falling right and left a town full of very senior citizens and many low income and welfare families (82% AFDC in Orick School as of this date). Where is the help this town was to get?

508-F

Where are we addressed in your current plan, that will help to turn this town around? From three thousand inhabitants to 300. Will be 30 when next you make a General Plan?

With the concerted help of the Federal Government and the Redwood National and State Parks, Orick could be a great town for the tourists and a few people to live in. Look at a few acres of land in southern Humboldt County for which one large Corporation received \$500,000,000.00! A place most of us will never see. Orick is your GateWay to the Park... right on Highway 101, everyone passes through here to see You. We need to be addressed, to be helped, to be GREATLY CONSIDERED when you make plans for the next twenty years or more..

508-F See summary comment B.

## COMMENTS

## RESPONSES

We do appreciate the Parks efforts in reviving the Redwood Creek Estuary and look forward to joint efforts of all agencies concerned to come up with a solution for all concerned.

Mr. Ringgold and Mr. Sermon, I suspect you will not be here in the next twenty years. Park Superintendents come and go, but families with long roots in the Orick valley stay and stay and stay. Actions that you take today will affect the lives of me and my children. Children who have roots in this community before the white man came and from the early 1800's when people were looking for gold on Gold Bluffs Beach and hunting and fishing and gathering wood and shells. Please consider the lives of these children and others who want to continue to live a good live here.

It was suggested at a town meeting this last week that we wanted to survive here. Then our local County Supervisor reminded us that we deserve not just to survive, BUT TO THRIVE!.

It is what you do today that will affect our life and the lives of children in this community today.. May you take that responsibility very seriously.

Yours truly,

Donna Hufford

COMMENTS

RESPONSES

Nov. 5, 1998

Andy Ringgold, Superintendent  
Richard C. Sermon, Superintendent  
Redwood National & State Parks  
1111 Second Street  
Crescent City, CA 95531

NOV 5 9 11 AM '98

Dear Sirs:

I wish to suggest some changes for the SOCIOECONOMIC PROFILE section found on page 215.

509-A

First, I cannot imagine why Orick was left out of the chart on page 215 for population changes! No doubt we have had the most significant change from somewhere near 2,500 to the census data of 1990 reading 340+/- . The estimate of the CA Dept of Finance of 650 probably came from the old highway sign that says 600 something and was there when I arrived in 1972.

509-B

Secondly, please note some needed changes on page 228 "The Orick Community". Orick is not 25 miles north of Arcata, we are at least 35 to 40 miles north. We have 3 motels, 2 gas stations (soon to be one), Two churches, Municipal services are provided by the Orick Community Services District--not Water District. Other employers include, Orick School District, a private logging contractor and three agricultural farms.

509-C

As you mention building construction in other areas you could note that no new homes have been built in the Orick area since one was built in 1981. I guess the Park itself might have built one at SOC and then several houses have been renovated into more modern homes. But in general we are a low-income town with a housing stock that is mostly detriorated.

Just a couple of editorial changes...

Thanks

509-A See response to comment K in Marna Powell's 8/20/98 letter.

509-B The revisions suggested in the comment have been made in the final plan.

509-C The suggestion has been incorporated in the final plan.



COMMENTS

RESPONSES

REDWOOD NATIONAL AND STATE PARKS  
Fax 707-464-1812  
e-mail: redw\_superintendent@nps.gov

Comments Due October 9, 1998

I am opposed to the Draft General Management Plan/General Plan, Environmental Impact Statement/Environmental Impact Report for Redwood National and State Parks as prepared and request the following:

1. The timeline for comments to be extended at least six months and immediately begin #2 below to prepare a new Draft.
2. Redwood National and State Parks conduct facilitated meetings locally to provide for community involvement. Develop a new Draft document consistent with our community's goals as well as the legislation of Redwood National Park and the California State Parks, National Environmental Protection Act (NEPA), and California Environmental Quality Act (CEQA).

The following are reasons for my request:

- The purpose of the Parks as stated on page 8 of the document is not consistent with the actual legislation for the park's creation. This inconsistency has laid the groundwork for a document without "the most fundamental criterion for determining the appropriateness of actions proposed in this joint plan." (Page 8 of the Plan)
- There is not a reasonable range of alternatives as required by NEPA and CEQA. Comparing the alternatives side by side reveals very little range in the proposed alternatives.
- The existing use (Alternative 2, No Project) is not clearly defined thereby precluding a reasonable comparison with the other alternatives.
- The general public has not been provided a reasonable opportunity to fully understand the document because it does not read or flow well.
- The recommendations and alternatives presented are not consistent with the information contained in the document.

Additional Comments:

*Orisk Community goals need to be considered*

Signed

*Thelma Hufford*

Name:

*Thelma Hufford*

Address:



71-A

71-A The section of the plan addressing the relationships between the agencies and gateway communities has been revised to elaborate on the types of activities or projects that could be addressed cooperatively. The plan also indicates that RNSP staff would provide technical assistance and advice to individuals interested in developing appropriate/complementary visitor services in gateway communities.

COMMENTS

RESPONSES

03 OCT -2 11 3:19

1111 SECOND STREET  
CRESCENT CITY  
CALIF. 95531

Andrew T. Ringgold  
Richard C. Sermon  
Superintendents Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

RE: Comments General Management Plan

Dear Superintendents:

I have reviewed the Draft GMP/GP/EIS/EIR for Redwood National and State Parks and wish to comment on those aspects which I am most familiar with and concerned about in the Humboldt County section.

I am a property owner in Orick and Redwood National Park is my adjacent neighbor on both the eastern and western property lines. I am also a Park Watcher and member of several of the National and State Parks Conservation Associations.

There are aspects of all three plans which I favor and wish to comment on specific proposals in the Prairie Creek Area, Bald Hills Area and South Area.

1) PAVE DAVISON ROAD

Gold Bluffs Beach and Fern Canyon are top attractions in the Park. The unspoiled beach, the Coastal Trail, convergence of other trails, Fern Canyon, wildlife, picnic and camping areas provide an outstanding outdoor experience for everyone. Davison Road is presently inadequate for access to this important site. It is dusty, dark and narrow. It is slow and dangerous. This road definitely should be widened and paved to accommodate all the Park visitors who wish to visit this special section of the Park. Also enabling wider and easier access, the present campground could be enlarged to accommodate some of the RV's from Freshwater Spit.

2) FRESHWATER SPIT 101 PARK AND STAY

I personally would prefer to look at the ocean than the line sometimes two abreast of RV's parked in that strip area right on the highway. A couple at the Orick Tomorrow meeting told a poignant story. They are retired after working responsibly all their lives. Now they are RVing around the Country--- this is what they can afford. They

363-A See summary comment F.

363-A

COMMENTS

RESPONSES

use to be avid hikers, now health problems preclude these activities. The Park needs to accommodate the needs of these older and energy limited visitors. The number of RV's on the road is growing. It seemed in my summer observations that at least 20% of the vehicles on 101 were RV's this summer. Seeing the Pacific Ocean is as important to these visitors as are the trees. I think proper facilities should be built to accommodate the growing RV travelers. The RV campers should pay the cost for hot water, rest rooms and support services by a use fee. I don't think the present RV park and stay should be closed until more and better facilities are built for these people. I did look at the site.

363-B

Directly North on the beach is the Redwood National Park picnic area and rest room. From here North the beach is broader, passes the Visitor Information Center and continues along a small bluff to the outlet of Redwood Creek. This area is also shielded for the most part from 101 by the natural landscape. This would make a prime RV park. The Visitors Center could remain and be leased to someone to operate the usual trailer park store. I do not think the present Visitors Center should be taken down. It is a beautiful building and took a lot of time and labor to build. It can be used for other purposes. People are coming in RV's now instead of tents and they are 50, not 25.

3) REDWOOD CREEK LEVY

363-C

Removing a section of the levy would risk flood and result in loss of land use to private landowners. The Parks actions should not interfere with the economic livelihood of private citizens.

also I think building the RV park would be the best use of this land to accommodate more visitors and improve the viewshed of Freshwater Spit.

4) NEW VISITORS CENTER

Yes, build the new Visitors Center in the tree area of the Park with a connecting trail system to Prairie Creek. This is an excellent idea. Continue to expand and improve the network of trails, connect trail systems and expand use to include bicycles and horses.

5) REMOVING LOGGING ROADS

I did not see the logging roads: however, since they have been there for over 30 years and may have future use potential, I would not support a plan to remove them. I have observed how fast plants grow on logging roads and trees fall on them. It seems they can go back to nature on their own or if later restored the potential remains. I have a special interest in trails and philosophically don't want any removed.

6) FISHING AT FRESHWATER SPIT

This is economic livelihood, tradition, and fun for a lot of people. The government therefore should not interfere and should support a broad number of interests and uses.

7) VEHICLES ON THE BEACH

I have observed vehicles on many beaches in Humboldt County. They seem dangerous and unnecessary. After observing one driving at least 30 miles per hour

363-B See summary comment A.

363-C Slightly more than 330 acres of land would be flooded by a 100-year flood if the lower 0.6 mile of levee within the national park boundary is removed. As depicted on the floodplain map (page 278 in the draft plan), the increased size of the floodplain would not threaten the majority of the Orick valley. The flood threat to the remainder of the Orick valley from direct flooding of Redwood Creek during a 100-year flood would continue to be the same because more than 2.5 miles of levee upstream of the national park boundary would remain in place.

The Redwood Creek levees have adverse effects on estuarine habitat for juvenile salmon and steelhead. One of the effects of confining the stream flow between the banks of the levees is that sediment accumulates in the backwater areas at low river flows. This has resulted in the filling of productive fish rearing areas with sediment and the isolation of the original last downstream meander (south slough) and northside tributary channel areas (north slough). The culvert installed on the south levee in 1987 was designed to improve water circulation in the estuary. The culvert has increased water circulation in the south slough when operated properly but does not completely restore the circulation patterns and does not restore all the habitat lost by channelizing Redwood Creek. Natural high flows during the winter flush-out accumulated sediment from those portions of the river within the levees but do not flush out sediment in the sloughs, which are isolated from the main river channel by the levees.

The property values of agricultural land adjacent to Redwood Creek are influenced by many factors including the chance of flooding. The agencies recognize that property values may change if portions of the levees are removed. Any acquisition of property or an interest in property would be only from willing sellers. As described on page 300 of the draft plan, property owners would be compensated at full current market value for any property or interest in property acquired.

COMMENTS

RESPONSES

through the fog, I don't think they should be allowed on any beach. There are parking areas close enough to walk. An exception may be the licensed commercial fishermen.

8) FIRES ON THE BEACH

I think most of the driftwood on the beach should be picked up and burned. This is a renewable resource and within balance. Fires in contained areas are safe and enjoyable to a lot of people. I see no harm in allowing the practice to continue.

Thank you for the opportunity to comment on aspects of th Parks plans. I look forward to following the implementation of the very good ideas presented for expanding and improving this beautiful Park.

Very truly yours,



Carole Hurst

COMMENTS

RESPONSES

Author: Deborah Jaques/Craig Strong <ccr...>  
 Date: 11/8/98 6:25 PM  
 Priority: Normal  
 TO: REDW Superintendent at NP-REDW  
 Subject: general management plan comments  
 Dear Superintendents,

Thank you for considering these last minute comments on the management plan. I am very supportive of many aspects of the preferred option-one. I believe that the parks primary mission should be to preserve the ecological integrity of what is left of the coastal old growth redwood forest ecosystem. I have not read the management plan carefully, but offer the following general comments:

I strongly support restoration of Redwood Creek and the estuary. I would like to know the reasons for salvaging the building that should never have been place on the beach near the creek mouth, however. It sounds like a terrible waste. Can the building be used for office space?

I support getting vehicles off the beaches wherever possible and would like to see strong enforcement of regulations regarding that issue.

511-A

I would like to see a biological justification for removing the roads, picnic area, parking lot from the Crescent Beach wetlands. I enjoy this using this area immensely and believe it is important to tourism and quality of life in the community. I cannot immediately see how the development there is causing any damage to wetland species. I will oppose this action if there is not a very good reason for it.

As a resident, I tend not to use any of the area that require day use fees. I hope that there is no increase in the number of areas that require day use fees. I recognize the problem at the Enderts beach overlook. Is there a gate to close the area at night? If not, perhaps installation of a gate and more patrolling would solve the problem.

511-B

I hope that Greater Coastal Drive can be maintained at least as a service road, and that driving access will be available for purposes such as research.

511-C

I would like to see a ban on Jet Skis in all coastal waters, including estuaries associated with the state and national parks.

I am in favor of more trail development, so that short LOOP trails (1-3 miles) are more available in the northern regions of the park (in areas that do not charge day use fees). I am happy to see that connecting trails into a more integrated system is included in option one.

I would like to see large RV's entirely banned from the state and national park campgrounds. If not, at least develop areas that are for tents only, but still car camping. The large RV's degrade the experience for both day use and camping. The private sector can then make money off of the RV "campers" in private facilities.

I believe that RNP should take the lead and develop a lodge. The private sector has had a chance and has not had the vision to pull it off. It is important to making the park a destination for non-campers, and might keep people passing through in the area longer. The lodge should be in second growth habitat, an eco-lodge type place, with interpretive facilities and access to trails right at the lodge.

It will be important to keep up the outreach and education in the community. Animosity towards the parks will probably always be there with some of the older generation, but hopefully with the help of your programs, young people will be exposed to a more enlightened land ethic

**511-A** The road to the Crescent Beach picnic area traverses an area that is classified as a wetland. The parking lot at Crescent Beach is occasionally flooded during heavy rains, confirming the likelihood that in the absence of without an asphalt cap, the current parking lot would be a wetland. The adjacent pond and other nearby ponds along Highway 101 near Crescent City are known breeding sites for red-legged frogs and are also used by waterfowl and other birds. Where natural wetland characteristics and functions have been degraded or lost due to previous or ongoing human activities, it is NPS policy to restore them to predisturbance conditions, to the extent appropriate and practicable. The agencies recognize that Crescent Beach provides a unique experience in the area and valuable recreational opportunities for the local community and for RNSP visitors. These experiences and opportunities must be considered during site-specific planning for the Crescent Beach area, in addition to any resource protection and restoration opportunities. A site-specific development plan would be prepared and accompanied by an environmental compliance document before redesigning the current visitor facilities at Crescent Beach. During the preparation of the plan, the community would be given the opportunity to review and comment on any proposals relating to the visitor facilities at Crescent Beach.

**511-B** The parks prefer and intend that Enderts Beach Road be left open for public use without overnight closures. Gating the road and/or converting to day use would occur only as a last resort if efforts to resolve criminal activity, vandalism, and public use conflicts that occur at night at the overlook and at Nickel Creek Campground are unsuccessful, and only after thoroughly exploring available alternatives with local officials.

**511-C** The agencies consider the issues raised by commentators related to the management of public use and watercraft on Freshwater Lagoon to be too specific to be addressed in detail in this plan. However, the plan has been revised to reflect that public use of Freshwater Lagoon will be managed cooperatively with other jurisdictions. The issue of the use of jet skis in Freshwater Lagoon and elsewhere within the parks can be addressed through agency regulations.

## COMMENTS

## RESPONSES

and broader view.

511-D

I would like to see more management focus on the coastal zone. For example, what responsibility is the park taking for seabirds breeding at colonies adjacent and within park boundaries?

Finally, thank you for your stewardship of our redwood forests. Keep up the good work.

Deborah Jaques

**511-D** The majority of coastline within RNSP boundaries is not readily accessible to humans because of the steep rugged terrain. High tides prevent access to much of the coastline on a continual basis. The offshore rocks are a hazard to navigation in rough or foggy weather, so that there is little human activity that occurs near or on these rocks. Commercial fishing is allowed in the offshore areas under the legislation that established the parks. Freshwater Lagoon Spit, Gold Bluffs Beach, and Enderts Beach are the coastal areas that receive most of the visitation and use. The National Park Service and California Department of Parks and Recreation have proposed reducing vehicle access to these coastal areas as described in the draft plan on pages 59-60. Geological processes that originate in the offshore and marine areas including seismic hazards (earthquakes and tsunamis) are investigated by RNSP geologists. The results of these studies, and those conducted by other geologists, have been incorporated into this management plan, as described on page 56 of the draft plan and in the "Public Safety" section of the "Affected Environment." The National Park Service and California Department of Parks and Recreation conduct surveys of marine birds that use beaches and onshore areas to the extent that funding is available. Should visitor or commercial use of the offshore rocks and waters within the parks increase substantially, the agencies would seek funding to monitor these uses.

COMMENTS

RESPONSES



8/21/98

Superintendents, Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Dear Superintendents:

This letter is in response to the General Management Plan for RNSP. Of the four alternatives, we support Alternative 1 with some modifications.

Freshwater Spit camping area can get very congested in the summer and we realize that the area is not set up to adequately support public camping in a sanitary manner. We do however support some camping in this area and we would urge you to consider the options mentioned in Alternatives 2 and 4 which would increase visitor services by installing chemical toilets and possibly water. We are in favor of limited camping with a mandatory fee at this site. Freshwater Spit offers a unique opportunity to camp along the ocean near our national park and so we are in favor of this option for visitors.

We support the proposed restoration of the parks areas mentioned in Alternative 1 because we feel the restoration will greatly benefit the areas fisheries and wildlife which is an important component of the national and parks.

We also support the ban on vehicles using the beach except for fishing and tribal purposes because of the damage which can occur from vehicle use in fragile environments as well as pedestrian safety issues.

We have some question as to why a new visitor center need be built only several miles north of it's current location. The visitor center as it now stands offers an opportunity for the visitor to learn about the parks along the coast as well as view and learn about the ocean ecosystem. Locating the center inland away from the shore would eliminate the opportunity to view the ocean from what is now an excellent viewing deck. We do not believe that locating the visitor's center near old growth trees will make the park any more attractive and believe this does not serve as adequate reason to move the building. If the proximity to the park is a problem why not increase services at the existing Prairie Creek visitor's center and advertise the visitor's center south of Orick a little more?

Thank you,

Michele and Douglas Kamprath

Michele Kamprath

REDWOOD NATIONAL  
AND STATE PARKS  
RECEIVED

SEP 14 1998

ARCATA OFFICE  
ARCATA, CA

366-A See comment A in Janis Crandall's letter.

366-A

COMMENTS

RESPONSES

FORMAL RECORD COMMENT FORM

Redwood National and State Parks / General Management Plan/General Plan/EIS/R

This form may be used to submit comments for the official record at public open house meetings, or it can be mailed by October 9 to the Superintendents, Redwood National and State Parks, 1111 2nd St., Crescent City, CA 95531. Comments may also be submitted in a separate letter to this address, or they can be sent as a letter via electronic mail to: redwplan@nps.gov.

Date: Nov. 5, 1998 To avoid our misreading your comments we request that you print if possible.

To: Superintendents, Redwood National and State Parks

From: Liza B. Kent - outings leader Sierra club. (Buckhorn)

[Redacted address and zip code]

Red Smith - Same Park Entrance  
 Stout Grove - better road & parking area  
 Houchi Center - keep same for combine with pt entrance  
 Crescent City too urban as visitor center  
 Remove camping sites in sensitive areas

Prairie Creek - Remove campsites in sensitive areas  
 More campsites where feasible -

Cel - Banel Pt - keep same - no trail  
 Fern Canyon - shuttle service, relocate parking area  
 Coastal Drive - OK as is

New trail loop - N. Shady to CAEA then back to parkway  
 via old CAEA trail past spot where rock is  
 with CAEA info, old trail needs work

Parkway - Fine as is  
 Visitor Center - great as is - attract & educate visitors  
 maybe @ B-mill deck - don't interfere with  
 Elk meadow behind Point, don't believe the  
 " would more

Del Norte - fine as is  
 Redwood Headquarters - nice - Great Visitor Center and  
 good interpretive center  
 (as pointed in Truck Pass Map)

Rebuttal - County Staff - Board Supra. Humboldt  
 No cooperation with Klamath Casino - Take out Pool Sig  
 Primitive campground Bauld Hills Rd.

513-A See summary comment C.

513-A



## COMMENTS

## RESPONSES

County maintain Bald Hills Rd., also lumber company  
 help.  
 No paving of Cal Barrel Rd. no picnic tables.  
 No paving Davison Rd. nor Gold Bluff Road.  
 Retain Tall Trees Grove access Rd. - no paving.  
 We need this for shuttle when hiking down  
 Davison trail / Emerald trail to be picked up  
 at Tall Trees parking area.

Thanks for all your hard work and these  
 marvellous state & national parks to hike.  
 It is a necessity for my well-being to  
 commune with nature to maintain  
 peace and control in my life.  
 I trust most of my remarks concure  
 with the North Group Sierra Club.

COMMENTS

RESPONSES

To: Superintendents, Redwood National and State Parks  
Attention: Andrew T. Ringgold

From: Eric Lund



99 NOV -5 PM 3:15

NOV 5 1989  
NATIONAL PARK SERVICE  
REDFWOOD NATIONAL AND STATE PARKS

"The success of the General Management Plan depends on a continuing dialogue between the National Park Service and the cities and towns adjoining Redwood. This is crucial because the park is but a single element in a regional recreational environment known as the 'Redwood Empire,' and a key element of that environment is the future of the adjacent communities." Quoted from the 1980 Summary of the General Management Plan (page 1).

After attending a Redwood National Park meeting to receive public comment, I was relieved to be informed that the plans may be altered. I find none of the plans acceptable as written. Plan number two, with major changes, would be the most acceptable of the four.

518-A

The Purpose Statement has been changed to include language from the State Parks' general plans. The resulting composite version is overly restrictive, "in a condition of unimpaired ecological integrity," and should be abandoned and replaced with the original R.N.P. purpose statement. The R.N.P. purpose statement in its original form is sufficient as a guideline for the new General Plan.

518-B

In reading the R.N.P. General Plan Alternative 2 (No Action) I find a vague statement that "there would be a continuation of existing trends, and the guidance in the 1980 R.N.P. General Management Plan and the State Parks 1985 General Plan would be followed." But none of the text is included in the Alternative 2 section. Much of the 1980 R.N.P. General Plan has never been implemented and some of the concepts have been abandoned (such as improvements in visitor and vehicle access and cooperation with local government and the private sector.) Some of the plan has been ignored. The text of the 1980 General Plan should have been included.

I would like to see incorporated in the final draft some of the language and concepts from the Management plan submitted in 1980, The Summary of the General Management Plan and ideas from the Final Environmental Impact Statement, all submitted in 1980.

From page six of the 1980 General Management Plan:

The Planning Concept: A Regional Potential

518-A See summary comment D.

518-B The approved *General Management Plan/ General Plan* supersedes the 1980 NPS *General Management Plan* and the 1985 CDPR *General Plan*. Any uncompleted actions or projects contained in the former plans that were not carried forward into the approved management plan would not be completed. Hiouchi, Mill Creek Campground, the Coastal Drive, Requa, and the DeMartin house are addressed in the new management plan. Camp Lincoln is addressed generally under historic structures. The trail projects identified will be revisited during the development of the new joint agency trail plan. The Little Bald Hills projects listed have been completed.

COMMENTS

RESPONSES

"Redwood National Park is one facet of California's north coast region. It is generally not a single destination for visitors, rather it is an area that people visit as they travel to other places. This General Management Plan addresses that premise by proposing programs, activities, and facilities that will allow visitors to enjoy their stays, regardless of how long, and to learn as much as they want about Redwoods unique aspects. The plan's success, however, depends to a large degree on how complimentary the activities and services provided by the park and the adjoining communities prove to be."

"Coordinated regional actions are especially important if the park is to make an inspirational, educational, and recreational contribution to the well-being of the region. The park should strongly influence the quality of the experience for visitors to the region, but it must not attempt to satisfy all needs and desires, many of which can be more adequately provided by other governmental agencies, surrounding communities, and private enterprises."

"Under the concept proposed in this plan, the national park and the state park will offer people opportunities to appreciate the natural environment, while the adjacent communities will continue to provide complimentary recreational activities and services for visitors. Proper planning and execution will result in an integrated regional recreation system."

"Many outstanding opportunities throughout the region can be best provided through interpretation, education, and recreation offered by others in cooperation with the National Park Service. Representatives of the various national, state, local, and private groups will be asked to participate in developing action plans for areas within the park and region."

"Nearby communities should be encouraged to provide for visitor needs and comfort. By doing this, they can help protect the outstanding resources within the park and increase the economic base of the region because a variety of quality accommodations and services will be needed. To accomplish this, the towns should seek planning and financial assistance from a variety of governmental agencies."

"Crescent City has the potential to develop additional motel accommodations, commercial campgrounds, restaurants, community activities, visitor attractions, and other visitor services. Promoting the recreational aspects associated with an enlarged deep-sea sportfishing industry and developing the recreational potential of the harbor and beach area will supplement those activities proposed on private lands and in national forests."

Some language and concepts I feel are important to be included quoted from the 1980 Summary of the General Management Plan are as follows. From page one:

"The success of the General Management Plan depends on a continuing dialogue between

## COMMENTS

## RESPONSES

the National Park Service and the cities and towns adjoining Redwood. This is crucial because the park is but a single element in a regional recreational environment known as the "Redwood Empire," and a key element of that environment is the future of the adjacent communities."

"Although the communities are outside the boundary of the park, they are integral to the visitors' experience. So it is important that special attention be given to the unique interrelationship of the physical, ecological, and socioeconomic environments in the region. The future benefits of tourism depend not only on the quantity of visitor services, but also on their quality. The park and neighboring communities can and must compliment each other to ensure the viability of the entire region."

From the "Visitor Use And Facilities Development Plan", page two, these concepts should be added:

"Long-established visitor use patterns--that is, how people move through the park and use its resources--will not change. Additional use areas and facilities within the national park will be created to allow people to seek new outdoor recreational opportunities. More of the park will be made accessible, but fragile areas will be protected from the destructive effects of overuse. Use will be distributed to reduce undesirable crowding, something many people have come to escape."

"Information systems will be revised to overcome the disorientation that visitors sometimes experience because of Redwood's long, narrow, and piecemeal configuration. People will be contacted early in their visits and told about the location of recreational opportunities in the park, and comprehensive information will also be distributed. Information centers will be established at Crescent City, Klamath, and Orick. Techniques for informing visitors will include the following:

- providing more directional information through better signs, strategically located waysides and information facilities,
- and appropriately stationed park information staff offering trip-planning information through the publication of a Redwood National Park guidebook and the construction of the activity centers at either end of the park, where park interpretive staff will be available to help visitors plan their stays
- making books, guides, and pamphlets available about natural and cultural history, and about outdoor recreation in the park."

Page four of the Summary of the General Plan, under Access and Circulation, had an outstanding idea:

"In addition, low speed scenic-driving opportunities will be made available by converting some former logging roads to one-way park roads."

Also on page four under Facilities Development:

COMMENTS

RESPONSES

"The natural features and recreational opportunities of the park will always be focal points for visitors to the region, but specific services for visitors --restaurants, motels, and developed campgrounds--will continue to be provided in the local communities."

In the Final Environmental Impact Statement there was an interesting comment and response on page fourteen that I think R.N.P. should include in the final draft as a concept.

"Comment: The analysis of the local economy, the labor force, and manpower-training programs was not very thorough."

"Response: The economic impacts in the DES were based on several detailed studies of the local economy that have been done in the last decade ( see An Economic Development Action Plan and Strategy for Humboldt County, prepared by QRC Research Corporation, 1977, and "Redwood National Park Tourism Study: Economic Impacts of Alternative Park Development Plans," by John H. Grobey and others, 1979). By not providing new overnight accommodations and campgrounds within the park, the Park Service hopes to encourage the private sector to provide these facilities."

These are important concepts and ideas; some have been forgotten, overlooked, or not implemented. Many of the tourists visiting our area travel in recreational vehicles, and parking on busy and dangerous highways is their only opportunity to enjoy the redwoods.

C-815

As stated in the original general plan, more low speed scenic drives need to be developed. One suggestion would be to pave and improve Walker road, possibly making it a one way drive linking it back to the north along highway 199. Paving and maintaining Howland Hill Road, the Coastal Drive, and Davison Road should be completed, as R.N.P. said they would be on their color "Facilities Development Map for Visitor Use" in the 1980 Summary General Management Plan. Davison Road could be reconnected with the Newton B. Drury Parkway and made into a one-way drive. These paved areas would greatly enhance the visitors experience! Could one imagine if Jedediah State Park campground were not paved.

Crescent City should remain the headquarters for R.N.P.. If visitation is down in the Crescent City Information Center, improved signage on Highway 101, purchasing the gas station and expanding their present location between 2nd and 3rd St. fronting on Hwy 101 would improve visibility and increase the number of tourists seeking information on the park. Also visitation might not be as great at the Crescent City location because the local businesses that cater to the tourists are informing the tourists where to enjoy the redwoods with Chamber of Commerce printed information. I register 8,000 to 10,000 camping units per year with three to four people per unit on average. That does not include off the road traffic looking for information. We send them directly to the redwoods using Chamber of Commerce and other printed material. We are not the only private campground in the area doing this. It is very difficult getting printed material from R.N.P. to help the tourists

518-C See summary comment F.

COMMENTS

RESPONSES

find the areas they want to visit and the activities they want to participate in. R.N.P. should include in the general plan more tourist related information and make a portion of it available to the Chamber of Commerce and tourist related business.

The Hiouchi Visitor Center should remain as is with only expanded parking. The north and south traffic flow along Hwy 101 would bypass and miss any new facility built in Hiouchi. When Hwy 199 is completely improved, a new facility could be studied in the next (year 2020) General Plan.

518-D

The planned facility proposed for "B" deck should be eliminated and the funds spent on making the park more accessible. There is not enough safe (off highway) parking for tourists traveling in recreational vehicles. More access areas and parking needs to be made available before R.N.P. spends a large portion of the budget on an elaborate new visitor center. The Orick Information Center to the south, the Hiouchi Information Center to the east and a more visible information center in Crescent City would be and is sufficient to handle the visitors' needs. Quote from the Summary of the General Plan, "Information systems will be revised to overcome the disorientation that visitors sometimes experience because of Redwood's long, narrow, and piecemeal configuration. People will be contacted 'early' in their visits and told about the location of recreational opportunities in the park, and comprehensive information will also be distributed." One of the tourist's most frequently asked questions is "Where is Redwood National Park?" Many of them have just driven the entire length of the Park. What they are looking for, is to experience the redwood forest. I think that is best done in the forest, not in an elaborate Visitor Center. If R.N.P. has an elaborate, centralized visitor center for a Park that is so spread out, and not enough recreational vehicle accessible access points to spread the tourists out so the park doesn't experience overcrowding, having a nice new bigger and improved center seems pointless. The visitor centers in their present locations, coupled with the private sector, which is mixed in throughout the park, informing the tourists where to go to enjoy Redwood National Park is sufficient for this General Plan.

Redwood National Park is mandated to protect the Parks' resources. Quoting from the Visitor Use and Development Plan, page two, "fragile areas will be protected from the destructive effects of overuse". The environmentally destructive, over-crowded, unregulated campground at Freshwater Lagoon south of Orick should be a day use area only. It would greatly improve the view shed of the southern entrance to Redwood National Park. Overnight camping should not be allowed because that area is situated across from a fault line located approximately seven miles out to sea. In the event of a tsunami there would not be enough time to evacuate the hundreds of recreational vehicles and people. Those hundreds of recreational vehicles (sometimes over three hundred a night) would be pushed into Freshwater Lagoon. Gas, diesel, oil and sewage would contaminate Freshwater Lagoon, not to overlook the loss of life. The resulting clean-up costs would be tremendous. Environmental damage would be significant. Making the

518-D The plan calls for numerous additional access areas that include parking, such as a primary visitor center. Some visitor use areas would be redesigned, such as Tall Trees; others would be relocated such as Fern Canyon and Crescent Beach; and several additional wayside areas and trailheads are called for. Many of these areas would be designed to allow for recreational vehicles.

## COMMENTS

## RESPONSES

518-E

bike activity. In the Howland Hill Road area an additional mountain bike trail should be made available and the Equestrian Trail needs to be reopened to mountain bike activity. The under-used Hiouchi Trail would provide a slow-speed, very technical mountain bike trail, especially in the off season. Special mountain bike trail maps and suggestions on how to minimize damage to the trails should be made available. Also to be considered, most trails should be made mountain bike accessible in the off season (Sept. 1st. to May 31st.) This would open up the trails to locals and the few off season tourists.

R.N.P. staffers and writers have had over two years to draft the four Management Plans. R.N.P. has not allotted enough time for local governmental agencies to analyze and make comprehensive suggestions on the General Plan. I quote from the current General Plan, "The success of the General Management Plan depends on a continuing dialogue between the National Park Service and the cities and towns adjoining Redwood. This is crucial because the park is but a single element in a regional recreational environment known as the 'Redwood Empire,' and a key element of that environment is the future of the adjacent communities."

"Although the communities are outside the boundary of the park, they are integral to the visitors' experience. So it is important that special attention be given to the unique interrelationship of the physical, ecological, and socioeconomic environments in the region. The park and neighboring communities can and must compliment each other to ensure the viability of the entire region." I think it would not be unreasonable to ask for a six month extension to allow local government agencies to make additional comments and suggestions. R.N.P. has had significant economic impact on Del Norte County; please give us the time we need to help with this important document that will greatly influence our socioeconomic environment for the next twenty years..

R.N.P. and the California State Parks have developed a memorandum of understanding which appears to be working well. Now a memorandum of understanding needs to be developed with representatives of Del Norte County.

Respectfully Yours,



Eric Lund

518-E See summary comment C.

## COMMENTS

John and Charlene Marvin  
[REDACTED]

October 26, 1998

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Gentlemen:

One of your Rangers at the Redwood Information Center gave us a copy of your draft plan and told us the deadline for comments had been extended one month. We have knowledge and comments on one small area of your park.

We recommend the No Action Alternative for Freshwater Spit. These are our reasons:

1. We have been camping on the spit for too many years to want to see it closed down. The facilities available are more than adequate for our needs. Our retirement income severely limits our ability or desire to pay for camping places.
2. If realigning Highway 101 is beyond the scope of this Plan, leave the spit alone. This is Cal-Trans property. I have been told they may four lane the highway across the spit rather than realign. While I don't like this idea, it would close down the spit to camping as it is now and would probably close down your pay campground as proposed in Alternative 4.
3. Your Plan has several mentions of wanting a "World-class scenic travel experience" for Highway 101. To us camping on Freshwater Spit right next to the Pacific Ocean is about as "world-class" as can be experienced anywhere. Lets keep this experience available to everyone -- senior citizens, handicapped, young families, rich and poor -- to enjoy seated on the beach or in their RV.
4. Since your park has 35 miles of coastline, can we please keep our one mile. We're asking for less than 3%.
5. We were impressed that you went down to the Spit on two separate days to find out why people like it. Remember that the number one answer was, "It's free." How many places do you get something for nothing from government. Please continue your excellent example of a kinder, more caring government.

6. Keeping the Spit as is boosts the economy of Orick significantly. Your inquiry at the Spit shows that people average about a weeks stay and spend about \$155 in the area. It also showed that about half or \$77.50 is spent in Orick. Assuming 20 weeks of good use and

## RESPONSES

522-A We agree that this is an important revenue source to Orick's economy. Also, see summary comment E and response to comment D in Janis Crandall's letter.

522-A



## COMMENTS

75 users per week, closing Freshwater Spit could deny Orick \$116,250.00 per season. Plus we have seen several RVs at the Spit even right after Christmas and New Years, so the total \$ are probably higher. I'm sure these dollars are quite significant to a town as small as Orick.

7. You talk of better knowledge of tsunamis. Yes, people should know of the dangers but lets not create panic. Many of your facilities are at risk - in 1964 you would have been treading water right in your office in Crescent City. Are you going to close them all?

8. You speak of the negative scenic impact of all our RVs and tents lined up along the Spit. You seem to think that this is a bad sight for people entering your park. We think it's great to see so many people enjoying your park right from the beginning. The rest of the

park must be even better! One solution you propose to this visual pollution is to convert the spit to day-use only. Nonsense. Many of these same RVs will still be parked there, if only to enjoy the day. By the way, it has been our observation that even now the day-users leave much more garbage on the ground than the longer term campers.

9. On page 331 you state that eliminating overnight camping would greatly improve the visual quality and restore natural beauty. Beauty has to be seen to be appreciated. The beauty here is the ocean. We refuse to allow beauty to only be enjoyed by the lone hiker. There is also beauty in the ocean sunset to be enjoyed from the window of our RV. And for the last couple of years we think we have brought a little bit of beauty to the Spit in the form of our 1958 Buick pulling our 1956 Dalton travel trailer. Before you call us a curiosity, consider that many who come over to look at us think we're really neat.

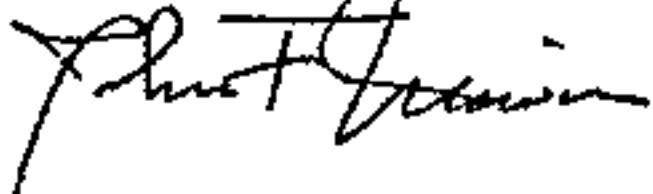
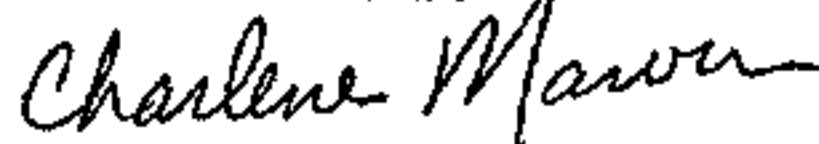
10. Draft environmental documents are supposed to offer alternatives and not suggest that you already have your mind made up. We think you have already decided the fate of Freshwater Spit - that you are going to close it down. Why else would the portable bathrooms and dumpsters be mostly gone. They have always been in place year round. And why does your new visitor map not show Freshwater Spit for camping. The older map does. Before you offer excuses, just go ahead and fool us -- listen to all the people who said they enjoy the Spit FREE.

We realize that living in Crescent City means you are probably less impressed with all the water of the Pacific. But just for a moment try to realize the beauty of a Pacific sunset from the point of view of mountain dwelling, land lubbers, knowing you can then go to bed in your RV only to get up and enjoy it all again the next day.

Thank you for your consideration of our side,

John F. Marvin

Charlene Marvin

## RESPONSES

522-B See summary comment A.

522-B

COMMENTS

RESPONSES

Redwood National & State Park Superintendents:

As a life long resident of Del Norte County and a nineteen year employee of Redwood National and State Park, I hope I can offer some constructive comments on the General Management Plan. I endorse most of the content of Alternative 1, it is a well balanced agenda of conservation and visitor use. I am somewhat puzzled at the reaction of some members of the local community. Some of there ideas stem from the fact it is easier to sit back and criticize the park for whatever reason, than to work with it and help achieve some of the goals that they are so adamant about.

523-A

The major disagreement I have with Alternative 1, is to close the Crescent City information center. I had a discussion with Cathy Cook, Chief of Interpretation, at the public meeting for the GMP at the Crescent City Culture Center. I explained to her that in my opinion, I did not think the majority of the visitors on US 101, would drive seven miles out of their way to a Visitor Center. Her reply was that the park would construct a self-service type information center at Vista Point. This could cause utter chaos, as people try to pull in and out of this area. I agree a new and bigger facility should be built in Hiouchi. It should be across the street as stated in the GMP, but it should also serve as the visitor center for the Hiouchi area. The small information center in the campground should not remain open, maybe its space would be better served as additional camping. I also think paving Howland Hill road and utilizing it as a one-way loop during the summer season makes sense. But knowing the cost and the objection from the environmental community, it may not be the appropriate time.

Some of the other ideas by community officials seem absolutely ludicrous to me. Constructing a loop road along Gold Bluffs out to the Newton B. Drury Parkway is one of them. This would require cutting old growth trees which I am sure would prompt a day in court with the Sierra Club. That added with the cost of such a project in such an unstable area deem it out of the question. Even modifying Coastal Drive and paving it has the appearance of being reasonable. But this road has the identical problems as US 101 on the Last Chance grade. You do not see community members clamoring to sink tax dollars into that section of road to keep it in its present location. These ideas stem from frustration of not seeing the millions of visitors that were promised when the park was established. If the local community leaders would spend some time actually in the park, I think they would realize that a lot of visitors do come to this area because of a National Park. Whether they would admit it or not, is another story. I honestly believe in time, Redwood National and State Park will receive its share of visitors. One of the unique features of this park that Yosemite or Yellowstone does not have, is its lack of over-crowding. Hopefully we will always be able to keep a balance between acceptable visitor use and over use.

523-A See comment A in Janis Crandall's letter.

**COMMENTS**

**RESPONSES**

One last thought I would like to throw in is the Hiouchi flat area would be ideal for a lodge. With its aproximity to the NRA and the year around recreation, it would be a winner and something the community could embrace. Realizing the park wants to stay away from building a lodge on park property, this site has such outstanding qualities, it should be pursued.

Thank you for the opportunity to comment and I am confident that the final plan will carry the park in the right direction for the next decade.

Richard Mayle

COMMENTS

RESPONSES

FORMAL RECORD COMMENT FORM

Redwood National and State Parks / General Management Plan/General Plan/EIS/R

This form may be used to submit comments for the official record at public open house meetings, or it can be mailed by October 9 to the Superintendents, Redwood National and State Parks, 1111 2nd St., Crescent City, CA 95531. Comments may also be submitted in a separate letter to this address, or they can be sent as a letter via electronic mail to: redplan@nps.gov.

Date: \_\_\_\_\_ To avoid our misreading your comments we request that you print if possible.

To: Superintendents, Redwood National and State Parks

From: Jeremy Mills (name) \_\_\_\_\_ (address) \_\_\_\_\_ (zip)

382-A

After restoration is completed the Redwoods Creek Basin should be evaluated for wilderness potential.

In general I agree with the balance between visitor use and resource protection that is being proposed. However, there are a few park resources that deserve the additional protections proposed in Alternative 2.

- 1) Redwood Creek should be fully restored.
2) The state wilderness in all 3 parks should be designated.

RECEIVED
ARCATA OFFICE
ARCATA, CA

382-A The draft plan contained no proposal for federal wilderness designation because the agencies believe that until watershed rehabilitation efforts are completed (beyond the life of this plan) there will be no roadless areas of federal land within the parks suitable for wilderness designation. However, the primitive zones proposed in the plan were defined and intended to reflect most of the conditions and values found in designated wilderness.

COMMENTS

RESPONSES

OEDC/RNSPNOTES

Thursday, October 08, 1998

Some Notes on the Draft General Management Plan  
Redwood National and State Parks

*"If you live near a dragon, do not leave  
him out of your calculations."*

J.R.R. Tolkien

*"This ain't like no other park I've worked  
in before!"*

RNP employee (paraphrased)

*"50% of Americans do not know there  
is wheat in bread."*

San Jose Mercury News

Some brief observations:

- The general document regards most human activity as negative, and the "natural" order of things as the ideal. While this is a widely held opinion these days, it is not a universal truth. Real life is far more complex.
- The stance on the surf fishermen is an example of the above. These men make an honest living gathering a small percentage of the catch and destroy nothing in the process. The fish gathered feed humans, zoo and research animals. Most of the fishing is done where few tourists go during times when few tourists are present. Why should fifty or sixty families lose their livelihood for the sake of uniformity?
- We speak of the "uniqueness" of the parks yet justify actions on the basis of national standards and practices. If these are so ar tight why are people being asked to give opinions? The plan could write itself.

389-A

➤ The economic pictures of Orick and tourism seem to have been written by someone who has never been to Orick. There are only two churches in town that still have services (St. Thomas has been closed and the Baptist church has been closed for years.) The motels mentioned are far past prime, to put it delicately. Any mention of increased tourism suggests an ignorance of past promises and the actual results. Through the years Orick has



Rev. Phillip A. Nasset, :

**389-A** We did not speculate on the reasons for the overestimation of visitation in the 1966 Arthur D. Little report, although presumably the projections developed in that study were based on expected high growth rates in visitation that would be consistent with a major destination attraction, such as exists for Yosemite or Grand Canyon National Parks.

Under the proposed action, visitor centers would be developed; possibly a new destination lodge would be developed by private sources; campsites would be improved and expanded; and visitation would be expected to increase at a greater rate than under the no-action alternative. These actions should result in additional opportunities for local tourism-oriented businesses. On the other hand, as stated in the draft plan (pp. 299 and 300), eliminating overnight camping at Freshwater Lagoon Spit might result in adverse impacts, particularly on retail and service businesses in the town of Orick, although these impacts might be offset, at least partially, by people staying at the new privately owned RV park, if it is developed, buying goods and services in Orick and by increased visitation to the parks and higher total tourism-related spending in the area.

See also summary comment G.

## COMMENTS

## RESPONSES

been a workingman's town. Taking away the livelihood of residents dis-invests the community. Perhaps a political science or sociology person should have written this section.

- The people of the community note that the parks are rather possessive of anything on their side of the property lines but rather eager to participate and comment upon what takes place on the other side. National Parks are "dark holes" of real estate- what goes in almost never comes back out. Each encroachment by the Parks diminishes the future of the areas remaining.
- I am one of the few people in Orick who agrees that the Freshwater spit should be day use only, both in terms of potential hazards during earthquakes and esthetics.
- No new camping places have been built in the state parks and none ever in the National Park. If the beach is closed down to overnight campers new facilities are needed.
- Construction of the new park office building in Orick is a good step.
- Campgrounds are a transition zone between the "natural" and the "human created" worlds. Gateway Communities are less transitional and have many different purposes. The "buffers" to such communities are the parks themselves. Extending influence beyond the parks must require phenomenal justification before it is acceptable.
- The promise of cooperation with Gateway Communities in the case of Orick must include leadership in solving the sewage/septic problem. In the long-term the park offices should not pay anything more than their fair share, but in the short-term the initial expense may be disproportionate.
- Orick has obtained grants to help in the design of its own general plan within its sphere of influence. We would encourage the parks to support these efforts and abide with the results. We really do not wish to become simply a tourist-related community. We must diversify our base. That is our responsibility, not the parks'.

Looking over this short list makes it seem as though my general impression is negative, but that is not the case. I enjoy the park and think highly of the people. I respect the professional training and attitude they bring to the work of protecting and managing the parks. Obviously it requires major, specialized skills.

Making a living and creating a future for a small town requires different talents, different assumptions, and some compatible but still different goals. This plan is not reassuring that the parks recognize the problems and respect the differences. It may be too easy to believe that one has a "national agenda" that supersedes the interests of the individual.

It will be interesting to see how this plays out.

Sincerely,

  
Philip A. Nesset



Rev. Phillip A. Nesset, 1

## COMMENTS

## RESPONSES

C15

9-19-98

To Whom it may Concern  
 It has come to my attention that there is a  
 planned closure of the Freshwater Spit.  
 I think this would be a great injustice  
 to all Americans. This is our Country.  
 I am a Native Californian & this is one of  
 the most beautiful areas. This is one of  
 the few places we can sleep to the sound  
 of the ocean. If you keep closing all the  
 parks then only the Rich can afford to  
 enjoy our beautiful Country. A young  
 couple, a senior citizen or just an average  
 American who can't afford the high prices  
 of R.V. parks won't be able to take a  
 weekend trip or vacation. We give Billion  
 of dollars to foreign Countries. How  
 about taking care of our Citizens  
 I tried to stay in a state park & there  
 were no spaces available to accommodate  
 my R.V. There are too many R.Vs on  
 the road that wouldn't be able to find  
 accommodations. There aren't enough  
 spaces & parks for all the R.Vs 2013  
 goes in a state park would pay for  
 the staff to take care of our parks.  
 If you close down our parks there will

390-A

**390-A** The cost of RNSP staffing in connection with maintaining and regulating the use of Freshwater Lagoon Spit is not a major factor in the proposal to terminate overnight RV parking and camping there. (Please see summary comment E.). In regard to the availability of alternative RV campgrounds, please refer to the response to comment K in the Klamath Chamber of Commerce letter. Also, a new RV park and campground facility could be established on private land in the vicinity of Orick, as mitigation for the planned termination of overnight RV parking and camping privileges at Freshwater Lagoon Spit.

COMMENTS

RESPONSES

(2)

be no place for people to park. There is no place for many to go. There are a lot of full time R.V.ers such as myself. Please don't sell out our citizens. The economy of some of these small communities is dependent on the revenues from all the R.V.ers. We spend dollars that pay for the families along our route. What about these citizens? It will be like the domino effect. They may have to become R.V.ers too + may even leave the area (left to die) Don't underestimate the power of R.V.ers. There are a lot of us citizens. Remember this is still our country. Please don't sell our citizens out. Don't take our freedom away. This is our America. The Land of the Free. The Constitution guarantees Life Liberty + the pursuit of Happiness. We talked to townspeople that said if this is closed they will go out of business. People on limited income, disability, social security etc. won't be able to pay high fees. Domino effect; Higher fees = higher taxes, increase in social security, disability, etc, etc, etc.



COMMENTS

RESPONSES

or are we being discriminated against  
You put the little guy out of business.  
You put America out of business.

Thank you

Sincerely

Mona  
Nohcken

MONA NOCKEN



F.S.  
I sent in a card  
supporting alternative 4.  
Upon further investigation  
I no longer support it.  
Alternative 2 is my choice

MEMBER  
S.C.S.  
W.I.N.

Save Fresh Water Spit  
as is. Free

## COMMENTS

Date: 11/8/98  
Sender: [REDACTED]  
To: REDWPLAN  
Priority: Normal  
Subject: Draft Management Plan for Redwood Nat'l & State Parks  
Superintendents, Redwood National and State Parks:

First, I would like to thank you for extending the comment period an additional 30 days. I attended the community meeting in Orick this past September while on vacation and submitted a written request for the extension; I appreciate your consideration.

My introduction to the parks was doing a research paper as a senior in high school. My most vivid memory is a picture of Fern Canyon with a caption saying there might be a freeway through there. Thankfully, that did not occur. I was so enthralled with the pictures in the research material I used, that, when I was told I could go anywhere in the world as a graduation present, I chose to go to Redwood National and State parks. I have been going every year since then for the last 22 years, with the exception of one year.

I have several concerns/questions/comments about the proposed plan (Alternative 1). I was not able to study the alternatives as I would have liked, so my concerns/questions/comments may already be addressed. If that is the case, I apologize.

529-A What will be the impact on the elk at Davison Road from building a new visitor center? Will they still be "allowed" there or will they be relocated or prevented from accessing that area? Will there be increased traffic backing up onto the highway if the elk are on the road and vehicles cannot proceed? Has the potential for increased elk-vehicle contact been assessed?

I am assuming the road would be widened to accommodate large motorhomes and that there would be considerably more traffic than there is currently. If it is paved, that will increase runoff from current levels; also oil and other vehicle fluids will be included in the runoff. Are there any creeks, streams, etc., that would be impacted?

Will there be a loss of any old growth redwoods due to any of the proposed construction? Are any endangered/threatened plants, or habitat for endangered/threatened species, at risk?

Eliminating overnight camping at Freshwater Spit will definitely improve the visual aesthetics, but are the current/proposed campgrounds able to handle the large motorhomes?

I am concerned about the construction of the new visitor centers: How well thought out are they? First there was the ranger station in Orick, then the current Redwood Information Center (remodeled not too long ago); there was the Jedediah Smith visitor center at the campground, then the Hiouchi ranger station. Now there will be a new visitor center in the southern part of the parks and one in the northern part of the parks. How many more buildings are necessary? How much land is being lost to buildings? Has due diligence been given to the locations, e.g., earthquake potential/damage, flooding, landslides, accessibility? What style of architecture will be used? What interior design will be used?

[Personal commentary: Prior to the remodeling at the Redwood Information Center, it had what I considered a "friendly" feel to it. It was rustic and more in keeping with what it represented - Redwood National and State Parks. The facility now has what I consider a "sterile" environment. It appears to have been redesigned to appeal to Europeans: a lot of white/light gray, geometric shapes, etc. I no longer have a desire to spend much time in it.]

There appears to be quite a bit of new trail construction. Are these all new

## RESPONSES

529-A The impact on the Davison Ranch elk herd from constructing any visitor facility on the B-Mill deck is anticipated to be minimal. The elk are not accustomed to using the deck itself because it does not contain any vegetation that they prefer to eat and it has been the site of concentrated human activity for many years. Elk in the Davison Ranch area are generally seen in either the pastures and riparian areas between Prairie Creek and Highway 101, or in the yard of the Davison houses. Visitor activity on the deck would not be anticipated to have a major effect on the elk. Elk herds are frequently seen close to humans at Stone Lagoon, Davison Ranch, the private residential areas between Davison Road and the Prairie Creek Fish Hatchery, and Elk Prairie in Prairie Creek Redwoods State Park. None of these animals have been observed to be overconcerned about the presence of humans except during rutting season in the fall and calving season in the spring. Visitors at any facilities will be warned about the dangers of approaching wild elk. The facilities would be designed with paths and fences to protect both elk and people. The National Park Service and the California Department of Parks and Recreation have no control over the actions of drivers on a public highway but recognizes the hazard created by people stopping in an unsafe manner to see the elk. Both agencies are working with the California Department of Transportation (Caltrans) to provide safe viewing areas off the highway from which visitors can enjoy looking at elk. A new visitor center or any major development in the parks would require a more detailed plan that would include consideration of adequate access and vehicle and pedestrian circulation patterns. All planning documents would be accompanied by an environmental document that will address impacts on all resources and mitigation for any adverse impacts.

## COMMENTS

## RESPONSES

trails, or are some of them replacement trails? Has there been an evaluation of the impact of more trails? There is already a lot of trash on the existing trails...Are there any plans to address this and the increased amount there would be with the development of new trails?

Has any thought been given to putting a restroom at the north end of Prairie Creek Redwoods, potentially at the Ah Pah Road restoration? There are restrooms at Big Tree Wayside and the Elk Prairie visitor center, but both of those are at the south end of the park. This could be a factor with the aging population.

How would I go about obtaining copies of the plans mentioned in Appendix F: Summary of Referenced Plans?

What is the next step in the planning process and how do I stay informed?

Thank you for the opportunity to comment.

Sincerely,

Debbie O'Grady  
1620 Longbranch Ave.  
Grover Beach, CA 93433  
e-mail: dsotree@msn.com OR dogrady@tosco.com

Received: from smtp.email.msn.com (207.68.143.159) by ccmil.itd.nps.gov with SMTP

(IMA Internet Exchange 2.12 Enterprise) id 001A94F9; Sun, 8 Nov 98 20:00:35 -0500

Received: from [REDACTED] with Microsoft SMTPSVC;

Sun, 8 Nov 1998 16:59:46 -0800

Message-ID: <000101be0b39\$fc1ba60\$ceb82299 [REDACTED]>

From: [REDACTED]

To: <redwplan@nps.gov>

Subject: Draft Management Plan for Redwood Nat'l & State Parks

Date: Sun, 8 Nov 1998 17:05:26 -0000

X-Priority: 3

X-MSMail-Priority: Normal

X-Mailer: Microsoft Outlook Express 4.72.3110.5

X-MimeOLE: Produced By Microsoft MimeOLE V4.72.3110.3

Return-Path: [REDACTED]

COMMENTS

RESPONSES

Andy Ringgold  
Supervisor, Redwood National Park  
Redwood National Park Headquarters  
Crescent City, California 95531

Dear Sir,

I imagine that the National and State Park Service have already decided, in its great wisdom, which alternative they want. The only reason it was released to the public was because of a much aligned law that requires a token gesture to appease the public. But in any case, here is my humble opinion.

391-A Instead of closing off the back lands, that you can't afford to maintain, ie, roads, trails and diseases, sell them back to the timber companies for select harvesting. That will put land back on the tax rolls, help pay your salary. That would also put people back to work. The landowners would have the responsibility to clean the forest of dead undergrowth and maintain the roads. The forest will be healthier because the trees that are diseased will be logged out and the Port Orford Cedar Root Rot will once more disappear.

With the land privatization plan, the fish will again flourish because it will have its habitat back. I remember about thirty years ago, the park service and environmentalists, with all good intentions, went to work to clear the streams and rivers of logging debris. The only thing that did was destroy the spawning grounds of Steelhead and Salmon. With nothing to hold back and protect the eggs, they were all washed away, along with generations of the specie. Now, logs and rocks are being put back into the streams to protect the eggs and help to right the wrong that was done by clearing them.

It isn't the fishermen alone that is killing it's industry, you have helped, also. But with the maintenance of the forest, by the landowners, the fish will return, also. Indian gill netting is a large culprit in the diminishing fishing industry. A limit should be enacted. Perhaps only allowing nets every other year. Eliminating fishing for anyone, altogether, is ludicrous.

Fire danger will lower with the clearing of the brush. The people that are alive now will enjoy the forest, along with our grandchildren and theirs, instead of letting a fire burn free and destroy what you and I want to protect. The idea of letting a fire burn out naturally is not very realistic in this day and age, too much fuel laying on the forest floor now.

A small wildfire started just outside of the Devil's Tower, in Wyoming, earlier this year. What would have been a couple acre fire turned into a two thousand-acre fire, destroying not only the forest but a large Prairie Dog Town that had been there long before I was born. Foresters say that the forest will come back more healthy than before, but it won't be in our lifetimes, or even my grandchildren's lifetime. I loved that forest, as an adult and as a child. It was where I was born. When I visited there two years ago, it brought back so many wonderful memories and now they are gone. That didn't have to happen, it would have been so easy to stop.

I have always maintained that your major plan, for Del Norte County, was to eliminate all industry, therefore eliminating most of the populace, and put a toll gate on all three highways.

391-A Congress established Redwood National Park under Public Law 90-545 and expanded the park under Public Law 95-250. These laws authorize the National Park Service to acquire lands under the conditions set forth by Congress. The legislation does not authorize the National Park Service to sell these lands. It is the policy of the National Park Service to allow native pest populations (Port Orford cedar root rot) to function unimpeded except where control is desirable to prevent the loss of the host species (Port Orford cedar) from the ecosystem, and to prevent outbreaks of the pest from spreading outside the parks. The National Park Service and the California Department of Parks and Recreation recognize the value of Port Orford cedar and will work with the U.S. Forest Service to control the spread of Port Orford cedar root rot where it threatens the long-term survival of Port Orford cedar within parklands and adjacent lands in Six Rivers National Forest.

COMMENTS

RESPONSES

That way you, along with U.N. Biosphere Reserve, will have the exact control you seem to think is so necessary to preserve and protect the Redwood National Parks. Hopefully, it isn't realistic thinking on either of our sides.

Now, concerning the freshwater spit, south of Orick. Going back to the previous paragraph as reference. Orick needs those tourists. They aren't asking that much. Just to live where they want to live and survive economically. California has hundreds of miles of ocean view, it won't hurt to let people camp along one lonely mile of it without causing a major mental breakdown for those persons driving along looking at the scenery.

In conclusion, the only real endangered specie that I see in the area are the young people that are leaving to make a living someplace else. What used to be the perfect place to raise a family is fast becoming an Earth Firster Paradise, where you can live on government handouts and have time to stand and protest a hardworking person out of a job.

I could go on but what is truly need, I believe, is for a new alternative to be compiled by the parks service and the people of the area, together. The four alternatives all have some good to them, maybe a fifth could combine all of them and make a plan that we can all live with.

Sincerely,



Shirley Olsen



COMMENTS

RESPONSES

FORMAL RECORD COMMENT FORM

Redwood National and State Parks / General Management Plan/General Plan/EIS/R

This form may be used to submit comments for the official record at public open house meetings, or it can be mailed by October 9 to the Superintendents, Redwood National and State Parks, 1111 2nd St., Crescent City, CA 95531. Comments may also be submitted in a separate letter to this address, or they can be sent as a letter via electronic mail to: redwplan@nps.gov.

Date: 10/16/98 To avoid our misreading your comments we request that you print if possible.

To: Superintendents, Redwood National and State Parks

From: Peter Keller via (name)
Ernie Perry. (address)
(zip)

395-A

Maps for Alternative 1, 2, and 3 (the General Plan map). Need to add within the "south area" box last bullet the word "south" in between Relocate and native

395-B

P.S. Roads: There is no action for the park-owned Alder Camp Road. This is true for all four alternatives.

395-A The suggested text is unnecessarily redundant because the reference is the south operations center.

395-B. The plan has been revised to address Alder Camp Road.

COMMENTS

RESPONSES

Superintendents, RNSP  
1111 Second St.  
Crescent City, CA 95531

Marna Powell  
PO Box 68  
Orick, CA 95555

"...you'll see, the plan has changed, it's changing again. By the time the draft comes out you won't even recognize it from that matrix...you all have nothing to worry about."  
~RNP Superintendent, Andy Ringgold, October 15, 1997

August 20, 1998

Dear RNSP Superintendents,

398-A I guess the plan did change from that matrix; it has more words now. The intent and the ramifications of the preferred alternative are exactly the same as before. The preferred plan is not well-rounded. The economic report and future projections are sadly lacking in reality. I am enclosing copies of letters I've written to the Times Standard and my County Supervisor so I won't have to waste time repeating myself to you people.

398-B I am appalled that our government would put hard-working, taxpaying Americans on to the unemployment roles; force families off from their homes of several generations; deny outdoor enthusiasts the opportunity to participate in recreational enjoyment; deny physically challenged, younger, or older persons the ability to enjoy our parks; and do so in the name of "preserving the environment." We can have fun, enjoy our parks, and continue to make a living in addition to saving the environment.

398-C-D I am sad that you had the opportunity to truly put together a solid plan that could have incorporated more opportunities for visitors, and residents alike, and you blew it! For instance, the commercial beach fishermen--why not use them as a park asset? They are a cultural interpretative attraction! They could save tax dollars in beach patrol alone. It has long been established that the commercial beach fishing activity does not hurt the environment or endanger any species. Furthermore, it is State law that the beach be open to commercial fishing. (see page 60 of your own draft plan). Why aren't you working with them instead of trying to drive them away?

I don't trust a word any of you people say. With each new park manager we get a different story. Past promises are forgotten and a new agenda begins. RNP has no history of living up to its word regarding "economic boons."

I am supporting draft management plan Alternative 4 (four) for lack of a better option.

Sincerely,  
  
Marna A. Powell,  
Orick Resident

cc: Everyone I can think of

RECEIVED  
AUG 25 PM 1:31

398-A See summary comment G for a general response to issues regarding the adequacy of the economic profile, particularly in regard to the town of Orick. Also, additional information, based on anecdotal comments and recent research using disaggregated Census data on historical population and housing in Orick has been added to the final plan. With respect to the visitation projections, the projection method was based on a careful evaluation of both NPS and CDPR visitor statistics to develop an historical information base from which to establish trends. The projected visitation levels for the various alternatives reflect both trend analysis and judgement regarding expansion of available facilities. It is our judgement that the projection method is conservative and provides realistic estimates of future visitation.

398 B Freshwater Lagoon Spit would still be accessible to people with disabilities during the day, and improvements would be made that would increase this accessibility. Alternate camping opportunities would be required to meet the Americans with Disabilities Act requirements for such facilities. A general objective for providing increased access for persons of all abilities has been added to the "Public Use, Recreation, and Visitor Safety" section of the document.

398-C The agencies feel that using beach fishing as a cultural demonstration activity is not an appropriate theme for the parks' interpretive program.

398-D State law does not require that the beach be open to commercial fishing. California State Park and Recreation Commission Resolution 1-85 addresses the *State Redwoods Parks General Plan* dated November 1985 and provides policy guidelines for vehicle access to the beach for commercial fisherpersons and Native Americans. The policy was an attempt to address the conflict between RNSP users identified in the 1985 plan. The current draft joint plan suggests an alternative to eliminate this continuing conflict between commercial vehicle and traditional RNSPusers.

COMMENTS

RESPONSES

RNSP Superintendents  
1111 Second St  
Crescent City, CA 95531

Marna Powell

September 10, 1998  
re: RNSP draft management plan

Dear Superintendents,

For the past two years you have told me that everything I have written was irrelevant because the public comment period was closed. Now that the public comment period is officially open I am submitting everything I've written or others have written about me pertaining to the draft management plan. I want you to disregard the past dates and accept every piece I am submitting now. I have further things on which to comment, but not enough time today to do so. Briefly:

398-E ♦ I believe that denying the commercial surf fishermen access to the beaches is a gross breach of the real estate contract Redwood National Park accepted when those areas became national park (see page 60 of your own draft). You cannot change the terms now. If you do not wish to abide by those conditions then give the land to the State Park system. If you never intended to abide by those conditions then RNP has committed fraud.

398-F-G ♦ Your economic analysis is a sad joke. I've written extensively regarding this issue and my comments are contained in the enclosed package. If you go through with your preferred alternative, expect litigation. You have not done your homework in making this plan and you have not allowed for mitigation of the consequences of your actions.

398-H ♦ Your arrogance and disregard for the taxpayers and visitors to our park are further signs of the misuse of your perceived powers. Rather than lock visitors out, you should be making plans for them to enjoy our beautiful area through interpretative and recreational opportunities. In fact, you have a duty to the public and to Congress to do these things. On page iii of your draft you state "The focus of this joint plan will be on why the parks were established and what resource conditions and visitor experiences should be achieved and maintained over time." Please refer to the words spoken by George B. Hartzog, Jr., Director of the National Park Service when RNP was created. Mr. Hartzog said "Congress, in establishing the national parks, stipulated that they were to be administered for the use of the people. The people should be free to visit them and, through them, understand the history of our Nation, our way of life, and the natural processes which have given form to our land. I reaffirm my belief in this wise mandate: Parks are for people. People are picnickers, hikers, devotees of skiing and swimming, fishermen, bird watchers, and lovers of the lonely wilderness..."

Yours truly,

  
Marna Powell

398-E The section on page 60 of the draft plan is not a real estate contract but is legislative history. It reflects congressional intent but does not carry the force of law or legislation.

398-F The economic impact section has been revised to more specifically address impacts on the Orick community, including the adverse impacts from restrictions on vehicles on the beach and overnight use of Frewshwater Lagoon Spit. See also responses J, K, and L below.

398-G Mitigation that can be prescribed at this general level of planning has been included where the impacts are known in sufficient detail to describe meaningful mitigation measures. Mitigation for general construction effects is found on page 36 of the draft plan. Other general mitigation measures include conducting projects at certain times of the day or year to avoid adverse effects of noise and disturbance on some threatened bird species or to minimize the amount of sediment that may enter creeks inhabited by threatened fish species. The use of boardwalks or rerouting trails to avoid adverse effects on wetlands are also described under the wetland section. More detailed plans will be prepared as the proposals in this general plan are implemented. These implementation plans will be accompanied by environmental compliance documents that will prescribe sitespecific mitigation measures.

398-H The general management plan/general plan planning process and follow-up planning documents will help guide visitor opportunities in the parks for the next 15 to 20 years. A comprehensive interpretive plan will be completed for the parks following the completion of the overall general management plan/general plan.





# Orick's Future In Jeopardy, Say Residents

## Redwood Park Plans Debated

By JONATHAN JEISEL  
The Humboldt Beacon

ORICK — When a working draft of the strategic plan for the Redwood National and State parks was leaked to Orick residents over a year ago, many thought the proposal would destroy what's left of their community.

Now that the draft plan has been officially released, little has changed.

Their preferred alternatives would basically destroy what's left of the economy of Orick, including the ranches and dairies, the surf fishermen, the tourism and the wood carvers," said Marna Powell, an Orick resident and member of the Orick Tomorrow economic development committee.

Those industries have largely comprised the town's economy since the decline of the lumber industry and establishment of the two parks in the late 1960s and '70s. Orick has shrunk from a town of 2,500 residents and more than 10 lumber mills in the 1960s to a few hundred residents today.

Four alternatives for management of the park over the next 20 years are outlined in the 200-plus-page draft plan. The alternative preferred by park management mixes preservation of park resources and visitor use, said Peter Keller, the park's public affairs officer.

Of the three other alternatives, one involves no action or preservation of the status quo, one most heavily

See ORICK, page A5

### ORICK . . . from page A1

emphasize preservation, and one takes a "visitor use" emphasis with more campsites and visitor centers, Keller said.

In a letter to park superintendents Andy Ringgold and Rick Scramon, Orick Tomorrow members said the first alternative would "fail to provide recreational enjoyment for visitors of the parks." Members are also specifically concerned about several of its individual provisions.

The proposed closure of Freshwater Spit to overnight use would send away the 100-plus recreational vehicle users that stay there mainly during the summer, they say, driving away potential patrons of Orick businesses.

"There's 400-500 people at the spit — why run them out of the park?" said Norman Carr, chairman of Orick Tomorrow and president for the California Commercial Beach Fishermen's Association.

Keller said the closure is meant to beautify the entry to the park.

"Presently, you come over the hill and see this line of RVs that blocks your view of the ocean," Keller said. "We want to send a different kind of welcoming message."

Another point of contention is the phasing out of off-road vehicle use on park beaches. Although 60 permits for commercial use would still be issued, they would be limited to just those that held permits in 1996 and would be non-transferable.

Keller said this is being done to bring the parks into compliance with current federal and state laws that don't allow such use.

Off-road vehicle use is not allowed in national parks," Keller said. "We want to bring ourselves into compliance."

Carr said the proposal would wipe out the wood carving and commercial surf fishing industries, which need the vehicles to haul away their loads.

Carr said the move would effectively remove 20 families from the Orick area, which he said would mean closure of the local school.

The Orick Tomorrow committee proposes adopting the last or tourism-centered alternative, which they say would provide more opportunities for people to use the park.

The committee has also sent a letter to Fifth District Supervisor Paul Kirk, asking him for help in getting Orick residents preferred status in park hiring practices to offset economic damage.

Residents must currently go through the standard park application process and compete with people all over the country.

Orick residents were scheduled to meet Wednesday, after The Beacon's press deadline, to discuss the plan.

The parks have scheduled four public meetings to gather comment on the plan: at the Humboldt County Library in Eureka on Sept. 8, Margaret Keating School in Klamath on Sept. 9, in the Orick School gym on Sept. 10 and at the Crescent City cultural center on Sept. 11. All run from 4 p.m. to 8 p.m.

After the public comment period ends, management will alter the plan "to comply with public comments to the extent appropriate within the laws governing the park," Keller said. Final drafts will then go on to the National Park Service's regional director and the state Parks and Recreation Commission for approval.

398-I See summary comment H.

398-I

COMMENTS

RESPONSES

Marna Powell

Times Standard  
PO Box 3580  
Eureka, CA 95502

August 14, 1998

Dear Editor,

I am compelled to comment on your August 13 editorial regarding Redwood National and State Parks (RNSP) draft general plan. Did you actually read the 458 page plan? Did you peruse the Socioeconomic Profile? Have you visited Orick lately?

I raise these questions because the draft plan paints a rosy picture of Orick. If you read the plan and haven't been here you would think we are a thriving Mecca of tourist facilities.

398-J Data has been omitted that might show our true situation. Population and housing data are included for outlying areas but not for Orick. The plan claims we have five motels and three gas stations. In fact we have three small, older motels, and one gas station (the gas pump at the Shoreline Deli will not be upgraded to 1998 requirements). The plan claims we have an RV park (we sort of have a few spaces). Half of our buildings are in disrepair or have been abandoned to rot.

398-K Your editorial praises the Plan's Redwood Creek restoration efforts and claims it will provide jobs for "out of work timber workers." There are several facts wrong with this statement. If the plan's preferred alternatives all go through as written, it will eliminate the few remaining occupations left in Orick, most of these occupations are not in timber. The Plan would compensate landowners through environmental easements for flooding their fields. The proposed new flood plain would eliminate every ranch here (three ranches on the other side lease fields on this side). Say the landowners are compensated; Great--first we've put hardworking, honest, tax-paying citizens on the government dole. More Welfare, just what Humboldt County and America need! Second, what about those leasing the land, they're just out of luck. What about employees of these ranches? The employees are out of luck. Sure, some people can drive to Arcata, or work out of their homes, but for most it's impossible. We don't have public transportation and even the internet is a long distance phone call. Great -- more unemployment!

398-L The Plan would put the Commercial Surf Fishermen and wood gatherers/carvers out of business. Another sixty four families would then have no work, but the Plan doesn't provide for any retraining or promise of jobs through the Parks. Without jobs, these families either have to go on welfare or leave. Many people are third and fourth generation residents, where will they go? The Orick School already has a hard time getting funding with so few students, I guess the School will just have to close. The Plan would eliminate camping at Freshwater Spit. It claims they could camp at Orick's RV park. Excuse me but we don't have an RV park for tourists. There go the few tourist dollars spent at our stores and restaurants. Many of the RV campers have said they will go to Oregon instead,

398-J For unincorporated areas, published census data is available only at the tract or "Census Designated Place" levels. The town of Orick is in unincorporated Humboldt County (California county census no. 023) within tract 102, which in 1990 had a population of 3,204 persons. However, in a recent study conducted for the U.S. Forest Service it was determined (using unpublished census block data) that the population of the Orick area amounted to 503 persons in 1990. From anecdotal information and personal observation, it is apparent that Orick has suffered a substantial loss of population during the past two decades as a result of cutbacks in the timber industry. The perception of a relatively aged housing stock and many commercial buildings in disrepair reflects heavy out-migration of the town's population and severe economic conditions during the past decade or so. Additional information on population and housing in Orick has been added to the final plan. See also summary comment G and the responses to comment A in Marna Powell's 8/20/98 letter.

398-K If ranches (or farms) were eliminated as a consequence of implementing the proposed plan, there might be adverse impacts on both lessees and employees of the ranches/farms (or portions thereof) acquired by the National Park Service. Owners of the ranches would be compensated, and sales of land would be on a willing-seller basis, so there should be no adverse impacts on the owners per se. The draft plan indicates (p. 300) that some agricultural workers would be adversely impacted if land acquisitions in the Redwood Creek basin floodplain were made by the National Park Service. Given the proximity of this area to the town of Orick, the dislocation of agricultural workers would potentially result in adverse socioeconomic impacts on the community. The impacts could be reduced, however, by temporary new employment opportunities generated by the estuarine restoration projects envisioned by the proposed plan. Text on dislocated farm workers has been added to the final plan.

398-L See summary comments E, G, and H and the responses to comments J and K in the Klamath Chamber of Commerce letter, comment A in the Green Valley market & Motel (Robert Cramblett) letter, and comment D in Janis Crandall's letter.

## COMMENTS

Humboldt County is out of luck now too. The Plan does nothing to enhance tourism or recreation.

Finally, and most importantly, back to your statement that RNSP would hire "out of work timberworkers" for watershed restoration. Unless the Plan includes a written statement that preferential hiring would be given to Orick residents, including quotas, there is no way the Parks are going to hire anyone locally. I've asked the RNSP superintendents why they don't hire locally and I'm always told they hire according to Government policy and that the job search is open to the entire nation.

To sum up; I agree, it would be a good thing to restore our watershed but I am appalled that our government would further initiate policies that would spend tax dollars and force an entire town on to welfare and unemployment. Perhaps the draft plan could be amended to take in to consideration jobs and training for the town it would displace. Perhaps this plan could include amendments that would ensure the Parks would help Orick with the myriad bureaucratic issues surrounding any positive community development (a topic for another letter). If any of your reporters would like to come here and see our situation for themselves I would be happy to give them a tour and provide lodging in my home. There are so many good, hardworking people here just trying to provide for their families. It is unfair that the government would treat them in this manner. Please stop writing editorials when you don't know the true picture.

Sincerely,



Marna Powell,  
Orick resident

## RESPONSES

398-M Federal and state law and regulations govern NPS and CDPR hiring practices; these practices cannot be changed through a planning document. The 1978 legislation that expanded the national park contained a number of provisions that authorized benefits, including hiring preferences and training programs, for timber industry workers affected by the park's expansion. The National Park Service implemented those programs successfully — all of which expired in September 1984 under a provision of the same legislation. Approximately 33% of the current NPS permanent staff was hired locally, and a large percentage of the seasonal staff hired each year comes from local communities. Local contractors are used extensively by both agencies for a variety of projects, including watershed restoration.

In the final plan, alternative 1, the section that discusses gateway communities (in the "Interdependence of Parks and Communities" section) has been strengthened to include providing technical assistance and advice to individuals or businesses interested in developing appropriate/complementary visitor services in gateway communities.

COMMENTS

RESPONSES

Redwood National & State Parks  
1111 Second Street  
Crescent City, CA 95531

Orick Tomorrow Committee  
PO Box 93  
Orick, CA 95555

August 24, 1998

Dear Superintendents Ringgold and Sermon,

As you know, the Orick Tomorrow Committee is a committee of Orick Economic Development Corporation. In prior meetings and correspondence the Committee has voiced its position on a number of issues concerning the RNSP Draft

398-N

Management Plan. Our position has not changed on any of the issues. We believe the proposed plan, Alternative 1 (one), would devastate the economic viability of Orick, heavily impact neighboring towns, and fail to provide recreational enjoyment for visitors to the Redwood Parks.

Although none of the other alternatives meet with our approval, we believe that Alternative 4 (four) would be the best option economically, recreationally, and environmentally. We are therefore taking a position of support for Plan Alternative 4. We are asking Redwood National and State Parks to abandon Alternative 1 and in its place adopt Alternative 4.

Sincerely,

*Norman Carr*

Norman Carr, Chairman

*Marna Powell*

Marna Powell, Media Relations

*Gloria Zuber*

Gloria Zuber, past Chair

*Philip Nessel*

Philip Nessel, Liaison

cc

Humboldt Co. Supervisors

Frank Riggs

Mike Thompson

Virginia Strom-Martin

City of Trinidad

CA Dept. of Parks & Rec.

US Dept. of the Interior

Eureka, Humboldt Co. Convention & Visitors Bureau

398-N See summary comments E, G, and H and responses to comment L in Marna Powell's 8/20/98 letter.

## COMMENTS

**Orick Tomorrow Committee** PO Box 93 Orick, CA 95555  
(707) 488-2675 (707) 488-5355

The Orick Tomorrow Committee is a committee of Orick Economic Development Corporation in cooperation with the California Commercial Beach Fishermen's Association. In prior meetings and correspondence the Committee has voiced its position on a number of issues concerning the Redwood National & State Parks (RNSP) Draft Management Plan. RNSP has finally released this draft plan and will accept public comment until Oct. 9, 1998. There is very little time to respond.

398-O-P **Our position has not changed on any of the issues. We believe the proposed plan, Alternative 1 (one), would devastate the economic viability of Orick, heavily impact neighboring towns, discriminate against physically challenged individuals, and fail to provide recreational enjoyment for visitors to the Redwood Parks.**

Although none of the alternatives meet with our complete approval, we believe that Alternative 4 (four) would be the best option economically, recreationally, and environmentally. We are supporting Plan Alternative 4, asking RNSP to abandon Alternative 1 and instead adopt Alternative 4.

Alternative 4 would create more picnic areas, pave and improve roads, create more cultural and interpretive exhibits, expand educational facilities, and allow more camping, hiking, mountain biking, and other recreational opportunities. Furthermore, Alternative 4 would not harm the environment or wildlife and would not destroy the livelihoods of half the families in an area with only 600 residents.

You, your friends, or family, may have previously visited Redwood National Park and wondered why there were very little recreational opportunities or visitor facilities. The proposed Plan 1 would allow for even less opportunities and facilities. RNSP would eliminate camping at Freshwater Lagoon Spit, not create any new camping areas, reduce the number of picnic and parking areas, reduce the number of visitor and information centers, restrict further recreational development, and ensure that there will be no place for you in this park unless you are a young, physically fit person. Their plan would also eliminate commercial beach fishing, eliminate the five ranches we have left in our area, create more welfare and unemployment, and place a further tax burden on an already financially stressed county.

If you have the slightest interest in any of these issues, please contact RNSP immediately and request that they implement Alternative Plan 4 (four) and abandon the proposed Alternative 1 (one). Here's how to contact RNSP:

RNSP Superintendents, 1111 Second Street, Crescent City, CA 95531  
Phone: 1-800-423-6101, 1-707-464-6101, Email: redw\_superintendent@nps.gov

## RESPONSES

398-O Same as comment N above.

398-P The following facilities are currently accessible to physically challenged individuals: Hiouchi Information Center, Crescent City Information Center, Crescent Beach, Crescent Beach overlook, Vista Point, Mill Creek campground, Lagoon Creek picnic area, Klamath overlook, Wolf Creek education center, Prairie Creek visitor center, Big Tree wayside, Lost Man Creek picnic area, and Redwood Information Center. Additional opportunities for accessing trails will be included in a new integrated trail plan for Redwood National and State Parks.

398-Q See summary comment H and responses to comments J in the Klamath Chamber of Commerce letter, comment A in the Green Valley Market and Motel letter, comment L in Marna Powell's 8/20/98 letter, and comment A in Del Norte County's Board of Supervisor's 8/31/98 letter.

# THE TRIBUNE-STAR

The North Coast's daily newspaper since 1854

114th Year, No. 228

WEDNESDAY, Aug. 20, 1997

50 cent

## Orick tells Riggs of job, elk worries

By Jessie Faulstich  
The Times-Star Staff

ORICK -- Rep. Frank Riggs heard residents' concerns here Tuesday and said he shares them. "I support you 100 percent," Riggs, R-Windsor, told a crowd of more than 60 gathered at the Orick Community Center. Among the requests that Riggs told residents he will address are reduction of the local elk herd and reopening of the former Pacific Creek hatchery. When the county abandoned the hatchery in 1994 the state closed it, saying it is antiquated and unworkable. The state is in the process of buying the hatchery over to Red-

wood National and State Parks, which has no authority to operate a fish hatchery. Although the meeting was open to discussion of any topic, most speakers concentrated on the redwood park's draft plan management plan. Norma Powell of Orick Tomorrow said the community's major needs are jobs, infrastructure, highway beautification and housing. She and others said the national park has not fulfilled its earlier pledge to develop at least 500 cottages and visitor attractions other than trees. "There's no reason for anyone to stay here," resident Betty Boyer complained.

Other speakers objected to proposed restrictions on vehicle driving on beaches within park boundaries, which they said would end surf fishing. They also criticized plans to close former logging roads, which they said will reduce recreational opportunities. The plan calls for closing disused roads to reduce erosion and landable damage.

Residents also complained that the protected Roosevelt elk herd has grown too large, and that the animals are invading private property and causing damage. Riggs pledged that their views will be considered in revising the management plan. The meeting was co-sponsored by Chamber of Commerce and the Orick Tomorrow Council.

**NEWSMAKER**



**Frank Riggs:**  
Congressman discusses Redwood National Park future with Orick residents/A3

**SELLING YOUR CAR?**  
Call about our "15" Special 441-0555

If it doesn't sell the first week the second week is FREE for only \$15. Supply price your 15 day ad for one week at the special price of \$15. If for any reason your vehicle does not sell, we'll repeat the ad at "NO CHARGE" for an additional week.

398-R

398- R See summary comment B.

COMMENTS

RESPONSES

**Orick committee not chamber-linked**

Thank you for your coverage of Frank Riggs' town hall meeting here in Orick on Aug. 19.

Second, although Orick Chamber of Commerce concurs with the Orick Tomorrow Committee, the committee is not under the umbrella of the chamber. It is a committee of Orick Economic Development Corp. and the California Commercial Beach Fishermen's Association.

Third, I'd like to elaborate on a couple of points your reporter brought up.

Regarding the elk issue, it is not so much a private property issue, as your reporter implied, but rather one of safety. The animals are often blocking Highway 101. They get hit by vehicles on a regular basis.

There are no safe elk viewing

areas along the highway. Tourists stop on the road edge or in the road when they see some elk, often causing other drivers to come to a screeching halt. Most of us are surprised that no human deaths have occurred in any of the resulting traffic accidents.

I did state that Orick needs jobs, infrastructure, corridor beautification and housing. These four basic needs were identified last year during community planning sessions with CEED and AEDC. All sessions were well-attended by Orick's citizens.

I further stated that our community has high hopes of being able to realize success in these four goals, but only if other issues are addressed. The town needs to gain control of its own planning and zoning, we need to develop a marsh sewer system, and we must

have better relations with Redwood National and State Parks.

Since its creation, the national park has kept Orick out of its plans and caused the town to erode away. Congressman Riggs was here to help us try to obtain that working alliance.

Marna Powell  
Orick

**398-S** The National Park Service and the California Department of Parks and Recreation are cooperating with the California Department of Transportation, the California Department of Fish and Game, and private landowners in Orick to manage elk in the parks so that visitors have safe opportunities to see the elk and private property is protected from damage by the elk.

398-S

COMMENTS

RESPONSES

June 10 1997 Spoken in an address  
to The Humboldt Co. Board of Supervisors

Mr. Kirk, you've asked me to bring a copy of Orick's Strategic Plan. I like to think of it as Orick's Vision. I know you don't have ENOUGH to read so I've also brought along last Sunday's Del Norte Triplicate, some interesting quotes, and some statistics regarding Redwood National and State Parks.

I believe the board is up to date on our current situation. Rather than repeat things I've already written, I'd just like to stress a few points and tell you what I hope to see develop.

The town of Orick has four main concerns regarding the draft plan;

- 1) Save our commercial surf fish industry.
- 2) More recreational activities.
- 3) No road closures, including any plans to block entry from one end or another.
- 4) No more land acquisition. Oh--the poor park, they never have enough land. This map shows just the Humboldt County portion of RNSP. Don't forget, it goes up into Del Norte as well.

I've already written extensively regarding these issues. I will be glad to go into more detail anytime. I'm listed in the phone book, or you can just write Marna on an envelope and mail it to Orick.

In 1968 when the National Park was created, it was presented to the county of Humboldt as an economic boon. Not only would nature be conserved, but the communities would also be thriving. The park would attract visitors, hire local residents, and contract local equipment. Park employees would create a demand for housing and services, and tourists would create demand for all kinds of local support services.

These things never happened.

As you are all aware, Our economic boon is more like an ECONOMIC BOMB! We can all start pointing fingers and blaming each other or we can begin right now to work together and change things.

In a nutshell, there is a terrible lack of communication and follow through.

Issues need to be openly discussed.

For instance, In June of 96 RNSP held public scoping sessions to gather input for the ten year general plan.

A couple of weeks before the Orick session, Superintendent Ringgold spoke at a chamber meeting. The very first thing he said was that he would not discuss general plan issues. We attended the scoping, but those issues weren't being discussed THEN either, instead, INFORMATION was being gathered. Well, it's not real easy to give input when you don't know what the issues are!...When the plan was leaked to

398-T See summary comment B.

398-T



## COMMENTS

## RESPONSES

*us, it created an uproar in the community. Park officials STILL won't discuss these issues! Well, the issues ARE out. Let's discuss them!*

*Furthermore, park officials often treat local residents in a condescending manner. Perhaps we ARE all a bunch of hicks, but it insults my intelligence to be talked to as if I am a mere child and the government is my daddy.*

*We all need to be able to communicate with one another. If the national and state entities have figured out that they should be working together towards common goals, then doesn't it follow that they should also be working on a county and local level as well?*

*We are lucky to live in such a breathtaking area! Our parks are here to stay. We could be working to ensure that those goals targeted way back in 1968 regarding economic success, nature conservation, education, and recreational enjoyment actually become our reality.*

*My intention has never been to fight the Park. I would like to work with the Park. Personally, I think they should hire me as their marketing director, because I have a lot of good ideas as to how we could all work together and how to inform and educate the public without great expense to the taxpayers! For instance, the surf fishermen have been a tourist attraction for years, why not go ahead and promote them as such?*

*In closing I'd like to quote Debbie Israel. She is Virginia Strom-Martin's field representative and I think she put it best when she said, "Every time I drive through Orick I think to myself, there's a national park right there, THIS town should be thriving!"*

## COMMENTS

## RESPONSES

Reed Hansen  
755 Winslow Way E.  
Solar Marine Bldg. # 206  
Bainbridge Island, WA 98110

Marna Powell

April 21, 1997

Dear Mr. Hansen,

It is my understanding that you have been contracted by Redwood National and State Parks (RNSP) to write an economic impact report as part of the environmental impact report for the new RNSP ten year general plan. It is my hope that you receive a true economic picture of our area.

I have enclosed a copy of a letter I wrote to Senator Craig Thomas, chairman of the Senate Energy & Natural Resources Subcommittee. Senator Thomas's group is deciding the future of the National Park System. In writing to Senator Thomas I included copies of old newspaper articles, census data, and excerpts from various reports. I am sure you already have this information so I am merely including an excerpt from the Orick School Healthy Start Grant Application and a page from an old "National Geographic" magazine pertaining to Redwood National Park and the rosy future of our local economy.

I would like to add that since I wrote to Senator Thomas on April 2, RNSP has a new policy of referring callers to local chambers of commerce for overnight facility information rather than telling out of town visitors that all campgrounds are full. This new policy is, in my opinion, a step in the right direction. It is my dream that in the future, RNSP will find more ways of securing better relations with the gateway communities. There is such a great potential for economic well-being in these communities coupled with visitor recreational needs, and park preservation.

As I said, "my dream..."

### REALITY BITES

I realize that RNSP won't discuss the working draft document, however our community is discussing it quite a bit! Important industries would be wiped out if RNSP gets their way. Our economy has not seen the promised tourist dollars, jobs, or contracts as a result of the Park. (In the 1960s and again in the '70s it was promised that the Park would hire locally with preference to out-of-work timber workers. Now they say that the government doesn't hire that way and that since many people were hired from California that counts as "hiring local.") Logging and millwork is history. The Army Corps of Engineers designed the levy at the mouth of Redwood Creek all wrong and RNP

## COMMENTS

owns the (now closed) Fish Hatchery so our salmon fishing dollars have disappeared with the fish habitats. What is left here to make a living?

RNSP would like to annihilate our commercial surf fish industry. I've enclosed an editorial I wrote relating to this topic, along with a mailer the California Commercial Beach Fishermen's Association has put out.

398-U

RNSP does not allow our driftwood gatherers to collect wood for economic gain. While it is true that many do so anyway, it would be a great boon to our area to legally allow commercial driftwood collection. This wood washes down Redwood Creek in winter storms, and would otherwise simply rot away. Woodgatherers are out there day and night in the worst weather, collecting this driftwood. Much of it becomes redwood split rail fence posts, shingle blocks, and firewood. Tourists passing through love our burl and carving shops. It is a shame that these shops must purchase their material from out of our area.

Campers at Freshwater Lagoon spend a few dollars in Orick. We wouldn't mind seeing the camping become a concession, but we surely do mind having the camping wiped out completely. Campers do indeed spend a few dollars in our stores.

Our agricultural lands keep disappearing. If not by condemnation, then by policy. One dairy farmer owns a piece of property that has become an island as a result of Army Corps of Engineers and Redwood National Park. Since he can't swim his cattle, or float his equipment over, this piece of land is useless as a dairy farm. Another rancher

398-V

has pasture adjoining park property. Traditionally the ditch along these parcels was kept clear so that water could flow down Strawberry Creek to Redwood Creek. RNP was asked to clean out their portion of the ditch three years ago. The property owner was told that it couldn't be done because microscopic organisms were growing in it. Her fields are now partially under water. My neighbor leases land to a rancher. Part of this land is under water as a result of park policies prohibiting the clearing out of debris in Sand Cache Creek. As an avid (amateur) bird watcher, I enjoy these marshy results (except for the millions of mosquitos that are also loving these new wetlands), however, I think my neighbors deserve some sort of environmental easement compensation. They are being forced off their pasture lands with no compensation and yet they still have to earn a living and pay property taxes on their lands.

Private land acquisition--why does Redwood National Park continually need more land? We constantly hear how there are no budget funds for anything anymore, yet the Park is always willing to accept more land from (supposedly) well-meaning conservation groups. The new land must be

## RESPONSES

398-U Commercial consumptive use of resources within a national park is prohibited without specific congressional authorization. In addition, the National Park Service and California Department of Parks and Recreation believe that the removal of large woody debris from the parks' beaches is inappropriate because driftwood is an essential element of beach ecology in the parks and throughout the Northwest. Large woody debris provides shelter, nutrients, hiding places, perches, and nesting habitat for numerous species of wildlife. It also plays a key role in energy dissipation during storms, promotes the entrapment and retention of sand, and promotes the formation of dunes. The vehicle access restrictions proposed in the plan will eliminate the means of removing this wood.

398-V The comment issue is not in the scope of this management plan.

# McKinleyville Press <sup>35¢</sup>

Vol. 1 No. 51

TUESDAY, Aug. 5, 1997

6 TUESDAY, Aug. 5, 1997

## OPINION

McKinleyville Press

### Closing Spit to camping would hurt local economy

398-W

*(Editor's note: The following is part two in a series of columns addressing the camping issue at Freshwater Lagoon Spit.)*

Who wants to eliminate camping at the Spit and why do they want to prohibit it? There are two main groups who want to get rid of the recreational vehicles and tent camping: Redwood National Park officials (the Wheels, not the employees) make up one group, and private RV park owners make up the other. I'll address the park's arguments in future columns.

To be fair, not everyone in Orick wants to keep the Spit camping. One neighbor, whom I'm very fond of, says, "It looks messy and those people don't spend any money here anyway."

Private RV park owners from Arcata to Klamath have been lobbying to get rid of the Spit camping. They think they're losing business. They believe that if camping were prohibited at Freshwater Lagoon then all those RVs would flock to their private campgrounds and pay to stay. In the past I've spoken to some of the RV park owners and I've asked them if they've ever come to the Spit and queried the



campers themselves. Not one RV park owner that I spoke to had ever gone down to the Spit and talked to any campers. They're doing all their lobbying efforts based on supposition and not on actual facts.

I have talked to the campers, lots of them! I talk too much anyway so it's very natural for me to strike up conversations with tourists when I'm at the market, post office, or on the beach. I even went down the camping row one day and talked to as many people as I could.

I'm not the only local who has taken an interest in learning more about the Spit campers. To test these theories, a group of Orick residents surveyed the campers on Memorial and Independence Day weekends. Overwhelmingly, the campers made

statements to the effect that they are here because it is the only place they can camp at the beach. Some of them even belong to nearby Redwood Trails, and could pay less money per night to stay there, but they wish to be "at the beach." Many said that they only visit Humboldt and Del Norte counties at all because they can camp at the beach.

From these comments I am sure that the private parks won't see any increase in business if the Spit campers are kicked out. In fact, the private RV parks would probably lose money if the Spit camping were eliminated because many

of the campers said they spend a night or two at these private parks to freshen up with amenities such as showers, laundry,

electricity, phones and TV. If they only come to our area to camp at the beach then they wouldn't be visiting the private campgrounds at all otherwise!

Overwhelmingly, they all said they spend money in Orick at our markets, gas stations, gift shops and restaurants. Along their journeys they also spend money in neighboring towns. I've no idea as to how much revenue Northern California would lose if this camping were eliminated.

From an economic standpoint for Orick, Humboldt and Del Norte counties, neighboring towns, and, yes, even the private RV parks, it only makes sense to allow the camping to continue at Freshwater Lagoon Spit!

“  
From these comments I am sure that the private parks won't see any increase in business if the Spit campers are kicked out.  
”

398-W See summary comment A.

# McKinleyville

Vol. 1 No. 52

35¢  
Press

TUESDAY, Aug. 12, 1997

## Arguments weak for closing spit

In the Redwood National and State Parks (RNSP) ten year draft matrix the preferred alternative regarding Freshwater Lagoon Spit is to eliminate the camping and turn the area into a day-use-only site.

Why does RNSP want to eliminate the camping? To be fair, I've been calling park management for a month to allow them to defend their plans. According to an RNSP official (a Wheel) they are still knocking ideas around and may or may not decide to oust the camping. He said there are four main issues regarding Spit camping. Let's look at these issues...

**Visitor Services** - This issue requires a future column to address.

**Health and Safety** - As one Caltrans official commented, "What? Are people dying out there? I haven't heard of anything! RNSP just doesn't want anyone having fun in their park!"

Law enforcement persons stated that there were no undue problems associated with the camping other than the occasional spousal disputes. Other law enforcement personnel adamantly supported keeping the camping because "they're



good folks, a good bunch of people," and "(it) looks more like the entrance to a park than a bunch of day use signs would." The Wheel was unable to elaborate other than to say that there is a potential for someone to be hit by a car and that the pit toilets aren't that sanitary. Hmm... doesn't this argument also eliminate any day use?

(Note - the toilets are thoroughly cleaned daily).

**Resource Protection** - The issue here regarded people and vehicles in the dune vegetation. I touched on the vehicle matter in the July 15 McKinleyville Press. Furthermore, I don't see any RVs driving on the beach so what has this issue to do with camping? The resource protection argument also eliminates the day use.

**Visual Issue** - (My favorite) "It doesn't look like the entrance to a National Park."

Hmm...a whole bunch of folks enjoying recreational activities such as fishing, camping, kite flying, surfing, boating, picnicking, or merely napping on the beach looks a whole lot like my idea of what a park is all about. Didn't congress create our parks "for the people?" This park's policies don't seem to want to include people in their plans. Oh, and does Orick look like the entrance to a park? The visual issue argument would have to eliminate both day use at the Spit and get rid of the town of Orick.

By and large, it has always been a great bunch of people who camp at Freshwater Lagoon. About 75 percent are retired people. One family has had an annual reunion every July 4 for 30 years here at the Spit. They come from all over the country with their children and grandchildren. I can think of no better symbol of what America represents than a family reunion enjoying healthy outdoor recreation together at an annual reunion on America's birthday.

If this image doesn't "...look like an entrance to a national park," then I don't know what does!

398-X-Y See summary comment A.

398-X-Y

**SAVE THE ENDANGERED SURF FISHERMEN  
AND  
SAVE MANY ENDANGERED OR  
THREATENED WILDLIFE SPECIES I**

**ZOOS, AQUARIUMS, BIRD SANCTUARIES,  
WILDLIFE CARE CENTERS  
ALL RELY ON THE SURF FISH INDUSTRY III**

Orick's surf fishermen supply smelt to a variety of nature care facilities. Smelt provide a high protein diet for many threatened or endangered species of wildlife. This particular species of smelt is only harvested here in the Northern California area, where we find the last commercial beach access for surf fishing.

The brown pelican and bald eagle are extremely picky about what they eat. They will not accept any substitutes in their diets. In fact, they will not even eat fish caught during daylight, preferring to dine instead on the smaller surf fish caught at night. Whales, otters, sea lions, seals, and many other bird species in captivity rely on the Northern California smelt industry for their survival.

398-Z

In 1985, when Redwood Parks drafted its last ten-year general plan, it was determined by the California State Park and Recreation Commission and the California Attorney General's office that in regard to the surf fishing industry: there is no threat of damage to the dunes, plants, or wildlife; there is no legal conflict with the State of California; there is a long-standing cultural tradition of surf fishing on these beaches; and to annihilate the industry would create too much of a detrimental economic impact. Under the new plan, the parks would like to eradicate all commercial beach fishing.

It is imperative that you act right now to ensure the continuation of the surf fishing industry and the continued existence of our nation's near-extinct wildlife.

Please write or lobby the politicians. Tell them to **SAVE THE SURF FISHING INDUSTRY**. Please request that the public comment period be reopened for the Redwood National and State Park General Plan.

For more information contact:

**California Commercial Beach Fishermen Association**  
P.O. Box 188 Orick, CA 95555 (707) 488-2675

**Orick Tomorrow**  
P.O. Box 93 Orick, CA 95555

398-Z The *Public Resources Code* (Section 5001.8) generally restricts motor vehicles in state parks to paved and designated roads. The California State Park and Recreation Commission, when it adopted Resolution 185 as part of approving the 1985 *State Redwoods Parks General Plan*, made a determination that offroad beach access for commercial fishing was appropriate in Prairie Creek Redwoods State Park. Each time a general plan is brought before the State Park and Recreation Commission, issues such as vehicle access are reconsidered and may be modified to meet current conditions. In 1985 the commission considered the conflicts that would occur between commercial fishing and other uses of the beach. The current general plan proposal again raises the question of conflicting use and recommends several alternatives to the commission. The preferred alternative conforms to the *Public Resources Code* by granting limited access rights to existing permittees to continue commercial fishing.

COMMENTS

RESPONSES

FORMAL RECORD COMMENT FORM

Redwood National and State Parks / General Management Plan/General Plan/EIS/R

This form may be used to submit comments for the official record at public open house meetings, or it can be mailed by October 9 to the Superintendents, Redwood National and State Parks, 1111 2nd St., Crescent City, CA 95531. Comments may also be submitted in a separate letter to this address, or they can be sent as a letter via electronic mail to: redwplan@nps.gov.

Date: 9/8/98 To avoid our misreading your comments we request that you print if possible.

To: Superintendents, Redwood National and State Parks

From: MARNA POWELL (name)

(address)

(zip)

REDWOOD NATIONAL AND STATE PARKS

1000 2nd St

ARCATA OFFICE

ARCATA, CA

399-A

1 The Economic Profile in your Draft is a Joke - CRICK HOUSING & POPULATION DATA ARE MISSING - ECONOMIC IMPACTS RE: SURF FISHERMEN, WOODCARVERS, RANCHERS, FRESHWATER SPIT CAMPERS, AND EMPLOYEES OF SAME ARE NOT CONSIDERED

2 ALTERNATIVE 4 IS A BETTER PLAN - MORE VISITOR SERVICES & RECREATION

3 page iii says the focus of this joint plan will be on why the parks were established and what resource conditions and visitor experiences should be achieved and maintained over time.

- George B. Hartzog Jr. - Director NPS when RNP was established said - Congress in establishing the National Parks stipulated that they were to be administered for the use of the people... Parks are for people. People are picnickers, hikers, devotees of skiing and swimming, fishermen, bird watchers, and lovers of the lonely wilderness... page 92 National Geographic

4 I make NR money from tourism - July 1966 I work in Arcata for a manufacturer who sells out of state - I love the beach campers - they hurt nothing. They are nice people and they should be allowed to continue to camp there.

399-A See summary comments E and G and H and the responses to comments J and K in the Klamath Chamber of Commerce letter, comment A in the Green Valley Market and Motel (Robert Cramblett) letter, and comment D in Janis Crandall's letter.

COMMENTS

RESPONSES

Thought you would like a copy of my comments to Humb. Co. Board of Supervisors

REDWOOD NATIONAL & STATE PARKS GENERAL PLAN ISSUES REDW-559  
as seen by Marna Powell, Vice President Orick Chamber of Commerce, Spokesperson for Orick  
Tomorrow Committee of Orick Economic Development Corporation  
PO Box 68, Orick, CA 95555-0068  
November 3, 1998

I) Purpose of the parks: Created "for use of the people" ( Hartzog, NPS Director 1966 quoting congressional stipulation)

- A) Preservation
- B) Visitor Use/ Recreation

II) Current attitude at RNSP

- A) Limit access in the name of preservation
- B) Acquire more and more land (but not for visitor use)
- C) Restrict use of private land through scenic and audio "buffer zones"
- D) Environmental easements to landowners without regard to livelihoods of employees, those leasing the land, or end-users of products
- E) Failure to recognize conditions for which the park was acquired
- F) Disregard for economic/recreational promises made at creation and expansion of RNP

III) Planning Procedure

- A) Scoping sessions offer no two-way dialog
  - 1) "Collect comments" only
  - 2) It is impossible to comment when you do not know the issues
- B) When draft matrix was leaked
  - 1) Park officials refused to discuss issues with public
  - 2) Claimed the entire thing would change (it did, it has more words)
  - 3) Claimed Orick residents concerned with draft were alarmists not to be taken seriously

- C) Economic report is incomplete
  - 1) Lacks specific information for Orick but includes it for other areas
  - 2) Plan would have more impacts on Orick economy than any other area but fails to fully explore those impacts
  - 3) Paints Orick as a Mecca of thriving visitor opportunities
  - 4) Economic impacts to Humboldt and Del Norte counties not fully explored
    - a) Focus on visitor services (if funded) would finally create the park that was promised thirty years ago
    - b) Both counties have widespread unemployment and welfare roles, any policy that would enhance recreation and tourism would also create job opportunities
    - c) Park needs to hire locally displaced workers
    - d) Job retraining for displaced workers
    - e) In lieu-of tax dollars are finite

D) Comment Period: If the draft matrix had not been leaked two years ago I do not believe we would have had enough time to review the draft document or associated appendices

559-A See summary comments E, G, and H and responses to comment, comment D in Janis Crandall's letter, and comment L in Marna Powell's 8/20/98 letter.

559-A



## COMMENTS

## RESPONSES

Page 2, Marna Powell re:RNSP draft plan 11/03/98

## IV) Commercial Surf Fishing

- A) Denying access violates spirit of agreement between state and federal governments when park was established (House of Reps Conference Report # 1890)
- B) Could use fishermen as interpretive attraction and safety patrols
- C) Commercial license could be suspended or revoked if violations of laws occur
- D) Issue finite number of transferable permits in perpetuity (much like a liquor license)
- E) Surf fish provide food to zoos, aquariums, and wildlife care centers, thus saving many endangered species

## V) Freshwater Lagoon Spit

- A) Historical use: People have camped there for three generations
- B) Only place accessible to RVs
- C) People want to camp on the beach
- D) Improve facilities and charge a fee or keep it the same
- E) Most RV owners are senior citizens
  - 1) Paid taxes all their lives
  - 2) Many are veterans
  - 3) Cannot physically get to the beach without driving there
- F) RNSP claims the campers are not the proper image of a gateway
  - 1) Is Orick the proper image? Should the town be removed?
  - 2) Aren't people enjoying recreation outdoors the very image a park should be portraying?
  - 3) When was this area declared a wilderness area?
  - 4) Is a beach a proper image for a "Redwood" park?
- G) Economic impacts: Spit Campers claim they will not come to Humboldt/Del Norte counties at all if they cannot camp on the beach

## VI) Roads

- A) Improve, pave, and maintain existing roads — *Pave Bald Hills Rd!*
- B) Expand, improve, and create more parking areas
- C) Large recreational vehicles have no place to park other than Freshwater spit
- D) Families and physically challenged individuals must have access

## VII) Land Acquisition

- A) Enough is enough!
- B) In lieu-of tax dollars don't last forever
- C) Humboldt County Resolution No 92-35 (no net loss of private land)
- D) Even "gifted" land cost taxpayer dollars to maintain

## VIII) Buildings

- A) Don't waste money tearing down or "salvaging" existing buildings
- B) Maintain and fix serviceable buildings as interpretive, educational facilities
- C) Buildings damaged through environmental events could be relocated
- D) Move Arcata offices to Orick

COMMENTS

RESPONSES

Page 3, Marna Powell re:RNSP draft plan 11/03/98

IX) Recreational, Educational, Interpretive Programs

- A) The more, the merrier!
- B) RNSP already has a great pool of knowledgeable rangers and volunteers
- C) College interns could add to interpretive pool
- D) Encourage more Concessions
- E) Work with HSU, local governments, and clubs to develop more nature walks, workshops, ecotourism and other low-impact events
- F) Better signage and kiosks on highways (people drive down 101 and don't realize they are in the park)
- G) More parking areas with picnic grounds and informational kiosks
- H) Work with local tribes
  - a) Interpretive demonstrations
  - b) Allow traditional gathering of plant materials
- I) Make every effort to consider new concessions and recreational ideas

*Picnic area at Schoolhouse Peak*

*Campground up Bald Hills*

X) Environmental concerns

- A) Sensitive areas should be classified as to their ability to withstand visitor impacts
- B) Every effort should be made to provide maximum visitor enjoyment
- C) Continue upstream creek restoration projects
- D) Consider continuing to allow (where possible) private property owners to install impoundments in the summer for fire control, swimming, and other water needs
- E) Preferential hiring should be given to local workers on restoration projects

Summary:

I am not suggesting we pave the redwoods! On the contrary, I consider myself to be an environmentalist. I live up on the hill, at the mouth of Redwood Creek. I do not live here because I enjoy shopping at malls. I live here because I enjoy nature and I enjoy hiking, kayaking, kite flying and beach combing. The Redwood Park system is under no obligation to create economic stability for the outlying areas, but I believe they are obligated to do no harm in terms of detrimental economic impacts. We can have recreation, visitor enjoyment, and enhanced economic opportunities AND RESTORE THE ENVIRONMENT!!! These things can be done concurrently. I would like to see the RNSP general plan focus upon visitor services and recreation. I would also like to see better TWO-WAY conversations between park management and local governments.

COMMENTS

RESPONSES

Redwood National & State Parks  
Attn: Super Intendants  
1111 2<sup>nd</sup> St  
Crescent City, CA. 95531-4198  
RE: "Fresh Water Spit" Orick, CA

99 OCT 13 AM 8:05

REDWOOD NATIONAL & STATE PARKS  
CRESCENT CITY  
CALIF. 95531

To Whom It May Concern:

I as well as my wife feel that to close the camping area at the Fresh Water Spit would be a tragic loss to both the Orick community as well as the thousands of people who camp there each year.

It is unnecessary to eliminate the camping area and changing it into a day use only facility sense there is already one just north of the Spit campground. Our family has frequented this campground for many years and used it as our central point while taking day trips during our vacations. We have always found it to be very clean and the grounds well kept, with very little vandalism or loud noise. I believe that the constant in and out traffic of a day use facility would change the appearance of the grounds considerably. People who only stop for a short visit have no respect for the grounds therefor do not care how themselves or other visitors keep it. Where as people who are often camping there tend to take more pride in the upkeep and the cleanliness of both the grounds and the facilities, it is regarded as a home away from home.

I feel that the State and Federal Government are not keeping the community in mind, and have nothing to gain from this action. Before making your final decision to eliminate the camping area at the Fresh Water Spit in Orick, CA, please take into

consideration both the visitors as well as the members of the Orick community. Without that campground the town could suffer a considerable loss in revenue due to lack of people spending time shopping the local stores, because they will just drive by.

401-A

Very Concerned,

John & Debbie Puryear

John & Debbie Puryear



401-A See summary comment E.

COMMENTS

RESPONSES

[Redacted]  
October 27, 1998

Redwood National Park  
1112 2nd Street  
Crescent City, CA 95531

Gentlemen:

This is in regard to the General Management Plan and Master Plan & EIR Statement & Impact (Document) of the National Redwoods & Jedediah Smith State Parks.

I worked for BLM as a forester for over 30 years. Six of those years were out of the Ukiah District back in the 1960s. Since I retired over seven years ago, I have spent part of the time working voluntarily to identify and help preserve the old emigrant trails between Ashland, Oregon down to Chico, California. We also are dealing with evidence of the Hudson Bay Fur Co. routes and other trails.

Because of my work on trails like this, I recently received a personal letter from a friend of my brother. The letter indicates that considerable research has been done on the Jedediah Smith trail which crosses both State Park lands and National Park land acquisitions. The journals of Rogers and Jedediah both describe their travels and the trails they took. Two native American oral recollections now written support parts of the route. This information is available at the Del Norte Historical Society. The descendent is Ralph Hughes.

Because this information is available and so many people are interested in the first explorers trail, I believe that the Jedediah Smith Trail should be included in the Master Plan for the Redwood National Park and Jedediah Smith Redwoods State Park. It deserves the recognition and support which you can give it.

Sincerely yours,

*David W. Raney*

David W. Raney

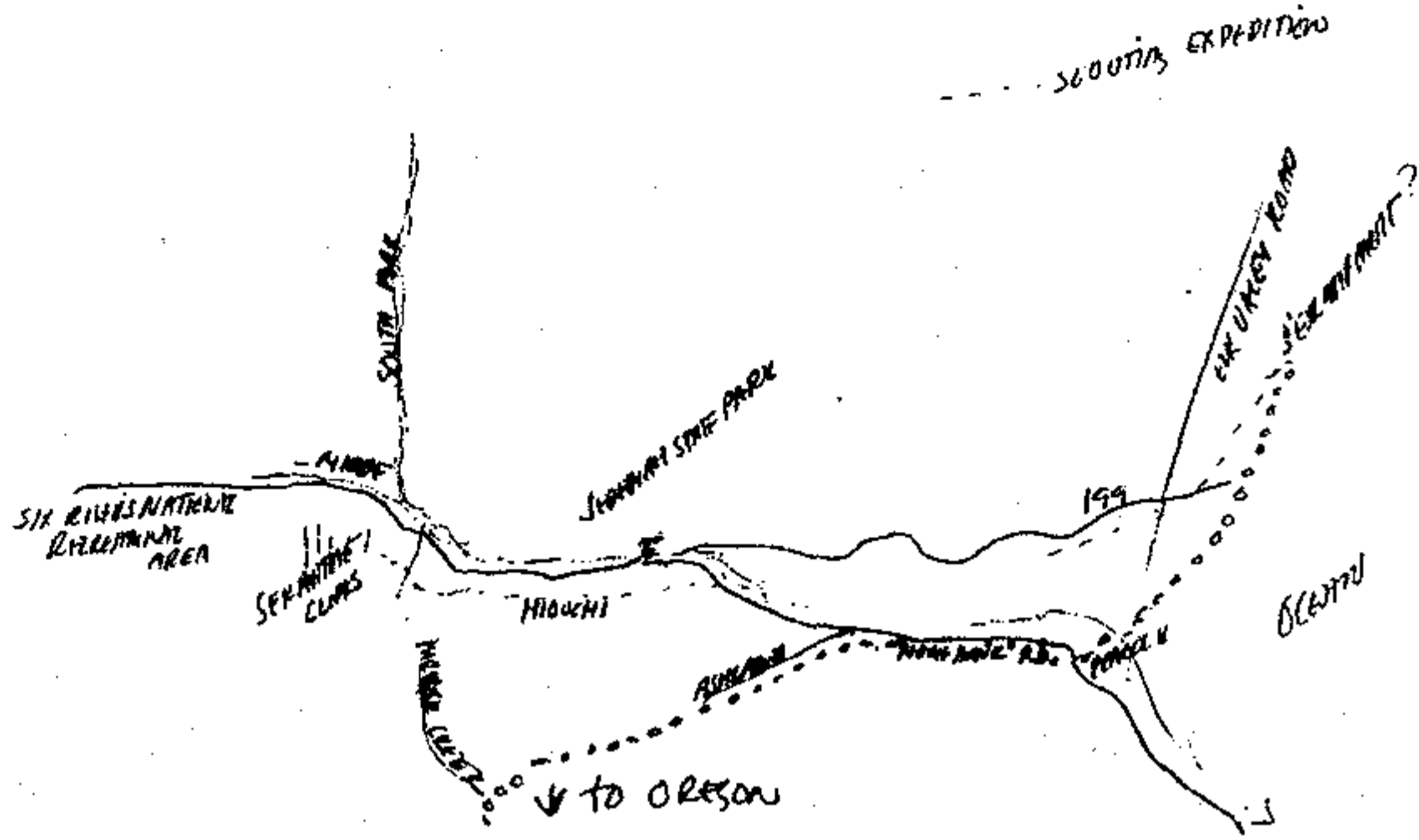
P.S. I am including a sketch map of the area referred to and I can get you more information if you need it.  
DWR

531-A See summary comment C.

531-A

COMMENTS

RESPONSES



COMMENTS

RESPONSES

September 27, 1998

Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

OCT - 1 PM 2:24

RECEIVED  
OCT 1 1998  
FRESHWATER SPIT

Comments on the GMP/GP/EIS/EIR for Redwood National and State Parks (RN&SP)

My husband, Jerry Rohde, has voiced many of my concerns in his letter of comments dated September 7, 1998. However, there are three areas I want to address directly.

1. Using Freshwater Spit as a RV campground: By allowing free camping on Freshwater Spit, RN&SP are encouraging people to camp in a dangerous area. This situation is a lawsuit waiting to happen.

a) The access to and from the camping area is hazardous; more than once have I almost been involved in an accident while driving along the Freshwater Spit section of Highway 101. Large vehicles, like RV's and trucks, stir up thick clouds of dust and sand as they leave the Freshwater Spit camping area; the visibility is greatly reduced for those drivers going the legal speed limit on Highway 101. To make matters worse, there is no real merge lane so the vehicles merging onto Highway 101 are going much slower than the average speed of the through traffic. It is well known that one of the most dangerous situations on highways is when one vehicle is going much slower than the rest of the traffic.

b) The pedestrian traffic crossing Highway 101 is another hazardous situation in this area. Many of the campers like to go to Freshwater Lagoon for fishing and/or boating. Unfortunately, this particular stretch of highway is also a popular passing zone; slow foot traffic and cars going over 70 mph create a treacherous combination, especially when visibility is reduced by clouds of dust and/or thick fog.

c) The Freshwater Spit area is in a dangerous Tsunami zone. There are plans to relocate the Redwood Information Center (RIC) because of this danger. Why would RN&SP encourage camping in an area they feel is so dangerous that RIC needs to be moved? An evacuation plan does little good if a Tsunami can strike within minutes after a large earthquake. It is one thing to allow people to walk on the beach after giving them appropriate warning about the potential dangers. It is quite another matter to allow lengthy, overnight stays, which greatly increase the chances of tragedy, especially, if an earthquake strikes at night while people are sleeping in their "rigs".

403-A, B See summary comment A.

403-A

## COMMENTS

## RESPONSES

2

403-B

If RN&SP decide it is part of their mission to provide a RV campground, why not convert the old mill site off Davidson Road (Mill Site B) into a camping area? Tourists already go to this area to see the elk herds or to visit Fern Canyon, and Mill Site B would be a much safer place for camping than Freshwater Spit. Even more appropriate, I would think, is for the town of Orick to establish a RV park to help bolster their economy. If they had a RV campground in Orick, the tourists would be more apt to take advantage of the many services and attractions offered by the town.

**2. Vehicles on the beaches:** In theory, vehicles on the parks beaches drive only on the wave slopes at slow, safe speeds. Unfortunately, I have seen plenty of evidence of vehicles making "wheelies" in the sand and/or crushing plants and destroying the dune structure as they drive in the dunes. Vehicle access is meant for physically challenged people and fishermen, but apparently poachers also drive on the beaches to retrieve their illegal kills. Since RN&SP does not have enough resources to adequately patrol the beaches and ensure that vehicle access is not abused, vehicles should not be allowed on RN&SP beaches.

**3. Use of motorized watercraft on Freshwater Lagoon:** The lagoon is currently used by motorboats and jet skis that launch from RN&SP property on the west side of this body of water. Such watercraft create substantial air, water, and sound pollution that harm the parks' resources and degrade visitor experience of the lagoon and the surrounding area. The parks should therefore prohibit the launching of motorized watercraft from that part of the lagoon shore that is park property and also ban travel by such watercraft over that part of the lagoon belonging to the parks.

Thank you for considering my comments.

*Gisela Rohde*

Gisela Rohde

COMMENTS

RESPONSES



September 7, 1998

03 SEP 24 PM 1:14

Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Comments on the GMP/GP/EIS/EIR for Redwood National and State Parks (RN&SP)

My wife and I have been regular visitors to the redwood parks since shortly after we moved here almost 20 years ago. We remember hiking the old Ten Taypo Trail at Prairie Creek when it used to run atop fallen redwoods as it ascended the creek. I was probably one of the last people to legally cycle into the Little Bald Hills before it was closed to mountain biking. We have cared enough about the parks that we spent two years researching and writing our guidebook, *Redwood National & State Parks: Tales, Trails, & Auto Tours*, which has now sold nearly 3,000 copies.

The plan you now propose for the parks carries with it an enormous responsibility. The future of these beautiful, historic, inspiring lands will be in large part determined by the decisions that park staff soon approve and implement. The following comments suggest ways that this plan could be improved to preserve and enhance the magnificent place we call Redwood National and State Parks.

1. The parks should acknowledge and emphasize scenic values. Nowhere in the plan do I find mention of the parks' many sites of overwhelming beauty. The closest the plan comes to recognizing these areas is in such tortured phrases as "...old-growth redwood groves provide observers with an awe-inspiring micro landscape experience." (p. 206) Any planning document that, like this one, discusses "visual and scenic resources" in terms of "landscape types" and "levels of visual sensitivity" fails to recognize the full value of the parks' awesome scenery -- the purple cloud of lupines that rises like a springtime fog up the slopes of Schoolhouse Peak, the yellow flood of skunkcabbage spathes that wash down their namesake creek, the charred opening in the "Trail Through Tree" that welcomes hikers on the Rhododendron Trail. RN&SP need to acknowledge that it is the perception of beauty, not the "micro landscape experience" which is significant for many of the people visiting the parks and plan accordingly. If this were done, there would be an inventory of specific "scenic sites" and a program to protect their integrity while allowing appropriate public access. And if *this* were done, there would be no question about the necessity of removing the annual abomination of visually virulent vacation vehicles from Freshwater Spit. I know of no other national park that welcomes its visitors with such a sight -- a gauntlet of garish and grotesque gas guzzlers that, without payment of any fee, are allowed to lacerate one of the region's



## COMMENTS

## RESPONSES

2

most remarkable landscapes, the wonderful sweep of the brilliant blue Pacific, punctuated by the projecting point of lovely Little Girl Rock. Remove the RVs from the spit.

**2. The parks should better document and acknowledge the significance of human**

**404-A** **history within their lands.** The plan shows and incomplete and often incorrect understanding of the region's human history and (perhaps as a result) fails to properly preserve and render accessible such historic sites. For example, information pertaining to the area at the extreme northern end of Prairie Creek Redwoods State Parks is rife with errors and omissions: the "Johnson" property (p. 197) misspells the name of the owner (Johnston) and indicates that what was actually a cattle operation was a dairy ranch. It fails to indicate the existence of Johnstons' mining operation (the ditch for their Amomy Placer Mine is still visible above Johnson (also misspelled, p. 200) Creek. Along the same creek was the J. H. Crother's house, mistakenly referred to as the Caruther's (misspelled) Cove Cabin (p. 200). Contract research done by Van Kirk and Stanton has added valuable information about several RN&SP historic sites; the parks' now need to conduct similar research on their many other important historic areas. In addition, RN&SP need to expand the vision of its mission, so that the acquisition and preservation of historic sites is made a priority. Several years ago the parks missed a great opportunity to complete a historically significant unit in the Bald Hills when they failed to acquire the Tomlinson Ranch properties that were then for sale. When combined with the Lyons Ranch holdings, this land would have encompassed an important segment of the county's sheep ranching range, along with the invaluable Tomlinson House, the only extant ranch house in the Bald Hills from that era.

**3. The parks should better document and protect areas of natural historic significance.**

**404-B** While the plan mentions various types of biotic communities and indicates the need to protect endangered species, it displays no special sense of the value of particular species or communities and shows no overriding concern to protect them. Two examples: 1) While the plan indicates that the endangered western lily has been searched for, but not found in the parks, it fails to mention the existence within RN&SP of the rare and arrestingly beautiful rosy firecracker flower (*Dichelostemma venustum*), which occurs on the Lyons Ranch property in an area subject to damage from human activity. 2) The plan mentions the oak woodlands and prairies of the Bald Hills as a "distinct vegetation community" but does not acknowledge that it is one of the most impressive oak habitats in the state, nor does the document indicate the degree to which such habitats have diminished in recent decades. RN&SP were formed primarily to protect redwoods, but a lot of other plants came in the package and they also deserve the full attention of park staff.

**404-C** **4. The parks should revise their trail plans based on more accurate and complete information.** The plan indicates that trails proposed in the 1984 Redwood National Park Backcountry Trail Plan and the 1985 State Redwoods Parks General Plan will be developed in the future. While many of these trails may be worthwhile additions, the parks should revisit the trail planning process and create a new plan that not only integrates the state and national proposals but which uses additional information in developing the selections. The issues raised in items 1. through 3. above all have bearing on the selection

**404-A** Text changes have been made in the final plan in response to this comment.

**404-B** Agency policies as well as management strategies for natural resource management in Redwood National and State Parks listed on page 38 of the draft plan include perpetuation, restoration, and maintenance of RNSP ecosystems. All native plant and animal species are part of those ecosystems. This strategy is intended to apply to the full diversity of resources that cannot be specifically mentioned in the plan due to lack of space and the general nature of the plan. The Oregon white-oak woodlands of the Bald Hills are not assigned as a plant community with highest inventory priority on the California Department of Fish and Game's Natural Diversity Database of Natural Communities' most recent list. Table H-3 in appendix H in the draft plan lists all plants known to occur or possibly occurring in the parks that are considered by the California Department of Fish and Game to be sensitive, rare, or associated with a declining habitat in California as of 1997. This list includes plants listed in the California Native Plant Society's *Inventory of Rare and Endangered Vascular Plants of California*.

**404-C** See summary comment C.

COMMENTS

RESPONSES

3

of new trails, and until those issues have been adequately addressed any trail plan will be inadequate. As an example: nowhere is mention made of restoring a key connecting link in the historic Kelsey Trail, namely the segment that ascends the east side of Mill Creek canyon from the site of the Nickerson Ranch to the ridgetop in the Little Bald Hills (in fact, it is my understanding that current park information erroneously indicates that the Kelsey Trail followed the Little Bald Hills Road up from near the Stout Grove). Since the parks are apparently unaware of the location or the significance of this trail route, no consideration has been given to including it in the trail plan; however, such a route would actually link two other existing segments of the Kelsey Trail, while also providing a loop hike that would include Mill Creek/Stout Grove trails and the Little Bald Hills Road.

5. To address the issues raised above, the parks should form an advisory committee composed of members of the concerned public. Many local residents have a deep and long-lasting commitment to the parks and possess detailed knowledge of many of the parks' facets and features. Such people would be valuable additions to the planning process as it makes the general plan's generalities specific. Park staff should use this resource to enrich its work by forming an advisory committee that would assist in the further development of RN&SP plans. Organizations such as the Redwood Region Audubon Society, the North Group Sierra Club, and the Humboldt County Historical Society could be asked to provide representatives, who would join with a selection of qualified and interested individuals. The parks belong to all of us, and we all need to share in their care.

Thank you,



Jerry Rohde

## COMMENTS

## RESPONSES

REDWOOD NATIONAL  
AND STATE PARKS  
RECEIVED

SEP 24 1998

ARCATA OFFICE  
ARCATA, CA

Date: 9/21/98  
Sender: Jen Coffey  
To: REDWPLAN  
Priority: Normal  
Subject: Rewood National & State Parks management plan

~~We received these comments on the Redwood GMP via the Internet and are forwarding the comments to the park.~~

Jen Coffey  
National Park Service  
Natural Resource Information Division

Forward Header

Subject: Rewood National & State Parks management plan  
Author: Joseph & Holly Romine <jollyrom@webzone.net> at NP--INTERNET  
Date: 9/20/98 5:35 PM

We tried to send this message to another e-mail address but it came back as undeliverable.

We hope you can and will forward it to the proper place, as the public comment period on this plan closes some time around October 8.

We are annual visitors to the Redwood National and State Parks and would like to voice our hope that the final management plan adopted for the parks emphasize restoration, protection and preservation of natural and cultural resources (Alternative 3).

We understand that closing of the Redwood Information Center south of Orick and of the Park Headquarters in Crescent City is being considered. In order to emphasize restoration, protection and preservation of the natural and cultural resources, and provide park users easy access to information at the same time, it might make perfect sense to:

1. Deconstruct the information center south of Orick, and
2. Use those materials as much as possible in the expansion of the ranger station in Hiouchi, thus creating a larger information center in the Jedediah Smith Redwoods State Park. This provides information for those entering the area from the north on Hiway 199.

3. Retain the Park Headquarters in Crescent City, as this is a logical place for transaction of business (in a population center), and provides an information stop for those entering the area from the north on Hiway 101.

4. Retain the Prairie Creek Visitor Center to provide an information stop for those entering the area from the south on Hiway 101.

There is very little left of the "greatest forest on earth," and we urge you to keep this foremost in mind as you deliberate the fate of this jewel in our park system. We understand that local residents and businesses want to capitalize as much as possible on use of the parks, but we all need to realize that when we live in an area so unique and irreplaceable, we must make sacrifices for its preservation. Thank you for listening.

--Joseph and Janet Holly Romine, Tulsa, OK  
Received: from yoda.webzone.net (205.219.23.7) by ccmil.itd.nps.gov with SMTP (IMA Internet Exchange 2.12 Enterprise) id 00124763; Sun, 20 Sep 98 18:37:38 -0400

Received: from [208.152.96.119] by yoda.webzone.net (Post.Office MTA v3.1.2 release (PO203-101c) ID# 0-0U10L2S100) with SMTP id AAA25593 for <jen\_coffey@nps.gov>; Sun, 20 Sep 1998 17:36:19 -0500

Message-ID: <3605830E.6E7B@webzone.net>  
Date: Sun, 20 Sep 1998 17:35:01 -0500  
From: Joseph & Holly Romine <jollyrom@webzone.net>

407-A See comment A in Janis Crandall's letter.

407-A

**COMMENTS**

**RESPONSES**

X-Mailer: Mozilla 3.01-C-MACOS8 (Macintosh; I; PPC)  
MIME-Version: 1.0  
To: jen\_coffey@nps.gov  
Subject: Rewood National & State Parks management plan  
Content-Type: text/plain; charset=us-ascii  
Content-Transfer-Encoding: 7bit

## COMMENTS

## RESPONSES

Date: 10/7/98

Sender: [REDACTED]

To: REDWPLAN

Priority: Normal

Subject: Comments

Redwplan@nps.gov

To: Superintendents, Redwood National and State Parks (RNSP)

From: W. Dale Russell and Judith J. Russell

## COMMENTS

## PROBLEM CLARIFICATION:

Visitor use at the Freshwater Lagoon Spit has been addressed in each of the four alternatives of the July 1998 Draft version of the RNSP General Management Plan/General Plan. The alternatives range from eliminating to reducing and charging for RV parking on the spit. These alternatives for the Spit are based on an unacceptable statement of the problem.

First, RV camping on the Spit should not be considered a negative impact on visual quality.i That is an arbitrary value judgment. Consider this: people and their creations are visible

- \* walking along a path,
- \* riding a horse down a trail,
- \* leaning a backpack under a tree
- \* setting a sleeping bag under a tarp,
- \* sitting on a rock catching a fish,
- \* parking an RV by the side of the road.

Please do not tell me that my beautifully designed and crafted RV is an eyesore. My heart is warmed by the sight of a line of RVs camped by the seashore. How wonderful that retired, elderly and disabled people can still enjoy the beauties of our land. And may the next generation to whom we have passed the reins of leadership continue to respect and provide outdoor recreational opportunities for the elderly and disabled.

Second, not all RVers like campgrounds. It is true that some RVers never go anywhere except to gated membership campgrounds where they have full hookups and full amenities. On the opposite extreme are others who seek out remote or natural campsites and never go to organized campgrounds. Be careful not to lump all RVers into one stereotype. (This issue is related to the recent political confusion as to whether public agencies are in competition with commercial campgrounds.ii From the users' perspective, each has its own place.)

Third, informal conversations with park rangers have suggested that there may be problems of maintenance and enforcement at the Spit. If these considerations are underlying the alternatives for modification of Spit usage, they should be documented and addressed in the RNSP General Management Plan/General Plan.iii

## BACKGROUND:

The primary users of the Spit are RVers. They are significant visitors to RNSP and will be increasingly so in the future.iv

Although the campers at the Spit represent a wide range of ages, the majority is retired, senior citizens. Many can look back on a lifetime of vigorous activity, such as hiking, fishing, and backpacking. Now, in their senior years, they still want to enjoy the beauties of nature, but may not be able to engage it as actively as in their youthv

Most of the vehicles using the Spit are self-contained. That means they carry their own fresh water and have sanitary facilities and waste water tanks. For the most part, these users demonstrate pride of ownership and

COMMENTS

RESPONSES

make an effort to maintain cleanliness in whatever environment they may visit, including the Spit.

ALTERNATIVES:

The four alternatives presented in the Draft do not address the needs of the visitors who use the Spit.

Alternative 1) By eliminating overnight camping and designating the Spit for day use only, the present overnight, week-end and week-long users who desire an in-depth experience of the coast will be driven away and replaced by travelers making brief stops en route to other destinations.

Alternative 2) Restricting RV camping to a single row would only affect the three biggest weekends of summer, Memorial Day, Fourth of July, and Labor Day. Designating length-of-stay limits, including return privileges, would not differ from the present situation.

Alternative 3) Same as 1.

Alternative 4) Restricting camping to the north end; providing water and restrooms; charging fees. Taken together this alternative would reduce the Spit to an organized campground. It would take away the last remaining spot on the West Coast of the contiguous United States where citizens can freely enjoy the seashore.

RECOMMENDATION:

Our recommendation includes seven specific suggestions for improving visitor use at the Spit.

1) Interpretation. Interpretation programs for the users of the Spit need to be geared to the visitors' age and experience. Some started coming to the Spit before any of the current crop of rangers were born. Some have grown up in the area and are true experts with first hand knowledge of the life and history of the coast. Many have physical limitations and some have hearing loss. Onsite, conversational, interactive approaches to interpretation are preferable to a unidirectional, didactic approach carried on in an instructional center removed from the Spit.

2) Relationship. Unfortunately, a generation gap often exists between rangers and RV campers. Rangers should be specifically selected and trained for working with this special population of visitors. The key to developing a successful program will be building relationships between Spit users and Park personnel. That means working on the beach, not in a building. It also means plenty of one-on-one contact, rather than making speeches to an anonymous group. Young rangers with the health, vigor and enthusiasm to backpack into the wilderness should not be allowed to speak and behave as if they are superior to elderly and disabled Rvers who no longer are able to enjoy the backcountry.

3) RV community. There are special bonds among Rvers. The Spit has a history of fostering new relationships among campers, and between campers and town folks. This is a grass-roots example of the greatness of our democratic nation and should be respected.

4) Enforcement. When asked to describe the crime situation on the Spit, individual rangers' comments varied from no problem to serious problems. Documentation is needed to identify whether or not there is an enforcement problem on the Spit.

5) Fees. If fees are necessary to support interpretation, maintenance and enforcement activities at the Spit, they should be set as low as possible, and they should definitely be structured to recognize the National Park Service Golden Age Passport.

6) Sites. A number of campfire rings are already in place. Stairs and ramps at selected locations would be desirable.

7) Facilities. Bathrooms and dumpsters should be available and maintained on an appropriate schedule to ensure a clean and healthy environment.

FOOTNOTES

i See Draft.

411-A and B See summary comment A.

411-A

411-B

## COMMENTS

## RESPONSES

ii Congressional Bills and other lobbying efforts of campground owners and their association.

iii In discussing the Draft with representatives of RNSP, we were often told that crime and littering were out of control on the Spit. We never saw any, nor did any of the other campers we spoke with, nor did other rangers who were more familiar with the area.

iv For example, one source, using the states' vehicle registration records, estimated a total of eight million recreational vehicles in the United States (Fall '97 Escapade, Lewisburg, West Virginia). Surveys of spit usage by citizens of the local community indicate the heaviest (peak) usage during the three summer months

v . During our recent visit we had the good fortune to park near a former sea-going fisherman who watched the horizon through field glasses and interpreted the local fish populations and the activities on the passing boats to his neighbors. For three days a fond husband helped his invalid wife to sit propped up in her RV so she could see the ocean and helped her to bed at night to sleep to the sound of the surf. A great-grandmother in her mid-80's is no longer able to walk down to the beach, but every month she and her husband spend a long week-end sitting in their beach chairs next to their RV overlooking the sea. A woman with degenerative arthritis from West Virginia had never seen the Pacific Ocean. Her husband guided her down the sandy bank, and with the help of a branch of driftwood she walked to the sea for the first and probably last time.

Received: from [REDACTED] by cmail.itd.nps.gov with SMTP

(IMA Internet Exchange 2.12 Enterprise) id 001502DC; Wed, 7 Oct 98 15:11:35 -0400

Received: [REDACTED] by x8.boston.juno.com (queuemail) id DQYULRW6; Wed, 07 Oct 1998 15:10:16 EDT  
To: Redwplan@nps.gov

Date: Wed, 7 Oct 1998 11:05:57 -0700

Subject: Comments

Message-ID: [REDACTED]

X-Mailer: Juno 1.49

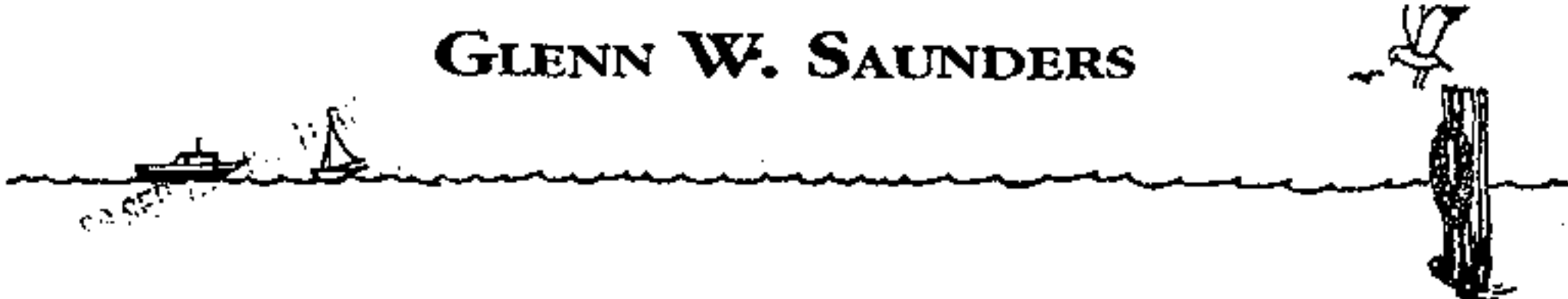
X-Juno-Line-Breaks: 0-9,14-15,18-24,30-31,39-40,45-47,49-50,55-56,61-63,  
65,69,73-74,79-81,83,92,102,106,110,114,116,119-124,126,130,  
135-136,149-150

From: [REDACTED] (Judy Russell)

COMMENTS

RESPONSES

GLENN W. SAUNDERS



Sept Redwood National Park 9/28/98  
Crescent City, Ca.

Dear Sept. you would like to make some  
pointed comments on your plans for the Park.

414-A

I wish I could put my fingers on  
what the park officials promised the  
area when you took over. They missed  
it by miles, the visitors expected,  
what it would do to such a fine  
community.

Ouch was a beautiful town  
in the 40's. my aunt & uncle ran  
the hotel, store, cottages and their  
grounds & operation was  
a sight to have experienced.  
People came from all over to stay  
with them, great food etc.

Look at Ouch now, "Slab Town"  
as they say & lots of drugs. no

414-A See summary comment B.



## COMMENTS

## RESPONSES

jobs, no beds for the school,  
no accommodations etc etc.  
What a sorry sight for our family  
to witness.

I am totally against all of your  
plans, # 4 parts are possibilities.

I am really opposed to cut out the fishing  
& jobs for the Fern canyon area.

Also to take away the permits  
parking at Freshwater Lagoon is  
completely off base, save the view for cots?  
Who do you think pays for all this?

also, the idea to move the information  
center out at dam & build ~~new~~ new one.  
What waste of tax money goes for  
just thinking.

I am 74 years of age, able to move around,  
my wife has a new hip & we wonder what  
the Park has in mind for people our age, don't  
seem to be thinking of the seniors.

Please give my thoughts some  
serious consideration

Thank you. Glenn Saunders

COMMENTS

RESPONSES

October 24, 1998

Superintendents, Redwood National and State Parks  
1111 2nd St.  
Crescent City, CA 95531

OCT 27 AM 11:57

REDWOOD NATIONAL AND STATE PARKS  
CRESCENT CITY  
CALIF. 95531

Dear Mr. Ringgold and Mr. Sermon,

First, I want to acknowledge the tremendous effort that has gone into this undertaking. It is obvious that the alternatives were thought out using careful analysis of the needs and projected needs of the park facilities. I appreciate the extent to which the State and National Parks' personnel considered conservation of our national treasures.

I am entirely in favor of any and all restoration that occurs. I support the relocation of picnic and parking facilities out of the wetlands in Fern Canyon and at Crescent Beach. I would like to keep these areas accessible to visitors, through maintaining Davison Rd. and allowing traffic on it, and by rebuilding the picnic area on Crescent Beach. As for vehicles on the beach, I fully support the Parks' prohibiting off-road vehicle use. Continuing off-road vehicle use for commercial surf fishing by nontransferable annual permit only, and renewing only permits issued in 1996, and issuing no new permits works for me. I support continuing permits for American Indian traditional uses, because preserving old ways is the right thing to do. Restoration of Redwood Creek is high on my list. Finally, I am in favor of designating parts of our parks to wilderness areas.

As for the Freshwater Spit area, I would like to see restriction of RV camping to a single row along the highway on the north end of the beach, and allowing tent camping on the south end of beach. I would like to see Parks' maintain a separation between the camping areas, providing a viewshed along the highway. Parks' should charge a use fee, provide a part-time ranger, and designate and enforce length of stay limits. Parks' should research composting toilets for the area. In addition, I do not support the use of jet skis on any lagoon in the park.

The present buildings for maintenance and visitor services should be retained, except for the Visitor Center in Crescent City, which should be relocated to the Cultural Center. This is a beautiful building in an idealic setting, currently underutilized, creating wasted space. Besides being a book store selling maps and stuffed animals and giving away trip planning for free, the RNSP interpretive program could provide year-round recreational opportunities (i.e. Jr. Rangers, nature crafts, speaker forums) for local citizens as well as tourists, utilizing the park and beach area adjacent to the center. This facility can also be a starting point for traveling interpretive tours, and a gateway for the entire region.

Rather than building a new VC in Hiouchi, Parks' should enlarge the present one, and maintain the State Park VC. Don't salvage the VC in Orick - all the money recently spent on upgrading that facility would be wasted, even if the displays could be moved. It, too, is a lovely center, and it should be used as long as possible. Use the dollars saved by not building new facilities to upgrade current facilities, and spend money refurbishing or replacing the interpretive signs which have faded or been vandalized throughout the park. Install better signage in and near Crescent City, making the signs visible and attractive to tourists. Put some money and strategizing into the Welcome Center proposed for the border with Oregon, making it more than just what people can see and do in our parks, with a few books for sale.

As for the proposed new primary VC in the Prairie Creek area, I support the idea of tribal governments or a private entity, in cooperation with RNSP staff, constructing a new visitor center near the park. However, I

415-A See comment A in Janis Crandall's letter.

415-A

COMMENTS

RESPONSES

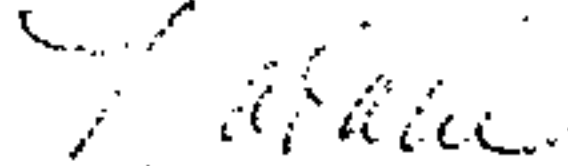
do not support the concept of a lodge constructed in any of our Redwood Parks. Not only will a lodge add congestion and pollution to the area, it will also compete with local businesses already established.

If camping is to be increased by adding new sites in present campgrounds, or entirely new campgrounds are added, I suggest they be primitive in nature, avoiding any unnecessary tree removal. Those sites presently located within sensitive areas should be removed, and the site rehabilitated. Preserving the rural integrity of our county is imperative. Any unpaved roads in the parks should remain so, and those to be removed should be converted to trails or returned to pristine conditions. Controlling erodable areas presenting sedimentation to the rivers and streams they are adjacent to is paramount.

In summary, I would like a conservative, more moderate approach to the Parks' plan. I value the reuse of materials where possible, but don't support waste. I support restoration where possible, and would like to see more camping in the parks. I value using the facilities currently in use, enlarging or upgrading them to serve the ever-increasing tourist population. I would like to preserve the rural flavor of our area while providing healthy, low-impact eco-activities year round. Adding interests to the park that compete with already established local businesses will only add to the distrust many locals have for the entities that oversee our beautiful parks.

Thank you for the opportunity of share my ideas and concerns with you.

Sincerely,



Natalie Schaefer, M.S.

## COMMENTS

## RESPONSES

(Comments to Redwood National and State Parks regarding the Draft General Management Plan)

### North Area

#### Jedediah Smith Redwoods State Park

- Park Entrance: Maintain as is.
- Campground: More sites are amenable, *but they should be primitive sites. Those sites presently located within sensitive areas should be removed, and the site rehabilitated.*
- Howland Hill Rd.: Maintain as is. *Control erodable areas.*
- Aubell Ranch Operations Area: Maintain as is, relocating other operations as necessary.
- Stout Grove: Make minor improvements to access road and parking. *Do not enlarge the road, or develop new parking areas.*
- State Park Wilderness: Create.

#### Visitor Facilities

- Hiouchi Information Center: *Build onto present site. Provide a pedestrian culvert to shuttle visitors safely across the road.*
- Jed Smith Visitor Center: *Maintain as is.*

#### Camping

- New campgrounds and new sites should be primitive and located out of sensitive areas, and avoid unnecessary tree removal.*

### Prairie Creek

- Elk Prairie Campground: More sites are amenable, *but they should be primitive sites. Those sites presently located within sensitive areas should be removed, and the site rehabilitated.*
- Cal-Barrel Rd.: *Obliterate road and convert to a trail.*
- Vehicles on Beach: Enforce regulations prohibiting off-road vehicle use. Continue off-road vehicle use for commercial surf fishing by nontransferable annual permit only. Renew only permits issued in 1996, and issue no new permits. Continue permits for American Indian traditional uses.
- Fern Canyon: Move the parking area out of the wetlands, *but keep the road accessible to all traffic.*
- Newton B. Drury Parkway: Moving road to another area will only damage another area. Maintain as is.
- State Park Wilderness: Create.

#### Camping

- New campgrounds and new sites should be primitive and located out of sensitive areas, and avoid unnecessary tree removal.*

Primary Visitor Center: *Tribal governments or a private entity, in cooperation with RNSP staff, should construct a visitor center near the parks. Do not build a lodge, as it will compete with businesses already established, and will add congestion and pollution to the area.*

Davison Rd.-Gold Bluffs Beach: Maintain as is. *Control erodable areas.*

## COMMENTS

## RESPONSES

**Pralrie Creek, continued**

Greater Coastal Drive: Maintain as is. *Control erodable areas.*

CDPR Facilities: Remove out of the prairie if moving to an area of low sensitivity, or combining with another facility.

**Bald Hills Area**

Redwood Creek Basin: Restore parklands disturbed by commercial logging and associated road building, mostly in the Redwood Creek Basin.

Tall Trees Grove and Lady Bird Johnson Grove: *Maintain as is.*

Tall Trees Access Rd.: Keep as unpaved road, with access only by permit.

Bald Hills Rd.: *Develop and maintain as low-speed, unpaved gateway to diverse natural and cultural landscapes.*

Camping: Construct no vehicle accessible campgrounds in Bald Hills. Provide primitive campsites *located out of sensitive areas. Avoid any unnecessary tree removal. Do not build a road into this area.*

**Del Norte Area**Del Norte Coast Redwoods State Park

-Access Road: Provide alternative road access.

-Campground: *New campgrounds and new sites should be primitive and located out of sensitive areas.*

Camping: *New campgrounds and new sites should be primitive and located out of sensitive areas, and avoid unnecessary tree removal.*

Visitor Center: *Do not build a small VC near Mill Creek campground.*

Ender's Beach Rd.: Convert to day use to resolve public use and resource degradation issues.

Requa Maintenance Facility: *Maintain primary NPS maintenance facilities at Requa.*

Crescent Beach: Relocate road, parking, trails, and restrooms out of wetlands.

*Maintain existing numbers of such facilities. Construct an amphibian culvert connecting pond areas.*

Vehicles on Beach: Enforce regulations prohibiting off-road vehicle use. Continue off-road vehicle use for commercial surf fishing by nontransferable annual permit only. Renew only permits issued in 1996, and issue no new permits. Continue permits for American Indian traditional uses.

Crescent Beach Education Center: Retain for interpretive offices.

Crescent City Cultural Center: *Move information center presently located in the main RNSP building to the Cultural Center. Provide year-round recreational opportunities (i.e. Jr. Rangers, nature crafts, speaker forums) utilizing the park and beach area adjacent to the center, and use this facility as a starting point for traveling interpretive tours.*

COMMENTS

RESPONSES

**South Area**

Freshwater Spit

415-B

*-Visitor Use: Restrict RV camping to single row along highway on the north end of the beach. Allow tent camping on south end of beach. Maintain a separation between the camping areas, providing a viewshed along the highway. Designate and enforce length of stay limits. Charge a use fee, provide a part-time ranger, and research composting toilets for the area.*

*-Vehicles On Beach: Enforce regulations prohibiting off-road vehicle use. Continue off-road vehicle use for commercial surf fishing by nontransferable annual permit only. Renew only permits issued in 1996, and issue no new permits. Continue permits for American Indian traditional uses.*

*Jet Skis: Do not allow jet skis on any lagoon in the park.*

*Redwood Information Center: Retain the center. Consider partnering with a private entity.*

*Redwood Creek Estuary: Partially restore the Redwood Creek estuary ecosystem while maintaining, to the extent possible, current land uses.*

*South Operations Center: Retain.*

415-B See summary comment A.

COMMENTS

RESPONSES

Superintendents  
Redwood National & State Parks  
1111 Second St.  
Crescent City, CA 95531

October 19, 1998

Re: Draft, General  
Management Plan  
Primary Information  
Center

Dear Superintendents:

I wish to object to the moving of the existing information center from the present location south of Orick on Highway 101.

416-A

My objections are as follows:

1. The existing location is easily accessible from both north and south bound traffic.
2. The Mill B location, which I am very familiar with, is a bad location for access from either direction. To have a safe location there would require a major intersection which would encroach on a business and the elk pasture on Davidson Road.
3. The existing location has a wonderful access to the beach. For some travelers, this is their only good access to beach. Not every traveler is equiped to walk the other beaches. Handicapped people have a nice boardwalk to enjoy the beach.
4. Why tear up and rebuild something that works well.
5. It is almost impossible to salvage the redwood in the exisiting Orick information center. Where will you find quality redwood for a replacement center at Mill B? You should be in the business of pre-serving that old growth material.

OCT 21 11:24

Very truly yours,

*Frank F. Schmidt*  
Frank F. Schmidt

416-A See comment A in Janis Crandall's letter.

COMMENTS

RESPONSES

RECEIVED  
SEP 14 1998  
Sept 7, 1998

ARCATA OFFICE

Dear Sir,  
Thank you for the opportunity to review the Draft General Management Plan/General Plan. I have a deep appreciation for these parks and have spent countless hours hiking the trails, taking Ranger led Field Seminars and showing my relatives the area.

417-A

The Draft does not explain the extravagant cost of closing the present Redwood Information Center. Does it have something to do with the Redwood Creek watershed? Why in the world was the Center built there if this was a problem area? It saddens me to see taxpayer dollars misspent.

The Draft does not explain how you will "manage visitors". Here is hoping you can come up with a less ominous and more customer friendly description. I presume this relates to the need to limit human impact on the delicate natural wonders of the park. It's my greatest hope that you will find a way to pave Bald Hills Rd. I have damaged my car driving this rough road. In this way you have, in effect, "managed" visitor use by making access extremely unpleasant. Please find another way to "manage" visitor use!

Thank you for the care and concern shown in this report.  
Nancy Schwarz (Nancy Schwarz)

417-A See response A in Janis Crandall's letter.



COMMENTS

RESPONSES

FORMAL RECORD COMMENT FORM

Redwood National and State Parks / General Management Plan/General Plan/EIS/R

This form may be used to submit comments for the official record at public open house meetings, or it can be mailed by October 9 to the Superintendents, Redwood National and State Parks, 1111 7th St., Crescent City, CA 95531. Comments may also be submitted in a separate letter to this address, or they can be sent as a letter via electronic mail to: redwplan@nps.gov.

Date: 9-10-98 To avoid our misreading your comments we request that you print if possible.

To: Superintendents, Redwood National and State Parks

From: RON SIMMONS (name) [redacted] (address) [redacted] (zip)

422-A

TO KEEP FISH IN ESTUARY LONGER  
INSTALL STAINLESS PIPE BYPIPE RUN PIPE OUT IN OCEAN  
OCEAN TO DRAIN OF EXCESS WATER TO KEEP FISH  
IN LONGER.

422-A The National Park Service and the California Department of Parks and Recreation believe that it is neither cost-effective nor practical to design a plumbing system to connect the estuary to the ocean in a manner that will drain water from the estuary during low flow periods while maintaining a sufficient quantity of good quality rearing habitat for salmonid fishes. A previous attempt failed when the culvert filled with sand at high tide. It is NPS policy to attempt to restore natural conditions and processes in areas such as the Redwood Creek estuary that have been altered by human intervention rather than to develop engineering solutions specifically to solve problems created by previous human intervention. The estuary is an extremely dynamic system affected both by flows in Redwood Creek and the tides, waves, and storms of the Pacific Ocean. The aquatic biota of the estuary evolved in concert with this dynamic physical system. Additional alterations to the physical system would be extremely expensive, will not restore the conditions under which the biota evolved, and may not be effective because of tidal action and the dynamic and unpredictable action of ocean waves and stream flows.

Multiple horizontal lines for additional comments.

OPTIONAL  
ADDRESS  
CITY  
STATE  
ZIP

COMMENTS

RESPONSES

FORMAL RECORD COMMENT FORM

Redwood National and State Parks / General Management Plan/General Plan/EIS/R

This form may be used to submit comments for the official record at public open house meetings, or it can be mailed by October 9 to the Superintendents, Redwood National and State Parks, 1111 2nd St., Crescent City, CA 95531. Comments may also be submitted in a separate letter to this address, or they can be sent as a letter via electronic mail to: redwplan@nps.gov.

Date: 9-8-98 To avoid our misreading your comments we request that you print if possible.

To: Superintendents, Redwood National and State Parks

From: RON SIMMONS (name)
[Redacted] (address)
[Redacted] (zip)

I DON'T WANT TO SEE OUR BEACHES CLOSED TO COMMERCIAL FISHING AND WOOD GATHARINGS

RECEIVED
REDWOOD NATIONAL PARKS
SUPERINTENDENT
ARCATA OFFICE
ARCATA, CA

COMMENTS

RESPONSES

Author: [REDACTED]  
 Date: 10/5/98 11:32 AM  
 Priority: Normal  
 TO: Aida Parkinson at NP-REDW-ARCA, carol\_bryan@nps.gov at NP--INTERNET  
 Subject: Redwoods Newsletter 1 Comments

Name: Garey W. Slaughter  
 Email: [REDACTED]  
 Address: [REDACTED]  
 City, State/Province: [REDACTED]  
 Country: [REDACTED]  
 Postal Code: [REDACTED]

I support the general goals of the biological and cultural portions of the Redwood general management plan, but I think the visitor use portion of the plan is insufficient to meet the needs of the interested public and the local communities. Efforts to rehabilitate and restore second growth stands of redwood forest to old growth conditions are definitely worth the effort, although it will take a long time.....we have to start somewhere. Restoring old roadbeds appears to be working.

424-A

The plans to enhance visitor use should be improved to allow more intensive use of some small portions of the park, in particular the "front country" areas. The parcel of land on the North Bank Road in Del Norte County, between the golf course and the Smith River, could be very useful for such an intensive use area. You really need to allow some development on front country parcels such as this one. I do research at Yosemite Valley on a regular basis, and I think intensive developments have worked there for the most part, except for holiday weekends, when things get too crowded. Some ideas follow for development of the front country parcel on the North Bank Road:

- a) build an old-fashioned ferry across the Smith, at the location of the old Peacock ferry;
- b) restore the anadromous fisheries habitat in Peacock Creek, which runs right through the parcel;
- c) build the new visitor information center there.....this would coordinate with the ferry and the stream habitat restoration project, which would make a fine nature walk/demonstration area/history exhibit near the visitor center;
- d) build the "destination lodge" there.

I do hope the park service will show some flexibility on the park development issue. Local communities such as Crescent City and Orick deserve the opportunity to enjoy increased economic benefits from tourism which were lost when private timber lands were taken out of forestry/lumber production. Allowing development of small and conveniently located parcels such as the North Bank Road parcel would allow this without disturbing the ecological integrity of the main parts of the park.

Regards,  
 Garey Slaughter

REDWOOD NATIONAL  
 AND STATE PARKS  
 RECEIVED  
 10/10/98  
 ARCATA OFFICE  
 ARCATA, CA

424-A The plan allows for appropriate kinds and levels of development outside of sensitive resource areas, and the Northbank Road area in Del Norte County will be assessed to determine if development would be appropriate in this area. The area has potential for new trailheads, campgrounds, and other visitor facilities. Future development in the parks will require another level of detailed planning with public involvement.

COMMENTS

RESPONSES

27 October, 1998

Superintendents  
Redwood National and State Parks  
1111 Second St.  
Crescent City, California 95531

Dear Mr. Ringgold and Mr. Sermon,

I appreciate the opportunity to review and comment on RNSP's Draft General Management Plan, and, having read most of the tome, I am grateful for the extended deadline too. Although I realize a great effort was put into developing and producing this plan, I do have a series of questions and comments relating to a variety of issues discussed in the plan. Please forgive me if I ask a question that is in fact addressed somewhere in the plan; while I did try to read it carefully, I admit I may have missed something here or there. At the end of my comments, I have included a summary of my own "preferred alternative" actions.

COMMENTS PERTINENT TO ALL ALTERNATIVES

Watershed Restoration

In some ways this plan gives extremes of choice among alternatives (e.g. visitor use and access between alternatives 3 and 4), but in other ways there is little difference among all alternatives. In what I consider one of the most important issues, watershed restoration, it seems landform restoration is in essence a sacred cow--there is no real alternatives presented to it in any of the alternatives. I do realize that the goals watershed restoration is meant to achieve are a major legislative emphasis of the national park. However, why is landform restoration in the parks the only possible choice given in the plan? For instance, a reasonable alternative might be to propose the fastest possible treatment of in-park roads by the same method being used successfully upstream--erosion proofing and decommissioning without landform restoration. I believe one of the goals of a plan such as this one is to provide a wide array of alternatives. In the matter of watershed restoration, I do not believe this has been achieved in this document.

In similar vein, why isn't any sort of real dollar estimate given for comparison between watershed restoration techniques (cost per mile)? I realize that the amount and cost of work involved in rehabilitating abandoned roads varies with the conditions of each road, but I do think that given the amount of work that has been done by park staff and others that some sort of range or average estimate (given with disclaimers as to the range) could be provided and is in order here. I think everyone knows that exact numbers are impossible, but total estimates are given for this program and other proposals later in the document, so there must be some idea of overall costs associated with these methods. I believe it would be in the best interest of decision-makers and the public reviewing the document for a more useful cost comparison between landform restoration (complete and partial) and road decommissioning/erosion-proofing. The comparison provided in Table 2 (p. 30) is virtually useless, since it gives no indication of whether the cost differences are orders of magnitude different (and if so, on what scale), modestly different, or what. If the public is to make judgements on issues as big and costly as this one, it seems essential to give some fiscal estimates as are given for many other items in the document.

What is the average frequency of occurrence of past storm events of sufficient magnitudes to cause significant erosion from untreated roads? Knowing that timeframe (and understanding that it is strictly a probability) might be very useful in determining whether the parks will likely have the time to treat even the majority of in-park roads using the current rate (alternative 2) or even the speeded up rate (other alternatives) of landform restoration. Given the enhanced rate of treatment for decommissioning/erosion-proofing (as opposed to either form of landform restoration), could treatment of the majority of abandoned roads be achieved in the likely window of opportunity? The answer to this question might make the choice more clear. Above and beyond noise restrictions imposed in the last five years, a main reason watershed restoration taking so long (25 years already plus a minimum of 17 more in the alternatives) because of the focus within the park on the more costly and time-consuming landform restoration

535-A Alternative 1 describes the RNSP staffs' preferred plan for watershed restoration. We recognize, however, that it may not always be possible to reach these goals. Achieving the management strategies of alternative 1 would require significant increases in available funds for watershed rehabilitation. In the absence of increased funding, managers would exercise the flexibility necessary to achieve the highest priority projects. At the discretion of RNSP managers, and in consideration of available resources, the level of erosion control and restoration work within the national park may vary from the parks' preferred technique of partial landform restoration to road decommissioning and erosion prevention. However, the preferred technique would be implemented whenever possible given adequate fiscal and personnel resources. Similarly, watershed restoration activities might be directed at any time from erosion control work within the national park to erosion control or related efforts in the upper basin. The future erosion control and disturbed lands restoration plan will explore more detailed site-specific implementation priorities for watershed restoration activities.

535-B

ESTIMATED COSTS FOR IMPLEMENTING WATERSHED RESTORATION ALTERNATIVES

	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
<b>IN-PARK PROGRAM</b>				
Roads treated (mi./year)	9.5	2	9.5	Same as alternative 1
Minor roads treated (mi./year)	Limited	None	99	Same as alternative 1
Estimated Costs /year*	\$640,000	\$160,000	\$2,320,000	Same as alternative 1
Years to complete	16.7	66	Same as alternative 1	Same as alternative 1
<b>UPPER BASIN</b>				
Roads treated (mi./year)	40	4	Same as alternative 1	Same as alternative 1
Costs/year*	\$536,000	\$40,000	Same as alternative 1	Same as alternative 1
Years to complete	17	227	Same as alternative 1	Same as alternative 1

\* The costs associated with implementing the watershed restoration alternatives include costs of contracting only and do not include the costs of additional technical specialists that would be required to oversee the work.

535-A

535-B

535-C

## COMMENTS

## RESPONSES

535-D

method? Doesn't the longer treatment takes increase the chance of landslides, etc from big storm events on completely untreated abandoned roads? What about addressing these impacts in the plan?

535-E

Since 85% of erosion potential is from roads upstream of the parks (p. 38), why does so much of the financial resources and emphasis remain on total landform restoration instead of simply decommissioning most roads in the park (which, if my arithmetic is correct, even if they fall will only contribute 15% of the sediment that the upstream roads will), and focusing on cooperative efforts upstream instead where it will do the most good?

535-F

Photos p. 50 are somewhat misleading. They seem to be intended to show the problems with abandoned roads if not treated; however these roads (West Side Access Road, /M-Line) are not abandoned roads, but roads that are still in use by the parks....So what it really shows is that RNSP is not satisfactorily maintaining its own currently used roads.

535-G

**Second Growth Management (all alternatives but #2)**

In commercial forestry, thinning and other treatments are, I believe, conducted well before trees are 25 years old (currently the minimum age of second growth forest in the parks). In terms of all treatments (except perhaps modification of species composition), is it considered likely that a decent benefit can be achieved starting with second-growth forest at this late stage in their cycle? Furthermore, by all estimates in this plan, by the time the majority of these stands are treated, they will be 70 or more years old. Is there any silvicultural precedent on the effectiveness of treating stands (in the proposed methods) at these significantly advanced seral stages? Since the goal is to speed recovery to old-growth characteristics and justified at least partially by anticipated benefits to marbled murrelets and northern spotted owls, I believe these are important questions, not addressed in the draft plan.

535-H

**Artificial Impoundments :**

With regard to restoring salmonid habitat by removing the dam there, how important was Richardson Creek to spawning salmonids prior to impoundment? What additional (above current levels of use) use by spawning salmonids be anticipated in the amount of stream channel that would be restored?

I believe the proposals in all alternatives do not adequately address the value and importance that some of the "artificial" wetlands and aquatic systems proposed for removal have in the environment now. In the past, perhaps their ecological values might not be as greatly missed, but now with the bulk of California's wetlands lost to human-induced changes in the environment, each functioning wetland, regardless of its origins (natural or artificial) can be important in the overall integrity of maintaining the natural distribution and biodiversity—a fact recognized legally in federal "no net loss" policies. Page 243 states correctly that NPS policy is to strive to achieve a net gain of wetland acreage. That being so, why are the parks steadfastly proposing to remove artificial impoundments that have created or expanded wetlands? As far as I can tell, removal of these impoundments and restoration of stream channels would necessarily result in significant reduction in wetland acreage at these sites; how does this fit with NPS policy of net-gain in wetlands?

The two artificial wetlands/aquatic habitats that are discussed in the text of the plan (and there are others) are significant and isolated from other such habitats. And contrary to statements in the plan, populations of at least several amphibian species would not only be displaced during transformation to another type of wetland/aquatic habitat (stream channel), but would be completely exterminated (unable to survive either the "restoration" process or the new type of habitat to be created). These species require calm water, not fast streams, in which to live and or breed. At least several pairs of wood ducks breed successfully at Marshall Pond (and are a big attraction for birders and other recreationists) virtually every year. Where else locally do they breed successfully on a regular basis? How much of an impact on local (and regional) wood duck populations would the removal of breeding and rearing habitat at Marshall Pond present. These areas are also home or foraging areas to numerous wetland-associated bird species, not just waterfowl; and again, some of these species are associated with large, open, slow-moving waters, but not the forest streams that would replace Marshall Pond and Lagoon Creek. I would also suggest, that given the presence of the other bird species at these sites, that these areas could be foraging habitat for peregrine falcons, which certainly would not be there if the ponds were replaced by closed-canopy stream channels. Although other open water bodies exist in the region, most are open to motorized watercraft and other activities which present significant disturbance

### Calculations of Cost Estimates for Treating Roads in the National Park in the Redwood Creek Basin

Initially there were 415 miles of major roads within the national park that were being considered for removal. From 1979 to 1997, the staff had removed about 190 miles at a cost of about \$13 million for site-specific rehabilitation only, at an average cost of \$68,421 per mile. Of the remaining 225 miles being considered, 155 miles have been prioritized for removal. Final decisions about the remaining 70 miles of roads are being delayed until treatment of the 155 miles has been completed.

Based on funds available for watershed rehabilitation contracts in 1998 — \$160,000/year for work within the national park -- about 2.34 road miles per year could be removed. Therefore, at the 1998 level of funding, it would take 66.24 years to remove 155 miles of road. It is assumed that 66.24 years is unacceptable (too long to wait). Funding needed to speed this process along, using various multiples of the existing contract funding (\$160,000), were calculated as follows:

MULTIPLICATION FACTOR FOR EXISTING FUNDING	TOTAL ANNUAL FUNDING	MILES PER YEAR THAT COULD BE TREATED	COMPLETION TIME (IN YEARS)
X1	\$160,000	2.34	66.24
X2	\$320,000	4.68	33
X3	\$480,000	7.02	22
X4	\$640,000	9.35	16.6

The multiplication factor that would achieve the necessary work within a time period that is more likely to precede the 25 year flood is X4 — which serves as the basis for alternative 1. Alternative 2 is represented by X1, and alternative 3 is represented by X4. Alternative 4 is equivalent to alternative 1.

The costs of treating minor roads (skid trails, etc.) was calculated as follows:

COMMENTS

RESPONSES

to these species, or which are inhabited by nonnative species (like the bullfrog) which negatively impact native species, and which may preclude their occurrence at these other sites? Given the red-legged frog situation (p. 179), it would be important to retain breeding habitats for them where they exist in the parks, and which these impoundments are likely to be; this is not mentioned in discussion sections on artificial impoundments. Although much smaller in size, some of the remaining stock ponds in the Bald Hills and impoundments created by roadbuilding and logging activities also have populations of amphibians or other wildlife that are dependent on these habitats. They would not be "displaced" by removal of the wetlands, but completely exterminated (as were entire populations of salamanders when the C-Line pond was removed in the park). Ponds are also a prime foraging area for bats of many species. As far as I know, no studies to determine their use by bats (and by which species) have been conducted at any of these sites proposed for removal. How will the parks address impacts, for instance to Townsends big-eared bats (and other bat species) that may use these areas?

535-I It seems to me that the question is which is more important--whether each wetland is of natural or human-induced origins, or whether it contributes to the overall natural functioning of the system? If it is true that wetlands are of value (as federal and NPS policies indicate) then I think it is prudent to avoid making black & white decisions that artificial wetlands in the parks should be removed simply because they are man-made. Just because an impoundment is artificially created or transformed does not mean the plant and animal communities that have developed there are not native, natural, and worthy of protection.

535-J The safety issues regarding the artificial impoundments in the parks are not made clear in the plan. If the dams fail, what realistically is the risk to public safety (e.g. what areas/populations might be affected and to what extent)? Is it possible to monitor and repair these dams as necessary to retain these wetlands? Although some NPS policy justifying removal of artificial impoundments is cited in the plan, I know that at least several years ago there was no clear NPS policy regarding artificial wetlands. However, in an NPS Wetlands Classification, Identification, and Compliance Workshop, the NPS Water Resources Division staff provided materials stating that while NPS Floodplain Management and Wetlands Protection Guidelines do not specifically address the question of whether artificial wetlands are subject to compliance with the Guidelines, "The recommended course of action is to assume that artificial wetlands are subject to the Guidelines. In making decisions regarding actions affecting artificial wetlands, managers should weigh such factors as ecological functions and values served (including T&E species issues) against such goals as restoration of historic scenes or removal of preexisting or outdated water control and supply structures." (Bold mine). Unless policy has since been established that is clearly contrary to the above information, I would argue that while the currently existing wetlands and associated aquatic habitats at Marshall Pond and Lagoon Creek (and perhaps elsewhere in the parks) are certainly different from those that would have existed without human intervention, they are not degraded, and therefore should be retained rather than replaced.

(I personally would be thrilled if the parks focused instead on removing the rampant ivy (exotic pest) from the vicinity of Marshall Pond instead of removing Marshall Pond).

Wildlife/T&E Species

535-K I am concerned that the parks have so little in the way of monitoring and evaluating effects on wildlife of the large, landscape-level treatments and management activities that it has already implemented and those proposed for implementation. I think the parks do an effective job of monitoring geologic/hydrologic conditions and impacts, but unless things have changed drastically in the last 3 years, impacts of treatments and management activities on wildlife is minimal to non-existent. For example, even though prescribed burning of prairies has been going on for nearly a decade (if not longer), to the best of my knowledge monitoring of impacts to the most vulnerable wildlife species (e.g. herpetiles, rodents, etc) were not instituted until this year (thus precluding collection of real baseline data). I am very concerned that more large-scale treatments and management activities as are proposed in this document will simply be carried out without adequate monitoring or evaluation of their "side-effects". How can this be addressed?

535-L One of my concerns with this plan is that there is no consideration of wildlife (impacts to or enhancements for) unless they are ESA/CESA listed T&E species. Even rare and sensitive species, although listed in Appendix H

The cost to treat 1 mile of minor (skid) roads was assumed to be approximately 75% less than the cost of treating a larger road and was estimated as \$68,421/mile of larger road x .25 = \$17,105/mile of minor road.

Initially there were about 3,000 miles of minor roads that were being considered for treatment. Because we have treated 190 miles — 46% — of the 415 total miles of major roads within the national park, it was assumed that it is not feasible to treat 46% of the minor roads because they were either treated in connection with treating the major road that they connected to or they cannot be accessed because the major roads that access the minor roads no longer exist. That leaves approximately 54% of 3,000 or 1,620 miles of the remaining minor roads that are left to be treated. If it costs \$17,105/mile to treat a minor road, then 1,620 miles x \$17,105/mile = \$27.71 million would be needed to treat the remaining minor roads within the national park within Redwood Creek.

Calculations for alternative 3: If, based on alternative 1, we want to be done in 16.6 years, we will need to treat approximately 98.6 miles of minor roads per year at a cost of \$1.66 million/year in addition to the funding needed for major haul roads (\$640,000).

**Calculation of Upper Basin Cost Estimates**

There were about 1,100 miles of road in the upper basin in 1998, of which an estimated 85% were built before the existing California Forest Practice Rules. Therefore, it is assumed that 935 miles (85%) of the total upper basin road mileage that needs some level of treatment. About 24 miles of road have been cooperatively treated as of 1998, leaving 911 miles left to treat.

The costs of road erosion prevention treatments for the upper basin are at least 20% to 40% less than for in-park treatments because erosion control, the restoration approach that would be used, would be cheaper than the total landform restoration approach that would be used in the park. That means that the average cost/mile for erosion control on roads in the upper

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535-M

(p.418-9) are not treated in the document with regard to impacts or anything else outside of the Affected Environment section. The only other mention of wildlife in the plan is in reference to wetlands, and is extremely vague. Bear, elk, amphibians in general, riparian species are all either major visitor attractions, potential major problems, or sensitive--and they receive no coverage at all. Impacts to such species are extremely likely in some of these proposals, so why is no consideration given to wildlife in this document, except those (i.e. T&E species) absolutely required by law? My concern partly stems from the belief that given the realities of funding, if they (e.g. sensitive but not yet threatened species) do not receive coverage in the GMP, they have little chance of receiving

535-N

funding later on. I am not suggesting that each species be discussed individually, but that objectives and goals be included that at least provide some insight into the parks' intent with regard to wildlife conservation. For example, On page 52 for Cultural Resources that states that the program would be expanded "from one project and compliance based to one that includes comprehensive study". Since the wildlife program at the parks suffers from the same problem (being compliance oriented) stated for Cultural Resources, what about alternatives that expand the Resource Management program to include an objective for wildlife resources (including T&E species) similar to that quoted above for cultural resources? In fact, some of the other issues listed on page 52 for cultural resources also apply to wildlife in the parks, such as inadequate protection and the challenge to protect them while providing for their interpretation; inventory, evaluation, and documentation of parks wildlife is incomplete, etc. I also think that the sections on impacts should be more inclusive. Rather than sections that deal only with T&E species, the general heading should be Impacts to Wildlife, with T&E being one important component.

535-O

T&E, Sensitive, and Rare Species. The plan appears to propose only to do the minimum required by law of a federal agency with regard to T&E species and issues (e.g. page 31), especially non-fish species. What about protecting and enhancing nesting habitat for peregrine falcons (see comment below for page 37)? At the very least, establishing a long-term monitoring program to the ascertain and address the impacts of treatments and management activities including development and visitor use would be appropriate. And what about protecting (and enhancing habitat for) rare and sensitive wildlife species in the parks (p. 418-419) that are not listed but which are headed in that direction?

535-P

Impacts on rare and sensitive species (listed in Appendix H, p. 418-9) are not addressed at all. And although several additional avian T&E species are present in the parks (listed in Appendix H, p. 416), generally only impacts to murrelets and spotted owls are addressed. I have mentioned some specific examples under the various alternatives, but the T&E impacts sections should be re-examined for these omissions. One example is that it does not appear that coastal bluffs are seriously considered to be sensitive habitats in this plan, even though some of these areas have been identified as high quality peregrine falcon nesting habitat by park staff (see report by Dame and McGuire in Wildlife Branch files). Since peregrine falcons are known to nest in the parks, coastline impacts with regard to peregrine falcons should be discussed in the GMP; in particular, proposals for continued mechanized access along coastal bluffs and adding campsites along the coast should be addressed, and consideration should be given to moving existing facilities back from the bluffs (see Draft Peregrine Falcon Management Plan in Wildlife Branch files for details).

535-Q-R

What is the timeframe considered for short-term versus long-term impacts/benefits to T&E species? Throughout the document, there is much discussion of (potential) long-term benefits from watershed restoration to spotted owls and murrelets (which I question), but little attention is given to the fact that some of the roaded areas to be treated have already acquired a closed canopy since the roads were abandoned (e.g. in the Skunk Cabbage Creek drainage for instance). While these linear areas of younger forest are not currently suitable nesting habitat for either spotted owls or murrelets, they do form a forested canopy and most likely a barrier which nest predators cannot penetrate to reach nesting areas in nearby areas. The plan does not address the impact of removing canopy of 30-40 year old (or more) stands that may have developed in/along road corridors since they were abandoned, or to removal of trees (some of which are large, old trees) to gain access (for heavy equipment) to restoration sites. These activities may re-open corridors for nest predators which will then take another 30-40 years to close again into any semblance of a forested barrier. Shouldn't these habitat modification impacts be addressed in sections with watershed restoration proposals?

535-S

Additional General Comments  
p.35-6. Given the significance of these parks to T&E species and given the impact these species' presence can have

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basin would be \$41,052/mile (\$68,421/park mile x .6 = \$41,052/mile). Because the within-park treatment costs per mile are averaged over the entire period of the program to date and include treatments that far exceed what upper basin treatments might be, a cost of \$10,000/mile for upper basin treatments was used for the calculation. This figure is further justified because RNSP staff would usually be participating in a joint venture with a landowner or state or federal agency and not unilaterally funding the entire project, as we are within the parks. (The average rate of treatment has been 4 miles/year through 1998). If RNSP staff can maintain at least \$40,000/year for upper basin projects, approximately 4 miles/year could be treated (**Scenario A**, below).

If we want to treat up to 20 miles/year we would need \$200,000 year. At this rate it would take us 45.6 years to treat the existing upper basin roads (**Scenario B**, below).

If the treatment of upper basin roads were to more nearly coincide with completion of within-park roads, more miles per year would need to be treated, at increased total costs. For example, RNSP staff could treat the upper basin within 23 years for \$400,000 per year (**Scenario C**, below). To complete treatment of 911 miles of upper basin road within 17 years (which mostly closely corresponds to completion timeframe for within park treatment), we would need to treat 911 miles - 17 yr. = 53.6 miles per year. The cost would be 53.6 miles per year x \$10,000 per mile = \$536,000 per year (**Scenario D**, below).

UPPER BASIN TREATMENT SCENARIOS

SCENARIO	A	B	C	D
Roads treated (mi.)	4	20	40	53.6
Cost	\$40,000	\$200,000	\$400,000	\$536,000
Years to complete	227	45.6	23	17

**Scenario D** was selected as the preferred alternative for the upper basin because its timeframe corresponds most closely with the 16.6 years required for roads within the national park's Redwood Creek basin.

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on park management activities, wouldn't it be a good idea to include a T&E Management Plan as one of the future action plans needed? (I know one was in the works awhile ago, what happened to it?).

535-T

-p. 37. I strongly concur with the proposal that new uses and facilities be required to be low impact in areas with sensitive resources, as stated here. However, aside from moving the Crescent Beach picnic facilities out of wetlands, little attention seems to be given to existing facilities and their appropriateness in sensitive resources. For example, I would refer you to the report by Dame and McGuire (in Wildlife Branch files) identifying high quality peregrine falcon habitat in the parks, and to the draft Peregrine Falcon Management Plan (authored by myself, Dame and McGuire, also available from Resources Management Division) which identifies sensitive resource areas along the coastline and provides recommendations with regard to facilities and visitor use in these areas.

-p 38. While I support objective 1 as far as it goes, why is it restricted to resource management efforts rather than all park management activities?

-Although the RNP Bear Management Plan is not mentioned (or cited in the list of plans) in this document, I believe it does have bearing (so to speak), especially with reference to facilities development and visitor use.

535-U

--Certain biases seem to show throughout the document. For instance, in Alternative 4 under Bald Hills Road heading (p. 124), it states that "Through-travellers would enjoy a unique alternative route to the scenic Klamath and Trinity River corridors and the Hoopa Reservation.", which is true. However, it is equally true of Bald Hills Road under Alternative 3, but is not mentioned there at all--adding to the reader's feeling that Alternative 3 strips the parks of most benefits to visitors. There are many other examples where it seems the document is "slanted" due to wording or omissions. Throughout the document, references to T&E species often suggest what a pain they are to deal with, and how their presence impacts park actions. Nowhere does it talk about how fortunate we are that the parks do have suitable habitat for these species, and that people to be able to visit a place (these parks) where these creatures still exist in their natural environment.

535-V

All of the alternatives reference the appendices (P. 409-10) with trail plan information in them. But the information is probably useless to many readers because no maps are provided showing at least general outlines of where the trails routes would be. (The actual trails plans (with maps) are not generally available to the public reviewing this document.). I suspect most readers are not so familiar with the topography of the parks that they know where all the features used to describe the trail routes are, and can't visualize their location from the descriptions. Thus, they may be unable to adequately review/comment on the trails portions of the alternatives. It would be useful if maps of the various trails to be constructed under each alternative be provided in the document.

535-W-X

**COMMENTS REGARDING ALTERNATIVE 1**

In addition to acquiring baseline information and monitoring on "environments", it would be appropriate and important to acquire baseline information and monitor certain individual species, particularly prior to, during, and after management actions and treatments. Evaluation on effects on non-target populations is important (see comments above (my p. 3-4) under Comments Pertinent to All Alternatives on this subject). It also would be appropriate to have an objective of protecting and enhancing T&E and sensitive species, and working toward bioregional connectivity and viability for these species. Regarding objective #1 at the top of page 38, the redwood forest ecosystem is stated to be "the prime resource of the parks". However, my understanding is that preservation of other ecosystems (e.g. seashores) were also cited in the enabling legislation for the national park(p. 370). Why aren't these communities/habitats also considered "prime resources" in this statement? And why are only resource management efforts to be consistent with and supportive of perpetuation of the redwood forest ecosystem? Why aren't all park activities included? (they certainly have at least as much affect potential as resource management activities do).

535-Y-Z

535-AA

Watershed Restoration (pages 38 and 48)--Same comments on this issue as described above under Comments Pertinent to All Alternatives (my p. 1-2). P. 38 and 48. In particular, see my comments above regarding rate of

**535-C** The probability of a flood of any recurrence interval remains the same for each year; however, the probability of a flood occurring within a given time period increases as the time period becomes longer. The probability of a damaging (25-year recurrence interval) flood occurring on Redwood Creek has increased each year since the last flood in 1975, and is currently equal to approximately 0.60.

Several major floods have occurred on Redwood Creek during the past 150 years. Recent floods occurred in 1953, 1955, 1964, 1972 (two floods), 1975, and 1997. The peak discharges of these floods were remarkably similar, ranging from 45,300, to 50,200 cubic feet per second (cfs). The small range of these flood peaks suggests that watershed physiography limits the peak discharges, though not the volumes, of floods near the mouth of Redwood Creek. Although disagreement exists, it is estimated that the 1955 flood had a recurrence interval of 25 to 30 years and the 1964 flood 45 to 50 years.

Floods in 1861-62 and 1867 were apparently as large or larger than the 1964 flood, although little is known about their effects on watershed conditions. Between 1975 and 1996, no large floods occurred, and intervals of annual peak flows were five years or less, until the larger 1996-97 event. The highest peak flow between 1975 and 1996 occurred in 1986, having an estimated recurrence interval of four to five years.

The storm of New Year's Eve 1996 and New Year's Day 1997 produced a moderately high peak streamflow at Orick of about 43,500 cfs, a flow with a recurrence interval of 11 years based on existing flood frequency relationships. This was the highest peak flow recorded in Redwood Creek since 1975.

The erosional impact of a storm depends on several factors: The intensity and duration of rainfall, antecedent moisture (how wet the landscape was at the beginning of the storm), the contribution of snowmelt to the floodwaters, and the level of ground disturbance from land use practices. The flood of 1997 activated and reactivated more than 400 observable



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treatment of abandoned roads using landform restoration. Also the statement (in the summary at the front of the document) that there would be no adverse effects on T&E species from watershed restoration is not necessarily correct; reopening currently forested corridors presents potential routes for nest predators.

Redwood Creek Estuary (p. 48). This section states that "a way to ensure the natural ecological functioning of the Redwood Creek Estuary needs to be determined." In fact, ways have been determined, they simply have been, up to this point, politically undesirable (e.g. some of the actions identified in Table 24, page 279). At this point, what needs to be done is implementation, not determination. What will be done instead of breaching if the Corps of Engineers denies breaching permits (which may well be likely now that coho are listed)? If the estuary is restored, improved salmonid runs could provide an opportunity for local residents to provide fishing guide services to visitors. Has this tourism opportunity been included in calculations of beneficial impacts of estuary restoration (this would also apply to alternative 3 too)?

535-AC

Artificial Impoundments (P. 51-52)--Same comments on this issue as described above (my p. 2-3) under Comments Pertinent to All Alternatives.

535-AD

Education and Interpretation. On page 31, under Actions Common to All Alternatives, it states that "original functions, values of each wetland would be restored to the greatest extent practicable." However, in this alternative, the B-Mill deck at Davison is proposed as an example of a site for development into a primary visitor center. Wasn't this site (including the deck) wetlands before being converted to farm/ranch land? On page 56, it states that creating a visitor center here would not impact RNSP resources. But in fact, it undoubtedly would by precluding restoration of wetlands there (an adverse impact) and by promoting increased traffic and human activity around an area now heavily used by elk and other wildlife, and increased disturbance in an area that is immediately adjacent to spotted owl and murrelet nesting habitat. The Davison Ranch Development Concept Plan as described on page 410 states that although a trailhead, picnic area, and restrooms will be constructed on the B-Mill deck, "the large area of asphalt on the deck will be removed, and an old stream channel will be restored." How does this fit in with the idea of this deck as a site for a primary visitor center? Wasn't the deck considered for a visitor center in the Davison Plan and rejected for a variety of reasons? If so, and given the statement above, why is this site being again considered for a primary visitor center instead of being restored to wetlands?

535-AE

P. 56 If the Wolf Creek Outdoor School were to be in operation most of the year, what impact would this have on the surrounding environment? Would there be any time for areas to "recover" from trampling, disturbance, etc? Is the water supply adequate? My understanding is that water is supplied from creeks; would the additional use (particularly in summer) strain the water supply and/or impact aquatic habitats at the source?

535-AF

Public Use, Recreation, and Visitor Safety (p. 58). I support relocation of the Fern Canyon parking area. I also support relocating the road, parking area, and restrooms from the wetlands at Crescent Beach, but I think that it might be appropriate to retain the trails there, if they are used for educating visitors about wetlands. Given the historic problems with vandalism, and criminal activity, I support a policy of day use only at Enderts Beach Road, but wonder how this would work with the Nickel Creek camping area at the end of the road. Would people camping there be locked in behind a closed gate at night? I concur that equestrian use (p. 59) should be retained on the west side of Redwood Creek basin, and that sensitive areas should be protected (equestrian trails and camps re-routed where necessary), but I also strongly concur that equestrian trails should not be provided on the east side of the basin.

I concur with vehicle use restrictions on park beaches (p. 60). There are other areas and local beaches where people can drive recreationally on beaches. National parks are not the place for such activity. It creates disturbance to both visitors seeking the solitude and peace of a beach setting, and to wildlife using shoreline areas (including some threatened, rare, and sensitive species). Nowhere is the issue of removal of large quantities of woody debris on the beaches addressed. This woody debris is apparently an important component of the natural beach/oceanic system (e.g. see *From the Forest to the Sea, the role of large wood*, by Chris Maser and James Siddell), but is largely absent from the beaches of these parks due to human activity. The removal of woody debris is facilitated by vehicle access

landslides identified by the U.S. Geological Survey, Biological Resources Division.

The type and degree of road failures generated by this storm were partly controlled by the nature of the storm. Short-term rainfall intensities were not high. For example, at a high rainfall site, Elk Camp (elevation 2,500 ft.) the maximum 6-hour rainfall intensity was 2.5 inches (only a two-year rainfall event). Consequently, there was very little erosion associated with failure of stream crossings.

Post-storm assessments revealed many road fill failures on abandoned roads. Post-storm road surveys by RNSP staff documented the erosion of at least 170,000 cubic yards of material from road benches. Large failures, concentrated on the abandoned logging roads along Redwood Creek, formed destructive debris torrents that ripped up and entrained downslope soil and vegetation. When this debris was swept into Redwood Creek and its tributaries, trees were uprooted and aquatic habitats were damaged. In the channel, pool depths, which had slowly increased from 1983 to 1995, again filled in after the 1997 flood, although not to the extent of pool filling following the 1975 flood.

These fill failures associated with sidecast road fills were the predominant mechanism for damage to resources caused by the 1997 storm and would not have been significantly curtailed by road decommissioning or stream crossing removal alone.

In many cases it is impossible to detect the locations where such road fill failures will occur. Therefore, the only way to prevent these failures is to completely remove the road. Erosion control alone and/or removing only stream fill crossings would allow the remaining road treatments to be completed faster than complete road removal and would prevent significant volumes of sediment from reaching stream resources, but these techniques would not prevent failures of road benches and accompanying debris torrents.

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to the beaches; if vehicles were not permitted on the beaches, this issue would likely be moot since there would be no easy way to haul it out. Legislative history of enabling legislation for the national park states that commercial and sport fishing are to be permissible activities, but does it stipulate that motorized vehicle use is to be permitted on beaches for these purposes? If recreational vehicle use is prohibited on park beaches, but commercial fishers are allowed to continue to drive vehicles on beaches, how will the parks monitor vehicle use? I mean, how would park staff be able to tell which vehicles on the beaches have the right to be there and which don't? Would law enforcement staff be out at night to monitor this too?

535-AG

Some issues and actions, for example the Adjacent Land Uses section (p. 63), are so vague as to make it impossible to substantively comment.

P.65. Housing. I recommend retaining law enforcement rangers' housing in the Bald Hills. Given the history of poaching problems, concerns for public safety, and other issues, I think a law enforcement presence is vital component of resource protection and visitor safety in this area.

COMMENTS REGARDING ALTERNATIVE 2

In many ways, this alternative is no different (no real choice) from the preferred alternative (#1); therefore I refer you to my comments regarding Alternative 1 and to my Comments Pertinent to All Alternatives for the issues of watershed restoration, artificial impoundments, estuary restoration, second growth management, fire management, etc. In addition, I much prefer the natural resources Objective #1 here (under Alternative 2 on p. 78 and 88)) than the one in Alternative 1 which only mentions the redwood forest ecosystem.

535-AH

COMMENTS REGARDING ALTERNATIVE 3

I have a difficult time understanding how "9.4 major road miles and 99 miles of associated minor roads" could be treated per year. Doesn't this far exceed any treatment levels (even without complete landform restoration) achieved in the park before? How would treatment of this many miles be possible, especially while at the same time protecting T&E species from disturbance? With regard to complete landform restoration, please see my comments (my p. 1-2) above.

I prefer certain zone designations in Alternative 3 to those in other proposals. In particular, I believe it is more appropriate for the area just east of Flint Ridge campground to be primitive (instead of mechanized backcountry), and Lady Bird Johnson Grove to be designated primitive instead of mechanized backcountry.

p.88 mentions evaluation in reference to prairie restoration. What sort of evaluation?

For what is deemed the "resource protection alternative", these objectives (p. 88) seem to fall short. With regard to Objective #1, I have the same comments as above for Alternative 1 objectives—that is, more than resource management activities should be included. Also Objective #4 is to "protect all threatened, endangered, and rare species and rare natural communities." The parks are required by law to protect all T&E species, and some of these communities (e.g. wetlands). Wouldn't it be appropriate to have the objective of doing more than is required—what about enhancement efforts, what about promoting research that would benefit these species and communities? If the NPS (with its mandate) doesn't take a more positive, proactive stance on behalf of these species, who will?

To minimize impacts to park resources, I am strongly in favor of constructing the primary visitor center outside of park boundaries, along Highway 101 or in Orick if possible.

While I am not against a few well-placed primitive (walk in) campsites in the Bald Hills, I concur with the proposal to build no vehicle access campsites in the Bald Hills.

I support the estuary restoration proposals in this alternative.

535-AI

This alternative states that artificial impoundments which did not significantly contribute to the cultural landscapes

535-D This general plan proposes that some RNSP watershed restoration funding and personnel be shifted to restoration work outside the RNSP boundaries to areas in the Redwood Creek basin upstream of the parks, to the extent that private landowners are interested in working cooperatively with the RNSP staff. Also, see response to comment A in the U.S. Forest Service letter.

535-E These photographs illustrate the types of failures that can occur on any logging road when a storm of sufficient magnitude produces more water than the road structure can handle. During the storm responsible for the road failures depicted, there were numerous road failures throughout the region, even on well-maintained public roads constructed to much higher standards. Staff and funds are insufficient to maintain the number of logging roads to the standards needed to handle major storms. Public safety is a higher priority during severe storms, and RNSP maintenance and resource management personnel were involved in monitoring and emergency maintenance work of higher priority roads.

535-F The second-growth management plan will address the effectiveness of treating older second growth and the relationship between the time needed to complete treatments and the increasing suitability of older stands as endangered species habitat.

535-G, H The proposal to remove Marshall Pond is intended to address the potential impacts to public safety should the structure that created the pond fail catastrophically. The restoration of salmonid habitat is not the primary objective for removing the artificial impoundment. Richardson Creek is known to support anadromous salmonids, including coho salmon and steelhead, and is reported to have had chinook salmon. Any proposal to remove the dam or the outlet will require site-specific planning and environmental compliance documents, which would consider the impacts on both wetland resources and visitor uses that currently exist at these locations. Mitigation for any adverse impacts on wetland functions and values and visitor experience that would result from removing the artificial impoundments will be included as part of project implementation.

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would be removed, and again, no consideration is given to contribution to the natural landscape. See my comments above (my p. 2-3) on this subject.

Education and Interpretation Section (p. 99). While I completely concur with the statement that visitor use in sensitive areas should be "carefully managed to protect these resources", the idea of restricting the public from most old-growth forest (for which the park was named) and other interesting areas is an extreme beyond what seems necessary for protection. What specifically is meant by "limited opportunities"? How limited?

Public Use, Recreation, and Safety. I support appropriate public use and enjoyment of the parks, and the statement (on page 100) that they "emphasize activities that will generate public appreciation of and support for the parks' resources." Given the parks mandates, shouldn't all alternatives emphasize this? I also agree with all of the objectives in this section, except the one emphasizing off-site interpretation. People can get off-site interpretation from the Discovery Channel. What the parks are best situated to do is provide knowledgeable, enthusiastic interpretive guides (primarily real people, not media) to the wonders and complexities and history of these parks--right there where people can experience them for themselves. Thus, despite my concern for protecting sensitive resources, I do strongly believe in the importance of the interpretative opportunities on-site. (This said, I am not however advocating building campgrounds and trails all over in sensitive resources, and do advocate avoiding building more facilities in them). As proposed here, the removal or relocation of all camping areas, hiking and other trails in sensitive areas (as defined in the document) would leave almost no area available for such facilities, or disconnected fragments, and that isn't really considered a viable option, is it? But existing facilities should be considered on a case by case basis, and some probably should be re-routed, removed, or re-done in a less damaging way. Also, facilities at coastal bluffs (e.g. overlooks, trails) and activities there (e.g. mechanized equipment for trail maintenance/repairs) should be reconsidered due to proximity to peregrine falcon nesting habitat.

COMMENTS REGARDING ALTERNATIVE 4

In addition to my Comments Pertinent to All Alternatives above, I have the following additional comments specific to this alternative.

I would have expected a different approach to watershed restoration under this alternative (for example, emphasis on road decommissioning and weatherizing roads in the parks where major visitor use is unlikely, and complete or partial landform restoration where visitor use is high). But it is basically the same as the others, which provides no real choices on this issue except the speed at which landform restoration occurs.

P. 118. Artificial impoundments. Clearly Marshall Pond and Lagoon Creek have substantial recreational values (birdwatching, aesthetics, canoeing, fishing, etc.). The proposal here that artificial impoundments that have recreational value could be maintained seems contrary to an earlier statement in the document that it is NPS policy to remove them all, only excepting those that significantly contribute to the cultural landscape. It suggests to me that there is in fact more leeway in policy on this issue than was indicated previously in this document. And if impoundments can be retained for recreational value, then surely they can be retained for natural values as well....which Marshall Pond and Lagoon Creek, and possibly a number of others, have in abundance. (See my Comments Pertinent to All Alternatives, my p. 2-3).

Education & Interpretation (p. 120). Why would providing general information on natural and cultural history topics require "little emphasis" on resource management and preservation issues (objective #3)? Why does one preclude the other? Couldn't they fit well together?

What is the reasoning behind the proposal to pave Tall Trees Access Road? I don't think it would permit access to any vehicles that can't make it currently. I am also not in favor of paving Tall Trees Access Road because I think it would just encourage people to drive faster on that road than is safe (particularly with traffic going both ways), and because I think petroleum products (from vehicles and from the road itself) are more likely to get washed into the waterways if the road is paved (completely impervious surface) than if it remains gravelled.

535-AK 535-AJ

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535-I, J NPS policies and guidelines for managing wetlands require that proposed actions be designed or modified to preserve and enhance natural and beneficial wetland values and to minimize, through mitigation, their destruction, loss, or degradation. The most recent revision of the NPS Procedural Manual #77-1: Wetland Protection (NPS 1998) requires that actions that affect incidental (e.g., created by inadequate road drainage) or intentional (e.g., associated with constructed ponds or reservoirs) artificial wetlands consider the potential loss of aquatic resource functions and values. RNSP staff will comply with these policies and guidelines when specific proposals are made for removing artificial impoundments. Wetland functions and values, including visitor use and enjoyment of wetland biota and recreational opportunities, will be weighed against the value of other resources at risk and other policy requirements, including public safety and cultural resource management guidelines.

535-K Beginning in 1999, RNSP staff will be developing an inventory and monitoring program for all natural resource categories, under the national inventory and monitoring initiative. Funding and staff limitations, and the requirements to direct available staff and funds towards critical monitoring programs such as endangered species prevent RNSP staff from detailed monitoring of all biological resources. RNSP staff often must rely on volunteers and external partnerships to monitor biological resources.

535-L, M, N, O A strategy for conserving, protecting, and managing threatened, endangered, and other sensitive wildlife species has been added to the plan (see the shaded box in the "Actions Common to All Alternatives" section in the discussion on threatened and endangered species). The list of sensitive species in appendix I (final plan) is provided so that readers are aware of the range of sensitive plant and animal species that occur or potentially occur in the parks. NPS and CDPR laws, policies, and guidelines provide sufficient authority and guidance to manage wildlife, including sensitive wildlife species in the parks. The impacts of proposals that have the potential to affect threatened and endangered species such as peregrine falcons have been discussed in as much detail as is possible in a general plan. Should specific issues arise that relate to individual species, separate management plans will be prepared if there are

COMMENTS

RESPONSES

535-AL

P. 122. I am opposed to developed campgrounds in the Bald Hills because of resource protection issues. If a camp host with resource protection training were retained, the idea might be more palatable. What is the rationale for the proposal to eliminate all tent camping at Freshwater Spit, but continue to allow some RV camping there? Do you consider tent-campers to be more of a problem than RV campers (e.g. in reducing the aesthetic value of the view)? I think the Coyote Creek basin has a lot to recommend it in terms of enjoyment for visitors who enjoy primitive camping (including myself); however for the protection of natural resources there, I am not in favor of developing such sites unless the park makes a commitment to and institutes a backcountry program, particularly with rangers conducting regular backcountry patrols.

535-AM-AN

Table 7--actions common to all alternatives. Page 128. What is the reason for the disparity between the requirement to restore parklands disturbed by logging and roadbuilding, but only to consider restoring wetlands damaged by previous land use? (But see my caveat re the artificial impoundments--my p. 2-3). Also, under the Wetlands heading it states that "wetlands would be identified and delineated if appropriate". What does the "if appropriate" mean? My understanding is that wetlands are to be identified and inventoried as part of the GMP process. Regarding T&E species topic, there is only legally required compliance, no real management of the species proposed here.

535-AO

Table 9 page 144. Treatment of T&E species (impacts) is woefully inadequate, and completely uninformative. In what ways are T&E species positively and negatively affected? The topics of Cultural Resources, Floodplains and Wetlands, and Soils are models of the type of coverage this topic should receive here but didn't.

535-AP

Table 10 (page 147) is equally uninformative and inadequate on the topic of T&E species. Again, the coverage given for other topics could be models for covering this topic. Based on concerns I have already stated, I also am not convinced that, as stated here, the benefits to T&E species in Alternative 3 would only be "somewhat greater than the proposed action" (what does "somewhat" signify?) nor that Alternative 1 would have "no significant adverse impacts" on T&E species.

AFFECTED ENVIRONMENT

Wildlife

535-AQ

With regard to small mammals (p. 180), the squirrels were completely neglected (e.g. ground squirrel, Douglas squirrel, etc.), but are quite common in the parks. Unless bat research has been conducted in the park that excludes presence of bat species other than those listed, I would suggest that the statement regarding which bats are present in the parks (p. 180) be left open-ended (since these creatures are the least likely to be accurately identified to species by visitors and general park staff, anecdotal records of observations are likely to provide an incomplete assessment of what bats might be there). The discussion (a list of three species which did not even include spotted owls) of species found in higher abundance in old-growth forest (p. 180) was so incomplete as to be of minimal value, and my understanding is that one of the three species mentioned, the flying squirrel, are not common in these parks. It should be made clear that the benefit of clearcuts to certain species (listed on page 180) lasts only a short time, a decade or so. Is there no more recent information on elk herd size(s) in the parks than 1984 (p. 180)? Or are abundances of elk thought to be about the same now as in 1984? Although the discussion of elk (p. 180-1) makes no mention of elk using old-growth habitats, elk in the Bald Hills (and presumably elsewhere in the parks) do use old-growth forest for cover (e.g. thermal cover). In the discussion on elk, the phrase "habitat characteristics" is misused on p. 180. I recognize a quote from the Autobiography of Isaac Wister regarding elk abundances in the Bald Hills used on p. 181, but it was not attributed. Is the conservation strategy mentioned on p. 182 a written document? If so, perhaps it should be cited.

535-AR

T&E Species

The statement (p. 182) that "there is no designated critical habitat for northern spotted owls in the parks" is potentially misleading. To my knowledge, critical habitat still hasn't been designated for this species. If and when critical habitat is designated, I'd bet parklands here would be included. To what do the parks attribute the low fledging success rate in the parks described on p 182? (I only ask because perhaps one or more of the actions proposed in the alternatives might improve or further lower their reproductive rate.). When murrelet detections in the parks are discussed (p. 183), do you simply mean murrelets have been detected or do you mean occupied

alternative ways to manage these species. There are no wildlife issues in the parks that require a general-management-plan level decision. Therefore, wildlife management as a specific issue is beyond the scope of this management plan.

535-P Impacts on listed, proposed, or candidate threatened and endangered species are addressed in this environmental impact statement. The impact topics discussed are those major categories of resources and values that would be affected by one or more of the alternatives. These resources and values were identified during scoping as those potentially at stake based on the issues raised during scoping. Although all RNSP resources and values will eventually be affected by the proposal, the impact topics were chosen because these topics cover those resources that are directly affected by the proposals at this conceptual level of planning. The implementation of the approved management plan will require more detailed planning. These later plans will consider effects on all resources directly affected by site-specific proposals.

535-Q, R The discussion of how timeframes were established for impacts on threatened and endangered species has been expanded in the final plan (see the "Assumptions and Methods for Assessing Impacts" subsection in the discussion of threatened and endangered species in the "Regulations, Assumptions, and Methods for Evaluating Impacts" chapter. The National Park Service and the California Department of Parks and Recreation acknowledge that there could be minor adverse effects on northern spotted owls from removing trees as young as 40 years of age under the watershed restoration and prairie restoration programs (page 267, draft plan) and second growth management program (page 286, draft plan). RNSP staff consulted with the U.S. Fish and Wildlife Service on the potential effects on listed threatened species from the watershed restoration program and the repair of roads damaged in the floods of January 1997. The program is being conducted according to the results of those consultations, in which the U.S. Fish and Wildlife Service authorized incidental take of owls due to removal of habitat and noise disturbance on up to 706 acres in 1998.

## COMMENTS

## RESPONSES

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behavior has been detected? In addition to the locations cited (p. 183), murrelet detections (and if I recall correctly, occupied behavior) have been made at numerous locations elsewhere in the national park, including along the first mile of Redwood Creek Trail. In the brief discussion on peregrine falcons (p. 184), it should be made clear that there have been no systematic surveys, so there may well be more than the one known nesting site in the parks. Also, given that peregrine falcons are known to breed here, it sure seems that they are given short shrift here. Shouldn't threats to falcons in the parks (e.g. human activity causing disturbance) be discussed here as they are for murrelets and owls in this section? The same statements regarding locations is repeated word for word in the first and second paragraphs on bald eagles (p. 184). A statement is made in the first paragraph that eagles found in the parks in winter are probably migrating through. I do not believe this to be the case--they migrate in spring and fall, not during winter; these birds are probably wintering in or around the parks. As with falcons (especially given the likelihood of eagles breeding in the parks now or in the near future), there should be some discussion here of threats to them in the parks.

**ENVIRONMENTAL CONSEQUENCES--Regulations, Assumptions, and Methods**

Should the statement (p. 244, bottom) be interpreted to mean that all wetlands in the parks have been identified, or just some? On p.246 it states that it is "NPS policy to promote conservation of all federally listed threatened, endangered, and candidate species within RNSP boundaries and their critical habitat." But in almost all areas of this document, only some of the known T&E species are considered. For example, peregrine falcons are known to breed in the parks and are likely to be impacted by a number of the proposals but are almost entirely excluded from discussion.

Page 248. Throughout this document there is the assumption that watershed restoration as conducted in the past and planned for the future would provide significant benefit to murrelets and spotted owls, and that long-term benefits outweigh short-term disturbance and habitat modification to these species. But the argument could be made that in terms of these particular species, landform restoration work is actually a net negative impact. Murrelets in particular are in crisis now. So, it could, I think, reasonably be argued that regardless of the theoretical long-term benefits, anything that in the short term (lets say the next 30-50 years) that may lower their reproductive success should be avoided. What good are long-term benefits (e.g 100-200 years from now) to a species that doesnt make it long enough to reap them? What does discussion of T&E-related restrictions (e.g. timing) effects on watershed restoration work (p. 247-8) have to do with impacts to T&E species?

**IMPACTS COMMON TO ALL ALTERNATIVES****Impacts to Wetlands**

I agree that the adverse impacts to wetlands disturbed by watershed restoration are localized, but not necessarily that the impacts are short-term (p. 255). It states that restoration of perennial stream channels in the parks would increase anadromous salmonid habitat; what are the estimates on how much additional habitat would be provided for these species? The statement that "frogs and salamanders inhabiting road ditches and small ponds would be displaced initially but would likely recolonize the restored intermittent/perennial riverine wetland habitats" does not reflect of biological reality. As I have stated before, the species that inhabit still water are usually not the same species that inhabit streams, so the "displaced" amphibians would almost assuredly not recolonize the newly created, different aquatic habitat--even if they survived the process, which they wouldn't. All or almost all of the creatures inhabiting the road ditches and small ponds would be killed by the draining of the water bodies and/or crushed and buried by the heavy equipment work that would follow. I encourage you to review the effects of the removal of the C-line pond to corroborate my contention. If you believe that the extermination of these amphibian populations is a worthwhile cost, that is of course your prerogative, but it should be stated up front. What about impacts to wetlands related to removal of artificial impoundments (e.g. Marshall Pond, Lagoon Creek, etc.)? Only catchment basins along highway 101 are discussed (p. 256). Impacts to Skunk Cabbage Creek were not mentioned (p. 257).

It states that "Impacts on wetlands related to camping activities would primarily be short-term but repeated adverse impacts from visitors walking in nearby wetland areas." I would say that given the nature and extent of use, most of the heavily-used camping areas actually receive long-term sustained adverse impacts. (This could also be true for heavily used trails). The document mentions the value of wetlands as nesting habitat for waterfowl, but neglects to

**535-S** RNSP staff have added a conservation strategy to the management plan (see the shaded box in the discussion on threatened and endangered species in the "Actions Common to All Alternatives" section) to address the management of listed species. RNSP staff are preparing biological assessments on major programs as the primary tool for consulting with the U.S. Fish and Wildlife Service and National Marine Fisheries Service on the effects of these programs on listed species. Programs and projects are conducted according to the results of the consultations. See the "Consultation and Coordination" chapter for more information.

**535-T** The management zones proposed in this plan are intended to ensure that future construction occurs in areas where it will have minimal impact. This plan does not propose major expansion of existing facilities.

**535-U** The plan has been revised to include in alternative 3 the text found in alternative 4 related to the experience enjoyed by people traveling on the Bald Hills Road.

**535-V** The management zones proposed in this plan are intended to provide areas of the parks where visitors can experience and enjoy all of the resources that the parks were established to protect.

**535-W, X** Trail plan information has been removed from the document. A new RNSP trails plan would be developed that will describe future trails development. Please see the discussion on recreational activities in the alternative 1 section (in the "Public Use, Recreation, and Visitor Safety" section) of the final plan.

**535-Y** A conservation strategy for protecting threatened and endangered species has been added to the final plan (see the shaded box in the discussion on threatened and endangered species in the "Actions Common to All Alternatives" section). This strategy is intended to cover all aspects of endangered species conservation. An important aspect of conservation is the connection of endangered species habitat within the parks to habitat outside the boundaries throughout the region.

535-AT

535-AU

535-AW-AY

COMMENTS

RESPONSES

mention that wetlands are prime foraging areas for many wildlife species which can be kept from using these areas by continual human presence or conflict with humans there (e.g. bears); these impacts to wetlands are not mentioned (e.g. page 257 bottom right).

With regard to vehicle access on beaches, please see my comments above (my p. 6) regarding removal of woody debris. There is some discussion on p. 258 regarding vehicles on the beach being a visual and auditory intrusion, as well as a safety hazard in some cases, and as a beachgoer, I completely concur with those statements; but these are impacts to visitors, not wetlands, and probably do not belong in this section.

P. 259 states minor negative impacts for small areas of wetlands. I would say that some are large areas, for example any development at Davison Ranch. Conclusions don't address impacts of removal of large artificial impoundments. The Cumulative Impacts section here is mostly a simple laundry list of past (bad) practices that negatively impact wetlands, and contains only one vague sentence on cumulative impacts of proposed actions on park wetlands outside of the Redwood Creek basin. It does not address the impacts of removing many small wetlands, for example to red-legged frogs and other amphibians.

Impacts to T&E Species

In addition to my previous comments on this subject in other areas of the plan (e.g. regarding peregrine falcons), I have the following comments.

Technically, murrelets are seabirds, not "terrestrial forest dwelling birds", as stated here on p. 260.

Why are impacts to Townsends big-eared bats (which are known to occur in the park, and have roosted in buildings at least temporarily, and may roost and/or hibernate in hollow trees) not addressed anywhere in the document? I expect that several of the proposed actions throughout the document could have impacts on this species, for example: fire management in old-growth forests (smoke, etc), and removal of artificial impoundments (foraging).

P.260. Column 2 paragraph 1. In addition to snowy plover nesting habitat being affected, their foraging habitat would be affected too since it too is on the beaches. Snowy plovers may occur in the parks, and if so would be direct impacts from vehicles on the beaches. Also, it should be made clear in this paragraph that the potential (likely) impacts to peregrine falcons are negative impacts. Noise and disturbance impacts on owls and murrelets are discussed separately, but there is no discussion there on disturbance to peregrine falcons which are known to be affected by noise and human activity, and which are known to breed in the park.

Impacts of Habitat Modification section (p. 261) does not include impacts to owls' prey species abundance and availability, which (depending on the treatment) may be positive or negative for the owls. This section indicates more positive impacts from watershed restoration than seem warranted, at least as far as T&E bird species are concerned (re-establishing native plant species composition and drainage patterns has minimal impacts on them if any). What size trees are considered "small" for second growth management and watershed restoration? (In the past, trees of sufficient size to be potential suitable owl habitat have been removed during watershed restoration activities).

In the section on Impacts from Human Use(p 262), it is stated that "reproductive failures due to human harassment are more likely to occur in marginal habitat than in ideal nesting, denning, or foraging habitat", citing Knight and Gutzweiler (1995). I have not read this book, but I am familiar with much of the published research on peregrine falcon and bald eagle and other avian species responses to human activity/disturbance, and there is plenty of evidence that in many cases, human activity is the factor causing the habitat to become marginalized.

P. 262 Impacts from Watershed Restoration. In addition to my previous comments on watershed restoration impacts, I have these additional comments. By stating that "minor effects but not adverse effects" would occur to murrelets, do you mean that they are minor positive effects? Or are you here using the ESA lingo in which "adverse effects" means a very specific thing? This section also states that many watershed restoration sites would be in headwater

**535-Z** One of the purposes of this plan is to explain the basis and direction of RNSP management to the general public, whose understanding of ecological concepts may be at a different level than someone familiar with the arbitrary nature of ecosystem boundaries. Historical accounts and the legislative history of the national park emphasize the preservation of the redwood forest as the primary reason for the establishment and expansion of the national park. Because of the primacy of this resource as the impetus for preservation, NPS and CDPR managers and staff believe that a goal specifically aimed at preserving the redwood forest portion of the parks' ecosystem is appropriate. The inclusion of redwood in the name of national and state parks indicates that there is some legislative basis for considering that the redwood forest ecosystem is worthy of specific mention. Both NPS and CDPR policies and guidelines, as well as environmental laws offering specific protection to other resources, ensure that all the parks' resources and values will be protected. The concepts of scientifically based ecosystem management actually encourage a more holistic approach to RNSP management than isolating portions of a park as separate "ecosystems." Ecosystems have boundaries, but the boundaries are defined arbitrarily (Johnson and Agee 1988). These authors define an ecosystem as any part of the universe chosen as an area of interest, with the line around that area being the ecosystem boundary and anything crossing the boundary being input or output.

**535-AA** This portion of the plan deals specifically with natural resource management and protection. It is an artificial distinction that is necessary to impose order on the variety of management actions that are undertaken to administer and manage a large and complex park area.

**535-AB** Page iv of the summary of the draft plan states that actions would be conducted to avoid or minimize adverse effects on listed species. See comment Y in the U.S. Fish and Wildlife Service letter for a discussion of why it is not possible to manage the parks with no adverse effects on listed species. Criteria for significance have been added to the plan under the "Assumptions and Methods for Assessing Impacts" section that was on page 247-48 of the draft plan.

Individuals

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intermittent streams not inhabited by fish or used by them for spawning, so I am unclear why elsewhere in the document, watershed restoration is partly justified on the basis that it will increase salmonid habitat and spawning areas in the restored sites. How can this be?

Regarding forest fragmentation, some road corridors that would be treated already have nearly 40 years of forest regrowth along them (not necessarily on the roadbed, but alongside it), trees that are often removed during landform restoration activities. The argument could be made that landform restoration work actually sets back the closing of the forest canopy over these linear corridors by setting tree regrowth along the corridor back to ground zero, and adds to fragmentation.

What evidence is used to determine that if landform restoration were not done in the park, it would take twice as long for forests surrounding abandoned roads to develop suitable owl nesting habitat and ten times as long to develop murrelet nesting habitat as stated on page 263? I can see how it might take much longer for suitable nest trees to develop on abandoned roads without landform restoration, but not why it would affect the surrounding forest. As long as the canopy over the roadway (not necessary for trees to actually be growing on the roadbed for this to occur) reaches a certain height for forest continuity, there is no real need for an abandoned road itself to provide the nest trees for these species.

Impacts of Vegetation Management section page 263. Second growth treatment could improve foraging habitat for spotted owls. Regarding the efficacy of second growth treatment to benefit T&E birds, please see my initial comments on this matter (p. 2). There is almost no coverage of prairie management and removal of encroaching conifer forest here, even though this treatment could possibly have direct impacts to spotted owl nesting habitat and likely impacts foraging habitat (and the owls' vulnerability to predators like great-horned owls) since by increasing forest acreage, the conifer encroachment may have increased spotted owl foraging and nesting habitat, and in time, murrelet nesting habitat.

Impacts Related to Visitor Use page 265-6. There are two separate sections on this page with the same heading.

There is no mention here of what the disturbance impacts from visitor activities are to T&E birds. (e.g. attracting nest predators, flushing from foraging sites or nests). Regarding area closures mentioned on page 266, these could only be useful if RNSP staff know what areas T&E birds are using and where they are nesting in any year; but the parks have shown little support for finding sites occupied by T&E birds, or monitoring known sites for any species except spotted owls. Also, although it is stated that the proposed primitive zones would provide refugia for T&E birds, the proposed primitive areas would not be of much benefit to peregrine falcons or snowy plovers (or perhaps bald eagles) since the primitive areas are not in areas these species would use for nesting. On page 266, the statement is made that hazard tree removal would not impact nesting murrelets because trees would be inspected for nests prior to tree removal. But, as stated in the plan's Affected Environment section, murrelet nests (and nesting murrelets) are nearly undetectable (their cryptic coloring is their only defense), and that's why so few nests have been found to this day; so inspecting the trees is no assurance that no murrelet nests are there. Given this reality, a reasonable action would be to apply to USFWS for an incidental take permit (for murrelets) for this activity.

Conclusion page 267. Here is the first mention of impacts to spotted owls from removal of trees for watershed restoration or prairie management activities; shouldn't this issue be discussed under those sections first? It should also be noted that removal of trees younger than 40 years of age is also an impact since it sets back regrowth that many years (the age of the trees removed). It should also be noted that even without treatment (watershed restoration), the benefit to owls and murrelets of reduced forest fragmentation will still occur within 200 years. The conclusion section only mentions attracting predators as the adverse impact of visitor use. But use of trails, and other facilities (even overlooks) could, depending on the location, adversely impact any of the T&E birds in other ways (e.g. noise disturbance).

Acres of Suitable Habitat, Table 23 (page 267). Why are roads and trails excluded from "acres of development"? Aren't they developments? If not, what definition of development is being used here? Would including roads and trails show that virtually all suitable habitat in the parks is within 0.25 mile of development, and thus impacted? I think it would be useful to include all currently maintained roads and trails, at least then readers would have a base from which to judge differing proposals in the alternatives. The use of the term "critical habitat" in two of the columns should perhaps be footnoted to clarify that "critical habitat" has specific regulatory meaning and that critical

**535-AC** The breaching permit for the estuary obtained from the Corps of Engineers is contingent on concurrence by the National Marine Fisheries Service that breaching will not adversely affect listed fish species. The salmonid species that are expected to benefit from estuary restoration are currently listed, proposed, or candidate species for listing under the Endangered Species Act. The National Park Service and the California Department of Parks and Recreation are reluctant to ascribe a benefit to visitors or the local economy from a sport fishery for these species.

**535-AD** Those portions of the B-mill deck closest to Prairie Creek were probably a forested riparian wetland, with most of the deck being an upland site that probably had a stream running through it. The stream channel and riparian areas are being restored. Page 56 of the draft does not describe impacts from constructing visitor facilities. Impacts from the construction of visitor facilities on the B-mill deck are described in the *Davison Ranch Development Concept Plan* and are incorporated by reference into this general plan. The B-mill deck was not rejected as the preferred alternative based on impacts on resources. The preferred alternative in the *Davison Ranch Development Concept Plan* was changed from construction of a visitor center to a trailhead because RNSP managers wanted to allow public review and consideration of a location for a major visitor center to be included in the larger forum provided by this general plan.

**535-AE** The year-round use of Wolf Creek Education Center is not anticipated to have any significant adverse effects on resources. The use is concentrated in a previously disturbed area.

**535-AF** Commercial consumptive use of resources within a national park is prohibited without specific congressional authorization. In addition, the National Park Service and California Department of Parks and Recreation believe that the removal of large woody debris from the parks' beaches is inappropriate because driftwood is an essential element of beach ecology in the parks and throughout the Northwest. Large woody debris provides shelter, nutrients, hiding places, perches, and nesting habitat for numerous species of wildlife. It also plays a key role in energy dissipation during

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535-BG

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habitat has not yet been designated for some of the species on the list. (To avoid misleading readers, it might actually be more appropriate to use something other than zeros for species that do not have critical habitat designated for them).

Cumulative Impacts section p 267-9 discusses many impacts (within and outside the parks) individually, but does not finally state anticipated composite (cumulative) effects of all these activities together, or even of all the common proposals together. Isn't the idea of such a section to do so? The threat to spotted owls from barred owls is not just hybridization as mentioned here (p. 268), but also displacement from nesting/foraging areas by the more aggressive barred owls. Earlier in this chapter it states that second growth treatments will have unknown, possibly no benefit to marbled murrelets because of the types of characteristics they require for nest platforms, but here it states that second-growth thinning would be mitigation (benefit to murrelets) for offsite timber harvesting, and that it would be of greater benefit to murrelets than to spotted owls. Doesn't this contradict previous discussion on this subject? Again, potential negative impacts from removal of forest encroachment is not mentioned.

ALTERNATIVE 1 IMPACTS

In addition to my previous comments above (Comments Pertinent to All alternatives) on the issues here, I have the following additional comments specific to this alternative.

Impacts to Wetlands

Artificial Impoundments (p. 282). It seems to me that the parks should have been able to identify and evaluate the threats to public safety posed by the various artificial impoundments by now, and those specific risks compared with the benefits of functions and values provided by these impoundments should be presented in the document. Again, restoring the stream channels would provide habitat for some species of amphibians, but not the ones using the still waters of these impoundments now. The beneficial wetland values of Lagoon Creek, but not of Marshall Pond are mentioned here; Marshall Pond also has great beneficial wetland values including recreation, aesthetic, and wildlife habitat. Shouldn't other impoundments like stock ponds in the Bald Hills, water catchment impoundments (for fire protection), and the dikes/ditches at Davison ranch also be discussed here instead of completely being neglected?

Impacts of Education and Interpretation (p283). There is no mention that a primary interpretive center on B-mill deck at Davison would have long-term negative impacts on wetlands. By failing to restore B-mill deck to natural (pre 1850?) landform, it diminishes wetland acreage by the area that would be covered by the building envelope and parking area, and perhaps sewage facilities. How much area would that entail? Are there any plans to restore the wetlands to conditions existing at this site pre-1850's influence?

P.284 Conclusions. The adverse impacts of draining Marshall Pond and Lagoon Creek and removing the dams would not be "short-term" impacts as stated here, for reasons I have described previously in my comments on this issue.

Impacts to T&E Species

Watershed Restoration (p 284-5). Many of my previous comments on this subject are pertinent here. There is also no mention of the benefits to foraging bald eagles and peregrine falcons that estuary restoration would provide (by improving fish and bird habitats respectively); peregrine falcons and bald eagles are both seen fairly regularly in the vicinity of the estuary

Second Growth Forest Management (p. 285-7). It is stated that treatment might increase increase suitability of habitat for prey species (thus increase their abundance), but probably an equal potential benefit would be that treatment would open up the understory and thus increase prey availability to spotted owls. The statement that 500 acres would be treated annually seems like a lot. Is this treatment level practicable/feasible given noise restriction periods relating to T&E species? If it is not, then time estimates of benefits could change significantly. Seventy-four to 190 years just to complete treatment of all second-growth seems a bit outrageous. Is there evidence that thinning and other treatment in stands of 100 or more years of age (74 + 25 years of current age minimum) will have real

storms, promotes the entrapment and retention of sand, and promotes the formation of dunes. The vehicle access restrictions proposed in the plan will eliminate the means of removing this wood.

535-AG The plan has been revised to include a land protection plan as one of the action plans to be completed by the parks following approval of the general management plan/general plan.

535-AH RNSP staff would need to seek funding to accomplish this level of watershed restoration. If sufficient funding was available, this alternative would be the environmentally preferable alternative.

535-AI See comments I and J in this letter.

535-AJ The alternatives for watershed restoration follow from the alternative concepts for the entire plan. Because of the general nature of the plan, it is not appropriate to provide more detailed alternatives for restoration of watersheds. The time required to complete the restoration program and therefore reduce impacts on downstream resources is a critical factor in choosing which alternative to implement.

535-AK See comments I and J in this letter.

535-AL The proposal in alternative 4 to eliminate tent camping in the dunes while retaining RV camping in parking areas was based on the fact that tent camping has a greater impact on dune vegetation.

535-AM The legislation establishing Redwood National Park specifically authorizes the secretary of the interior, through the National Park Service and other entities, to develop and implement "a program for the rehabilitation of areas within and upstream of the park contributing significant sedimentation because of past logging disturbances and road conditions." There is no specific equivalent legislative authority for restoring degraded wetlands. NPS procedures (Director's Order #77-1, effective October 22, 1998, and NPS Procedural Manual #77-1: Wetland Protection) for implementing Executive Order 11990 "Protection of

535-BH

535-BI

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benefit? Given murrelets' apparent fidelity to breeding sites, it has been proposed elsewhere that the best option would be to speed recovery of habitat adjacent to already occupied suitable habitat. Choosing such sites (especially those at lower elevations where trees will likely grow faster) first would be the most likely way to benefit murrelets in particular through second-growth habitat manipulation. Also, given the long time frame involved in the proposed treatment, and given the crises the species (particularly murrelets) are in now, it suggests to me a need for emphasis on making existing suitable habitat as viable as possible in the interim to promote successful reproduction. (Suitable habitat 200 years from now will be little help to species that don't retain viable populations that long). How could currently suitable habitat be enhanced (e.g. artificial nest platforms)?

Impacts of Prairie Restoration (p 288). What is the amount of acreage of Douglas-fir removal? Depending on the acreages that have been treated and are proposed for treatment, it could present more than the stated "minor" adverse impacts, since it affects forest habitat that could now be or would become future suitable habitat for owls and eventually for murrelets. The justification that the impact would not be significant because of the amount of more suitable habitat available in forests adjacent to prairies is a potentially flawed argument. Since habitat is known to be a main limiting factor for both owls and murrelets. Is there information that suitable habitat in adjacent forests is not already occupied?

Impacts of Fire Mangement (p. 288). How significant would effects (short and long-term) of the proposed treatments be on prey species of spotted owls? How was it determined that benefits to owls from restoring fire in forests "will outweigh" adverse effects on owl prey base (and thus on the owls), as stated here? How frequent would fires in an old-growth area be conducted? If fires significantly diminish prey abundance, then owl reproduction (frequency and success rate) will likely diminish as well. Also, it is unclear to me how surveys to locate spotted owls and murrelets would help reduce disturbance to them if the plan is to conduct burns outside of the nesting season anyway.

Impacts of Artificial Impoundments (p. 289). There is no mention of the likelihood that retaining impoundments like Marshall Pond would benefit peregrine falcons (foraging habitat).

Impacts of Visitor Use (p. 289). The paragraphs on impacts from trails is confusing. One paragraph discusses trails and their impacts as if addressing all trails, but upon closer inspection, it appears only to mean foot trails--this distinction should be clearly stated. It should be made clear that the statement, "the construction of all trails included in approved RNSP planning documents would result in 69% of old-growth being within 0.25 mile of a trail...." refers only to trails restricted to foot-traffic and does not include equestrian or bike trails. Why are horse and mountain bike trails separated out from foot trails in this section, and why is no percentage (of old-growth forest within 0.25 mile) provided for equestrian and bike trails, which would give readers a way to compare effects and judge the total impact? In my rough estimation, it seems that with all the proposed trails (foot, equestrian, bike) in this alternative, the impacted acreage jumps to 78% of all suitable habitat in the parks. Is this correct? How significant is it when more than 3/4 of all suitable habitat for these species would be impacted? Furthermore, this is still not the complete picture for the impacts of visitor use, since it excludes all acreages of suitable habitat impacted (within 0.25 mile) by facilities/development other than trails. So, how much acreage of suitable habitat is within 0.25 mile of all existing and proposed (under alternative 1) facilities, development, roads, and trails? Does that leave any suitable habitat in the parks that would be left un-impacted by noise disturbance and risk from avian nest predators? Whatever this figure is, it seems to me that it should be a very high priority for the parks to determine (via research) whether and to what extent trails, visitor use, and facilities actually do cause impacts to these species. Despite the importance of the visitor center, there is no mention of the impact of increased traffic and activity near B Mill deck (visitor center) on adjacent spotted owl and murrelet habitat. This section provides no discussion of impacts to other T&E species, such as peregrine falcons, from visitor use, despite their known vulnerability to human disturbance.

Given my concerns above, I believe the conclusions (p 289-90) section and cumulative impacts section (p 291) may contain errors or be incomplete. In particular, given the state of knowledge on the impact of noise disturbance to murrelets and owls, it seems premature and dangerous to state that the increase in trails, campsites, and other

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Wetlands" direct that a general management plan must outline actions to reestablish environments in which wetland ecological processes can function as they did prior to disturbance, to the extent practicable. The procedures recognize that it is not practicable to restore all degraded wetlands. This general management plan does provide a more specific outline of steps needed to restore the Redwood Creek estuary.

**535-AN** RNSP staff have added a conservation strategy to the general management plan (see the shaded box in the discussion on threatened and endangered species in the "Actions Common to All Alternatives" section) to address the management of listed species. In addition, the management zones proposed in this plan provide areas in the parks where visitor use and development will be limited to serve as refuges for all wildlife, including threatened and endangered species.

**535-AO, AP** The table summarizes the impacts, which are described in additional detail on pages 260-71 and pages 284-91 of the draft plan under specific management proposals. There are no specific proposals for managing threatened and endangered species, so there are only general impacts rather than impacts for each alternative.

**535-AQ** The "Affected Environment" section is intended to give readers an overview of the resources of the parks that might be affected by implementing any of the alternatives. A complete listing of the wildlife species in the parks is not needed to understand any of the alternatives. NEPA regulations and NPS guidelines for implementing the National Environmental Policy Act require that this section "succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The descriptions shall be no longer than necessary to understand the effects of the alternatives. Data . . . shall be commensurate with the importance of the impact." RNSP staff have added a conservation strategy to the general management plan to address managing the listed threatened and endangered species (see the shaded box in the discussion on threatened and endangered species in the "Actions Common to All Alternatives" section).

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development proposed in this alternative (increasing by at least 25% the human disturbance within 0.25 mile of suitable habitat) would have only minor cumulative adverse impacts to owls and murrelets.

Impacts on Quality of Visitor Experience (p. 293). I disagree that "visitor access to sensitive natural resource areas would be reduced from their current levels" under this alternative. How is this possible with the vast increase in trails and campsites proposed for construction under this alternative? There also seems to be the implication that visitors would not have access to the beaches because they could not drive on them; you are not implying that driving is the only way for most visitors to experience and travel on the beaches, are you?

ALTERNATIVE 2 IMPACTS

In addition to my previous comments that pertain to the issues here, I have the following additional comments specific to this alternative.

535-BJ

Impacts to Wetlands

Impacts of Watershed Restoration (p.306). Under estuary restoration, why are all these impacts considered indirect instead of direct? If the area of wetland and quality of wetlands are not restored, isn't this a direct impact? Also, the degree of adverse impact (significant? minor?) is not stated.

Impacts Related to Artificial Impoundments (p. 307). Here, unlike in alternative 1, the recreational and aesthetic benefits of these impoundments to hikers is mentioned, but the benefits to other recreationists (e.g. canoers, birders) is not mentioned.

Impacts Related to Visitor Use (p. 307). What are the current levels of impacts from current facilities/development in the parks? This is an important component of discussion of Alternative 2's impacts, since it is more of the same, for the most part. Also, the statement that there "would be fewer impacts from construction, use, and maintenance of camping areas than from trails because more new trails would be constructed than new camping areas" is not necessarily the case. One new campground does not equal one new trail. Camping areas concentrate a high number of people in a small area, and even though individual persons may only be there a short time, the area is in constant use for a long time; and people in camping areas are cooking, storing food, disposing of waste, collecting firewood, and often require sewage facilities, whereas trails do not generally have all of these activities associated with them. Plus campgrounds, unlike trails, generally are riddled with roads and parking areas (and associated compacted surfaces) and vehicle use (petroleum products washing into waterways). Trampling impacts on vegetation are often much higher in/around camping areas than around trails. On another topic, is the acreage (0.5 acre) stated for retaining the road, parking area, restroom at Crescent Beach picnic area simply the area directly impacted (under pavement, trail, etc), or does it include the area of indirect impacts as well?

Cumulative Impacts to Wetlands (p. 308). In my mind, arguments for long-term negative impacts due to lack of second-growth treatment do not make their case here. My understanding (from this document) of the types of actions that might be undertaken for second-growth treatment includes nothing that would change drainage patterns. I can see how watershed restoration activities would do so, but it clearly states here that if second-growth forests are allowed to mature without intervention, there will be cumulative impacts resulting from "perpetuating unnatural drainage and vegetation patterns". What does that mean? Also, Net loss of wetland acreage due to removal of artificial impoundments is left out completely, as are impacts related to visitor use (except roads)--don't these have to be accounted for in analysis of cumulative impacts?

Impacts to T&E Species

Impacts of Estuary Restoration (p.309). It is clear that uncontrolled breaching can have very negative impacts on fish in the estuary. But doesn't even controlled and late breaching have some potential negative impacts on T&E fish species? If so, it isn't stated here (or elsewhere in the document).

Impacts Relating to Artificial Impoundments (p. 309). It is stated here that hydraulic pressure after catastrophic dam

535-BK

535-AR The most recent list of threatened and endangered species and designated critical habitat received from the U.S. Fish and Wildlife Service indicates that there is no northern spotted owl critical habitat proposed for designation. Critical habitat for marbled murrelets was designated for state park lands but not national park land, so it should not be assumed that the national park lands would be designated as critical habitat. Should critical habitat be designated for northern spotted owls, the agencies will manage such habitat in accordance with agency policies and requirements for protection of such habitat. The discussion of endangered species has been updated with the most recent results from RNSP surveys. It is not possible to speculate on the causes of reproductive success of some endangered species in the absence of long-term studies specifically designed to address such questions. Peregrine falcons and bald eagles are noted in the final plan as species likely to be disturbed by noise. The discussion of impacts on endangered species on pages 260-62 of the draft plan is intended to describe the general impacts on threatened bird species from many of the actions undertaken in the parks. All impacts anticipated for any given species are described under the specific management action proposed.

535-AS Impacts of proposals on listed species are described in as much detail as is possible, given the general nature of the plan. There are very few specific proposals that affect the coastal bluffs on which falcons nest. All proposals for resource management and maintenance actions, and for development of facilities, including trails, would require additional planning. Any plans would be accompanied by environmental compliance documents that will describe potential impacts on listed species and mitigation for those impacts.

535-AT The National Park Service and the California Department of Parks and Recreation consult with the U.S. Fish and Wildlife Service on the effects of watershed restoration projects on marbled murrelets. In 1998, 131 acres of murrelet habitat was affected by watershed restoration projects, with 16 acres affected by storm damage repair and 3 acres for a culvert replacement project. The National Park Service received permission from the U.S. Fish and Wildlife Service for incidental take of murrelets on this amount of habitat. Incidental take is defined as a

failure could force fish prematurely into the Klamath River. How likely would that be? And how does a one-time event like this would be (the dam could only fail once, right?) compare with the effects of repeated breachings of the mouth of Redwood Creek on a regular basis, as has been the case? In the Impacts of Estuary Restoration section (p. 309), there is no statement that not restoring the estuary is a negative impact to T&E fish, so how can it be argued here that not restoring spawning habitat to 1500' of stream is an adverse impact to T&E fish? This is clearly an inconsistency--If one example of failure to restore potential T&E fish habitat (Marshall Pond retention) means an adverse impact, than surely a more extreme example of failure to restore known T&E fish habitat (of Redwood Creek estuary) is also an adverse impact.

Impacts Second-Growth Forest Management (p. 309-10). It states here that if second-growth is allowed to mature without treatment, "suitable nesting habitat will remain limited to the approximately 43,000 acres that now exist in the parks." Instead of saying that the 45,000 acres of second-growth will never become suitable nesting habitat, don't you really mean that it will become suitable habitat more slowly (as has been stated elsewhere in this plan, e.g. p. 312 in cumulative impacts)? If not, what evidence supports this claim? Also, a 1975 NPS (RNP) EA is cited when discussing how long it will take for old-growth characteristics to be achieved from second-growth. A lot of silvicultural work has been done since 1975; isn't there any more recent research with new information pertinent to this issue?

Impacts Relating to Visitor Use (p.310-311). Why are resource management activity impacts (e.g. noise disturbance) in this section? There is a statement in this section that no primitive camping areas have been developed in suitable spotted owl/murrelet nesting habitat; does this include horse camps on the west side of Redwood Creek basin? And how much suitable habitat is within 0.25 mile of primitive camping areas? It is stated that 69% of old-growth is within 0.25 mile of trails. But if in addition to trails, all developments and facilities (camping areas, roads, etc) are included, then what is the percentage of old-growth subject to disturbance? It seems to me that all these locations which all have similar impacts on owls and murrelets should be summarized together. What are the impacts to peregrine falcons and their nesting habitat from continued use of coastal facilities and activity sites? In the conclusions section, it discusses only impacts to spotted owls and murrelets, but impacts from visitor use are not limited to these two species, and it completely disregards impacts to peregrine falcons which are known to breed in the parks.

Cumulative Impacts (p. 312). With regard to watershed restoration and second-growth management, I question the 500 year timeline stated in reference to forest fragmentation. While it may take hundreds of years to recreate suitable nest sites (individual nest trees), forest fragmentation will almost certainly be reduced substantially far in advance of the stated 500 years. After the canopy is closed, the risk from avian predators (e.g. corvids) will diminish, and that is one of the basic concerns about forest fragmentation with regard to spotted owls and murrelets. Although not mentioned here, there are more impacts from human presence than just attracting predators (e.g. noise and disturbance).

#### ALTERNATIVE 3 IMPACTS

In addition to my previous comments that pertain to the issues here, I have the following additional comments specific to this alternative.

#### Impacts to Wetlands

P. 323. Please see my comments for Alternative 2 regarding second-growth management's effect on drainage patterns. There is mention of localized, indirect negative impacts from runoff from disturbed soils if heavy equipment is used to remove downed trees; does this mean impacts from soil compaction caused by the heavy equipment?

Impacts Relating to Artificial Impoundments (p. 324). It states here that immediate removal is the greatest benefit to naturally occurring wetlands. I strongly disagree, and refer you to my comments on this subject at the beginning of my letter (Comments Pertinent to All Alternatives, my p 2-3). It also states here that the adverse impacts to wildlife and recreation are indirect. How can it be determined that removing recreational opportunities of certain kinds, and

moderate adverse effect in this document. Restrictions on the timing of activities to reduce adverse effects is considered mitigation because adverse effects are avoided or reduced by timing of activities so that they occur outside the breeding season. Refer to the definition of mitigation on page 244 of the draft for a complete definition of what constitutes mitigation under the National Environmental Policy Act.

**535-AU** The watershed restoration plan for the parks is being revised. The environmental compliance document that accompanies the revised plan will provide more detail on the mileage of perennial stream channel that will be restored under the program. The benefits for salmonids result primarily from the reduction of sediment that would otherwise be delivered into spawning streams. The stream channels are crossed by short segments of roads, because roads are generally not constructed in streams.

**535-AV** The environmental compliance document that accompanies the revised watershed restoration plan will include detailed discussions of the adverse impacts on all affected resources. These effects are not covered in this environmental impact statement / report because wildlife other than threatened and endangered species was not considered to be an impact topic that needed to be addressed at a general plan level.

**535-AW** The effects on amphibians that would result from the removal of artificial impoundments would be discussed in a site-specific environmental compliance document that would accompany a planning document. Effects on amphibians are not covered in this environmental impact statement / report because wildlife other than threatened and endangered species was not considered to be an impact topic that needed to be addressed at a general plan level.

**535-AX** The use of the term "repeated" conveys the long-term nature of the impact.

**535-AY** The National Park Service and California Department of Parks and Recreation acknowledge that visitor use of wetland areas can affect many species of wildlife. Bears are not considered a typical wildlife

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permanently exterminating populations of native amphibians, and displacing, reducing populations supported here, or killing other wildlife are not direct adverse impacts?

Impacts from Visitor Access and Circulation (p. 325). Relocation of Newton B. Drury Parkway at Elk Prairie. On page 103 it states the purpose of this action is to restore the integrity of the prairie. While I support the intent, I am opposed to a new alignment across Boyes Creek. Isn't Boyes Creek currently a productive salmonid spawning creek? Why mess it up more than it already has been by other activities?

Cumulative Impacts. In addition to other problems with the discussion of artificial impoundments, it says neglects to mention any negative impacts to wildlife habitat and wildlife.

**Impacts to T&E Species**

Impacts of Watershed Restoration (p.326). Finally, admission that the primary benefit is to waterways and salmonids, and that regardless of method, this action has minimal long-term (and virtually no short-term) benefits to T&E birds (this is true of all watershed restoration proposals under all other alternatives too). There also seems to be a discrepancy between statements made here and in other sections of the plan with regard to major sediment problems. In another section of the plan it says 85% of the sediments are delivered from upstream of park boundaries in the Redwood Creek basin; so how can it also be true, as stated here, that watershed restoration upstream of the national park "would have minor to moderate benefits on coho salmon and other anadromous fish...." while in-park watershed restoration in the lower redwood Creek basin "would provide the greatest short-and long-term benefits for populations of coho salmon and other anadromous fish." ? Isn't this backwards?

Impacts of Estuary Restoration (p. 327). Discussion of uncontrolled breaching leaves out the possibility (or probability) that uncontrolled breaching would be less likely to occur if flood easements, elevation of Hufford Road, and the other options were implemented. If these things were done, wouldn't there be less incentive for people to breach the mouth? Again, there should be mention of the benefits from estuary restoration to peregrine falcons and bald eagles (due to increased prey).

Impacts of Second Growth Forest Management (p. 327). Simply because the second-growth treatments would occur in habitat that is not suitable murrelet or spotted owl habitat, this does not necessarily mean that there would be no short-term adverse impacts from noise and disturbance to these species (as is stated here). If treatment sites are within 0.25 mile of suitable habitat, then noise/disturbance impacts could occur. I would expect that this would be the case if treatments would be focused on second-growth stands adjacent to old-growth as proposed in this alternative (and which I agree with). I assume that what is really meant here (but not stated) is that no impacts would occur because treatments would be conducted outside the breeding seasons of these birds, right?

Impacts of Fire Management (p. 328). The statement that opening the understory would benefit murrelets by increasing the space available for maneuvering to the nest seems to be a stretch. Murrelets nest in the upper canopy of old-growth trees (hundreds of feet up), and generally they do not fly low in the understory to reach their nest sites. So in order for openings created by fire to be useful to murrelets maneuvering to their nests, fires would have to remove canopy vegetation --which suggests crown fires and catastrophic fire, something the fire management program is meant to prevent, right? The more open understory created by fire management is much more likely to benefit spotted owls (by increasing prey availability) than murrelets. Although not mentioned, direct short-term adverse impacts of prescribed fire are the same as for large uncontrolled fires: smoke, heat, destruction of vegetation, and death of less mobile wildlife. In this section, as in other alternatives, loss of habitat from catastrophic fire is mentioned, but direct loss of T&E birds (e.g. nestlings and incubating adults) from catastrophic fire is not mentioned; the risk of these direct losses would be minimized by fire management, and thus a benefit of fire management to these species.

Impacts Relating to Visitor Use (p. 328-9). In addition to attracting predators, visitor use impacts include noise disturbance. It states here that noise and disturbance impacts to owls and murrelets would be "slightly less than under the proposed action". I would think it would be substantially less since 23 miles of trail (with 0.25 mile

species associated primarily with wetlands. This section discusses the most important impacts on wetland functions and values. Visitor use of wetlands is anticipated to have a greater likelihood of affecting birds primarily associated with wetlands such as waterfowl.

**535-AZ** Wetland functions and values are defined in the NPS *Procedural Manual #77-1, Wetland Protection*, to include cultural values such as aesthetics and recreation.

**535-BA** Any proposal to remove any artificial impoundment would require site-specific planning and environmental compliance documents, which would consider the impacts on current resources and visitor uses at these locations. Mitigation for any adverse impacts on resources that would result from removing the artificial impoundments would be included as part of project implementation. The cumulative impact discussion in the draft plan on page 259, and on page 284 for the proposed action, acknowledges that development can result in adverse effects on wetlands. In a general document such as this, the environmental impact statement describes the most important effects. Adverse effects from visitor use of wetlands in the parks are insignificant in comparison to the impacts of previous land uses on wetlands in the Redwood Creek basin. See comment AW in this letter for an explanation of why effects on amphibians are not discussed in detail.

**535-BB** The text has been revised to reflect that murrelets nest in terrestrial forests. Murrelets are discussed with terrestrial forest-nesting birds in this document because the proposals in this plan that potentially affect murrelets affect the terrestrial forest in which murrelets nest.

**535-BC** Effects on bats are not covered in this environmental impact statement because wildlife other than threatened and endangered species was determined to be an impact topic that did not need to be addressed at a general plan level.

**535-BD** The discussion of impacts from noise and human disturbance on pages 260-62 in the draft plan is intended to apply to all wildlife.

535-BM

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impacted around them) would be removed and an additional 60 miles of trail (with 0.25 mile impacted around them) would not be constructed (but which would be under alternative 1). It also states here that "visitor use on well-established trails would not be anticipated to be high enough...to create adverse effects on owls or murrelets." What levels of visitor use have been determined to be below the threshold of adverse noise/disturbance effects for these species? What is the source of information used to make this determination?

Conclusions and Cumulative Effects (p. 329). It seems to me that the statement that watershed restoration, second-growth management, and fire management would provide major long-term positive cumulative effect for spotted owls and murrelets, but coho and other anadromous fish would receive only moderate long-term benefit from watershed and estuary restoration is backwards. However, by my reckoning (for reasons elaborated previously), the fish would be the major beneficiaries under cumulative effects of landscape level treatments, and T&E birds would derive a much reduced cumulative benefit. And as above in the Visitor Use section, I do not find a reduction of 83 miles of trails and other developments to be a "slight reduction", but a substantial reduction with comensurate reductions in disturbance to owls and murrelets.

Impacts on Visitor Access and Circulation

(P. 332). Here it states that there would be major changes in visitor use patterns, but in the section on impacts to T&E species, it stated that changes in visitor use would be slight. If one were cynical, one could interpret this discrepancy to mean that the preparers were trying to minimize the impression of positive impacts of this alternative to T&E species and maximize the impression of negative impacts to visitors to make this alternative as unpalatable as possible.....

It states here that "fewer visitors would have the opportunity to experience those resources directly". Given the proposals in this alternative, I believe this is not the case. Visitors would still be able to experience the resources, like old-growth, directly at vehicle accessible and trail accessible sites in the parks (for example at LBJ Grove, Stout Grove, Newton B. Drury Parkway, etc.) What would change is that with fewer of these type sites, visitors would likely experience more crowded conditions at the remaining sites that were readily accessible.

In another part of this section, it mentions the desirability of reducing "visitors dependence on direct interaction with trained interpretive staff". Why is it desirable? In my experience, person-to-person interpretive interactions (tours, talks, guided walks, evening programs, etc) are a highlight of most visitors park experience. Why isn't there an option with more, instead of less ranger-led activities? I also don't understand the statement that a primary visitor center outside of park boundaries would necessarily inhibit interpretation of park resources (and therefore be "less suitable" than one within the parks); it is true that rangers probably couldn't simply walk out the door and lead a hike from the visitor center, but they could still meet visitors for scheduled hikes, etc at various locations in the parks, couldn't they?

On the matter of Freshwater Spit, I agree that a line of RV's three deep and obscuring the view of the coast is not very inspiring as motorists crest the hill at the south entrance to the parks, and thus as a first (or last) impression of the parks is not desirable. With less development of campgrounds in this proposal, what is the likelihood that private campgrounds could be developed outside park boundaries which could "take up the slack"? Strictly as a matter of opinion, I think it would be ridiculous (and political suicide) to remove Tall Trees Access Road and replace it with a trail at this point. On p. 333 there is discussion of losing several slow-speed scenic drives under this alternative, but it neglects to consider that the parks have relatively recently "gained" an extensive slow-speed scenic drive at Newton B. Drury Parkway when the highway was rerouted (at great expense to resources and financially) to the Bypass.

Socioeconomic Impacts

Regional Impacts (p. 335-6). Was consideration given to the fact that less development of camping facilities in the parks would result in increased opportunities for local businesses to provide campgrounds (and gain revenue) outside but near the parks?

Peregrine falcons have been added to the list of threatened and endangered species that are disturbed by human activity. The discussion of impacts from visitor use on page 265 in the draft plan acknowledges that use of beaches potentially affects plovers. The text has been changed to reflect that plover habitat in general is affected by use of beaches.

Consultations with the U.S. Fish and Wildlife Service on the effects of the watershed restoration program on northern spotted owls and marbled murrelets have resulted in agreement among the National Park Service, the California Department of Parks and Recreation, and the U.S. Fish and Wildlife Service on the extent of impacts allowed. The size of trees that can be removed is subject to these agreements. The future second-growth management plan will also be subject to review by and consultation with the U.S. Fish and Wildlife Service. The biological opinion issued by the U.S. Fish and Wildlife Service will describe the specific actions allowed under the second-growth management program.

See response to comment AZ in the U.S. Fish and Wildlife Service letter for a discussion of how significance is defined for impacts on endangered species.

The effects of watershed restoration on intermittent drainages result in an indirect benefit to fish in permanent streams. Because fish are one component of the RNSP ecosystem, actions that restore ecosystem processes such as original drainage patterns result in indirect cumulative benefits to all wildlife species that occupy the ecosystem. This benefit is described on page 255 in the draft plan under the "Impacts of Actions That Are Common to All Alternatives."

The comparison of time over which benefits accrue to fish or forest-nesting birds is based on an estimate of time over which short-term adverse effects of stream sedimentation to fish spawning habitat may occur versus the time needed for trees to be an age that would be considered marginally suitable for owl nesting. Road failures that result in sedimentation of spawning streams have a direct effect on the spawning success of fish in the next spawning season. RNSP geologists define a

535-BN

535-BO

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ALTERNATIVE 4 IMPACTS

Many of my concerns regarding this alternative's impacts have already been brought up in my comments in previous sections. In addition to my previous comments that pertain to the issues here, I have the following additional comments specific to this alternative.

535-BF

Impacts to Wetlands

Impacts of Estuary Restoration (p341-2). Actually the impacts here are from lack of action, which is stated to be "adverse impacts on wetlands associated with the estuary." However no clarification is made as to level of adverse impact (minor? major? short-term? long-term?). It seems to me it would be a long-term major impact. Why does it state that long-term adverse impacts to anadromous fish and gobies are an indirect impact on wetlands; shouldn't it be considered a direct impact since the major value of concern here is the estuary's role as rearing habitat for these fish?

Impacts Relating to Artificial Impoundments (p. 342). Birdwatching is a major recreational pursuit at Marshall Pond and Lagoon Creek (I know HSU ornithology classes have regularly taken fieldtrips to Marshall Pond specifically to watch the woodducks), but it is not the only recreational activity pursued at these artificial impoundments. It is however the only one mentioned here regarding recreational value of these sites. Visitors also fish and canoe there, and choose to hike there at least partly because of the type of wetland/aquatic habitats there. These recreational opportunities should also be considered benefits of retaining impoundments such as Marshall Pond and Lagoon Creek.

Impacts of Visitor Use (p. 342). This section is totally inadequate in addressing the impacts of the substantially increased levels of development and use proposed in this alternative. Why are there no estimates and/or statistics on acreages of wetlands that would be impacted by the additional miles of trails, camping areas and other additional development to be constructed and used by/for visitors as proposed in this alternative? Without this information, there is no way to judge whether impacts mentioned (in the conclusions) are minor to moderate as suggested, or whether they are more significant.

Impacts of Vehicles on Beaches (p. 342). The statement that impacts are short-term doesn't seem appropriate since even though the vehicles may be on the beaches part of the year, they are on them every year--a long-term impact. There is discussion of auditory and visual intrusions, which are stated here to be direct adverse impacts on the aesthetic value of shoreline and wetlands. I do not see how this could be considered an impact to wetlands (unless the case is made for disturbance to wetland birds), especially a direct impact as are determined here. Doesn't this discussion belong instead in the section on Impacts on the Quality of Visitor Experience which begins on p.349?

535-BQ

Impacts to T&R Species

Impacts of Estuary Resoration (p.345)--in particular, please see my comments regarding this subject in Alternative 2.

Impacts of Fire Management (p. 345). As stated here, "alluvial stands of redwood forest and riparian communities along major rivers and streams would be least affected by fire suppression because these vegetation types are likely to have evolved without fire playing a major role." If fire never played much part in these areas, why is prescribed fire proposed for these areas in other alternatives?

Impacts of Artificial Impoundments (p. 345). Please see my previous comments on the likelihood that these impoundments are beneficial to peregrine falcons.

Impacts of Visitor Use (p. 346). With regard to impacts to spotted owls and murrelets, this section fails to mention the impact of attracting predators. It also states that a minimum of 69% of old-growth would be within 0.25 mile of roads/trails/facilities (check this with prior section on 69%), but what is the estimated maximum under this alternative? And what about other suitable owl habitat in addition to old-growth (how much of the total suitable owl habitat would be impacted?)?

major storm as one capable of producing road failures that deliver sediment into the parks streams. Based on their research in the Redwood Creek basin, they assume that a major storm is a 25-year-storm event. Using storm frequency data from the Redwood Creek basin, the geologists estimate that a major storm will occur in the next 20 years (see page 239 in the draft plan). Not all watershed restoration sites have 40-year-old conifer trees. If the last logging occurred in 1975, the trees are at most 25 years old now. The 20-year period in which a major storm is expected to occur is about twice as long as the 40 years in which trees may become suitable owl nesting habitat. The minimum time in which researchers estimate that trees may become suitable murrelet nesting habitat is 50100 years but is more likely to be 100-200 years (see response to X in the U.S. Geological Service letter). The National Park Service and the California Department of Parks and Recreation believe that long-term threats to fish are reduced by restoring watersheds; it is also a short-term benefit to the owls to not restore watersheds because that sometimes requires removing trees that the owls use for nesting. Both agencies believe that reducing the threat to the fish is more beneficial than saving marginally suitable northern spotted owl nesting habitat.

One effect of watershed restoration on surrounding forest is a minor indirect benefit to forest-nesting birds; this benefit results from restoring ecosystem functions, as described on page 262 in the draft plan.

Criteria for significance have been added to the plan under the "Assumptions and Methods for Assessing Impacts" section that was on page 247-48 of the draft plan.

535-BE The effects of prairie restoration actions on northern spotted owls and marbled murrelets are described on page 288 of the draft plan.

535-BF The two separate sections titled "Impacts Related to Visitor Use" have been combined. The effects of disturbance on endangered birds from visitor use in a variety of habitats are discussed on page 261 of the draft plan. Maintenance activities such as hazard tree removal are conducted according to the results of consultations with the U.S. Fish and Wildlife

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Impacts Relating to Visitor Access and Circulation (p.346). It states here that increased visitation and maintenance would increase impacts to owls and murrelets, but there is no estimate of how much more acreage of suitable habitat would be affected under the proposed actions, so judging the significance of the impacts is impossible. Also, realigning and widening Greater Coastal Drive as proposed in this alternative could have significant adverse impacts on peregrine falcons (foraging and nesting) which are not addressed anywhere in this section (again, please review the report analyzing habitat quality in the parks for peregrine falcons and the draft peregrine falcon management plan which are in possession of the Wildlife Branch, RNSP). There is also no mention of the potential benefits to T&E birds like peregrine falcons and snowy plovers from decreased vehicle access (recreational) on park shorelines.

Cumulative Impacts. See my previous comments regarding Cumulative Impacts sections for Alternatives 1 and 2. It seems to me that more than the "minor to moderate cumulative negative impacts" that are stated here accrue from the increased development, access and visitor use in sensitive habitats under this alternative.

535-BR

Impacts on Quality of Visitor Experience (P 349-50). Which visitors that now do not have access to Tall Trees Grove would be provided access if the Tall Trees Access Road were to be paved? The road is graded, so vehicle clearance really shouldn't be an issue. The people who couldn't physically make the hike from the parking area to the grove and back, still wouldn't have access. People in R.V.s (which are not recommended on Bald Hills Road anyway) still wouldn't have access. So which visitor group would be provided access with this "improvement"? All I can think of is those who don't want to get there vehicles dusty....

Cumulative Impacts (p. 351). The statement that "this alternative would have a very positive impact on visitor use and visitor experience..." is quite biased, and I beg to differ. A percentage of local visitors and travellers from afar are seeking solitude and are attracted by the ability to get away from other visitors and especially from vehicles. In the long narrow park complex, it would be easy to overdevelop trails and facilities and pack too much in. This alternative encourages that situation, and would either drive this segment of the visiting population away or at least greatly diminish their enjoyment there.

535-BS

Socioeconomic Impacts  
Regional Economic Impacts (p. 353) This sounds like a "something for nothing" proposal. I know that where money is to come from is not considered in this type of planning document, but if RNSP thinks its operating budget is going to be increased by 23% (1.6 million dollars) to foot the increase in workload (25 FTEs) resulting from this alternative, please forgive me but I'd have to suggest someone is living in a myth. What would happen if this alternative were chosen and the operating budget didn't not increase concomitantly? In my experience, park staff already have difficulty coping with protecting park resources adequately, so I would expect that the impacts on park resources would only become even more exacerbated with the proposed increase in development. Also, there is no mention that the construction income and jobs are all short-term influxes of money, not on-going.

535-BT

APPENDIX H: (p. 416-19) The list of rare, sensitive, T&E species is incomplete. For example, it states that peregrine falcons are "suspected to nest occasionally" in the parks, but in fact they are known to successfully breed in the parks (see parks wildlife records). Furthermore, I believe Vaux's swifts are on CDFG's species of special concern list, and they are known to occur in the parks, but they are not included in appendix H. On numerous occasions, I have seen (and reported on Wildlife Observation Cards) hundreds of Vaux's swifts arising from a roost (presumably a hollow tree) in the Skunk Cabbage Creek drainage; my assistant also saw them on occasion there. I would assume they may also be roosting elsewhere in the park, but are not observed since they leave just after dawn. Also, burrowing owls winter regularly near RIC. With regard to Townsend's big-eared bats, it states that they are recorded from the WWII radar site (probably this information--the exact location-- should not be published in this document, as peregrine falcon nesting sites should not be either) but it doesn't say that they were roosting there. What evidence are you using to make the judgement that their probable occurrence in hollow redwoods is "accidental or transient"? Given habitat-use evidence for this species from other areas, I would disagree with that statement, and would suggest that their use of such trees could easily be for hibernacula and roost sites--which is neither accidental nor transient. The statement is made that fisher are "thought to inhabit suitable habitat throughout

Service. The National Park Service and the California Department of Parks and Recreation receive permission for incidental take of endangered species as a result of these consultations. On page 263 in the draft plan, it is stated that suitable murrelet and owl nesting habitat would develop during a 200-year period without watershed restoration actions.

**535-BG** Acreages of suitable habitat are provided to give readers an understanding of the amount of threatened and endangered species habitat in the parks. Information on roads and trails is available in the biological assessments that have been submitted to the U.S. Fish and Wildlife Service. The information on roads and trails is incorporated by reference because it is too lengthy to be included in this general plan. Because this is a joint plan for management of Redwood National and State Parks, all information that does not specifically refer to either national or state park lands applies to both national and state parks.

The cumulative impact analysis is adequate for readers to understand the total effect on listed species from actions proposed in this plan combined with effects of past and reasonably foreseeable future land uses in the vicinity of the parks and the region. It is not possible to describe the effects of second growth management on listed species with greater accuracy until a more detailed plan with site-specific proposals is prepared. The effects on listed species of removing encroaching conifers for prairie restoration is discussed on page 288 of the draft plan.

**535-BH** Information that was available at the time this general plan was prepared has been incorporated into this plan. When funding opportunities arise, artificial impoundments will be inspected for conformance to NPS standards and for the potential for adverse effects on public safety and resources should some of these impoundments fail. It is inappropriate in a general plan to discuss site-specific actions on which a decision is not needed immediately. The loss of a recreational opportunity (birdwatching) from removing Marshall Pond is mentioned on page 284 of the draft plan.

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the parks", but in fact, they have been seen by park employees on a number of occasions and I believe also found by researchers (via track plates) in the Redwood Creek basin and vicinity. Thus, I would suggest it would be more appropriate to say they are known to inhabit the parks.

535-BU

Definitions (p.440). The definition of wetland states that "natural ponds" are wetlands, and by specifying the "natural" aspect implies that artificial ponds are not wetlands--is this the intent? Using the definition here, created ponds, for mitigation or other purposes, would not be considered wetlands, and thus not subject to protection. I believe this definition is too limiting, and therefore not appropriate, given NPS policy and other agencies' definitions of wetlands.

MY PREFERRED ALTERNATIVE

So, finally, (and of course, without the answers to my questions at this point), my own personal "Preferred Alternative" would be a hybrid, largely Alternative #1 but with some modifications. For reasons described in my comments above, it would include the following:

- complete or partial landform restoration in a limited number of high visibility areas with high visitor use. In all other areas, depending on the site, either partial landform restoration or road decommissioning/erosion-proofing, but emphasizing the latter.
- retain and maintain certain artificial impoundments (including but not necessarily limited to Marshall Pond, Lagoon Creek, and the stock pond at Elk Camp Prairie).
- commitment to monitoring and protecting park populations of T&E, sensitive and rare species (wildlife and plants)
- commitment to monitoring wildlife likely to be affected by resource management treatments (prescribed burning, second-growth management, etc) and large-scale management actions, and evaluating impacts.
- A primary visitor center (and other major developments like lodge, administrative facilities, additional park housing) outside of park boundaries, along Highway 101 or in Orick if possible.
- consider moving existing facilities back from the edge of the coastline where high quality habitat for nesting peregrine falcons exist.
- Retain park housing in the Bald Hills, and keep it occupied with law enforcement ranger(s).
- no vehicle access campsites in the Bald Hills, unless the parks implement have much more ranger presence in the Bald Hills than has been the case.
- an extensive shuttle service in the parks (and from hub areas outside the parks, including). This, in and of itself, would reduce vehicle impacts and at the same time would allow visitors access to places in the park that they otherwise wouldn't be able to go and provide opportunities they otherwise might not have. Specifically, I mean that visitors who come in RVs (which are not recommended on Davison Road or Bald Hills Road) could take shuttle service to Lady Bird Johnson Grove, Tall Trees, other areas in the Bald Hills, Fern Canyon, etc. Also, if bike racks were provided on the shuttles, it would also allow mountain bikers access to drop-off and pick-up spots
- estuary restoration as proposed in Alternative 3, including removal of levies near mouth of the river.
- relocation of the Fern Canyon parking area; relocating the road, parking area, and restrooms from the wetlands at Crescent Beach, but possibly retain the trails there; policy of day use only at Enderts Beach Road

There would be no significant adverse effects on wetlands from constructing visitor facilities at the B-mill deck. See response to comment AD in this letter.

535-BI The discussion of bald eagles on page 184 of the draft plan mentions eagles seen foraging at the Redwood Creek estuary. A general document of this nature must concentrate on the most important effects of the proposal. The National Park Service and the California Department of Parks and Recreation acknowledge that restoring the estuary would benefit numerous species that use the estuary but only the most important effects of restoration are described in this plan. See previous response to comment F in this letter. The effects of second-growth management will depend on the objectives of the program and the specific sites chosen for management.

Approximately 830 acres of Douglas-fir (1992 figure) that has encroached onto former prairies and oak woodlands is being considered for removal under the prairie restoration program. As with all other resource management programs, prairie management is subject to consultation with the U.S. Fish and Wildlife Service because of potential effects on listed endangered species. The results of those consultations determine how much acreage of Douglas-fir the RNSP staff may remove. The total acreage of conifers removed may not be as important as the size and location of trees removed. All suitable murrelet habitat in the parks is assumed to be occupied. Based on the size of northern spotted owl nesting territories known in the parks, and the amount of suitable habitat, it is assumed that not all suitable owl habitat is occupied.

RNSP staff have not performed specific studies in the parks on the effects of fires on spotted owl prey species. It is a reasonable prediction that restoring an ecological process to the parks would restore the processes that created the habitat in which both the owls and their prey evolved, and that the long-term benefits of restoring a process would be greater than the short-term adverse effects that would occur in a limited area. The frequency of old-growth burns would attempt to mimic the natural fire frequency. Fire management programs are subject to consultation with the



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- no paving or widening of Tall Trees Access Road, Cal Barrel Road, or Greater Coastal Drive
- in the Redwood Creek basin, keep equestrian trails on west side of the basin, but do not provide equestrian trails on the east side. Reroute equestrian trails and camps to protect sensitive resources.
- if second-growth management is to occur, treat areas adjacent to occupied murrelet sites first, and then treat other sites as time/money permits.

Thank you for your consideration of my comments.

Sincerely,



Sabra Steinberg

## RESPONSES

U.S. Fish and Wildlife Service, and the actual schedule of implementing prescribed fire in old growth would be determined based on the outcomes of those consultations. See comment CM in the U.S. Fish and Wildlife Service for a discussion of the effect of weather on prescribed fire scheduling.

There are numerous benefits for wildlife that use Marshall Pond that cannot be included in a general plan because the resulting document would be too lengthy. The most important impacts are described. Subsequent site-specific planning and environmental compliance documents would be prepared before implementing most actions proposed in this plan. Those documents would provide more detail on wildlife species, including listed threatened and endangered species, that would be affected by the proposals.

The acreage of old growth affected by trails includes equestrian and mountain bike trails. The effect of human disturbance on wildlife in general is mentioned on pages 260-62 and 265 in the draft plan. See response to comment CD in the U.S. Fish and Wildlife Service letter for an explanation of where to find more detailed information on the amount of endangered species habitat affected by RNSP facilities. Site-specific impacts on endangered species from any development proposed in this plan will be described in the environmental compliance documents that will accompany the planning documents prepared before implementation.

The cumulative impact analyses in this environmental impact statement are adequate to understand the differences among the plan proposals. All implementation plans, including a comprehensive trail plan, will be reviewed by the U.S. Fish and Wildlife Service during formal consultation. Should the U.S. Fish and Wildlife Service issue a biological opinion that reveals significant adverse effects on listed threatened and endangered species, RNSP staff would revise the proposals to avoid, reduce, minimize, or otherwise mitigate any adverse effects on listed species.

This plan proposes that the trail system would be expanded, and that new campsites, if needed, would be provided. It is inappropriate to characterize

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these proposals as a "vast" increase in the absence of a specific proposal. This plan does not imply that driving is the only method of visitor access to beaches. That is why the section is entitled "Vehicles on the Beach" rather than "Visitor Use of Beaches."

**535-BJ** Not all the actions that are listed under estuary restoration have direct effects on physical (soils, hydrology) or biological (vegetation) elements that define wetlands — for example, land acquisition or purchase of flood easements. The degree of impact is described in the conclusions and cumulative impacts sections on page 308 of the draft plan.

Birdwatching is also mentioned on page 308 as a recreational use of Marshall Pond.

Current impacts on wetlands from visitor use and developments are described in the section on "Impacts of Actions That Are Common to All Alternatives" on pages 256-57 of the draft plan.

The "Conclusions" subsection on page 308 of the draft plan states the estimated acreage of wetland that would be lost if Marshall Pond and Lagoon Creek were removed. It is not possible to provide accurate estimates of wetland acreage that would be affected by removal of artificial impoundments without more specific information on which *impoundments would be removed*. The effects of second growth management on wetlands are anticipated to be minor, as stated in the section on page 307. Environmental impact statements are intended to concentrate on the more important aspects of a proposal rather than minor effects. Because vegetation patterns are related to effects of rainfall on soils, one effect of allowing second-growth forests to remain untreated is that rainfall and subsequent drainage patterns are different than what would have existed in unlogged forest.

The "Cumulative Impact" subsection describes the effects from actions that are thought to be most important of all effects on wetlands from plan proposals in combination with past activities and uses and reasonably

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foreseeable activities. Effects on wetlands from visitor use are very minor compared to the other activities listed.

**535-BK** The discussion of controlled breaching on page 309 in the draft plan states that adverse effects from breaching would be minimized to the extent possible. The term "minimized" is used rather than "avoided" to express the idea that some adverse effects would be anticipated. All breaching would be conducted under the conditions of the U.S. Army Corps of Engineers permit. One permit condition is that the National Marine Fisheries Service must be consulted. Should National Marine Fisheries Service determine through consultation under section 7 of the Endangered Species Act that breaching would adversely affect listed species, RNSP staff would be required to alter the activity to avoid or reduce or otherwise mitigate adverse effects.

Information from a qualified engineer on the likelihood of catastrophic failure of the Marshall Pond dam is not available. This dam will be inspected by a qualified engineer when the parks receive funding for inspection of this and other artificial impoundments in the national park. Should that inspection indicate that catastrophic failure is unlikely, or that the structures do not pose a serious threat to public safety, the Marshall Pond dam would remain.

These are not considered direct effects on wetlands because wetlands are defined by a combination of soils, hydrology, and vegetation, and the effects are on wildlife habitat, aesthetics, and recreational values of the wetland. The significance of an effect is not discounted because the effect is indirect. The National Park Service and the California Department of Parks and Recreation acknowledge that removing Marshall Pond would have adverse effects on recreational values of the pond. This adverse effect on visitor experience is not a direct effect on a wetland.

Any specific proposal for relocating the Newton B. Drury Scenic Parkway would require detailed site-specific planning and environmental compliance documents. Should the detailed planning reveal that significant adverse impacts would result from implementing the proposed

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realignment, the project would be redesigned so that adverse impacts were reduced below a level of significance, as required under the California Environmental Quality Act.

**535-BL** If heavy equipment was used to pile brush, it could cause soil compaction. Heavy equipment would only be used where there are existing roads and within the road corridor.

Any proposal to remove artificial impoundments would be accompanied by a site-specific environmental compliance document in which all impacts on resources would be described and considered before making a final decision. Any adverse impacts, direct or indirect, on wetland functions and values that result from the proposal would be mitigated to the greatest extent possible, as required by NPS wetlands guidelines. The impacts on wildlife and on recreational values are not considered direct impacts on wetlands, because wetlands are defined as the wet areas themselves, not the functions and values of the wet areas.

Planning for relocation of Newton B. Drury Scenic Parkway would require sitespecific planning and environmental compliance documents. These plans would consider site-specific impacts on all resources that might be affected by the proposal, including fish in Boyes Creek.

Adverse impacts on nonthreatened and endangered wildlife species and visitors who enjoy watching these species are described on page 324 of the draft plan. The impact on wildlife habitat at Marshall Pond and Lagoon Creek has been added to the cumulative impact discussion.

**535-BM** The subsection on "Impacts of Watershed Restoration" on threatened and endangered species in the "Impacts of Actions That Are Common to All Alternatives" on page 263 in the draft plan states that "Watershed restoration would have greater benefit to coho salmon and other anadromous salmonids than for spotted owls and marbled murrelets." Watershed restoration upstream of the parks will benefit resources only to the extent that private landowners are willing to undertake watershed restoration projects or to engage in forest practices that result in less

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damage to watersheds than occurred under previous logging practices. Timber harvest and associated road building on private lands upstream of the parks is anticipated to continue, with resulting adverse effects on resources. Complete restoration of all former logging roads, including minor roads such as skid trails, will have greater benefits for streams and aquatic resources than under any other alternative provided restoration occurs before the onset of a major storm.

The National Park Service and the California Department of Parks and Recreation cannot guarantee that private landowners will be willing to sell their property or easements. The National Park Service has sought such actions unsuccessfully for many years. Because of the uncertainty, the impact analysis describes what is a likely outcome under this alternative.

The plan has been revised to clarify that the discussion of 0.25 mile distance from suitable nesting habitat that appears under the "Assumptions and Methods for Assessing Impacts" section on page 247 of the draft plan is intended to apply to all noise-generating activities conducted in the parks, not only to watershed restoration activities.

The text has been changed in accord with this comment. See response to comment CY in the U.S. Fish and Wildlife Service letter.

The effects of trail use by visitors on continued survival of marbled murrelets are not significant compared to the effects on murrelets from the loss of nesting habitat throughout the range of the bird. This statement is based on best professional judgments about the current visitor use of trails and the observations of marbled murrelet use of old-growth stands in areas adjacent to trails. If it were true that visitor use created sufficient noise and disturbance to make habitat unsuitable for use by murrelets, it would be expected that no birds would be located during murrelet surveys of old-growth stands in Prairie Creek Redwoods State Park, Lady Bird Johnson Grove, and the Lost Man Creek area of the national park. Murrelets have been observed in these areas, which have been used by visitors for more than 20 years and longer at Prairie Creek.

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The cumulative benefits for northern spotted owls and marbled murrelets are considered major because the National Park Service and California Department of Parks and Recreation have greater control over restoring suitable habitats within RNSP boundaries. The cumulative benefits for fish are described as moderate because timber harvest and associated road building would continue upstream outside RNSP boundaries, with potential adverse effects on stream systems and thus potential adverse effects on fish in Redwood National and State Parks.

**535-BN** See summary comment A. The changes in types of visitor access proposed under this alternative would affect RNSP visitors much more than the same changes would affect endangered species. Changes in whether roads are open to motor vehicles would have substantial effects on how visitors can use the parks, particularly less mobile visitors or those with less time to spend in the parks, but would not have substantial effects on endangered species because visitors would continue to use the trails that were formerly roads. The difference in effects on endangered species from visitor use in vehicles as opposed to visitor use of the same area for hiking or bicycling or horseback riding cannot be quantified because of a lack of studies specific to these parks.

The reference on page 332 to "less visitors' dependence on direct interaction with trained interpretive staff to provide in-depth interpretation" relates specifically to visitor center facilities. A primary visitor center would allow RNSP staff to develop in-depth exhibits on RNSP resources. Currently, the only way visitors receive that type of information at facilities is through direct contact with staff who are busy answering questions and providing information to many visitors. A variety of learning styles and visitor preferences could be better accommodated through more comprehensive exhibits. *There are no plans to reduce ranger-led activities that are conducted throughout the parks.*

Currently, RNSP staff meet visitors for scheduled hikes at various locations in the parks. These ranger-guided activities would continue, but the range of activities that could be provided by locating the visitor center adjacent to RNSP resources would greatly increase. It would also allow

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RNSP staff to provide a better array of interpretive services to visitors who only have a couple hours to spend during their visit or have other limitations.

**535-BO** An effort was made to ensure a balance between public (NPS and CDPR) camping opportunities and privately owned facilities.

**535-BP** The level of significance of actions taken to restore the Redwood Creek estuary is described in the "Conclusion" and "Cumulative Impact" subsections on page 344 of the draft plan. The impacts on fish in the estuary are described as direct impacts in the discussion of "Impacts of Estuary Restoration" on threatened and endangered species.

The National Park Service and the California Department of Parks and Recreation will consider all recreational uses of Marshall Pond and Lagoon Creek in a site-specific planning and compliance document that will be required before any actions that affect these impoundments.

It is not possible to estimate accurately the acreages of wetlands that might be affected by new trails and facilities without site-specific planning.

The direct adverse impacts of vehicles on the beaches are short term because the vehicles are only there for short periods of time and drive only on the wave slope. Tidal action on the wave slope erases vehicle tracks.

**535-BQ** Refer to responses for previous comments regarding the Redwood Creek estuary (comment AC above) and artificial impoundments (comment H in this letter). Fire did occur in old-growth forests, as evidenced by fire scars on old-growth trees. Fire did not play a major role, however, in those forests compared to its ecological role in other vegetation communities such as knobcone-Jeffrey pine forests or the prairies.

It is not possible to estimate accurately the maximum amount of old growth that might be affected by trails and new facilities without site-specific information on the location of new development. See response to

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comment CD in the U.S. Fish and Wildlife Service letter for an explanation of where to find more detailed information on the amount of endangered species habitat affected by RNSP facilities. Site-specific impacts on endangered species from any development proposed in this plan will be described in the environmental compliance documents that will accompany the planning documents prepared before implementation. Benefits to peregrine falcons from decreased vehicle use of beaches would be insignificant because vehicles would still be allowed to use the roads immediately adjacent to the beaches.

**535-BR** Alternative 4 --Visitor use emphasis -- calls for increased visitor facilities, orientation, and interpretation at many locations throughout the parks with major development focused along U.S. Highways 101 and 199. It is proposed in alternative 4 that the upgrade of internal roads may result in better access to areas such as the Tall Trees Grove for some visitor groups. Without a detailed plan that addresses this proposal, it is not possible to identify the specific user group that would benefit from this type of improvement.

The agencies feel that opportunities for solitude would still be provided through management zoning in all the proposed alternatives. The cumulative impact statement addresses all the impacts in alternative 4 under "Quality of the Visitor Experience."

**535-BS** The increase in staff and the higher operating budget are only estimates intended primarily to assist reviewers in comparing alternatives. These increases also would occur over a 10- to 20-year period. If one looks back over the last 20 years, this figure is not an unreasonable estimate. Regarding construction impacts being short term, the text has been revised to say that impacts would be short-term in duration during the construction period.

**535-BT** The plan has been updated according to the most recent observations of wildlife in Redwood National and State Parks. The single observation of Townsend's big-eared bats from the WWII radar station suggests that the bats do not occupy this structure on a regular basis, and



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are unlikely to suffer harm from people who might be seeking to capture or harm bats. Information on the likely occurrence of Townsend's big-eared bats in the parks is from Gellman and Zielinski (1996). The Townsend's big-eared bat is known to be active during the winter in coastal California (Pearson et al. 1952). It is generally too mild during the winters in Redwood National and State Parks, and there is a lack of locations that have the stable temperature and humidity regimes required by most hibernating species. Larger aggregations of hibernating big-eared bats are confined to areas that have prolonged periods of freezing temperatures (Pierson and Rainey 1994). Townsend's big-eared bats have among the most specific temperature and humidity requirements for hibernacula of western hibernating bat species and are primarily a cave-dwelling species. Gellman and Zielinski speculate that logging has left fewer hollow old-growth trees that could serve as potential hibernacula.

**535-BU** The nontechnical definition of wetland in the glossary is intended to give readers a general understanding of different types of areas that are considered wetlands. As described in the "Wetlands and Aquatic Habitat" portion of the "Affected Environment" on pages 169-71 and the "Assumptions and Methods for Assessing Impacts on Wetlands" on pages 244-245 of the draft plan, the National Park Service and the California Department of Parks and Recreation will use the Cowardin classification to define wetlands. For those projects that might require compliance with Section 404 of the Clean Water Act, the National Park Service the California Department of Parks and Recreation will delineate wetland boundaries according to the criteria developed by the U.S. Army Corps of Engineers. Neither the Cowardin system nor the Army Corps delineation criteria discounts wetland functions and values because the wetland is artificial. Proposed actions in artificial wetland functions or values that are adversely affected by a proposal would be replaced, or otherwise mitigated, as part of a proposal, regardless of whether the wetland is natural or artificial.

COMMENTS

RESPONSES

REDWOOD NATIONAL AND STATE PARKS  
Fax 707-464-1812  
e-mail: redw\_suptintendent@p

Comments Due October 9, 1998

I am opposed to the Draft General Management Plan/General Plan, Environmental Impact Statement/Environmental Impact Report for Redwood National and State Parks as prepared and request the following:

- 1. ~~2.~~ The timeline for comments to be extended at least six months and immediately begin #2 below to prepare a new Draft.
- 2. ~~1.~~ Redwood National and State Parks conduct facilitated meetings locally to provide for community involvement. Develop a new Draft document consistent with our community's goals as well as the legislation of Redwood National Park and the California State Parks, National Environmental Protection Act (NEPA), and California Environmental Quality Act (CEQA).

The following are reasons for my request:

- The purpose of the Parks as stated on page 8 of the document is not consistent with the actual legislation for the park's creation. This inconsistency has laid the groundwork for a document without "the most fundamental criterion for determining the appropriateness of actions proposed in this joint plan." (Page 8 of the Plan)
- There is not a reasonable range of alternatives as required by NEPA and CEQA. Comparing the alternatives side by side reveals very little range in the proposed alternatives.
- The existing use (Alternative 2, No Project) is not clearly defined thereby precluding a reasonable comparison with the other alternatives.
- The general public has not been provided a reasonable opportunity to fully understand the document because it does not read or flow well.
- The recommendations and alternatives presented are not consistent with the information contained in the document.

Additional Comments:

Signed: Mina Stephens  
 Name:  
 Address:

*I would like to see more input. I live in Hiouchi and the private property taken over by government 25 years ago was mis-managed and left to deteriorate. Promises were not kept.*

132-A See summary comment B. The preferred alternative (proposed plan) incorporates a number of proposals for the use of federal lands in the Hiouchi area, including the development of a new visitor information facility, a new entrance road to Jedediah Smith Redwoods State Park campground, and the probable expansion of hiking opportunities and existing state park campgrounds.

132-A

COMMENTS

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REDWOOD NATIONAL AND STATE PARKS  
Fax 707-464-1812  
e-mail: redw\_superintendent@nps.gov

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- The recommendations and alternatives presented are not consistent with the information contained in the document.

Signed Mimi Stephens Additional Comments: See Attached Letter  
 Name:   
 Address: 



COMMENTS

RESPONSES

October 26, 1998

Letter to Editor: This is an open letter to the Redwood National & State Parks who has asked for input regarding guidance as to what way the Parks Service should be in the next 20 or so years. Approximately 26 years ago when we purchased our homesite in Hiouchi, we were told that some areas in Hiouchi had been taken from the landowners by adverse possession to be given back to the people, to make our area a "destination point" and that a large lodge was to be built to encourage visitors in our area to "take up the slack" that government involvements were shutting down mills and making fishing harder to make a living, before that time Crescent City was a prosperous lumber & fishing town, believe it or not. As time went on, one by one the 14 lumber mills that were here diminished down to now only one. I watched after boat after fishing boat was re-possessed, people were losing their homes right & left, it was a terrible time to watch these proud people lose their livelihoods one after another. There used to be four car dealerships here, a few years ago, it came down to none. We waited for the "big promises" that were made to these people whom were born and raised here and expected those promises to transpire. I watched the homesites here in Hiouchi being torn down and burned, and then left with trash, empty foundations and the beautiful plants that were treasured, die for lack of care. For What? Since then another large area was bought for another lodge they were told, and now we learn that no Park Lodge can be built on Park Land??? It has to be private land??? What I have perceived is that the Parks want more and more land to shut off roads, burn the little hunting cabins used for cons by the local hunters, keep the little one way gravel road to Stout Grove so that no tour bus could EVER get to it, visitors lay down in the road, walk in front of cars near Walker Road to take pictures, there is no nice area for them to easily turn into there, how in the world can this be a "Destination Point", and after 30 years, it is still not, it is more conservation more than any enjoyment for the people. Now we are being ASKED our opinions? Tell us, will it do us any good now that we have spoken? We have voiced our concerns at several of your meetings, I am just re-iterating what some of our people feel. If you have any power at all, please, use it now.

Sincerely,

*Mimi Mitchell Stephens*

536-A See summary comment B.

536-A

COMMENTS

RESPONSES

8 Nov 1998

Redwood National and State Parks  
1111 Second St.  
Crescent City CA

ATC 1/9

NOV 9 11 09:21

Dear Sirs

While I have not found time to review your entire Draft Management Plan, I submit these general comments for your public comments section regarding the alternatives presented. As a major federal landowner you have responsibilities to the taxpaying public as well as to preservation and maintenance of intact ecosystems and natural resources. I am generally supportive of alternative 1 with the amendment that visitor access, in terms of parking, trails, and camping, should be improved at existing locations wherever it does not impact listed species or important natural resources or ecological function. A number of exceptions and additions to the concepts of Alternative 1 are detailed below.

JET-SKI use, Crescent Beach (and Davidson road): Here you have an opportunity to set limits on the most obnoxious sport ever created. Jet skiers compose far less than 1% of your recreational users at present. Yet if a jet ski is buzzing the beach, it is certain to negatively impact 60-100% of all other users. At certain times, waters just beyond the surfline at both Crescent Beach and Gold Bluffs Beach support large numbers of foraging Marbled Murrelets, which would be displaced by jet ski use (Strong 1996, Redwood Sciences Laboratories, USFS unpubl. data). There are alternative use sites for these violators of natural beauty. Please insert some language to restrict use of jet-skis on ocean waters adjacent to the park. I understand the Humboldt Lagoons under your management are currently dealing with this issue, and I support a limited-area use at those locations (if you must have them).

Howland Hill road: Yes, I strongly support maintaining this road as an unsurfaced 2 way road. It's value and intrigue to visitors would be severely compromised if it were paved, plus speeds would increase and accident rates would go up from the current zero level.

Crescent Beach: I strongly support alternative 2 on this. What are you thinking? One of the attractions of this parking area is its direct access to the beach (the only one wheelchair accessible). You will gain an unimportant amount of wetland at great cost by destroying a perfectly functional, year-round, low maintenance visitor use area here and then destroy some habitat of slightly lesser value in relocating it to an inconvenient location. Meddling with this site as in alternatives 1 and 3 will firmly place your plan in the 'wasted tax dollars' category to anyone who is aware of the situation.

Freshwater Spit: There are no significant natural resources affected by camping in this area. A large number of visitors use

537-A The agencies consider the issues raised by commenters related to the management of public use and watercraft on Freshwater Lagoon and elsewhere in the parks, including offshore waters adjacent to the parks, to be too specific to be addressed in detail in this plan. However, the plan has been revised to reflect that public use of Freshwater Lagoon will be managed cooperatively with other jurisdictions. The issue of the use of jet skis in Freshwater Lagoon and elsewhere within the parks can be addressed through agency regulations.

537-B The road to the Crescent Beach picnic area traverses an area that is classified as a wetland. The parking lot at Crescent Beach is occasionally flooded during heavy rains, confirming the likelihood that without an asphalt cap, the current parking lot would be a wetland. The adjacent pond and other nearby ponds along Highway 101 near Crescent City are known breeding sites for red-legged frogs and are also used by waterfowl and other birds. Where natural wetland characteristics and functions have been degraded or lost due to previous or ongoing human activities, it is NPS policy to restore them to predisturbance conditions, to the extent appropriate and practicable. The National Park Service and California Department of Parks and Recreation recognize that Crescent Beach provides a unique experience in the area and valuable recreational opportunities for the local community and RNSP visitors. These experiences and opportunities must be considered during site-specific planning for the Crescent Beach area, in addition to any resource protection and restoration opportunities. A site-specific development plan would be prepared and accompanied by an environmental compliance document before redesigning the current visitor facilities at Crescent Beach. During the preparation of the plan, the community would be given the opportunity to review and comment on any proposals relating to the visitor facilities at Crescent Beach.

537-A

537-B

COMMENTS

RESPONSES

537-C

the site, and they provide some tourism to the local communities as well as have economical access to park visitor areas. I support maintaining this area as a camping site, an 'exception to the rule' based on its long history of heavy use and low impact. If you remove this site, you are obliged to make available a comparable amount of camping/RV use area elsewhere in the park, and this will come at great financial cost and certainly have more natural resource impact than the existing area.

Marbled Murrelets: There is no question that corvids prey on murrelet young at the nest, and little question that camping facilities attract corvids, and probably allow local population increases. Expansion of existing camp sites is far preferable to creating new ones in murrelet habitat. Probably the most effective tool in limiting this impact is EDUCATION of park visitors on the effects of feeding wildlife and disposing of trash correctly. Some background on these comments: I am a marine biologist with 7 years experience surveying murrelets at-sea. I have attended Marbled Murrelet Recovery Team meetings and been involved in federal and state Recovery Plans for this species.

A final comment: Be cost-effective. Don't destroy functional facilities only to construct something else somewhere else; use what you have. This has great bearing on how you are perceived by the public (local and visitor), and, hopefully, an effect on your use of fiscal resources.

Thank you for your consideration, and good luck! Please contact me if you would like more input on the ecology of Marbled Murrelets as it pertains to your management plans.



Craig Strong

ref: Strong, C.S. 1996. Abundance and reproductive performance of Marbled Murrelets along the northern California coast in 1994 and 1995. Unpubl. final report to the Marbled Murrelet Study Trust. 26 pp.

537-C See summary comment A.

COMMENTS

RESPONSES

R. Perry Taylor

REDW-433



August 22, 1998

98 AUG 24 PM 1:16

The Superintendants  
Redwood National & State Parks  
1111 Second Street  
Crescent City CA 95531

Dear Sirs:

Comments on Draft General Management Plan

Congratulations on preparing detailed alternative plans for public discussion. I am an older American, not an extreme environmentalist, nor am I in any way associated with the timber or fishing industries.

Generally I am in favor of your Alternative 1, "Proposed Action Plan." I am in favor of reasonable preservation and restoration, but I am against encouraging more visitors by substantial additional development.

I am in favor, for example, of marking trails discreetly, not obviously from highways, so that those who can read maps and truly wish to visit an area can do so, but excessive wear and tear from casual and perhaps careless visitors is minimized.

433-A I am certainly against paving or widening Howland Hill Road. If it became essential to make it one-way, it should be made one-way from the Crescent City south end, where the approach is most dramatic, not from the other end, where the approach is more gradual past a residential area. Keep the roads in Bald Hills area as is.

With the increasing U.S. population, and increasing recreational demands, catering to the latter will steadily destroy the experience for all. This has already happened to some degree, in several popular areas such as Yosemite, Tetons and Yellowstone.

To summarize, using your words in alternative 1, "Preserve & protect .... and emphasize restoration in sensitive areas at risk." Some visitor center upgrading is probably desirable, but not to the extent of "marketing" the area to ever increasing tourism.

Sincerely,

R. Perry Taylor

433-A See summary comment F.

COMMENTS

RESPONSES

Robin Tromble

[Redacted]

[Redacted]

September 22, 1998

Peter Keller  
Redwood National & State Parks  
Crescent City, CA 95531

Dear Mr. Keller:

I would like to be on record in favor of Alternative 2 of the General Management Plan. A new park facility in Hiouchi on the river would not promote local commerce. The original plan included the promotion of tourism in exchange for the loss of timber sales in Del Norte County. The National Parks priority should be recreational access and growth in the National and State Park system in the Recreational Area.

Emphasizing new developments within the National Recreation area would benefit many of the existing non-profit organization's. The potential for additional camp space, trails, park facilities, recreational uses such as baseball, volleyball, basketball, outdoor amphitheater etc., is there. The community could include a wide use of the new facilities to promote tourism.

437-A

The promise to promote tourism in Crescent City and Del Norte county by the National Park should be kept. It is vital to our community that the Redwood National Park office stay in the downtown area. We can only make a better community when all work together for the betterment of the community.

Sincerely,

Robin Tromble

SEP 23 1998

437-A See summary comment B. See also the response to Janis Crandall's letter.



COMMENTS

RESPONSES

Douglas G. Warnock



October 23, 1998

OCT 28 AM 11:00

REDWOOD NATIONAL PARK  
CRESCENT CITY  
CALIF 95531

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Dear Sirs:

Please find my comments as follows on the *Draft General Management Plan and Environmental Impact Statement* for Redwood National and State Parks.

Let me say at the outset I would concur that Alternate I is the preferred alternative. However several issues in Alternative I give me some cause for concern. First, is the heavy emphasis on vegetation management (pgs. 48 & 51 and other sections). The statement "Old-growth redwood forests are the primary resource and the purpose for the establishment of these parks" is without argument. However, the cutover lands (i.e. second growth forests) certainly do not fall within those parameters. They were added to the park to serve as a buffer to protect the "primary resource" and to protect the upper slopes of Redwood creek drainage from further degradation and not as "the primary resource." The fact that "they still lack the old growth qualities" does not impinge on or enhance the purpose for their addition to the park and should not be the rationale for launching into a very costly program.

543-A

The endangered species justification as presented for second growth management is so thin as to be nearly transparent. The attempt to "restore old growth conditions in the shortest time period possible" through "silvicultural methods" raises both questions and objections! Several of the most serious questions are very well framed by the statements in the second paragraph in the section on *Impacts of Vegetation Management* itself (pgs 263 & 264). "Several factors contribute to the uncertainty about the effectiveness of silvicultural treatments or forest manipulation in second-growth forest ..." and further "Also uncertain is the effectiveness of silvicultural treatment to recreate habitat characteristics suitable for murrelet nesting." It is made even more murky by such statements as "It is not known how many treatments or multiple entries into a stand should be required." In addition, statements such as that at the bottom of page 287 do not inspire a great deal of confidence. "It is not known whether there is enough suitable old-growth nesting habitat to sustain local or regional murrelet populations during the at least 145 to 245 years required for treated forest to become suitable for murrelet nesting." If they can make it for 145 years they surely can make it another 50 to 100 years while waiting for untreated forest to become suitable. The very significant costs of such an undertaking without having some reasonable assurance of achieving the intended result certainly cannot be viewed as either sound management or sound fiscal strategy." This is particularly true when, in this case, nature will achieve the desired result in due course at no cost. The removal of exotics where at all possible and practical should be pursued.

543-A The National Park Service and the California Department of Parks and Recreation agree that managing second-growth forests is a potentially costly undertaking and that there must be a reasonable likelihood of success. The second-growth management plan will undergo full public and agency review of the site-specific objectives and alternatives for restoring old-growth forests in previously logged areas of the parks. Reviewers of the more detailed implementation plan will be able to judge whether the alternatives for restoration would be effective and would meet the parks' goals.

COMMENTS

RESPONSES

A second concern is the preservation of the Prairie Creek Fish Hatchery. The best use of this facility would be the judicious action of a bulldozer to begin the process of restoration of the location to its natural condition before the erection of the hatchery. Just because a building is over 50 years old does not automatically translate to historic (see Webster's Encyclopedic Unabridged Dictionary) worth the money to save it.. The only history this facility has is failure. It was a failure when the State of California abandon it and it was a failure when the County of

543-B Humboldt operated and abandon it. In fact, its operation had significant detrimental impacts on the natural anadromas fish runs in both Prairie Creek and Lost Man Creek during the entire time the County operated the hatchery. As an aside I believe the statement on page 198 that the Prairie Creek fish hatchery "was developed to improve sport and commercial fishing" is incorrect. Several old time Department of Fish and Game officials (including one District Director) informed me the primary reason for the original construction and operation of the hatchery was the propagation of coastal cutthroat trout which is not and never has been a commercial fishery. To

543-C try and adapt this complex of buildings to public use will not only be very costly, it will spread an already thin park staff even further. It would result in the need to maintain and staff at least 3 visitor center/information facilities within a 3-mile radius. Of course, if the Park Service wanted to give up the proposal to build a new visitor center at the B-Mill site and the State consider consolidation of the State Park visitor center at Prairie Creek into a single joint facility at the converted hatchery as the one and only visitor center in the south end of the park - - a case might be made for keeping the hatchery?

543-D With or without approval of this proposed General Management Plan camping on the Fresh Water Lagoon Spit should be terminated on the shortest time frame possible. The California Department of Transportation has no legislative authority to operate camping facilities and cannot legally spend highway funds to do so. The District Office of Cal Trans in Eureka was under intense pressure from Department Headquarters in Sacramento in 1986 through 1988 to eliminate camping on Department lands on the spit. Had the National Park Service not come to the rescue of Cal Trans there is little doubt that camping on the highway right of way on the spit would have ceased several years ago. Not only is the situation an unsightly slum, it is a sanitary nightmare. In addition there can be little doubt the National Park Service is in serious jeopardy of becoming involved in a major lawsuit as the result of the catastrophic traffic accident that is just waiting to happen.

543-E There are several minor problems with the document in the form of typos, misstatements and mixed metaphors, most of which you will no doubt hear about from the many other commenters. Examples include the author of the last paragraph of the section on Ethnographic Resources (pg. 54) who seems to have become tangled with the work permit and who permits what, why and how. Redwood National has in the past issued permits to Native Americans for gathering traditional used plants. This was done in accordance with the section on Collecting Natural Products of the Management Policies of the US Department of the Interior, National Park Service, Chapter 8:15 (issued Dec 88 and similar preceding policies). I believe this management policy is still in effect.

There is no question (pg. 62) but that the character of the Howland Hill Road should be retained. However, with the current technology available there must be a way to retain the character and still have a road that by mid-July is not so full of chuckholes so deep that visitors endanger life and limb to say nothing of their vehicle when traveling it. On many years by the first of August

543-B This plan does not propose to operate the Prairie Creek Fish Hatchery as a hatchery. The structure is eligible for listing on the National Register of Historic Places. It is NPS policy to preserve or restore natural aquatic habitats and the natural abundance and distribution of native aquatic species including fish. Stocking in a national park will only be allowed where there is congressional intent expressed in a law or a House or Senate report accompanying legislation (NPS Management Policies 4:8). Under NPS policy, fisheries restoration refers to increasing the density of native fish species to historic levels through the application of scientifically based habitat protection and/or habitat rehabilitation (reconstruction) techniques. Fisheries enhancement activities are prohibited in natural zones such as Redwood Creek and other national park streams. Enhancement activities include the artificial production of fish through systems such as fish hatcheries (NPS Natural Resources Management Guideline, 1991, pp.40-42.) RNSP staff are working with the Yurok Tribe and the Redwood Creek National Watershed Center staff to develop an appropriate use of the Prairie Creek Fish Hatchery facilities to the mutual benefit of the involved parties.

543-C Suggestion is noted; however, the agencies support the proposed action under the "Historic Resources -- Structures" section on page 52 of the draft plan, that the Prairie Creek Fish Hatchery would be available for adaptive use through the historic leasing program. This facility could be developed into a working site that features regional resource management activities. The agencies feel that a working research center with an educational component alone would not fulfill the need for a multifaceted visitor center for the parks.

543-D See summary comment A.

543-E The text has been rewritten in the final plan.

## COMMENTS

## RESPONSES

- 543-F the dust is so thick on the vegetation a hundred feet on either side of the road, that it is more like driving through an old Salvador Dali painting than a temperate rain forest. Does anyone know what are the cumulative effects of that thick coating of dust year after year on the road side plants? The 3rd paragraph of the Air Quality section on pg. 253 also points out the above outlined problem and alludes to some possible remedies. However, in the section on Visitor Access and Circulation/Roads on pgs 61 & 62 there is no mention of the problem either in the Issues or the Actions sections.
- I was not aware that the State Parks had acquired the Little Bald Hills. The last I knew they were part of Redwood National Park. However, the last paragraph of the first column of page 173 as well as all the maps indicate the State has made this acquisition!
- 543-G There is a certain irony in the statement on page 178 that English ivy is a slow growing plant. True, English ivy is no banana poka but a plant that spreads seed from 50 to 100 feet up in redwood trees for distances of a quarter of a mile doesn't need speed. At 300 feet from the seed source it is very possible to find 50 to 75 viable seedlings per square yard. At the same time the plant each growing season is sending out 10 to 12 foot runners in all directions that root along their entire length. It forms a dense mat and climbs every vertical surface it comes to. This exotic is already causing significant localized disruptions of native plants.
- 543-H-I On page 226 last paragraph under American Indian Tribes section, the fastest growing tribal business enterprise - casino gambling (3 in Del Norte County) has been omitted.
- In the statement on Impacts from Vehicles on the Beach (page 258) vehicles are rather causally dismissed as having little if any adverse impacts. There is a wide array of zoological species that occupy the areas on and just beneath the surface of the sand and gravel of the inner tidal zone. I know of no definitive studies that assess the impacts of vehicles repeatedly driving over them.
- 543-J The omission on page 270 may be politically correct but it certainly leaves a shadow on the voracity of the section Cumulative Impacts on Threatened and Endangered Fish. Everything under the sun including the kitchen sink is listed as a cause for the collapse of anadromous fisheries -- save one. That very significant one, particularly on the Klamath River, being the in river commercial Indian fishery.
- A couple of typos - page 229 the Eureka-Arcata Airport near McKinleyville is 70 not 50 miles from Crescent City. Page 222 the figure for travel to the Redwood Information Center in 1995 is an obvious typo.
- The rather thinly disguised justification for retaining Marshall Pond (pg. 282 section on Impacts Related to Artificial Impoundments particularly the last paragraph) is rather disappointing. Marshall Pond is a totally artificial condition creating a situation not found naturally within "significant examples of the primeval coastal redwood (Sequoia Sempervirens) forests streams and seashores with which they are associated" (Public Law 90-545). Statements such as "The use of Marshall Pond by breeding birds and aquatic wildlife (exotic fish?) would be considered along with other wetland functions and values that might be lost if the dam were removed." May I be so bold as to ask, what happened to the functions that were lost when the dam was built? Those pre-dam functions are the functions that the National Park Service is mandated to preserve. Wood ducks are nice but I do not believe Congress charged the National Park Service with

543-F If the coating of dust on vegetation adjacent to unpaved roads is on the bottom on the leaf surface, it impedes respiration of vascular plants. However, it is thought that the primary impact is aesthetic rather than a physiological problem because most of the dust settles on the tops of the leaves.

543-G The text has been revised to indicate that English ivy is a long-lived perennial. English ivy is identified in the *Exotic Plant Management Plan* as one of the highest priorities for control. English ivy is grouped with pampas grass, Scotch broom, and Himalaya berry as a species that exhibits a number of characteristics that threaten RNSP resources. Among these characteristics are its methods of dispersal and sprouting, and its ability to grow in the shade.

543-H Casino gambling has been added to the discussion contained on the American Indian Tribes in the final plan.

543-I The National Park Service and the California Department of Parks and Recreation agree that there are effects of vehicles driving on the beaches that are not discussed in this plan. NPS guidelines for preparing environmental impact statements suggest that the document provide discussions of the most important effects of a proposal. Without inventories of the sand-dwelling species affected by vehicles driving on the beaches, it is not possible to discuss the effects on these species. The most important effects of vehicles driving on the beaches below the wave slope relate to aesthetics and public safety.

543-J Recreational and commercial fishing are listed as having contributed to the decline of coho salmon and other anadromous salmonids (NMFS 1995).

543-K The analysis of impacts on threatened and endangered species on page 289 (draft plan) from removing Marshall Pond identifies the restoration of habitat for native salmonids as a benefit.

COMMENTS

RESPONSES

creating or maintaining artificial habitats at the expense of natural conditions for the enjoyment of the visitors.

I am sure there are one or two more glitches in the proposed plan but is not a document that once you start reading you just can't put down. Quite frankly it is not an easy document to work with.

543-L

The fractionalization and separations of segments of any given subject makes it very difficult to get a clear picture of what is being proposed and why i.e. various discussions on 2nd growth management are found in no less (maybe more) widely scattered locations in the document.

Thank you for the opportunity to comment. While some of my comments may seem a little on the harsh side I have no doubt they will seem like child's play compared to what the good citizens of Humboldt and Del Norte Counties will be sending you!

Sincerely,

*Douglas G. Warnock*  
Douglas G. Warnock

543-L The organization of an environmental impact statement is, in large part, dictated by the Council on Environmental Quality regulations (40 CFR Parts 1500-1508). Furthermore, this document also had to meet the requirements for a California environmental impact report and the requirements for both NPS general management plans and the CDPR's general plans. We believe that, given all these constraints, the document is an acceptably clear presentation of a complex array of material.

## COMMENTS

## RESPONSES

SEP 24 PM 1:13

Superintendents  
Redwood National and State Parks  
1111 Second Street  
Crescent City, CA 95531

Dear Sirs:

Thank you for providing opportunity for the public to comment on the Draft General Management Plan for Redwood National and State Parks. First, we would like to comment on several proposals in the alternatives. Second, since the plan is general in many areas, and is too long for us to read in detail in our available time, we would like to comment also on other issues which have either come up in the past or which we have noticed occurring in the parks (which may or may not be addressed in the plan). We comment as professional biologists and long-time visitors to the parks.

Since the parks were originally established to preserve redwoods and the redwood ecosystem, we prefer the alternatives in the following order (with some reservations): 3, 1, 2, 4. Greatest emphasis should be placed on restoration and protection of the environment, with visitor use of secondary importance.

Most of our specific comments will deal with the southern area, since that is the area with which we are most familiar.

1. Vehicles on beaches.

We see two issues here: driving on the Park beaches, and fishing, especially commercial fishing, in the Parks.

We approve heartily of your decision to exclude recreational driving on the beaches. We further think that ideally NO vehicles should be allowed on the beaches, even for fishermen. Beaches are habitats for shorebirds. Birds live at the edge of starvation; every time people force them to fly, they use precious energy.

Snowy plovers are losing nesting habitat because people disturb their beaches. The sandy beaches in the parks are potential nesting habitat of these birds, which probably nested there in precontact times.

People already drive and fish on many beaches; they do not need access to every single beach! If beaches, shorebirds, and fishes cannot be protected in parks, where will they be protected?

Furthermore, vehicles detract considerably from the experience of people seeking peace and quiet on the beaches, and are dangerous in the fog (one of us nearly got run down on a beach in Samoa in the fog).

Fishing, like hunting and logging, is antithetical to the concept of parks. We strongly feel that commercial fishing should not be allowed for anybody. A chief purpose of parks is to protect natural populations of organisms -- fish included. The parks should serve as a refuge for surf smelt, which are exploited elsewhere, and perhaps prevent local extinction (as happened to sardines in Monterey Bay).

442-A The discussion of western snowy plovers on page 184 in the draft plan acknowledges that vehicles driving on beaches have adversely affected potential plover habitat.

442-A

COMMENTS

RESPONSES

Waters 9/21/98 re General Management Plan RNP/SP

2

If commercial fishing cannot be stopped immediately, we approve of your compromise in alternative 1 restricting issuance of permits.

442-B

We feel that the Yurok have a greater right to fish on the beaches than Euroamericans, since they have done so for generations. However, before contact they fished for their own use, and they did not use vehicles. If the Yurok are allowed to fish on the beaches because of their traditional right to do so, they should use traditional methods; that is, they should only fish for subsistence and they should not drive vehicles. If vehicles are prohibited for them, then they must also be prohibited for Euroamericans and other non-Yuroks.

If the plovers return to breeding on these beaches, the beaches should be closed entirely to people (and dogs!) during the breeding and nesting seasons. Screens or blinds could perhaps be set up for birdwatchers. The plight of these birds has been widely publicized, and their return would attract visitors to the Parks.

2. Redwood Information Center.

We strongly feel that this beautiful, relatively new visitor center, which appears to be in excellent condition, should be retained until a tsunami or Redwood Creek takes it out. The park has just spent money on remodeling it. It is spacious, with room for interpretive exhibits and information. Park money could better be used for restoration, land acquisition, or other purposes than to destroy a visitor center and build another one. The B Deck at Davison Ranch is already cleared, and is a good site for that reason, but increased traffic to it could disturb the elk and interfere with people trying to observe them quietly. It is also hidden from the highway, whereas the present center is conspicuous and easily accessible.

442-C-D

A better strategy might be to wait for Arcata Redwoods to abandon the A Deck, then purchase that ground. If the Park ever needed a new Visitor Center near Orick, it could be built there, convenient to Highway 101 and the Bald Hills Road.

We also do not like the idea of taking down the Hiouchi Visitor Center, which is even newer and is also very attractive. However, it is small, and we agree that a larger one may be needed. The existing one is in a good location, and it seems preferable to enlarge it rather than replacing it, especially since it could expand into the existing parking lot.

Certainly, in no case should established plants be cleared for new visitor centers or parking areas. Use recently disturbed or cleared land which is not yet recovering.

3. Freshwater Spit.

Ideally, we think that camping should be prohibited along the spit. The vehicles and tents are unsightly and detract from the scenic view of the ocean. Litter and public hygiene may be problems.

On the other hand, does camping on the Spit reduce demand for campsites in the parks? If so, perhaps camping should be allowed. (If camping is permitted, it should be regulated and the campers charged a nominal and enforced fee for trash pick-up, use of the outhouses, etc.) But do the people camping on the Spit visit the parks? A park employee told us that most of the campers are not interested in the parks (e. g., nobody showed up for campfire sessions one summer when the park offered them). We feel that camping on the Spit should be permitted only if most of the people there are visiting the parks.

However, in spite of our esthetic objections, if the campers contribute significantly to Orick's economy, probably camping should be allowed, though regulated as we just mentioned.

442-B California Public Resources Code (Division V Parks and Monuments, Chapter 1.75, Native American Historical Cultural and Sacred Sites) Section 5097.9 requires that public agencies permit Native American cultural/religious activities on public (state) property. The California Department of Parks and Recreation manages this activity and allows vehicle access for this purpose if necessary in order for Native Americans to carry out cultural/religious purposes.

442-C The agencies reviewed public comments regarding visitor center facilities and modified the proposed actions under the "Information, Orientation, and Interpretive Centers" section on page 56 in the draft plan. A location for a new facility between Prairie Creek and the Orick area would need to be constructed outside the tsunami run-up zone. The A-mill deck is currently owned by a private company and cannot be considered as a possible location during the development of this plan.

442-D The agencies feel that the Hiouchi Information Center is not in a good location and does not adequately serve the current or projected needs of RNSP visitors. The location of the center does not provide safe access for visitors to any of the parks' primary resources or links to any recreational activities. Safety for visitors crossing Highway 199 to enter Jedediah Smith Redwoods State Park is of primary concern. Adequate parking for busses and large recreational vehicles is needed. The facility was designed as an information center, and adequate exhibit and trip-planning space was never included in the design. Duplicate services are offered at the small visitor center in the Jedediah Smith campground. A new facility would combine operations and provide for a more efficient use of RNSP staff as well as expanded services to visitors.

COMMENTS

RESPONSES

Waters 9/21/98 re General Management Plan RNP/SP

3

4. Expanding the campgrounds.

We would not like to see them expanded, as large campgrounds detract from the feeling of wildness of the parks, and are also more destructive to the environment. Campgrounds cannot be expanded forever as demand grows; there has to be a limit to increase. The best limit is the size they are now. We cannot comment on the construction of new ones without knowing exactly where they would be built, the environmental impacts, etc., but we certainly would not like to see more developed, paved, car campgrounds, which would detract from the wildness and wilderness feeling of the parks.

442-E

If new campgrounds are to be developed, they could be placed in partially rehabilitated logging roads, rather than clearing more land. Campsites should be kept low-density, to minimize their impact and maximize people's privacy and enjoyment of nature.

5. Roads and parking.

Driving access to the Parks is already good. Adding, widening, or paving roads would greatly diminish the quality of the visitor's experience. It would bring more and faster traffic, with greater opportunity for vandalism, poaching, and injury to wildlife, trees, and people.

442-F

Enforce the speed limit on Drury Parkway. We have seen very fast drivers on this road, and recent fatalities are well known. (The visitor will wonder who Drury was. A prominent signboard or exhibit along the highway itself, explaining his significance, would be appropriate.) We are glad that the through trucks are no longer allowed to use this road.

Do not widen or pave Davison Road, Cal Barrel Road, and the others, but keep them as low-speed rough roads, as proposed and as they have historically been maintained.

Let the Coastal Drive deteriorate to a bicycle or foot trail, as proposed.

We favor removing the parking areas at Fern Canyon and Crescent Beach and rehabilitating the wetlands, as proposed.

6. Burning to maintain prairies, coastal bluffs, etc.

We are totally opposed to burning. It is non-selective. It kills small mammals, snakes and lizards, insects, oak seedlings and saplings, mosses and lichens, fungi and animals in the soil....

442-G

Lightning and lightning-caused fires are not frequent here anyway. Burning by the Yurok was human intervention and was not natural. Succession is natural and should be allowed to follow its course. The naturally bald areas will remain bald, and the extent of the balds will vary with climatic change in amount of rainfall over the years. Restoring the Bald Hills to their condition in the 1850's is purely arbitrary: why pick the 1850's? Why not let the Bald Hills be themselves?

If the park feels it desirable to remove Douglas firs to enhance the oaks in certain areas, do it manually, and do not remove large old trees. (We were very upset when Prairie Creek S. P. cut fine old spruces on the east edge of Boyes Prairie to increase grazing area for the elk, especially when most of the elk moved to Davison Ranch when it was acquired.)

The Park could institute carefully regulated cutting of Christmas trees. Removing invasive non-native plants such as Scotch broom and pampas grass should be of higher priority than killing native non-target species by burning. Such exotics should be removed by hand or with biodegradable herbicide applied to individual plants.

442-E New campgrounds, whether accessible by automobile or primitive backcountry sites, would be developed with full and careful consideration of the resource values at risk. Development would be preceded by careful planning and appropriate environmental compliance.

The plan allows for appropriate kinds and levels of development outside of sensitive resource areas, and the Northbank Road area in Del Norte County will be assessed to determine if development would be appropriate in this area. The area has potential for new trailheads, campgrounds, and other visitor facilities. Future development in the parks will require another level of detailed planning with public involvement.

442-F The suggestion is noted and will be included as a possible topic in the wayside exhibit plan being developed for Redwood National and State Parks.

442-G The National Park Service and the California Department of Parks and Recreation recognize that the Bald Hills are the result of a complex interaction of natural processes and human intervention in those processes. RNSP staff believes that ignoring the influence of the first humans to inhabit the area would be to preserve and protect a landscape that did not previously exist and would not be consistent with agency policies and other management guidance. The agencies have chosen to treat the Bald Hills as a cultural landscape to acknowledge these interactions and to maintain the appearance of the landscape created through these interactions.

COMMENTS

RESPONSES

Waters 9/21/98 re General Management Plan RNP/SP

4

When one manages the environment to favor one organism, others suffer. Who is to say which should live and which should die, anyway? Are oaks more "important" than mice and snakes? Are elk more important than centuries-old spruces?

7. The Redwood Creek estuary.

We favor as much restoration of the estuary as is possible, without destroying pastures or flooding Hufford Road. The park should acquire pasture lands as they become available, so that it could eventually remove most of the dikes. The proposal to raise Hufford Road is a good idea, especially if culverts or bridges could be incorporated to allow interchange of water on both sides of the road. Restoring the estuary would increase opportunity for birdwatching, canoeing, and other low-impact recreational use, in addition to its primary benefit to the ecosystem.

442-H

8. Second-growth forests.

The plan for second-growth forest is not specific enough for us to evaluate it in detail. We have mixed feelings about this issue, depending on just what is planned. The forests along Bald Hills Roads which have recently been thinned look much better for the thinning. In general, we would favor emphasis on thinning spindly trees in young regenerating forests, especially artificially seeded and unnaturally dense ones, as along Bald Hills Road. However, we favor leaving naturally regenerating, older forests alone. They are a lesson in regeneration and succession, for one thing. And disturbance injures or destroys undergrowth and soil and sets recovery back.

9. Removal of old logging roads.

This is a particularly important issue for us, and we have mixed feelings here also. Removal of many roads has been delayed so long that the forest is vigorously recovering. We definitely agree with the park in the necessity of minimizing or preventing massive mud slides and erosion and the consequent silting of streams. We commend the Park for its internationally recognized leadership in rehabilitating roads.

However, just how the roads should be removed, and which sections should be graded, should be carefully considered. Recovery of the forest will be set back many years by removing decades-old trees so grading can take place. Also, the plants covering the roads would be removed, exposing the soil again to erosion.

Further, some ditches along the roads have become habitats and breeding places for amphibians. We have been observing one road in particular since the breeding season of 1984. This is a logging road along Larry Damm Creek (tributary of Lost Man Creek). The park removed many trees along it last winter preparatory to grading it next winter. About a mile and a half up the road is a broad flat level area with fairly large shallow ponds which last into summer in a rainy year. Red-legged frogs (*Rana aurora*) and Northwestern salamanders (*Ambystoma gracile*) breed in it in profusion, especially the frogs. Pacific tree frogs (*Pseudacris regilla*) and rough-skinned newts (*Taricha granulosa*) also breed in them. There are also other ponds along the road where *Ambystoma* breeds, but this is the only place where we have seen abundant frog eggs and tadpoles.

Farther up the Larry Damm road there is a small pond where newts breed. This pond has a few leather grape-ferns (*Botrychium multifidum*) at the edge. This fern seems rare here; we have never seen it anywhere else in our part of northwestern California. The road also has a tiny population of running-pine (*Lycopodium clavatum*). Jepson lists this as "rare in California"; this is the only place in the parks where we have seen it.

442-H The restoration of the Redwood Creek estuary would require the cooperation of federal, state, and local agencies, the Yurok tribe, and private individuals. Specific restoration actions would be considered and must be agreed upon by all involved parties.



## COMMENTS

Waters 9/21/98 re General Management Plan RNP/SP

5

442-I

Ponds are a rare habitat in California. These ponds are slated to be removed. We very strongly oppose this proposal. This stretch of the road is not in danger of slumping; the ground is level and stable and erosion is not occurring in the ditches. Red-legged frogs are in trouble in most of the state; it would be a tragedy and morally wrong to destroy their habitat here, in a park!

These ponds have unusual educational value. We take JFW's herpetology and natural history classes from Humboldt State University there to see the egg masses and larvae of these amphibians. This is the only place we know where people can go right up to the edge of a pond and easily see all stages of the life cycle, which elsewhere are hidden in muddy or marshy places. Through the years we have also taken many people in our seminar on amphibians and reptiles of RNP to see these ponds (in the series of seminars which the Park used to offer). Still farther up the road, where we go less often, we have also found tree frogs and red-legged frogs breeding in puddles in the road, also in a level area which is not eroding.

442-J

Park personnel have shown us that considerably farther up Larry Damm Road there are terrible slumps. We agree that the heavy machinery needs to get up there; but why waste time destroying the margins of the road and some of the few breeding ponds in the Park, where there is no erosion nor threat of erosion, on the way to the real work?

442-K

Our point is that the roads, before being removed, should be carefully surveyed all along their lengths and sides for potential impacts to amphibians, rare plants, and other organisms. Who knows what other rare creatures may be hanging on to survival along the hundreds of miles of old road where we have never been? Each stretch should be carefully evaluated to see if it really is in danger of falling -- ditches are not always going to destroy roads. Precious resources of money and labor could then be concentrated where erosion is a real threat and the roads urgently need rehabilitation.

Thus routinely removing all logging roads may not always be the constructive idea which it seems at first sight.

#### 10. Concessions in the parks.

Do not let the parks become another Yosemite; do not permit private lodges, gift shops, etc. in the parks. Those cheapen and commercialize parks, detract from their beauty, and make them like any other commercial area. The park should design and build and run any lodges in the parks (the national parks have shown their ability to build extraordinarily beautiful buildings, of which the Redwood Information Center is one). Private people should be encouraged to build or restore motels and lodges in Orick, whose economy is in great need of being diversified. Whale- and birdwatching boats along the shore, and other forms of low-impact ecotouring, might also help the local economy.

#### 11. Trails.

We cannot evaluate the plans for trails without knowing more specific details than the Plan provides. However, we feel the park should minimize horse trails. We understand the desire of equestrians to have places to ride, but horses are very destructive to the ground (not to mention messy!) and should only be permitted on certain designated trails away from hiking trails (e. g. the existing trails on the southwest side of Redwood Creek). Mountain bicycles should also be minimized, because they are also destructive. They also should only be allowed on designated trails, since they are potentially dangerous to hikers. Also no motor bikes or motorcycles! Prevent erosion of trail by covering with wood chips, not gravel, as gravel is noisy and very unpleasant to walk on and alien to a forest (even though longer-lasting).

## RESPONSES

442-I The National Park Service and the California Department of Parks and Recreation recognize that short-term adverse impacts on nonthreatened or endangered species might occur during watershed restoration activities. However, the agencies believe that the short-term adverse impacts are outweighed by long-term benefits to the ecosystem as a whole, including the reduction of sediment into streams and the restoration of original drainage patterns and stream channels that would provide the natural habitat for amphibians. Rare plants identified by RNSP botanists are avoided to the greatest extent possible. The amount of habitat for breeding amphibians throughout the parks is considered to be sufficient to maintain the populations of these species over the time that watershed restoration activities would be conducted. Ponds are evaluated for wetland values during project planning. A wetland delineation is conducted for any pond to be removed that meets the U.S. Army Corps of Engineers' definition of jurisdictional wetland. RNSP staff would ensure that appropriate mitigation as prescribed by the Corps for wetland functions and values lost during watershed restoration projects is conducted.

442-J The ponding of water within inboard ditches, by saturating road fill material, contributes to road failures during storm events that deposit sediment directly into streams. Routine road maintenance generally includes maintaining inboard road ditches such that water does not accumulate and unnecessarily contribute to these erosive events. Even the most stable appearing roads may be capable of failing and delivering significant sediment loads to aquatic habitats during storms.

442-K We agree that a proper evaluation of potential impacts should be accomplished before rehabilitation work is undertaken. We have inventoried resources and in some cases delayed work to minimize impacts on sensitive resources and will continue to do so.

COMMENTS

RESPONSES

Waters 9/21/98 re General Management Plan RNP/SP

6

A real problem with horses and mountain bikes is that some of their users will not stay responsibly on the designated trails, and it takes very few of them on a hiking trail to cause nuisance, hazard, and damage. Perhaps it would be better just to prohibit them in the Parks. If they must be admitted, barriers of posts or stiles could be built to keep them off the hiking trails, and the Park could require that they produce some inoffensive but continuous warning sound (e. g. bear bells) for the safety of hikers on their trails.

12. Jet skis and speed boats should not be allowed on the lagoons, but only canoes, kayaks, sail boats, wind-surfers, and quiet motor boats for fishing.

13. Harvesting of wild plants and mushrooms.

Traditional use by the Yuroks should be allowed, but only if they do not injure or kill the plants (e. g. by digging spruce roots and bulbs). Berry-picking could be allowed, as long as it does not deprive wildlife of their necessary autumnal food. All such collecting should be for one's immediate personal consumption only, not for sale or storage (exception for materials for Yurok baskets).

Mushrooms should not be picked either commercially or for personal consumption. Mushroom collectors tend to be hoggish and destructive, picking more than they can use, and damaging the habitat. Many people enjoy the beauty of mushrooms and like to see them along the hiking trails.

Collecting deprives the many of this pleasure for the benefit of the few. Harvesting mushrooms, like any consumptive use, is contrary to the nature of a Park. Where else will these organisms be protected? Furthermore, fruiting bodies are important or primary sources of food for many animals including flying squirrels, red-backed voles, banana slugs, and certain insects.

14. Dogs.

These should not be allowed in parks at all. They chase, harass, and terrorize or kill wildlife. They ruin the wilderness experience for the rest of us, again the majority, who come to the parks hoping to see wild animals and experience quietness. If dogs must be admitted, at least do not allow them outside of campgrounds or unleashed at any time, especially on beaches, where they chase birds. And make sure that these rules are sternly enforced. Impounding dogs in violation would be justified by their destructiveness to wildlife.

15. To enhance the experience and education of visitors, keep the seminar series running! We are glad to see this program restored. The seminars are an excellent way to learn about the parks. Shorter, free nature walks, bird-watching trips, wild-flower walks, etc., led by interpreters or volunteers, are always educational and enjoyable, like Jim Wheeler's walks out of the Redwood Information Center. These are all good activities - keep them going!

We did not intend this letter to be so long! Thank you for your patience in reading it. The parks have done an excellent job in preparing the plan, which reveals a lot of hard work and thought, and we commend everyone highly! Again, thank you very much for providing opportunity for public input.

Sincerely,

Virginia Waters James Waters

Virginia and James Waters

442-L Gathering or possession of any species of mushrooms or fungi in the parks is prohibited under 36 Code of Federal Regulations 2.1(c)(3)(I) and the California Public Resources Code.

442-M Dogs and other pets, on a leash not exceeding 6 feet, are permitted in the national park only at all road-accessible beaches and picnic areas; the Redwood Information Center parking lot; Freshwater Lagoon Spit overnight use area; and within 100 feet of public roads and parking lots. Pets are prohibited on all other national parklands and areas and from all buildings except those listed above. Seeing Eye and hearing dogs assisting a disabled person and under physical restraint are permitted in all public areas in the national park. The use of dogs as pack animals is prohibited in the national park (36 CFR 2.15 [a] and 2.16[a]).

Under the California Public Resources Code, Section 5008.1, visitors may bring animals into the state parks provided the animals are under the immediate control of the visitor or shall be confined, and under no circumstance is the animal permitted to pose a threat to public safety and welfare, create a public nuisance, or pose a threat to the natural or cultural resources or to improvements at the parks. The California Department of Parks and Recreation may require a person bringing an animal into the parks to provide proof of immunizations and valid licenses (CA PRC 5008.1).

442-L  
442-M

## COMMENTS

## REVIEW COMMENTS

## REDWOOD NATIONAL &amp; STATE PARKS GENERAL MANAGEMENT PLAN/GENERAL PLAN

First of all I would like to give you some of my background for you to be able to judge my opinions and weigh my comments. I have lived in Humboldt County since 1972, I am a Humboldt State graduate in Resource Planning, and I work for the U.S. Forest Service. I utilize and thoroughly enjoy the State and National Park system in this area. It is a resource worth protecting, and has a capacity to serve many forms of land uses for the public enjoyment and resource protection.

Rather than go through and analyze each alternative of which none I can agree with in there entirety, I will comment on the plus's and minus's of the proposals this plan seems to base its alternatives on.

## POSITIVE COMMENTS

1. I can see only good coming from increased watershed restoration efforts. This can only be positive for water quality, fish and wildlife, and increased visitor enjoyment. Hopefully these efforts have some common sense on cost/benefit decisions with regards to degree of restoration.
2. Preserving our cultural resources and educating the public of them provides important ties that man has had with the land. History is of great interest to many people, a good learning tool, and is of course important to the local tribes and should be preserved and integrated into the many assets of the parks.
3. If current use figures warrant it I would be supportive of new visitor centers. If valid surveys show a destination lodge would be beneficial and profitable I would support this also and encourage private funds and management of such a facility. These are ideas that may well be needed now that the parks have "matured", and has worked well for parks in other areas.
4. Expanding trail systems and campgrounds would allow people greater opportunities to experience and access the parks as long as visitor use warrants it. It makes no sense to invest initially, or continue through maintenance, if not enough people utilize and financially support this infrastructure. Currently I feel the land base of the parks is under-utilized and these efforts could rectify this.
5. Managing the parks ecosystem for a return to old growth forests is an obvious yes, and would require little effort as long as trees are there to start the process (may require re-stocking and vegetation rehabilitation). Look at Aracata Redwood Park now, once a logged over ugly lanscape, now a beautifully redwood grove with little expense or management activity. Manageing prairies through fire management is probably a good idea and consistant with preserving cultural history, although not consistant with natural ecosystem evolution and the natural gain/loss of prairie woodlands.
6. Road improvement would be beneficial now that the parks are maturing and as long as use levels warrant it. This should increase accessability which would result in increased use. It can also help protect resouces by decreasing sedimentation and soil movement by road failures from low standard road construction.

## NEGATIVE COMMENTS

1. I strongly object to the parks aquiring more private land in the redwood creek estuary. This is prime agricultural land and provides taxes and income to the local economy. Many years ago now the park aquied large tracts of private timberland which the local econmy still has not recoverd, and which is still underutilized. I feel the parks have enough land base, the estuary area is not an old growth environment, and if the parks want to restore or enhance the qualities of the estuary they should do it with

444-A

## RESPONSES

444-A The National Park Service and the California Department of Parks and Recreation recognize that restoring the estuary will require complex negotiations among government agencies, the Yurok Tribe, and private landowners. Any acquisition of private property or an interest in private property would be only from willing sellers. As described on page 300 of the draft plan, property owners would be compensated at full current market value for any property or interest in property acquired. The economic value to the county from taxes and income of the 130 acres of private agricultural land in the estuary is far below the economic value of the thousands of acres of timberland removed from production because of park establishment and expansion.

COMMENTS

RESPONSES

current and future land owners, as the parks currently is willing to do with upstream land owners. I find it interesting that in alternative one, the second paragraph states "partial restoration of the estuary while maintaining current land uses". Then in the summary, the last paragraph states "need to acquire parcels in flood plain and the displacemnt of several farms and loss of agricultural production". I find this highly contradictory and I question either your thought process, honesty, or hopefully just your editing skills.

2. Proposed wilderness within the parks boundaries? I feel current restrictions and protections afforded this land base as designated State and National Parks is more than adequate. This would restrict land use practices and types of recreational uses available now. Wildernesses have great political appeal, but we already have sufficient numbers and variety in this area of the Northwest and don't need any more.

3. Camping on Freshwater Spit. A few years ago you tried to eliminate this use and there was so much public opposition that you dropped your efforts. I see now you haven't learned from past experience and are back to this proposal. Obviously the public wants this type of use, any drive by during the summer can tell you this. Orick's economy was devastated when the parks aquired the surrounding timberlands, these campers contribute significantly to the towns income. Not to mention the the publics desire to pursue this recreational experience at this location. What's the beef? Where's the harm? It may not be that aesthetic driving by or stopping and looking at RV's instead of the pacific ocean. This is one of the few places for RV's to stay in such an ideal location (view, accessability, affordability). There are many other places on the coastline for casual and day use visitors. Do not preclude this use, and if you must then charge a fee or set up zones for overnight stay.

What's the harm with camping on the beach? As long as sanitation is provided, which it currently is, this is a low impact use and obviously one which the public enjoys.

4. Prohibiting off road vehicle use seems to be one of the political wagons very popular today. Compared to when I first came to this area there is only a fraction of the areas available today for this recreational activity. This type of recreation that goes back a long way around here and although I can see how it may conflict with tradition park objectives, maybe the park needs to be flexable and open minded here. Does it really hurt for vehicles to be on the wave slope? Can't this form of recreation be regulated and enfroced like any other. Under your proposals no new or transferable permits will be allowed, effectively eliminating this use in the future as current permittees pass on. Except for traditional American Indian use of course. I did not realize that traditional indian fishing/gathering activities included OHV use. Why are these people treated differently than the rest of the american public? America is made up of different nationalities, and should ALL be treated equally.

SUMMARY

If I had to choose one of your alternatives it would be #2 based on my above reasoning. I realize this is the no action alternative and is a "default" requirement in the listing of alternatives and almost never selected. Therefore as a second choice I would choose #4. I feel the best action would be to after hearing the public comments come up with a plan that does not necessarily comply with any of your alternatives as they are written, but incorporate the better ideas and drop the ideas the ones which do not have support. If you would like to talk to me futher about my comments or solicit my help in the review process feel free to call me.

*Kurt D. Werner* 8/31/98  
Kurt D. Werner

SEP-2 12:12

444-B See summary comment E. Changes in the timber industry evidenced by timber harvest declines and related employment decreases have taken place throughout northern California. Areas not near the parks have experienced similar declining activity in timber harvesting and related manufacturing.

444-C *Public Resources Code* (Div 5, Chapter 1.75 Native American Historical Cultural and Sacred Sites) section 5097.9 requires that public agencies permit American Indian cultural/religious activities on public (state) property. The California Department of Parks and Recreation manages this activity and allows vehicle access for this purpose if necessary in order for American Indians to carry out cultural/religious activities.

444-B

444-C

COMMENTS

RESPONSES

Dear Sirs:

I am writing with respect to the current action being considered regarding the Orick, Ca. beach site.

Alternative #4 seems to be the most favorable in that it makes the most use of the environment without hurting it. It also does not destroy the economy of small nearby towns such as Orick and Klamath.

I have had occasion to stop at Orick beach and enjoy a short stay before moving on. I see many recreational vehicles (mostly older people) enjoying the same.

At the north end of the beach is an existing day use area which I have noticed being used, but never to capacity.

446-A I hate to see a small town such as Orick and neighboring towns have their economies seriously damaged due to the closing down of this potential source of their income. Also, the discontinuance of the commercial beach fishing in this area, should alternative #1 be selected, would place many out of work who depend upon this for their livelihood.

Please consider alternative #4 as a means of making the very best use of this small remaining area of enjoyment as well as the saving of a valuable source of income for these small coastal towns.

Thank you for considering this important matter,

A concerned senior citizen

Gerald L. Williams



*Gerald L. Williams*

09 OCT -5 PM 5:09

446-A See response to comment J in the Klamath Chamber of Commerce letter.

COMMENTS

RESPONSES

10-8-98

Superintendents  
Redwood National and State Parks  
1111 Second Sreet  
Crescent City, CA 95533

RECEIVED  
OCT 14 PM 2:35  
REDWOOD NATIONAL PARK  
CRESCENT CITY  
CALIF. 95531

Dear Superintendents:

Thank you for the copy of the Draft GMP/GP/EIS/EIR for RNSP (Draft). Following are my comments.

448-A Page 130 says that in Alternative 3 "the public would be educated so that they would support the protection of the resources". Why some political purpose? We get enough government propaganda without paying for more. I request that this purpose be deleted.

Watershed restoration

Page 38 says that in 1978 it was anticipated that watershed restoration efforts within the national park would be completed by 1993, however, "due to a shortage of resources", only 190 miles of roads have been removed to date. The last line on page 38 says "The ability of RNSP staff to participate in further cooperative erosion control efforts is limited by the lack of resources". The impression had been given by RNP that all this restoration work was being completed, and the 1993 goal had been met. None of this information on the "shortage of resources" had been publicized in the local newspapers. In the future, since restoration is one of the prime purposes of the park acquisition, it would be desirable that a yearly evaluation be made of the progress towards restoration and other GMP goals, and a timely press release should be prepared so that the public can be kept aware of the progress or lack of progress. PL 250 said that during the initial years of RNP a series of eleven reports were to be made to Congress on the issues and progress of the park, but each one took about three years before it was prepared, approved by the Washington office, and finally "issued", and the last one was not even prepared. While it is sometimes non-productive to give these kinds of reports, and sometimes nobody reads some of them, it would be desirable to have some sort of measurement of the progress towards goals so that corrective action may be taken before the park drifts too far off course. In the next GMP twenty years from now will we be hearing the same reasons for the still incomplete restoration program?

Alternative #1 is preferred. Page 78 says Alternative #2 would take 66 years to treat the roads, but after a certain period of time the trees would grow big enough to significantly increase the costs and timing of the restoration.

Cooperation of State and Federal governments

Page iii discusses the "joint plan". Page 64 says one objective of administrative facilities is "Consolidate or jointly locate CDP and NPS facilities wherever operational efficiencies or savings would be achieved." While the public was never allowed to be

448-A The agencies feel that one of the objectives of the interpretive program is to provide information through a variety of media (e.g., exhibits, brochures, programs, posters, videos, and books) on RNSP resources. An informed public that is knowledgeable about RNSP resources can then make informed decisions regarding their actions or activities that may protect or adversely impact park resources.

COMMENTS

RESPONSES

privity to the real issues separating the two agencies, the fact that they have admitted that the park could be managed better together than separately is a tremendous step and a benefit to the people whose money the two governments use..

Restoration of Redwood Creek estuary.

- 448-B Page 254 says that "Logging activities and levee construction in Redwood Creek basin have adversely impacted water quality in lower Redwood Creek". . Page 259 says "The levees ... have had a greater adverse effect on the water circulation and sediment deposition ... than logging activities ..." Levee construction has not adversely impacted water quality such as turbidity. Turbidity is not sedimentation, and also no adverse effects of turbidity seem to be cited. Water circulation and sediment deposition are the problems, not turbidity.
- 448-C Page 276 says there is "agricultural runoff". Page 277 says there are "contaminants originating from grazing and farming activities.". Page 304 refers to "contamination from animal wastes". The magnitude and nature of these contaminants is not indicated. Orick is not the standard mid-western farm cliché where chemical fertilizers and herbicides are extensively used and feedlots are prevalent, and this statement should be challenged as more environmental hype.
- 448-D Page 276 says that "agricultural runoff and sediment would be diluted and washed out to sea", but removing the levees would not dilute the water any more than at present nor would removing the levees improve the flushing action while the creek was flowing into the ocean.
- 448-E Page 277 says "The amount of benefit for water quality would depend on how much of the levees was removed". On the contrary, the removal of the levees "would cause increased turbidity levels over the short term" and introduce fuels during construction, but removal would result in little change in long-term water quality. The only water quality characteristic not created by RNSP itself is turbidity, and this quality is not affected by the presence of the levees.
- 448-F Page 277 refers to the elevation "above mean sea level". USGS uses this datum on topo maps, however, the Corps of Engineers uses mean higher high water (NGVD) datum in their calculations and on their maps. The Draft tsunami datus is mentioned as being mean sea level, but as I remember, the initial tsunami calculations used another third datum. Caltrans may use yet another datum for the height of the spit. Since the relationship between these datums is sometimes hard to visualize, a graphical figure could list the different kinds of sea level datums and show the ones that are being used.
- 448-G Page 1 of the 1994 Corps report states "The project was constructed to provide the town of Orick and surrounding areas with Standard Project Flood (SPF) protection." Page 2 of the 1994 Corps report shows that the "Excedence Interval (years)" for SPF protection is greater than the 200 year level. Page 163 confirms with "The levees offer protection against a greater than 200-year flood", however, this appears to be only "to within 1,000

**448-B** Turbid is defined in the *Third College Edition of Webster's New World Dictionary* (1988) as muddy or cloudy from having sediment stirred up. Turbidity is measured by the scattering and absorption of light by dissolved and particulate matter in water (D. S. Lloyd, 1987, "Turbidity as a Water Quality Standard for Salmonid Habitats in Alaska," *North American Journal of Fisheries Management* 7:43-45). Water quality is a general term to describe the relative levels of pollutants in water. Pollutants are substances, including sediment, which cause deterioration of water quality when added in sufficient quantities to waters. Sedimentation is the process of deposition of soil particles (page 1, U.S. Department of Transportation, *Federal Highway Administration, "Best Management Practices for Erosion and Sediment Control,"* June 1995. Report No. FHWA-FLP-94-005). Sediment that has recently been stirred up or that has not yet settled out of water causes water to be turbid.

The levees have altered the circulation patterns of the water in the estuary so that sediment may be deposited in backwater portions of the estuary. The sediment is primarily of marine origin, but the origin of the sediment does not change its effect on water quality. Before either the deposition of sediment or flushing of sediment out to sea, the suspended sediment causes the water to be more turbid than it would be otherwise. Usually, turbidity and suspended sediment concentrations are highly correlated; thus, turbidity can provide an index of suspended sediment concentrations (D.S. Lloyd, J. P. Koenings, and J. D. LaPerriere, 1987, "Effects of Turbidity in Fresh Waters of Alaska," *North American Journal of Fisheries Management* 7: 18-33). Suspended sediment concentrations may directly or indirectly influence the survival of salmonids (R. N. Iwamoto, E. O. Salo, M. A. Madej, and R. L. McComas, 1978, "Sediment and Water Quality: A Review of the Literature including a Suggested Approach for Water Quality Criteria," EPA-910/9-78-048 [PB-279-048], U. S. Environmental Protection Agency, Seattle, WA). Murky or turbid water can absorb more heat than clear water, causing water temperatures to be higher. High water temperatures are generally considered to be bad for salmonids, as described on page 186 in the draft plan. Suspended sediment can affect fish directly by clogging or damaging the respiratory organs. High sediment concentrations elevated several physiological measures of stress in juvenile coho salmon and steelhead (J. M. Redding and C. B.

COMMENTS

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feet of the Pacific Ocean". Anything less than SPF protection is taking away protections that have come to be expected, and there may be severance damages. Page 242, 277, 278, 279, 300, 304, and elsewhere refer only to the 100-year floodplain, however, the SPF floodplain should be used instead. Since the Draft says that right of way acquisition will be only from willing sellers, then any right of way acquisition would have to include all properties within the SPF area which would be flooded.

448-H

Table 24 on page 279 refers to removing the lower 0.6 mile (3168 feet) of levees on Redwood Creek, yet refers only to the size of the 100-year floodplain. If the SPF floodplain is the criteria in the area upstream from 1,000 feet from the ocean, then the SPF criteria should be used in determining the private properties affected.

448-I

The peak flow for Redwood Creek in Table 11 is shown as 50,500 cfs which corresponds to a 20-year recurrence interval on Table 12. The peak flows in Table 11, however, for Smith River and Klamath River correspond to slightly over 100-year recurrence intervals in Table 12. Page 163 says "The upper portions of Redwood Creek flood at about the same frequency as the Klamath River", so the recurrence intervals for the 1964 flood should be about the same. Is there some mistake?

If any of the properties within the proposed flooded area do not agree to sell, and RNSP honestly adheres to its willing-seller policy, then a single property owner has veto power over the particular proposal. As page 242 says, "The extent of restoration of the estuary depend on the level of cooperation of the landowners and the National Park Service". Government could intentionally flood the private properties and force them to sue for damages and inverse condemnation, but the willing-seller policy and resultant veto-power is good. Government has been too confiscatory and demanding, and citizens are justifiably becoming very anti-government. Government has the advantage of being immortal (between revolutions) compared to humans. Government also has the advantage of being able to force taxes from people, while the people may be stuck holding onto non-economical property. Much of the floodplain is not economical to use for agriculture, but it is up to the individual property owner to decide whether he wants to risk losing money, not government or local political groups.

448-J

Page 259 says "gravel mining in Redwood Creek" has "significantly and cumulatively altered the water circulation patterns and flow regime in Redwood Creek, reduced the water depth in the estuary, and filled in creeks that once entered the estuary". Gravel mining has had the opposite effect of that stated and has been very beneficial to the estuary by removing the gravel sedimentation prior to its being deposited downstream.

448-K

Page 259 mentions "the diking and draining of original wetlands for residential and agricultural development". Where is the residential development?

448-L

Page 281 says "Soils would become more hydric and fertile ...", but this "fertility" is not the kind needed for the plants desired for grazing.

Schreck, 1980, "Chronic Turbidity and Stress in Juvenile Coho Salmon and Steelhead Trout," Report PNW-1705-16, U.S. Department of Agriculture, Forest Service, Pacific Northwest Forest and Range Experiment Station, Corvallis, OR). Because salmonids are considered to be sight feeders, the reduction in light transmission caused by high turbidity may result in less feeding and decreased growth (L Berg, 1982, "The Effect of Exposure to Short-term Pulses of Suspended Sediment on the Behavior of Juvenile Salmonids," pp. 177-196 in G. F. Hartman, et al., editors. *Proceedings of the Carnation Creek Workshop: A Ten Year Review*. Department of Fisheries and Oceans, Pacific Biological Station, Nanaimo, British Columbia, Canada).

448-C On page 168 of the draft plan, the discussion of water quality indicates that elevated levels of phosphorus and nitrogen have been detected in water samples along lower Redwood Creek. In the absence of other possible sources, such as fertilizer plants and large feed lots, and because the potable water supply in Orick is regularly tested and meets state standards, it is a reasonable assumption that these nutrients originate from the use of commercial fertilizers and from cattle and sheep that graze in the pastures in the Orick valley. The impact section on page 277 of the draft plan has been changed to reflect that agricultural sources of pollutants are minor relative to upstream sources of sediment.

448-D The document has been changed to reflect that the primary benefit on water quality from removing the levees would be due to the restoration of the water circulation.

448-E The National Park Service and the California Department of Parks and Recreation disagree that levee removal would not improve water quality. See response to comment B in this letter for a discussion of how the levees are related to turbidity of the water.

448-F There is an order of magnitude of difference between either of the datum points used to established mean sea level and the estimated height of a tsunami caused by a large earthquake. Most RNSP visitors are familiar with the concept of high and low ocean tides and have a basic



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Since several property owners who might be affected by the proposals have already indicated that they are **not** willing-sellers, there may be **no action** on any of the RNSP restoration proposals, and there would be no workable estuary restoration accomplished.

448-M As page 48 says, "A way to ensure the natural ecological functioning of the Redwood Creek estuary needs to be determined". The Corps of Engineers, DFG, USFS, and RNSP would all like to avoid management of the Redwood Creek estuary, but it may not be possible. Since it is still desirable to restore the fishery, a "significant resource at risk", and government construction has failed twice already, I suggest the following two alternatives which do not involve any right of way acquisition, and which appear to be much cheaper than any of the RNSP proposals.

#### Alternative A

No action is suggested in the Draft for Freshwater Lagoon despite its government created problem of eutrophication. The elodia and algae blooms are probably caused by too much nutrients, which in turn is caused by a lack of salt water and the absence of a flushing action during winter. I question whether Freshwater Lagoon has overflowed since Caltrans raised the level of the spit and the culvert under the new highway was built. The winter of 1996-97 was one of the ten highest rainfall years, and there was no overflow. The following winter of 1997-98 was the fourth highest rainfall year, and there was again no overflow.

Prior to Caltrans raising the level of the spit, the ocean overwashed the spit and raised the level of the lagoon. The salt water lens at the bottom of the lagoon discouraged elodia growth and storage of nutrients in the dead plants. Introduced fish species such as bass could not live in the brackish water, but trout could. When winter rains came, the water level was already high, and the small amount of additional water from the small watershed was able to break through the spit occasionally. There is no overwash now, and there is no overflow back into the ocean.

448-M One possible solution is to pump salt water into the lagoon during the fall months before the heavy rains. Another possible solution, "Alternative A", is to construct a culvert between the Redwood Creek Estuary and Freshwater Lagoon, crossing only Caltrans and RNP property. The opening to the culvert could be gated for control. Obviously, during floods a certain amount of water would flow through the culvert to fill the lagoon and possibly help it overflow. The greater benefit, however, would be during the spring and fall when the creek was blocked by sand and the static water level rose. The lagoon has a much larger surface area than the estuary, and it can accommodate a very large volume of water. The level of water in the estuary would rise much slower, and there might even be a certain level at which it would stabilize due to the increased percolation through the increased length of sandbar. Salmon might be able to survive better in the lagoon than in the shallow estuary. They definitely would have a tremendously increased habitat. The culvert draining the lagoon is usually blocked by very little sand, and with the higher water levels, the culvert water would open a hole in the sands. When the culvert drained, however, the flow would be relatively small, flow would be limited, and salmon would not be sucked out into the ocean prematurely. No Corps of Engineers permit would be

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understanding that sea level changes with tides. The National Park Service and California Department of Parks and Recreation believe that it is sufficient to inform visitors that a tsunami may be 50 feet in height, and that visitors will understand the hazard posed by water levels that could be 50 feet above the beach that they might be standing on.

448-G & H Page 277 in the draft plan lists those structures that would be subject to flooding from a 100-year flood given removal of the levees. Information on the extent of the floodplain with various portions of the levees removed was taken from the U.S. Army Corps of Engineers, San Francisco District, hydrologic and hydraulic analyses for the evaluation of proposed restoration alternatives for the estuary, dated December 7, 1994. The Corps used a standard step-backwater program HEC-2 to develop information on floodplains in the estuary during flood events with recurrence intervals of 2.5, 10, 25, 50, and 100 years.

For most actions, the National Park Service uses the 100-year-floodplain as the regulatory floodplain, e.g., that floodplain which is subject to regulation under Executive Order 11988 "Floodplain Management." EO 11988 requires federal agencies to consider the effects of the 100-year flood as the minimum level of flooding to be used by a community in its floodplain management regulations (*Federal Register*, vol. 43, no. 29, February 10, 1978). For the National Park Service, critical actions in coastal high-hazard zones (those areas subject to tsunamis), the 500-year floodplain is the regulatory floodplain. The Army Corps of Engineers uses the 200-year flood recurrence interval to develop its standard flood protection structures. It is NPS policy to avoid to the extent possible the long- and short-term impacts associated with the occupancy and modification of the floodplain, and to avoid direct and indirect support of floodplain development where ever there is a practical alternative. It is inappropriate for the National Park Service and the California Department of Parks and Recreation to support the retention of any flood protection structures that encourage occupancy of a floodplain. See also the response to comment A in Donald Comstock's letter.

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required to breach the sandbar, yet the pasture lands would not be flooded. If more control was desired, a second gate could be built at the entrance to the sandspit culvert. At other times when the creek opened to the ocean, and creek water levels were not at flood stage, the lagoon water would flow back into the estuary and thence into the ocean.

Alternative B

448-N

It appears that there were generally four stages in the estuary flooding. 1) During very heavy flows, Redwood Creek overflowed the island and to the north into Cache Creek, and the momentum of the water cut a hole in the sand bar and caused scouring of deep holes in the north end of the estuary. 2) As water runoff subsided, the water level dropped, and the river adopted the meander thru the south slough, causing some minor scouring, but enough to keep the south slough clear. 3) As the beach sand built up, the low flow eventually backed up and just percolated through the sand. 4) The earlier rains in the fall or late rains in the spring would cause more water to back up behind the beach bar, and random overtopping (or government or tourist digging). The deeper pool tended to be at the north end. The levee has obviously changed the characteristics of the estuary. The area of the island which was inundated by high flows would previously return to dry land during the non-flood times, but this inundated area now remains covered with water, partially compensating for other lost estuary areas.

Alternative B would construct one deflatable dam and one deflatable tube/culvert (or either one by itself). The deflatable dam would be just downstream of the south slough diversion at the westernmost end of the levee. Inflatable dams are built of neoprene coated fiberglass fabric and are available from Goodyear and from Firestone (now Bridgestone). Goodyear developed the dam in collaboration with the City of Los Angeles about 1960, and they have worked very well in a variety of other locations. The dam is inflated by pumping in water. The dam would be inflated in sections, starting at the south end. In the event of a flood, it can be quickly deflated to allow all water to pass unimpeded. The flexible material can survive a lot of logs and sharp rocks. The dam could be deflated in sections, starting at the north end.

The deflatable tube/culvert would consist of a regular small diameter culvert buried in the beach sandbar well south of the usual anticipated break area in the beach sandbar. Inside the culvert would be an inflatable tube which would keep out sand. The tube would be made of the same neoprene coated fiberglass fabric as the dam. When the tube is deflated, the water could flow through the culvert and would only have a short distance to cut through the sandbar before becoming free flowing to the ocean. The culvert should extend far enough through the sandbar that the remaining sand would not be too much to breach, but not extend so far out towards the surf runup that it would get damaged by surf. The sandbar provides protection from even heavy surf much better than any heavy rock armor. At one time RNP tried using culverts to control the flow, but the obvious result was that these culverts got blocked with sand, and the water could not get thru any better than it could thru the regular beach bar.

448-I The section of the plan that addresses the restoration of the Redwood Creek estuary has been revised to emphasize the fact that any NPS land acquisition that would take place in connection with that effort would be limited to willing seller situations. It has been revised also to reflect the need for a strong interagency approach to identifying and implementing restoration strategies. The sentence that compares flood frequencies of the Klamath and Redwood Creek has been deleted.

448-J Gravel mining is one of several activities that together (cumulatively) have affected Redwood Creek and the estuary. Gravel mining does not occur in the estuary. However, gravel mining upstream alters the depth and flow of the creek, and therefore is included in the list of actions that have affected the Redwood Creek channel. Gravel and sediment are not equivalent; both particle size and the effect of the particles on biota differ. See responses to comments R in the USGS letter and comment E above.

Also, the agencies acknowledge on page 280 of the draft plan that landowner cooperation is needed for some of the actions directed at restoring the estuary. The conclusion and cumulative impact discussions on page 259 of the draft plan list gravel mining in Redwood Creek as one among several of the activities that have altered the physical and biological processes in the estuary. This language remains in the final plan.

448-K The photo on page 278 in the draft plan shows numerous structures in the Orick valley along Redwood Creek, most of which are residences. Discussions with the U.S. Army Corps of Engineers and many Orick residents, as well as comments on this plan from Orick residents, suggest that the purpose of the flood control levees along Redwood Creek is to protect residences in the Redwood Creek floodplain. Analysis of aerial photos taken as long as 50 years ago indicate the topography of the Orick valley has been changed to accommodate the construction of residences. Soil analyses at the former Antonioli residence suggest that there were formerly more wetlands than currently exist. Anecdotal evidence from NPS staff and Humboldt County Road Department

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During high flows (stage 1) the dam would be deflated and would allow flood waters to pass unimpeded to the ocean. During high flows, there would be a certain amount of flow thru the south slough anyway. As the water level lowered, the southern end of the dam would be inflated, causing the flow to maintain scouring velocity at the north end. During low flows (stage 2), the dam would be inflated completely, the water would rise behind the dam, and the water would be diverted through the south slough, the higher velocities helping to scour out the sand and mud. I understand that the County controls the maintenance of the Corps of Engineers owned levee and did not want the liability from erosion caused by diverting large volumes of water thru the south slough gate, but RNSP could make an agreement with the County to accept any liability. The water would then flow thru the flood-caused break in the beach bar, which had been encouraged to be deeper at the north end. During very low flows (stage 3), the dam could be kept inflated (although it might not need to be much inflated because of the lower water levels), and although it might not divert much flow, there would still be some flow directed thru the south slough to keep it cooler. The water would be slightly deeper in the river channel upstream from the dam, have a large volume, be cooler, and have an increased area by extending upstream between the levees, perhaps compensating for the *unnatural conditions created overall by the levees*. The level of this storage behind the dam could perhaps be controlled by the gate in the dike for the south slough. Since no fish are migrating upstream, there would be no impediment. As flows increased (stage 4), the water backs up and threatens to break through the beach bar. Rather than allowing it to breach and drain the estuary, pulling small fish with it, the *inflatable tube/culvert* would be deflated, allowing the higher level water to flow thru the sand at a controlled location. When the inflatable tube/culvert is opened, the water would only have a short distance to cut thru before becoming free flowing. The tube could be inflated at any time to stop the flow. By encouraging the mouth of Redwood Creek to remain at the northern end, there would be less likelihood that the Information Center would be threatened.

#### Vegetation Management

Again, the prime purpose in creation of RNP was the watershed protection of the old-growth forests. The second-growth forests should be managed to facilitate this goal. Prairie restoration thru prescribed fires should be encouraged. Prescribed fire in the park should be encouraged. The fires give the park a much more "natural" appearance. The Alternative 1 fire management program should be implemented.

Page 51 says that "Some members of the American Indian community are seeking more involvement in the *planning and implementation of resource management actions on their ancestral lands*". The American Indian community can express their views, but it is not government's function to set into the GMP a procedure where the views of a selected ethnic group are given preference over those of other ethnic groups. After all, we are all supposed to be treated equally, without kowtowing to politically favored ethnic groups.

In the case of the Yuroks, their ancestral lands did not include much of Redwood Creek, and they do not even have an "ancestral" claim. If we start bowing to "ancestral" claims, then we should challenge the tribes who occupied the land ~~after~~ the original inhabitants,

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personnel indicates that Orick residents construct temporary drainage channels to route water away from residences.

**448-L** Increased soil fertility is generally considered to be a benefit for vegetation.

**448 M & N** The National Park Service and the California Department of Parks and Recreation believe that it is neither cost-effective nor practical to design a plumbing system to connect the estuary to the ocean in a manner that will drain water from the estuary during low flow periods while maintaining a sufficient quantity of good quality rearing habitat for salmonid fishes. A previous attempt failed when the culvert filled with sand at high tide. It is NPS policy to attempt to restore natural conditions and processes in areas such as the Redwood Creek estuary that have been altered by human intervention rather than to develop engineering solutions specifically to solve problems created by previous human intervention. The estuary is an extremely dynamic system affected both by flows in Redwood Creek and the tides, waves, and storms of the Pacific Ocean. The aquatic biota of the estuary evolved in concert with this dynamic physical system. Additional alterations to the physical system would be extremely expensive, will not restore the conditions under which the biota evolved, and may not be effective because of tidal action and the dynamic and unpredictable action of ocean waves and stream flows.

It is NPS policy to restore native ecosystem functioning that has been disrupted by past or ongoing human activities, and to restore native species when it is feasible to restore habitat approximating natural conditions (NPS-77, 1991, *Natural Resources Management Guideline*, 3:40). The first alternative (see comment M in this letter) proposed is not consistent with NPS policies because it does not address restoration of the estuary, which is the natural rearing habitat used by juvenile salmonids. The second alternative (comment N in this letter) likewise proposes an engineering solution that does not address the causes of estuarine degradation and would not restore either the physical structure or the natural processes of the estuary. However, the National Park Service and the California Department of Parks and Recreation recognize that restoration of the

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just as the Ojibwa previously occupied the territory now occupied by the Iroquois, or the Hopi-Navajo overlap, or the Columbia Gorge man. While evidence of a long occupation by somebody is not disputed, oral history and language patterns indicate some of the local tribes may have come after earlier occupants.

### Historic Resources

Page 54 suggests developing an inventory of "ethnographic place names for use in naming developments and the parks". Usage is a good criteria, but it is not desirable to relate the place name inventory to the ethnicity of the users and to give priority based on this politically preferred ethnicity.

### Ethnographic Resources

Page 119 and 134 Alternative 4 suggest that government GIVE AWAY THE MANAGEMENT AND CONTROL of certain functions of the park to a particular ethnic/racial group. Consulting and cooperating are different from giving away. Page 273 says this give away ("facilitating and supporting American Indian participation") would be beneficial, but the opposite would be the case. This proposal should be DELETED. An example of out-of-control government is at nearby Patricks Point State Park where government has created a private sweathouse at taxpayers expense (unlimited budget for construction) on government property which is off-limits for most citizens except a particular ethnic/racial group, and which specifically discriminates against females. They may do it on private property, but not on government owned property.

### Collections

RNSP already is having difficulty meeting proposals for restoration of the park and expansion of park collections takes taxpayers money which is needed elsewhere. Collections should be developed on a case-by-case basis (Alternative 2).

### Visitor Centers and Information Centers

Construction of a visitor center at the Mill B deck, mentioned on page 56, is a good idea. The area is readily accessible from Highway 101 and is a good hub for the various activities.

Page 233 says the physical location of the Redwood Creek Information Center "may pose a hazard to public safety". I disagree. No evidence has been given that relocation of the Redwood Creek Visitor Center would save any significant number of lives. The beach is well used, and it seems doubtful that the few people in the building would not be evacuated with as much success or lack of success as those on the beach. The point has been made, however, that the visitor center may be subject to destruction by tsunamis or by lateral migration of Redwood Creek. While RNSP may want to build a new Information Center at the Mill B deck, any demolition of the existing beach structure should come from a tsunami, flood, or lateral movement of Redwood Creek, not from government. The structure is useful, and government should not waste taxpayer money by removing it. After all, "limited resources" prevented fulfillment of the Redwood Creek watershed restoration, the main purpose in creation of the park.

estuary will require cooperation among agencies, the Yurok Tribe, private landowners, and the citizens of Orick, and that engineering solutions such as the one proposed may be considered further during the site-specific planning for restoration of the estuary.

**448-O** The referenced paragraphs only state that American Indians would participate in managing and interpreting the parks' resources. This does not relinquish NPS and CDPR responsibilities to manage the parks' resources. Also, see "Relationships with American Indians" in the "Actions Common to All Alternatives" chapter.

448-O

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About six years ago Congress passed a law regarding development of regulations for use of Federal monies on the Coastal Barrier Islands of the west coast. While the politician-lawyers who prepared the legislation didn't seem to know that the east coast barrier islands didn't exist on the west coast, and the Portland office of USFS seems to be creating fantasy regulations in conflict with the specific wording of the legislation, they are apparently still working on the draft report. The Redwood Creek Visitor Center is within the area shown on the draft maps and funds for further construction may eventually be prohibited.

**Outdoor Schools**

The CDF has road standards for fire safety which are not met by the road to the Wolf Creek School. If government expects private citizens to comply with safety regulations, then government itself should comply. The road width and bridges should be reviewed to allow two fire trucks to pass side by side. The road should have an alternative loop escape route. Access to the fire protection facilities at Wolf Creek are vulnerable to fire and may be unavailable when needed.

**Fern Canyon**

It has been about 15 years since government straightened the creek with a bulldozer, and the creek should be allowed to find its own route. The parking area should be relocated to outside of the stream channel where it gets flooded anyway.

**Crescent Beach**

It always surprised me that the road, parking area, and restrooms were constructed in the swamp, and it is a good idea to move them outside. People camping overnight on the beach burn the driftwood, and the fire rings and trash they leave do not give the appearance of a park, only the beginning of another South Spit. Day use only of Eoderts Beach Road may be necessary to control the overnight camping on the beach.

**Backcountry Management Plan**

As differentiated on pages 22 and 23, the frontcountry trails might be "hardened" for bicyclists, while mechanized backcountry trails would be "unpaved". "Unpaved" means they should not include river-run rock, crushed rock, asphalt cement concrete, or Portland cement concrete. These surfaces do not "harmonize with the natural environment" (page 23). Horses do not like "hardened" trails. Electric bikes are vehicles according to the California DMV and should be allowed in the Frontcountry Zone only. They should not be allowed in the mechanized backcountry zone. It is questionable whether mountain bikes are really desirable in the mechanized backcountry zone, and no new mountain bike trails should be developed. Vehicle camping should not be allowed in the Bald Hills. Additional picnic sites in the Bald Hills would be desirable, however, since there are so few spots (only 4?) to stop a vehicle and get out of your car. The westerly coastal portion of the historic Trinidad-to-Trinity equestrian trail should be coordinated with private and State parties. This regional trail would start south of Trinidad, progress along Big Lagoon spit, turn inland at about Kane Road, and join the trail system on the westerly

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**448-P** The National Park Service will review the developments at Wolf Creek in regard to fire safety and access for emergency vehicles and take appropriate action to correct any deficiencies.

**448-Q** See summary comment C.

448-P

448-Q

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side of Redwood Creek. If we are supposed to develop non-motorized means of transportation, then horses should not have to be trucked to the park. Horses also have a historical right to use Highway 101, Drury Parkway, and the Coastal Drive without permission from RNPS.

### Redwood National Parking Lot at Freshwater Lagoon Spit

Page iv states that the highway "routes would convey to travelers a sense of being in a park environment". The grand southern entrance to this "park environment" is the trashy Redwood National Parking Lot along Freshwater Lagoon Spit. It is no wonder people can't really get the feeling that they are entering a park. The land is within the California Coastal Protection Zone, is under the jurisdiction of the Coastal Commission since it is State and not Federal property, and is not zoned for use as a campground. Page 242 points out that this spit is subject to a federal consistency determination by the Coastal Commission, but the parking lot is still not Federal property. County and State regulations would require much better sanitation and other facilities. Government would not allow private citizens to have such a campground, and government should comply with its own regulations. Overnight camping should be prohibited on the spit.

Page 299 says "eliminating camping at Freshwater Spit would slightly reduce the purchases of goods and services in Orick made by such visitors" which is a temporary effect, not permanent. As the visitors change to using local RV facilities, there would be a significant increase in purchase of services, and the closer proximity of the RV facilities to other businesses would result in another significant increase in the purchase of goods..

RNP has done a good job in cleaning up the appearance of the spit and preventing it from becoming like the Humboldt Bay South Spit, but it is now time to complete the transition to a better arrangement. While the "low class" transients have been cleared out, the "high class" transients in their \$100,000+ RVs have moved in.

RNSP should not acquire the Caltrans right of way because it would eliminate one of the few places where a passing lane could be created. The impatient backed up vehicles sometimes try to pass in the Orick community area.

Recently the policy on use of jet skis has been in the news at Whiskeytown Lake, and the jet skis have apparently been prohibited there. The question was raised whether jet skis would also be prohibited on Freshwater Lagoon. Since the spit itself is Caltrans property, and the lagoon is the property of the California Lands Commission, both within and outside of RNP, it appears that RNP does not have any jurisdiction over either launching jet skis from Caltrans property or the use of jet skis on the lagoon itself. The State DFG plants hatchery trout in Freshwater Lagoon, but RNSP has a policy of not using hatchery fish. As in the case of jet skis, RNSP doesn't appear to have any jurisdiction over dumping the hatchery fish from Caltrans property or dumping the hatchery fish into Freshwater Lagoon inside the RNP boundary.

Off-road vehicle use.

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448-R

One purpose of the parks (page 8) is to preserve the seashore. On page 213 it says "More than 90% (of the visitors) on both surveys listed "viewing the scenery" as one of the reasons they were visiting the parks ...". A seashore rutted with motor vehicle tracks is not consistent with this park purpose. Vehicles should definitely be removed from the beaches, including Gold Bluffs Beach, whether the vehicles are used by commercial smelt fishermen's or by American Indians. Fishing should still be allowed in accordance with the policy agreed to on page 60, but off-road vehicle use should be prohibited. Page 299 says that "Commercial fishermen ... would ultimately have no access ...", which is incorrect.

Page 258 for "Impacts of Actions That Are Common to All Alternatives" says "These adverse impacts from vehicles associated with commercial surf fishing on Gold Bluffs, Crescent, and Freshwater Spit beaches would continue". This statement appears to only apply during the period when the off-road vehicles continue to use the beach. Alternative 3 would not have this adverse impact after the year 2001, and Alternative 1 would not have this impact after the existing permittees died. Alternative 3 is best, with Alternative 1 a very poor second.

I have heard a proposal that certain fishermen be given a "vested privilege" to use their vehicles on the beach and be able to pass this right to their family. Our ancestors fought a bloody revolution against King George to **eliminate hereditary preferences and privileges**, and I believe it is federal law that no such hereditary preferences shall be given.

The Draft uses the 1996 date for fishing permits. While this date may be convenient for the phasing out of the permits, a much more logical date would be the date when RNP was created. I would like to have the opportunity to have the privilege of driving on the beach, so I request that there be another open period when everybody could apply for family hereditary rights.

448-S

American Indians should **not** be given hereditary rights to use off-road vehicles on property which is not their own. "Traditional" American Indian fishing/gathering activities did **not** involve motorized vehicles. Motor vehicles are not part of the Indians' "traditional lifeways" or "methods of subsistence" (page 9). American Indians did not have motor vehicles in years past, and they have no right to claim this "traditional" right to use cars on the beach now.

When RNP was first created, there was a massive \$30,000,000 retraining program for the displaced workers. A few years later, the Department of Labor prepared a report on the status of the program, and it indicated the program had cost \$131,000,000 at that time and was still continuing. The number of people helped was also given, and I calculated that the **average person received about \$80,000**. We don't need a repeat of the expensive displaced worker program paid by taxpayers.

448-R The plan has been revised to reflect this correction.

448-S The *California Public Resources Code* (Div 5, Chapter 1.75 - Native American Historical Cultural and Sacred Sites) section 5097.9 requires that public agencies permit American Indian cultural/religious activities on public (state) property. The California Department of Parks and Recreation manages this activity and allows vehicle access for this purpose if necessary in order for American Indians to carry out cultural/religious activities.

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448-T

Early this year it was claimed in the McKinleyville Press that there were 65 families in Orick who depended for a living on commercial beach fishing. The number was later reduced in another McKinleyville article to 50 families, with an income of \$2.5 million from fishing. That would mean these families are getting \$50,000 each. Orick supposedly had 343 people per the last Census, and since the average family is somewhere around 3.5 people, apparently there were 175 people in Orick dependent on fishing. That leaves only 118 people living off from some other source, but the welfare population is claimed to be pretty high, so there is something wrong in the claims. Page 220 indicates 57 CDPR permit holders in 1995, with only 20 from Orick, not 65, and not even 50. Page 220 indicates a wholesale value of \$700,000 in 1995, which appears to be \$0.35 per pound of fish, which seems high. Is the price less than half of this amount, or \$0.15? Using \$700,000 and 57 permittees, it works out to \$12,300 each, which seems closer to the truth than \$50,000 each.

The local fishermen have complained that RNSP does not give local preference in hiring employees. It is not desirable for RNSP, however, to be a "make-work" project for unqualified people. Encouraging local employment is still a good goal. There is perhaps a tendency to hire locally anyway if the people are qualified, as the number of HSU graduates attests. In the past five years, however, I have seen only two employment posters in the Orick post office, so RNSP does not do much "community outreach", and I suggest that RNSP make more of an effort to publicize these job openings in Orick, even if there is not much response.

448-U

Page 250 says "efforts would be made to increase the representation of local American Indians in the parks' workforce". Page 203 refers to the Park-Yurok MOU which provides for "working towards the parks' recruitment and employment of tribal members". The MOU with the Yurok Tribe on page 430 says "The Parks will work towards the recruitment and employment of Tribal members", meaning Yuroks. Here are three problems for you. First, the MOU and page 250 may be in violation of State Proposition 209 which prohibits hiring discrimination based on ethnicity/race. Second, the MOU may be in violation of Federal laws against discrimination in hiring Yuroks compared to other tribes, that is, the Yuroks are being given hiring preference, but the Tolowa, Chilula, Hupa, Shoshone, Ojibwa, etc. are not. Third, the NPS is a Federal agency and has to comply with Federal affirmative action, even if the State or the Yuroks do not, so the NPS itself cannot discriminate against ethnic minorities and give preference to Indians. Since such ethnic/racial hiring preference for the Yurok tribe is apparently being implemented now, then RNSP's claim that it cannot give local preference in hiring to Orick/local residents may be false. I request that the MOU not be renewed until the ethnic/racial discrimination provisions are deleted and the legality of discrimination is reviewed.

The people of California voted to eliminate any discrimination on the basis of race, color, religion, sex, or national origin. The Federal government includes language in its other MOUs that the other party (State of California, CDPR, CDF, County, or local agency, such as Orick Community Services District) must adopt affirmative action and

448-T We can not guarantee the accuracy of the information attributed to the McKinleyville Press. The information on CDPR permit holders refers to permits issued for access to Gold Bluffs Beach. The dollar figure (\$700,000) reflects the wholesale value of fish landed from Crescent City (Del Norte County) to Fields Landing (Humboldt County) in 1995, as reported by the California Department of Fish and Game. Undoubtedly there are more people engaged in fishing for smelt and perch than indicated by the numbers of CDPR permit holders (57 permit holders); thus, with a higher denominator (total beach fisherman) divided into the total catch value, the average value of fish caught would likely be lower than the \$12,300/fisherman figure noted in the comment.

448-U All hiring by RNSP staff would conform to applicable federal and state laws, policies, and guidelines regarding nondiscrimination.



## COMMENTS

discriminate against certain groups of people in favor of its own Federally favored ethnic/racial groups. A typical example of the wording is shown on page 368, under "Required Clauses", "During the performance of this agreement, the participants agree to abide by the terms of Executive Order 11246 on nondiscrimination and will not discriminate against any person because of race, color, religion, sex or national origin. The participants will take affirmative action to ensure that applicants are employed without regard to their race, color, religion, sex or national origin." Page 432 includes this clause under "Civil Rights". These affirmative action provisions should be deleted in contracts with the State of California and other local agencies where the Federal government is not the source of funds. If the NPS attempts to force discrimination onto the people of California by requiring this clause in its agreements, then it may mean the end to the Cooperative Management MOU.

I understand the Yurok tribe is not governed by State laws but by Federal laws and the Yurok tribe budget is mostly Federal money. It appears that, while the affirmative action clause is included in the Park-Yurok MOU, in their own contracts using Federal money which are advertised in newspapers, they do not have any reference to affirmative action, goals, or to equal opportunity. Yuroks do specify that they give preference to their own Yurok tribe. The Yuroks are apparently specifically discriminating against even the Federally favored ethnic/racial groups. In accordance with the MOU, the Yurok Tribe should be required to comply with Federal affirmative action in Yurok contracts.

Under Cultural Resource Management page 52 indicates that RNSP would continue working with American Indians for "positive consideration of economic opportunities". The phrase is grammatically incomplete, and the meaning is not clear. If the intention is to give preference to American Indians over other ethnic groups, however, then this proposal should be deleted. All ethnic/racial groups should have an equal right to "economic opportunities".

#### **Theft and Commercial exploitation, Concessions**

Alternatives 1 and 3 say "Aggressively pursue remedies to prevent theft and commercial exploitation of RNSP resources", whereas Alternative 2 says "Undertake efforts to prevent ...". Alternative 4 says "Prevent theft ...". No elaboration of what is meant by "theft and commercial exploitation" is given, however, the direct implication is that RNSP feels that any "commercial exploitation" is as illegal as theft. Government seems to be threatening to police for actions which are not illegal. If there are specific issues of "commercial exploitation" that should be covered in the GMP, then the public should be privy to them also.

Page 139 mentions the horse and hostel concessions as well as future tour concessions, but does not mention anything about the two existing non-taxed commercial concessions groups (one State-employee dominated and one Federal-employee dominated) in the visitor centers. While they are called "non-profit", actually they are most definitely "for profit", the only distinction being that they **do not have to pay taxes** like other people. As an example, on October 3, 1998 the State non-tax paying group sponsored bicycle

## RESPONSES

**448-V** The parks' two nonprofit cooperating associations, the Redwood Natural History Association and the North Coast Redwoods Interpretive Association, exist to support and supplement NPS and CDPR interpretive, educational, and scientific programs. Agency policies and the terms of written agreements with their partner agency govern the associations' activities. The roles of concessioners differ from those of the associations by providing to RNSP visitors a variety of commercial services that are not focused on interpretation or education.

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rides through the park and charged \$25 to \$60 for various categories. They also arranged discount camping fees. Commercial exploitation of RNSP by non-tax paying groups should be treated the same as commercial exploitation by tax-paying groups. RNSP policy with respect to these non-tax paying groups should be shown in the GMP.

Both government and the government supported non-tax paying groups should not compete with private facilities. The park was created to be a park, not another monopolized money maker for the NPS, CDPR, and the non-tax paying groups. No more monopolistic concessions should be created by government.

### **Bald Hills Road**

Vehicle campgrounds should **not** be constructed in the Bald Hills. The park is already having great difficulty because of its strip-like shape and the proximity to Highway 101 vehicles.

Bald Hills Road is not paved for a considerable portion, and the increase in usage will increase the maintenance of the road as well as increase the amount of dust which coats all plants within a few hundred feet of the road. Howland Hill Road and Davison Road are two other examples of dusty dirt roads which coat the landscape and force the tourist to go to a car wash at the next town.

### **Davison Road/Gold Bluffs Beach**

RNSP charges a day use fee to go to the parking lot at the end of Davison Road where you can walk to the beach. It is my understanding that there was an agreement with the Coastal Commission to allow free access. It appears also that the end of the road and the parking lot may be County property, not Federal or State. I request that the day use fee be discontinued for this location.

The road should not be realigned. Minor improvements such as grading and improving sight distances may be desirable for safety.

### **Cal-Barrel Road**

Keep this road as-is other than for minor safety and drainage improvements.

### **Howland Hill Road**

I traveled on the Howland Hill Road last year the day after it was opened after construction work. I noticed that the road had been widened 4 to 6 feet by grading and placing of rock. It is undesirable to widen this road further, cutting the roots and increasing the rock area, especially in such a surreptitious way without an environmental impact evaluation. Perhaps the work was done without RNSP supervision and uncritically accepted. I suggest that Howland Hill Road be made one way going west so that RNSP is not tempted to widen the roadway any further to allow cars to pass.

It appears that the short road from Howland Hill Road down to Mill Creek west of the bridge has finally been blocked by vegetation, and no vehicle access should be allowed.

## COMMENTS

## RESPONSES

**Tall Trees Grove Road**

Keep as an unpaved road with access only by permit.

**Greater Coastal Drive**

Page 123 indicates one objective is "depend on U.S. highways located within the parks to serve as the primary access routes to the parks, to be managed and maintained by state and federal transportation agencies". Page 61 lists one objective as "Depend on U.S. highways in the parks to serve as the primary access routes to the parks, to be managed and maintained by state and federal transportation agencies". Page iv notes that U.S. Highways 101 and 199 are the main access routes to and within the parks. Pedestrians historically could use the public right of way to walk from Orick to Klamath. California Streets and Freeways Code, Section 157, says: "The Department when operating thru the Division of Highways shall not construct a state highway as a freeway that will result in the severance or destruction of an existing major route for non-motorized transportation traffic and light motorcycles, unless it provides a reasonable alternate route or such a route exists". The 1973 amendment which substituted "non-motorized transportation" for "pedestrians, equestrians, bicycles" makes it clear that both pedestrians and equestrians were meant to be included. The Caltrans Highway Design Manual also refers to this Code. When Caltrans erects "Pedestrians prohibited" signs on Highway 101 or RNSP closes Drury Parkway or the Coastal Drive, then the basic means of transportation is being eliminated. Bicycle vehicles have not been prohibited from use of Highway 101, so their rights have not been infringed. Pedestrians, equestrians, and wagons, however, have a historical right of way over several routes, including Highway 101, Drury Parkway, Greater Coastal Drive, and the Klamath bridge, which cannot be closed by government without "just compensation" for loss of ingress and egress. Permission to use trails on RNSP property does not replace the legal right of way. RNSP cannot charge admission or block usage if there is a legal right. Page 291 and elsewhere do not describe this serious legal problem.

Caltrans agreed to remove the "Pedestrians prohibited" sign from the 101 southbound entrance from Drury Parkway so that pedestrians can legally walk from Orick to the park. Drury Parkway may not be closed to pedestrians, equestrians, and wagons when the non-tax paying organization arranges its bicycle races because these other means of transportation have a historical right, not just permission, to use the road. Highway 101 north of Drury Parkway has "Pedestrians prohibited" signs, so the only remaining route is the existing right of way using Coastal Drive. Coastal Drive cannot be closed or changed into a trail.

**Lodge**

A lodge should not be built in the park. Government should not use park land for a subsidized commercial enterprise. Cooperation with RNSP may be needed for private parties, however, government is known to waste taxpayers money on building ever-bigger temples.

## COMMENTS

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### Renewable sources of energy

Page 20 refers to sustainability and "buildings would function with a minimum amount of energy". Page 64 lists an objective of administrative facilities as "Use renewable sources of energy and energy-efficiency technology where appropriate and cost-effective". About 1974 Prairie Creek State Park was given a Federal Department of Energy grant for a solar water heating system which would help provide design information to the Federal DOE for other systems in the area. A report was to be prepared to help others design these devices in the nearby area. Was a report ever prepared?

### Leasing Administrative and Operations Facilities

Page 64 lists an objective for administrative facilities as "If additional or replacement administrative space is required, give preference to leasing facilities in communities that are adjacent to the parks". Page 64 says "Resource management staff offices in the South Operations Center and leased resource management staff offices in Arcata would be relocated to a GSA built-to-specification facility outside the parks in the Orick area. In the past, there appears to have been confusion in the GSA as to what their policy on leasing or buying administrative facilities would be. Will the vacillating GSA policy supercede the Draft's objective?

Travel from the Arcata/HSU area to Orick for employees will use additional energy and will not really benefit the employees or the park. It may be desirable for RNSP to utilize more telecommunication techniques so that the employees can work together without having to be physically present at the common SOC facility. The same applies to employees at the Crescent City headquarters who have to travel south. Obviously field work has to be done in person, but we are entering a new world of telecommuting, and RNSP should take advantage of the new devices. Training employees can also be done by telecommunications without having the employees waste time driving to the common facility. Denver should also be made more available by telecommunications. Continued utilization of 4-10 and 9-80 programs may help by allowing more time at the workplace without so much travel. RNSP should work with GTE to get better telephone service.

### Employee housing

Page 64 says one objective of administrative facilities is "provide housing for employees only where necessary for managing and protecting the parks". Page 65 says "Generally, RNSP employees would live in local communities". These goals are good but cannot be forced onto the employees. The two billion dollar park was also not bought to provide additional low-cost housing. If the SOC is relocated, the ranger station there should be removed in accordance with this stated objective, since there would be nothing left to protect. Is the SOC ranger housing the same as the "Orick" housing shown on page 142? The CDPR Elk Prairie residences should also be removed when the opportunity allows. The Schoolhouse Peak fire lookout should be removed when no longer needed. Only one Davison Ranch residence should be retained.

### Property Acquisition

## COMMENTS

Page iii mentions that the parks include some 105,516 acres. The legislated limit is 106,000 acres. These numbers should be continually updated and highlighted because government has earned the reputation for expanding its ownership of land without much consideration for individuals. It should be noted that about 80 percent of the land within 1,000 miles is owned by government, and about 80 percent of the land within 100 miles is owned by government. Citizens are very conscious that government continually expands its ownership but seldom, if ever, relinquishes any of the land it has acquired, even when it no longer needs the land.

448-W

While the Draft says that land acquisition for the Redwood Creek estuary restoration would from "willing sellers only", there is no mention of this concept in the land acquisition section. Government, like Clinton, is evasive when it wants to do something that is not very specifically spelled out, and the "willing sellers" concept should be repeated.

The 9-2-98 Orick Tomorrow meeting had a map of the RNSP that showed about 110,500 acres total, which appears incorrect. The map also showed about 78,000 acres (as I remember) in Humboldt County. I request that the RNSP areas for both Del Norte and Humboldt Counties be given.

#### Wilderness Proposals

The BLM indicated in one of their publications that 10 percent of California had been designated as wilderness, and that percentage was before the desert park was established near Mojave. While the State proposals seem suitable, government should recognize the amount of land that is being restricted.

It is obvious the Draft represents a lot of hard, detailed analysis. It is also remarkable in being so well written, with excellent grammar, and with only three words spelled incorrectly in the 458 pages. Thank you for the opportunity to comment on the Draft.



Charles Wilson  
Orick

## RESPONSES

**448-W** The section of the plan that addresses the restoration of the Redwood Creek estuary has been revised to emphasize the fact that any NPS land acquisition that would take place in connection with that effort would be limited to willing-seller situations.

COMMENTS

RESPONSES

10-8-98

Superintendents  
Redwood National and State Parks  
1111 Second Sreet  
Crescent City, CA 95533

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CRESCENT CITY  
95533

Dear Superintendents:

Thank you for the copy of the Draft GMP/GP/EIS/EIR fore RNSP (Draft). In reviewing the Draft I had the following additional comments which were perhaps beyond the issues of the joint plan or which are of a more minor nature and which may clutter your responses in the Final GMP/GP, and this letter may be left out of the Final GMP/GP.

The Draft encourages local disruption and community confusion by refering to "four alternatives" rather than a "series of issues with four alternatives". The Draft encourages people to think in terms of the four plitical stereotypes and essentially "vote" whichever "party line" seems most favorable to their views. Just as the "party line" is for the advantage of political parties but not necessarily good for the individual, the stereotyped "party line" type of thinking is not good for evaluation of the many separate issues in the Draft.

On the opening page i this separation of the decision making process into only four separate considerations is particularly emphasized. Each of the alternatives is referred to as a single concept to be accepted or rejected as a whole. While it may be desireable to create a theme concept in order to keep track of the many alternatives, the whole Draft fails because it does not emphasize the issues instead. Table 7 which starts comparing the four alternatives is buried at page 127.

This separation into only four choices was particularly evident at the 9-2-98 Orick Tomorrow meeting where it was repeatedly stated that only one alternative could be picked. Rather than encouraging people to comment on the many, many issues, the Draft is encouraging only a vote for number 1, 2, 3, or 4. Government is simplifying our life by encouraging a multiple choice answer! Along with this simplistic line of thinking, it might be convenient to provide postcards with only the four sterotyped alternatives listed. The postcards would be much easier to tabulate, and they would give just about as much information as the brief letters you will be getting. Perhaps the best selection would be a fifth choice, "none of the four".

The political bias is given to Alternative 1. "The concept under alternative 1, the proposed action, would be to achieve a balance between resource protection and visitor use ...". Page 13 says "Alternative 1 provides a balance between ..." **By definition, Alternative 1 is more balanced** than any of the other alternatives and, therefore, to be preferred. Assigning it number 1 helps, just as the first person on a ballot has the best chance to be elected. The artifical separation into two extreme "alternatives" with the

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Park's proposal being the biased "balanced" answer encourages illogical, dumb responses. As my mother once said, "Ask a dumb question, and you get a dumb answer".

Although the methodology will give you dumb responses, it is obvious RNSP has put a lot of work into the Draft, and it is well written. Alternative 1 has some good proposals, but so do some of the other alternatives. Alternative 2 seems to continue with policies that are failing. Alternative 3 is generally too draconian. Alternative 4 generally destroys the park. Now I have given you my own dumb response, but I feel it is still better to comment on the individual issues.

Throughout the Draft "state" is not capitalized, however, it is a proper noun since it refers specifically to the State of California and not to any of the other 49 states. I suggest that it be capitalized.

Throughout the Draft "alternative 1" (or 2, or 3, or 4) is not capitalized, however, it is a proper noun since it refers to a specific set of actions. I suggest that it be capitalized.

Page iv notes that relations between the NPS the Yurok tribe, and CDPR "would be managed in accordance with applicable laws and agreements". I note that the Yurok territory does not include the Chilula territory, and the RNSP is not bound by any Yurok agreement in regard to Chilula territory.

457-A

Pages 13 and 14 of the Draft refer to "Sensitive Resources" and "Sensitive Areas". They are used synonymously several times by joining them with the word "or", but they are not synonyms. Instead of "or", I suggest that they be joined with the word "and". No definition is given for "Sensitive Areas" on page 13 or 14. The glossary on page 438 also does not describe "Sensitive Areas". I suggest that something be added like "Sensitive Areas are areas where Sensitive Resources are located". Or just eliminate the term "Sensitive Areas".

457-B

Page 15 says that "38,000 acres (70%) of the Redwood Creek watershed was logged". This would mean that the Redwood Creek watershed, including Prairie Creek, is 54,286 acres, which appears to be incorrect. Page 19 says the PPZ is 33,000 acres by itself. Perhaps the meaning is the "watershed upstream of the new park boundary" or the "watershed within the 1978 Redwood Creek park acquisition" or something like that.

457-C

Page 19 says "When Congress established this zone, it guaranteed that the RNSP staff would have access into that private land ..". I believe this interpretation is incorrect. The legislation only allowed further acquisition if the landowner did not take measures to protect the downstream park. It is my understanding that during the early years of the park, property owners purposely did not allow park personnel on their lands within the PPZ.

457-A Sensitive areas refers to locations that do not contain tangible sensitive resources, such as endangered species habitat or wetlands, but that are important for more intangible reasons -- for example Native American spiritual sites. Sensitive areas may also be areas with combinations of resources that are not individually defined as sensitive but that are important when considered holistically and that might still be affected by actions in the plan -- for example a viewshed. The definition on page 14 of the draft plan includes sensitive areas.

457-B The document has been revised to correct the acreages.

457-C The text on page 19 in the draft plan has been modified in the final plan to clarify the discussion about the park protection zone.

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457-D

All the alternative maps incorrectly show Davison Ranch and the lower Skunk Cabbage Creek area as being within the legislated RNP boundary, but they are not, they were added later. The Caltrans portion of the Reshwater Lagoon spit and State Lands Commission Freshwater Lagoon are shown as being within the legislated boundary, but they are both not owned by RNSP.

The designation of management zones (pp 21-28) seems like a useful concept.

Electric bicycles are proposed to be rented near Davison Ranch on private property. Electric bicycles are not bicycles according to the State Vehicle Code. It is not desirable to allow motorized vehicles on trails. Motorized vehicles should be restricted to Developed and Frontcountry Zones, including trails accessible to visitors with disabilities.

Page 23 indicates that for the "Backcountry Zone, Nonmechanized", "no noise from use of mechanized forms of transportation would be allowed". Since the Centerville Naval facility has been closed, there appear to be no jet fighters flying low to test defenses. Coast Guard and ARCO helicopters, however, routinely fly over the area. It is not understood why the Coast Guard flies up from Orick and then up Redwood Creek following the creek, then returns. There are not that many emergencies reported in the newspapers.

Television likes to use police and ambulance sirens in the background to give authenticity to movies about downtown L.A. or New York. Along Highway 101 these background sirens don't add any value to the park experience, but page 195 doesn't include these emergency sirens in its list. Ambulances like to use sirens because they can then charge an additional \$500. Emergency vehicles are not supposed to exceed the speed limit unless they are in pursuit of someone. Sirens are not needed when the vehicle is not near any other vehicle, and they can then be turned off. Highway 101 is usually not very crowded, and a siren is not needed everywhere. It would be desirable to reduce the amount of siren noise, and RNSP should contact the applicable agencies to establish some sort of policy for their use.

457-E

Page 29 refers to the lower part of the Redwood Creek Basin as being within the national park. Page 144 makes several references to "upstream of the national park" and "outside Redwood Creek basin". Both terms need to be specifically defined. "Upstream of the national park" could be anywhere upstream from the mouth of Redwood Creek which is part of RNP. The Redwood Creek basin may or may not include the Prairie Creek watershed, depending on the reference. The "lower Redwood Creek valley", which presumably is the community of Orick, also may need to be more specifically defined.

Page 29 creates some confusion when it refers to the Redwood Creek "basin", which is not defined. Perhaps this "basin" should be referred to as the Redwood Creek "watershed" instead. The Prairie Creek watershed is referred to as a separate watershed

**457-D** The NPS acquisitions in the Davison Ranch/Skunk Cabbage Creek areas are outside the boundary established in the national park's enabling legislation. Efforts are underway to revise the boundary to include those lands and other relatively recent or pending acquisitions. The Caltrans and State Lands Commission lands in the Freshwater Lagoon Spit area are within the national park boundary and are correctly depicted on the alternative maps.

**457-E** The Redwood Creek basin refers to Redwood Creek and all of its tributaries, including Prairie Creek. "Redwood Creek basin" or "Redwood Creek watershed" refers to Redwood Creek and its tributaries, including Prairie Creek. "Upstream of the national park" refers to the Redwood Creek basin from south of the southernmost boundary of the national park to the headwaters of Redwood Creek. The term "lower Redwood Creek valley" refers to the area around Orick and is used in discussions of the Redwood Creek estuary. Text on page 29 and 144 of the draft plan has been modified in the final plan.



## COMMENTS

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from that of Redwood Creek, whereas elsewhere the Prairie Creek watershed is correctly referred to as a portion of the larger Redwood Creek watershed.

Page 34 mentions the "world-class scenic travel experience". Since the "experience" for most people will be from an automobile passing thru at relatively high speeds, the effect of government signs on this experience should be reviewed. I counted about 400 government signs between McKinleyville and Orick, but only 7 private signs. Obviously government is the significant desecrator of the highway environment. Caltrans has reviewed the highway corridor as part of the Highway 101 scenic corridor study, and RNSP should implement as many of the Caltrans suggestions as it can within its boundaries. Page 135 suggests upgrading directional signs, but again there are too many government signs already. One Federal restriction on scenic highways is the elimination of off-site advertising. RNSP has several signs pointing to off-highway commercial facilities, such as the horse rental sign south of Redwood Creek bridge. If the Federal government thinks it is not desirable to have these off-site signs on a scenic highway, then RNSP should not install them either.

Save-the-Redwoods League has recently been installing plasticized redwood memorial signs rather than the older unprotected signs. The plasticized signs are obnoxious and do not blend with the park surroundings. The unprotected redwood signs survived well and weathered to blend with the park. RNSP should be a park, not a cemetery with monstrous headstones.

At the 9-2-98 Orick meeting it was stated that Orick did not have an RV park that would accept RVs. I don't know why the one RV park we do have will not accept RVs, however, it recently was foreclosed twice, and it appears that if there was money to be made by renting to RVs, they would do it. There is also much property zoned commercial highway in Orick which could be developed to provide RV parks. A year or two transition might be needed to develop the alternative, but without competition from subsidized free government camping, it would happen. Klamath also has a tremendous unused capacity for campers.

Page 36 mentions mitigation measures for disturbed lands. One of the more visible erosion areas is just south of the Freshwater Lagoon spit west of Highway 101 and south of the tenting area. The area is only about 75 feet long. Caltrans did a good job in hydromulching several hundred feet of bare cut slopes next to the highway about six years ago, and vegetation has covered the cut slopes very well. RNSP should do the same on the eroded area.

Page 10 indicates the Yuroks want to hunt on the RNSP. My father hunted elk for subsistence, and would like to carry on the family tradition and culture. I feel that as an equal-American I feel I have as much right as the Yuroks to hunt, but I recognize the world is not the same as it used to be. The Yuroks do not now own the land within the parks. They can hunt on their own lands in accordance with government regulations. They should not be allowed to hunt on park lands.

## COMMENTS

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Poaching of elk still occurs frequently, but there is no convenient way to report "poaching in progress". At the time of most poaching, the Sheriff is unconcerned, DFG is closed, the park is closed, and you just watch the lights moving through the woods.

Enforcement seems futile. Even when you see the elk in the back of the pickup there seems little purpose to report anything. I heard about 15 years ago that a park ranger caught a pickup stuck in the sand along Gold Bluffs beach which had an elk in the back and elk blood on some credit cards in the cab, but the poacher was gone, and the park was not able to prosecute anybody.

The Management Zone concept described on page 13 appears useful.

RNSP is obviously a more technical oriented park which has unusual problems. The past superintendents have served well, both State and Federal, but it appears that there is a bias in favor of ranger-type employees rather than technical-type employees. One aspect of "equal opportunity" is that no one particular group is supposed to be favored, and everybody should have the potential of rising through the ranks to the top. Government has often pointed to de-facto bias as evidence of illegal discrimination, whether or not the disparities were caused by natural factors. This government political maneuver to achieve its political goals works both ways. When government shows a de-facto bias towards a particular group of people, it appears that there is a lack of real "equal opportunity". Supervisory ability is inherent in most skilled people, not just rangers. I suggest that government career ladders be reviewed so that all employees are not stuck in their particular niche and that they all have the opportunity to advance. If the government career ladders are faulty, then I request that they be modified.

Page 10 hints at the suggestion "Realign Highway 101 to improve the visitor experience", but no further details are given. RNSP is already a strip park. The "park experience" is difficult already. Realigning Highway 101 does not seem desirable.

I've seen quite a few dogs on the trails over the years. None has been on a leash. Since the dogs are not controlled, and park personnel are not available everywhere to enforce leash regulations, it is better to not allow dogs. I still remember the mean German shepherd the park ranger had at Wolf Creek just after they built the first buildings. I had to find a heavy branch to use as a club when I walked thru the site.

Page 10 suggests "Remove trees along the highway so visitors can see the coast from more locations", a good idea if limited to only good views. At the Bald Hills overlook, it may soon be necessary to also start thinning, otherwise the trees will block the view.

Part of the charm of the coast is the piles of driftwood. Hopefully we will not have as many violent floods, and we definitely will not have as many redwood trees being cut. The amount of driftwood will naturally diminish, but it should not be hauled away to sell. A beach bare of all driftwood is not the goal.

## COMMENTS

Drilling holes and hammering nails into rocks and trees should not be allowed. Just before the Earth Firsters began sitting in trees on Palco land, the State allowed them to practice climbing trees off Cal-Barrel Road, but this permission should not be continued.

Page 47, "differently than" might be better as "differently from".

Page 51 & 88 mention "prairies and oak woodlands maintained by American Indians", implying that they had a conscious control of the the goals of prescribed burning. This romantic speculation does not appear to be supported by fact. While their presence may have helped to keep these prairies, it was not conscious maintenance.

While page 52 says "provide opportunities for American Indians to interpret their own culture". Page 143 says that "Actions would ... increase non-Indian knowledge and appreciation of American Indian cultures". RNSP does not like to challenge the local tribes, but sometimes there is no basis for their claims or decisions.

Cultural traditions change, but there is no reason to always give special privileges. Mother's Day is a national observation, not a historical Indian tradition, and gathering two big arm-fuls of white trillium for Mother's Day (gathering floral products?), as I have seen done, is an abuse of our sympathy. Driving a motor vehicle over the foreshore plants in order to have a salmon barbecue at a picnic table is also an abuse of "tradition".

Caltrans erected a new sign for Bald Hills Road about 5 years ago which left off the "s". They have no intention of changing the sign, just as they didn't want to change the "Guintoli" sign in Arcata. The County Assessor's map does show "Bald Hill Road" on one map, but all the others to the east show "Bald Hills Road". The USGS topo maps apparently followed the same usage, and Orick map shows "Bald Hill Road", but the maps to the east show "Bald Hills Road". I have yet to see a document or hear a person say "Bald Hill Road". In the interest of preserving historical names, I suggest that RNSP negotiate to have an "s" added to the Caltrans sign, even if it is just painted on the existing sign.

"Davidson Road" on page 409 should be "Davison Road".

The Draft refers to "Freshwater Spit", but this is not the proper and correct historical name. We already have a number of locations labeled "Freshwater" in Humboldt County, and there is no reason to add further to the confusion of names. In emergency situations the location could be confused and the emergency help sent to the wrong location. The proper name is "Freshwater Lagoon Spit".

On page ii the detailed map of the parks is fairly good, but the regional map still gives the impression that this park is for Californians only. While it may be true that most of the visitors come from the south and California, Oregon is ignored. As page 6 says, the park

## RESPONSES

457-F The maps and text have been modified to reflect this change.

COMMENTS

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headquarters is "equidistant (350 miles) from San Francisco California, and Portland, Oregon", but Portland is not even shown.

One portion of history that is being ignored is the early dairy industry. The Davison's milking shed, for instance, was not considered significant, even though it showed how difficult work was for early dairy ranchers. If the estuary restoration proposals are developed, more dairy history will be removed.

Much is said in the Draft about "developing a greater appreciation for American Indian culture" (page 134 Alternative 4 and elsewhere), but nothing is said of lumber and cows. The park gives the appearance of wanting to remove these parts of the park's history unless they are mentioned negatively.

Page 139, for Freshwater Spit Visitor Use Alternative 4, "see" should be "seek".

Page 154 says the most significant air pollutant in the parks is primarily from "boradcast". Is this a specialized timber term or is something missing?

Page 164 says "the upstream portions (of the estuary) are owned by the county". Is this area, which appears to be within the two Redwood Creek levees, owned by the county or by the Corps of Engineers? Perhaps the county only has jurisdiction over maintenance.

457-G

Page 167 says "214,000 cubic yards of gravel were mined from between the levees of lower Redwood Creek" between 1987-92, then says "As recently as 1992, only 25% of the amount of gravel removed had been redeposited in the lower river". That would mean that only 9,000 cubic yards per year of gravel was being carried by Redwood Creek, an amount which is not in conformance with the high levels of erosion in the watershed. Is there some mistake?.

457-H

On page 167 a number of adverse effects are attributed to the gravel removals in lower Redwood Creek, "Mining removed point bars and pools, widened the baseflow channel, spread the flow out, and reduced water depths at lower flows." It would appear that the gravel removal would do exactly the opposite and improve the estuary. Page 168 even says "Elevated sediment levels entering Redwood Creek have made the river wider and shallower with lower streambank heights, the increased sedimentation has degraded aquatic habitats and streamside vegetation (comma needed) and water quality has deteriorated". Despite all the erosion in the Redwood Creek watershed, are we to assume that gravel mining should be restricted in Redwood Creek in order to improve the estuary?

Contrary to what is said on page 167, I note that a large slug of gravel is moving downstream past the confluence of Redwood Creek and Prairie Creek. The gravel is already starting to pass thru the Orick levees, the level of the gravel is rising, and the water capacity of the channel is being reduced. If the amount of gravel becomes very

457-G The years 1987-92 were drought years during which low flows were inadequate to mobilize sufficient volumes of gravel to replace what was removed from between the levees for construction of the Highway 101 bypass. During the recent years with more typical high flows, RNSP geologists have performed cross-section measurements of Redwood Creek that indicate that the gravel is being replenished at a higher rate and that the channel is reestablishing itself as a deeper narrower stream that more closely resembles natural conditions before gravel removal.

457-H The adverse effects of gravel mining described on page 168 refer to the effects of the volume of gravel removed upstream of the estuary between 1987 and 1992 for constructing the Highway 101 bypass. In addition to the volume of gravel removed in that period, the gravel was removed in a manner that changed the channel of Redwood Creek, with resulting decreases in depth and increases in width. This information is provided so that readers can understand what factors have affected Redwood Creek and its estuary. None of the proposals for watershed management or estuary restoration described in this plan relate to private gravel mining operations in Redwood Creek. Planning for restoration of the estuary done in cooperation with the U.S. Army Corps of Engineers would include consideration of levee condition and function.

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great, then the levee may be overtopped. I see no mention of any study of this potential problem, and I suggest that the Corps of Engineers evaluate it.

At present there appears to be a County project to protect Bald Hills Road by removing gravel downstream from the washout by the road. Apparently no work is being done upstream, although there is adequate room prior to the RNSP boundary. RNSP should get involved in commenting on the County project because if their efforts fail, then the only access to Lady Bird Johnson Grove will be eliminated.

457-I Page 167 says "the Yurok Tribe has attained status as a state under the Clean Water Act and now regulates clean water through permit issuance in the Klamath Basin under section 106 of the act." Isn't this permit issuance applicable only within a portion of the basin, not the entire basin?

457-J Shouldn't the nonpoint source regulations being proposed by the NCRWQCB be mentioned?

457-K-L On page 168 shouldn't "ammonium" be "ammonia"?

457-M Page 168 says "High nutrient levels, such as phosphorus and nitrogen from ranching and farming activities, have been detected in the streams in the lower Redwood Creek valley." Since Redwood Creek is the only significant stream in the lower Redwood Creek valley and very little farming is done in this area, are the amounts really "significant" or just "detected"? What is "high"? Since relatively little fertilizer is applied in this area, are the amounts really from artificial sources or just natural organic breakdown byproducts from pastures?

457-M Page 170 describes wetlands. Prairie Creek was not considered a wetland by Caltrans/RNP and about a quarter mile of the stream was buried and rerouted in order to construct the bypass highway. Mae Creek was considered a wetlands and was protected. Government does not appear to be consistent.

Page 171-2 describes the redwood forests, but much of the environmentalist literature refers to redwoods as being "rain forest". Nobody seems to know what a "rain forest" is, yet each environmentalist organization says it is saving one. I suggest that this term be described.

Page 176 says "Fires that are not intense enough to open the canopy favor the regeneration of western hemlock but usually eliminate the older trees". It is not clear what species the "older trees" are. Is it western hemlock or the trees that form the canopy?

Page v says the prairies "were maintained by American Indian land use practices or other natural phenomena", which sounds partly correct. Since "American Indian land use practices" is not a "natural phenomena", I suggest that "other" be deleted. Page viii says

457-I The text has been corrected according to the comment.

457-J See comment E in the U.S. Environmental Protection Agency letter for information on TMDL regulations that affect Redwood Creek. Also, the information on natural resources on page 167 of the draft plan ("Water Quality").

457-K The reference is to ammonium ions (NH<sub>4</sub><sup>+</sup>), not to ammonia (NH<sub>3</sub>).

457-L The text has been revised according to this comment.

457-M The National Park Service uses the Cowardin classification system to define wetlands, as described on page 169 of the draft plan. Prairie Creek is depicted on the *National Wetlands Inventory* map as a riverine wetland. Under the Cowardin classification, the riverine system includes all wetlands and deepwater habitats contained within a channel. A channel is an open conduit either naturally or artificially created that periodically or continuously contains moving water, or that forms a connecting link between two bodies of standing water. The riverine system is bounded on the landward side by upland, by the channel bank, or by wetland dominated by trees, shrubs, or persistent emergents. Water is usually, but not always, flowing in the riverine system. Adverse impacts on riparian and wetland resources, including Prairie Creek, resulting from the construction of the Highway 101 Bypass were mitigated to the extent possible as described in the 1984 "Record of Decision" on the *Final Environmental Impact Statement*. The "Record of Decision" stated that neither of the environmentally preferable alternatives would satisfy the purpose of the bypass demonstration project mandated by Congress.

The term "rain forest" does not appear in this document.

"Older trees" refers to any of the dominant or subdominant trees species that may be present in old-growth redwood forest at different elevations and distances inland, including Douglas-fir, western hemlock, grand fir,

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"certain naturally occurring prairies, and prairies and oak woodlands that were created by American Indian land use practices or other natural phenomena ...", which is unproven and probably incorrect, and "created" should be replaced by "maintained". Again fires caused by American Indians is hardly a "natural phenomena". I suggest "or other natural phenomena" be replaced by "or natural phenomena".

It is questionable whether American Indians consciously had prescribed burns. Davey Crocket in Texas noted how untended Indian campfires started many prairie fires. Page 177 says "The purpose (of setting fires) was to produce ... as well as to create ...", but the cause of most American Indian fires was probably the result of having a lot of campfires outside designated campgrounds, not tending the fire, not making sure it was dead-out, not clearing the ten foot circle around the fire, and not having a shovel and bucket of water, just like any present-day camper is told. And there were always those that liked to set fires just to see the grass burn, just like today. It may be romantic to think there was a purpose in most old-time fires as contrasted with today's fires, but there was not. I suggest that "purpose was to produce" be replaced by "result was an increase" and "as well as to create" be replaced by "as well as resulting in increased".

Page 181 "Western red lilly" should be "Western red lily" (two places).

457-N  
457-O

Page 182 mentions "Threatened and Endangered Terrestrial wildlife", but it doesn't say which one are threatened and which ones are endangered.

Page 184 says Western Snowy Plover is threatened or endangered. Actually, isn't there a very large population of Western Snowy Plovers inland, and even a large population along the coast in Baja California, but only the "coastal population in the United States" that is considered threatened? Also, the southern California coast is the primary nesting and feeding area. but no restrictions have been proposed anywhere between La Jolla and Malibu, only elsewhere, such as in Northern California.

Page 184 lists the American Peregrin Falcon, but has this bird been delisted?

457-P

Page 187 says "Sportfishing in Prairie Creek occurs in summer when the trout season is open", but is there an open season? Do they catch salmon and think they are trout?

Page 194 "whites" should be "Euro-Americans".

457-Q

Page 202 mentions that the "Yuroks spoke an Algonkian-affiliated language that may be related to the language of their southern neighbors, the Wiyot", but it fails to mention that the only other people that speak this type of language are 700 or more miles away east of the Rockies and imply that the Yuroks and Wiyots are late-comers to this area.

457-R

Page 202 states "Within the (Yurok) reservation, about 1,100 to 1,200 acres of land and waters are federal lands within the parks that are administered by the National Park Service". The implication is that the lands are owned by the Yurok reservation, which is

and tan oak. The fire must be intense enough to burn older trees but not so intense that the large redwoods that form the canopy are destroyed.

The text has been revised according to this comment.

It is well documented in anthropological, historic, and prescribed fire literature that native peoples, in northern California and elsewhere in the world, intentionally set fires to manage the resources in their environment.

457-N The status of these species under federal and state endangered species legislation appears in appendix H on page 413 in the draft plan.

457-O This comment is correct regarding the relationships among the populations of plovers, but the comment regarding "restrictions" is unclear. The Pacific Coast population of the western snowy plover, one of two subspecies of the snowy plover recognized in North America, is defined as those individuals that nest adjacent to or near tidal waters, and includes all nesting colonies on the mainland coast, peninsulas, offshore islands, adjacent bays, and estuaries. The Pacific Coast population of the western snowy plover is genetically isolated from western snowy plovers breeding in the interior.

The peregrine falcon was removed from the federal endangered species list on August 25, 1999. The falcon is still listed as endangered by the state of California. The bald eagle, brown pelican, and tidewater goby, are being considered by the U.S. Fish and Wildlife Service for delisting under the federal Endangered Species Act. Until these species are delisted, they are protected under the act.

457-P The California Department of Fish and Game closed Prairie Creek to sport fishing in 1999 to protect all trout spawning and rearing tributaries. Before this closure, the California Sport Fishing Regulations in effect from March 1, 1998, through February 28, 2000, allowed a daily bag limit of two trout with a minimum size of 8 inches and no more than one trout more than 22 inches to be taken per day from Prairie Creek. The daily bag limit for salmon was zero. When Prairie Creek was open to trout

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	<p>false, the land is owned by RNP. An attempt was made in 1988 to give away this park land to the Yuroks, but the attempt was discovered, and the giveaway did not happen. I request that this statement be changed to "About 1,100 to 1,200 acres of RNP land and waters administered by the NPS are also within the paper boundaries of the Yurok reservation."</p>	<p>fishing in the past, the most likely fish caught were cutthroat trout and juvenile steelhead.</p>
457-S	<p>Orick seems to consider that they are "ranchers", not "farmers", page 150, 300. "Farm" on page 207 should be "ranch". "Farmland" should be "ranchland" on page 205 (1 place) and page 207 (5 places).</p>	<p>457-Q In the interest of brevity, much interesting information about the Yuroks, other American Indians, and cultural resources in general was not included.</p>
457-T	<p>Page 215 says that "Communities that are principally affected by RNSP operations and visitor activities are the town of Orick in Humboldt County and the Hiouchi communities in Del Norte County". No information is shown for Orick or Hiouchi in Table 15, but information is presented for a number of other areas. Information for Orick should be shown, although page 226 points out that much of this information is unavailable. Grant applications may show some of this information. The magnitude of the Orick population is closer to 340 than 650. The population of McKinleyville in 1995 is listed as N/A, but the McKinleyville Chamber of Commerce will probably give a number of 13,500, almost as much as Arcata.</p>	<p>457-R The existing sentence accurately reflects the fact that the lands are under federal ownership and not in trust status.</p> <p>457-S The text in the final plan was changed according to the comment.</p> <p>457-T The reference to N/A means that information is not available from official published sources. See also the response to comment K in Marna Powell's 8/20/98 letter.</p>
457-U	<p>Page 220 says "recreational fishing is a significant draw, probably second to the redwoods as tourism attraction ..". Not any more.</p>	<p>457-U We believe recreational fishing to be an important drawing card.</p>
457-V	<p>Page 220 describes the growth in tourism, however, as I remember, the 1987 Tourism study said there was 7,200 average daily traffic thru Orick, but now the figure is around 4,000 ADT (1,460,000 vehicles per year). Caltrans has the figures. The reduction in logging trucks would be one factor, but there may just be fewer vehicles. Unless RNSP employees drive back and forth more, there may never be much more traffic. A comparison perhaps should be made between the visitor statistics and the vehicle statistics.</p>	<p>457-V The historical visitor statistics are based on official NPS and CDPR data, adjusted to avoid duplication due to double counting. Traffic data, based on Caltrans ADT counts, were also consulted for purposes of assessing historical visitation. The purpose of the discussion on visitor use (draft plan pp. 221-24) is to provide an accurate assessment of RNSP visitation. Traffic data reflecting vehicle counts at a specific location, e.g., Orick, would not necessarily be correlated with general visitation figures for the parks.</p>
457-W	<p>Page 224 indicates that visitor counts beginning 1995/96 run from July 1 to June 30. A calendar count would be much more useful and would not split the middle of the tourist season. The counts do not have to match a CDPR fiscal year. Rainfall figures use this July to June period because most of the rain falls in the winter, so small summer fluctuations do not change the statistics much. The tourist season is at its lowest in December, January, and February, so the tourist counts should follow a calendar year to be more meaningful. Alternatively, CDPR could keep subtotals for each six months, and then it would be easier to calculate the wanted number.</p>	<p>457-W The figures used are the only available official data. The question regarding the organization of the data by the California Department of Parks and Recreation into calendar years or other time intervals is not within the scope of this management planning effort.</p>
457-X	<p>Page 225 indicates that "85% of RNSP lands" are in the aboriginal territory of the Yuroks. If RNSP has 105,500 acres, then 15,825 acres were not Yurok aboriginal territory. The Chilulas occupied the upper Redwood Creek area, and the Tolowas occupied the area north of the Klamath River. It appears that the 85% figure is incorrect and may be closer to 50%.</p>	<p>457-X Based on "Yurok Territory Northern California," a map prepared by the Yurok Tribe Environmental Planning Department (See <i>Yurok Loge Project Review, Pre-Architectural Programming/Feasibility Scoping</i>, prepared by Market Value Planners, August 12, 1996), the aboriginal</p>

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457-Y

Page 226 indicates an unemployment rate of 54%. The 412 employed plus the 912 unemployed equals 1324, not the 1683 cited as being the total labor force. Something is wrong with their data.

457-Z

On page 226 the comparison for Indian unemployment is with the Department of Labor figures for unemployment, however, it seems doubtful that the criteria being used by the Yuroks is the same. You're comparing apples with oranges. As in Southern California recessions, after a certain point, if a person ceases to "actively seek work", then that person is no longer considered to be unemployed. The unemployment rate may be much lower if Dept. of Labor criteria is used. I suggest that the same criteria be used for measuring Yurok unemployment.

457-AA

Page 226 says that "Ambulance service is provided by three companies." I believe only one company, Mad River Ambulance, provides ambulance service to Orick and north to the County boundary.

457-AB-AC

Page 228 says there are three gas stations in Orick, but I think there are now only two, and that may drop to only one.

457-AB-AA

Page 228 says "Municipal services are provided by the Orick Community Services Water District and Orick Volunteer Fire Department and by Humboldt County." There is no Orick Community Services Water District, it is the "Orick Community Services District". The Orick Volunteer Fire Department is not a separate agency, it is part of the Orick Community Services District.

Page 228 says there is an RV park in Orick, and the sign on the property says it is an RV park. but at the 9-2-98 Orick Tomorrow meeting it was stated 4 or 5 times that Orick did not have an RV park. The 1987 tourism report indicated there were many properties with many acres of land available that are zoned commercial recreation and could be used for RV parks. Klamath also has many unused facilities. It is difficult to make an RV park profitable when government offers subsidized free camping just a short distance away.

457-AD

Page 229 says that the Pelican Bay State Prison "is not contiguous with the main incorporated area". As I remember, the two areas must be attached physically (contiguous), so isn't there a shoestring of land connecting the two? Perhaps you might say "is separated from the main incorporated area".

The Draft refers to the "Redwood Information Center" which could be anywhere between San Francisco and the Oregon border. I suggest it be replaced by "Redwood Creek Information Center" or "Orick Information Center". Also, wasn't this building at one time called the "Redwood Creek Visitor Center"?

457-AE

In 1983 when we protested the initial site because of tsunami threats, I was assured by RNP that there was no problem. While the recognized threat of tsunamis has changed

territory of the Yurok Tribe covers all of the southern and central portions of Redwood National and State Parks and extends into the northern portion of the parks (the terminal point being approximately the southern half of Del Norte Coast Redwoods State Park). Text in the final plan has been modified for clarity.

**457-Y** Based on the "Yurok Overall Economic Development Plan: FY 1996-97 Annual Review," the total labor force stood at 1,683 persons, including 421 employed workers, 912 unemployed workers (1,159 unemployed workers, if persons not actively seeking work are included), and 106 underemployed workers. The share unemployed is 54% if only those persons actively seeking work are included and 69% if all unemployed workers are included. The final plan has been modified to provide the above clarifications.

**457-Z** No direct comparisons are made in the draft plan between Department of Labor and Yurok Tribe figures; however, clarification will be provided in the final plan on Yurok Tribe employment/unemployment, as indicated above in the reference to comment Y above.

**457-AA** Clarification of service provided in or near the RNSP area has been provided in the final plan.

**457-AB** Many independent gas stations are facing closure due environmental regulation and competitive pressures from vertically integrated oil companies. The reference to three stations at Orick has been changed in the final plan.

**457-AC** Text in the final plan has been changed.

**457-AD** The comment regarding rewording is appropriate; the wording has been changed in the final plan.

**457-AE** The primary source of the new information regarding the tsunami hazard at Freshwater Lagoon Spit comes from research by Dr. Gary Carver and Dr. Lori Dengler of the Geology Department at Humboldt



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considerably since the construction of the Redwood Creek Visitor Center, the validity of the the runup height from oral histories needs to be challenged. Blind acceptance of oral histories resulting in speculative statements like "the 500-year tsunami run-up height of 16.9 feet would be a gross underestimate, and the center could be overwhelmed by 50- to 75-foot high tsunami waves" need to be tempered by more dependable calculations. It is good that the sea level datum is shown on page 231 since there are several datums in use.

Page 240 mentions nothing about the current hearings being held by the North Coast Regional Water Quality Control Board on non-point sources.

457-AF Page 256 says "Suppression of large catastrophic wildland fires results in adverse impacts on wetlands, including larger stream channels." The meaning is questionable. The sentence should perhaps read "Large catastrophic wildland fires result in adverse impacts on wetlands, including larger stream channels." It is still not clear why "including larger stream channels" is mentioned.

Page 257 says "Visitors using the boardwalks might disturb nesting waterfowl, and indirect adverse impact on wetlands". This statement is very true. Audubon bird watchers in Southern California are the main impact on resting birds because they seek out the birds and always try to get closer, causing the birds to leave. If blinds are provided, the bird watchers still have to get to the blinds, and when they get bored, they have to leave to go to the next spot. Blinds are not the answer unless the route to and from the blind is also hidden..

Page 262 mentions the adverse impact of corvids on the eggs of threatened birds. Coprvids have also been related to the decline of Desert gopher turtles (*Gopherus agazzi*?). Squawfish in the Eel River are caught without DFG limits in a perhaps futile attempt to save the salmon, but perhaps a raven/crow hunting program could be encouraged to reduce the corvid numbers.

457-AG Page 262 says "the long term benefit for the murrelets would be realized in about 100 years". It is difficult to imagine that with all the 1,000s of acres of old growth trees in RNSP that an additional 500 acres would start making a significant difference. Perhaps the real change would come when it is admitted that California is at the southern extreme of the murrelet's natural range. As an example of the ignorance, a 6-97 article in the Eureka Times-Standard stated that there were no murrelets remaining in Alaska, Washington, or Oregon, and that the only remaining murrelets were in northern California.

457-AH Page 271 mentions that if human remains then 25 USC 3001 would be followed, however, there is also the possibility that Euro-Americans may be found, and I assume that appropriate disposition would also be done.

Page 274 says RNSP would install more tsunami warning signs. Government clutters up the landscape with signs. The signs won't help much anyway.

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State University. The oral histories serve only as additional information supporting the geological research. Both the Humboldt and Del Norte County Offices of Emergency Services agree that the previous analyses of tsunami threat underestimated the magnitude and proximity of an earthquake, and therefore underestimated the height of a tsunami that could occur.

457-AF The previous three sentences describe how fire suppression activities (equipment, fire lines) affect stream channels, which are defined under the Cowardin classification system as wetlands (see response to comment M in this letter). Very large fires (catastrophic fires) require proportionately larger suppression efforts than smaller, less intense fires, including prescribed fires.

457-AG Although re-creating a single 500-acre block of suitable marbled murrelet nesting habitat in the parks may not be sufficient by itself to restore all marbled murrelet populations, it is one of many actions prescribed in the *Recovery Plan for the Threatened Marbled Murrelet* which in combination will allow the populations of murrelets to stabilize and eventually increase. The recovery plan recognizes that long-term actions such as the creation of new nesting habitat are more difficult to accomplish and that such actions must be accomplished in small incremental steps. The extreme southern edge of the breeding range of marbled murrelets is just south of Monterey Bay, which is also about the southern end of the range of coastal redwoods. Areas that were historically used by marbled murrelets, but no longer support these birds, are where (or near where) coastal older forests no longer remain.

457-AH In the final plan, the text has been changed to read as follows: If Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001) would be followed. The disposition of human remains identified as being not of Native American origin would be handled in accordance with applicable federal and/or state laws, policies, and guidelines.

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457-AI-AJ

Page 283 uses "Emerald Creek" instead of the correct "Harry Weir Creek".

Page 148 and the index refers to "Greater Coastal Drive", but page 149 refers to "Coastal Drive". Page 210 mentions both again. If they are the same, then they should have the same name. Is there some reason "Greater" was added? Page 283 uses "greater Coastal Drive" with lower case.

457-AK

Page 287 says "The alluvial redwood groves on the lower 8 miles of Redwood Creek and within 0.25 mile on either side of the creek were not harvested before the national park was established in 1968", which is incorrect. Redwood Creek starts at the ocean at mile 0, not east of the ARCO mill at about mile 5. Perhaps the sentence could be changed to "... lower 8 miles of Redwood Creek east of the ARCO mill and ..."

Page 289 discusses trail connections between the Coastal Trail and the Redwood Creek basin. The owls and murrelets are not the species that would be potentially most affected by this trail connection. Humans crossing Highway 101 are more likely to be hit by vehicles if the crossing does not have adequate sight distance. The location of the crossing should be done with care.

Page 289 indicates that RNSP may want to acquire land for a trail connecting the Coastal Trail to Jedidiah Smith Redwoods State Park. It is important that RNSP become frugal with its land acquisitions elsewhere so that there is still adequate authorization to acquire this parcel if the opportunity arises.

457-AL

Page 290 says "Adverse impacts from illegal uncontrolled breaching to reduce the flooding of private property would continue". Page 131 says Alternative 1 would "Manage and restore estuarine functions while maintaining to the extent possible, land uses on adjacent private lands". RNSP would not allow flooding until it acquired the private land, so there would be no need for illegal breaching, so the page 290 statement should be changed to "Adverse impacts from controlled breaching ..."

457-AM

Page 295 says "a destination lodge would be developed by the turn of the century", however, this cliché doesn't work too well when the event is only 15 months away. Perhaps the phrase would be better as "a destination lodge would be developed within the next twenty years".

457-AN

Page 299 uses the term "commercial fishers" rather than "commercial fishermen". There has never been any sexist discrimination implied or shown that "fishermen" is not a generic term for both sexes. The attempt to revise the English language is assinine. No equal attempt is made to revise Spanish.

RNSP has a policy to discourage hatchery fish, yet hatchery fish are routinely planted in Freshwater Lagoon. Admittedly, there is no spit overwash or overflow now, and the

457-AI The National Park Service uses the name "Emerald Creek." Harry Weir Creek appears on the USGS topographic maps.

457-AJ The text has been changed to exclude the use of the term "greater."

457-AK The text has been revised according to the comment.

457-AL The text has been revised according to the comment.

457-AM The text has been modified in the final plan to address this comment and reflect a longer planning horizon for this proposal.

457-AN Text in the final plan was revised in response to this comment.

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hatchery fish eventually die out if they are not caught by fishermen or otters. Page 265 mentions hatchery fish in Lagoon Creek, but nothing is said about Freshwater Lagoon.

I am pleased that the National and State parts of government are continuing to cooperate on management of this wonderful area for the benefit of the people, rather than for each separate jurisdiction. Thank you again for the opportunity to comment on the Draft.



Charles Wilson  
Orick

COMMENTS

RESPONSES

98 OCT 13 AM 8:10 October 9, 1998

INDIVIDUAL MAIL  
CRESCENT CITY  
CALIF 95531

Superintendents  
Redwood National Park  
Draft General Management Plan  
111 Second Street  
Crescent City, CA 95531

Dear Redwood National Park,

This letter is to be submitted as part of the public input for the development the new plan for the park. My comments focus on the following two concerns as indicated in Alternative 1, the agencie's proposed action: (1) the Freshwater Lagoon Spit and (2) a proposed new visitor center.

The Freshwater Lagoon spit area that has been used for informal camping should remain as it is. Most of the people who use this area are older people in trailers and motor homes. This spot provides a unique site along the California coast where people can camp very close to the ocean. The only other similar spot is near San Diego. Most of these campers are older and unable or unwilling to hike the distances required to have such a unique visual experience. The maintenance on this visual resource for this group of campers is vital, especially as this group will have more users as the U.S. population continues to age. There are plenty of beaches assessable to the younger more vigorous citizens. I recommend the Lost Coast area for people seeking a remote visual coastal experience. My research indicated that it is the closeness of the ocean at Freshwater Lagoon Spit that attracts these campers (unpublished data of the author).

In your draft proposal you suggest the area is a high-hazard tsunami area. When was the last tsunami to hit this beach or north west California? Crescent City was hit hard in the 1960's. You might want to consider moving your administrative office. Seriously, today's technology

provides us with ample warning of impending dangers of this type. Campers in motorhomes and trailers can leave the area on a moments notice. The tsunami hazard is a bogus reason to close the area to camping.

Some local private campground owners and managers do complain about the competition of the spit site. However, none of these local campsites offer anything near the ocean view and activities that can be found on the spit. Secondly, there are not enough current campsites to accommodate the spit campers at peak use times. In addition, one camper I interviewed at the spit in 1991 said the reason he was there was because he was turned away from a nearby private campground (unpublished data from author). This camper belonged to one of those camping clubs, but the campground only provided one or two sites for members of this camper club; so the person I interviewed had no where to go in the late evening. He was headed north and saw the spit with other campers. It saved his day and I am sure part of his vacation .

449-A See summary comment A.

449-A

## COMMENTS

An unpublished study done by me in 1990-91 indicated that these people had very little need of services such as water and toilets associated with traditional campgrounds. The one thing that the overwhelming majority of these campers did want was a sanitary dump station.

The spit area can always accommodate one from the road. Redwood National Park has not provided a single developed camping site since the park was created. To my knowledge it is the only National Park that has no developed camping sites. The Freshwater Spit is a unique site that has been used by campers for at least 30 years. The area should remain available for camping due to the unique nature of its scenic location and the accessibility and availability it affords our older travel/outdoor enthusiasts regardless of whether it remains in the ownership of Caltrans. Any other action would be irresponsible to the citizens who support the park with their tax dollars. In addition, I suggest that the National Park Service build some developed camp sites in the bald hills area. There are some wonderful views that any camper would appreciate.

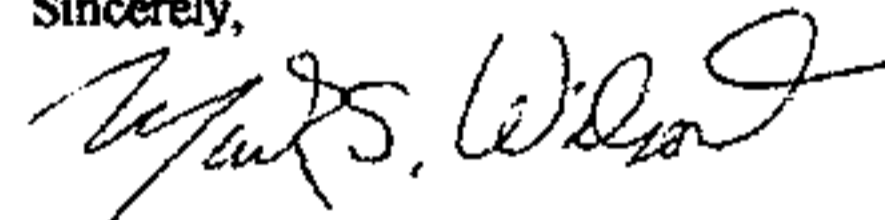
449-B The second item concerns the proposal to build a new visitor center. I believe the current visitor center is adequate for the use. The tsunami zone reason for moving it is a bogus reason.

449-C You should have known this when the current center was first proposed for building (it was in the coastal zone). I was curious about the location when it replaced the original visitor center in Oriskany. If this was not an issue when you built the current visitor center, the people who put together the plans and approved them should have been fired. If a tsunami is predicted to hit that section of the coast, I am sure the center can be evacuated quickly. The size of the current visitor center seems adequate. I did not see any data in your draft plan addressing the size of the facility.

Based on my visits to the center, I see no reason for a larger one. I do appreciate the fine displays and materials available. I often stop at the visitor center with students on field trips to examine the terrain model of the park. The students usually spend some money on the purchase of books and maps.

Thank you for considering my comments. If you have any questions, please contact me.

Sincerely,



Mark S. Wilson, Ph.D.

## RESPONSES

449-B See comment A in Janis Crandall's letter.

449-C See comment A in Janis Crandall's letter.

COMMENTS

RESPONSES

PG V, RNSP-1998  
GENERAL MANAGEMENT PLAN

Sept 7-98

DEAR SIRs: I AM WRITING TO PROTEST  
YOUR PLAN ON REMOVING THE OVERNITE  
CAMPING & PARKING AT THE FRESHWATER SPIT,  
ONE MILE SOUTH OF ORICK, CA. PLEASE DO  
NOT DO THIS - OUR FAMILY & FRIENDS HAVE BEEN  
CAMPING AND ENJOYING THAT BEAUTIFUL STRETCH  
OF WATER FRONT FOR OVER 20 YEARS - WE  
LOVE THE NICE FRIENDLY PEOPLE IN ORICK - WE  
ATTEND CHURCH THERE - BUY GAS & GROCERIES  
AND IN GENERAL ENJOY THE AREA.

WE LOVE THE BEACH & ALWAYS DONATE OR  
\$500 PER DAY - WE DO NOT MISSUSE THE LANDSCAPE  
IF YOU TAKE THIS BEACH AWAY FROM US  
CAMPERs, WHERE WILL WE GO TO BE CLOSE TO  
THE WATER TO FISH & RELAX??

CAN I MAKE A SUGGESTION? WHY NOT MAKE A  
\$700 PER DAY CAMP CHARGE? THIS WOULD GENERATE  
APPROX \$875 PER DAY (IF CONTINUALLY COUNT 125  
RV'S PER DAY) OR \$26,250 PER MONTH  
THIS WOULD SURELY COVER THE COST OF TOILET  
CLEANING & GARBAGE COLLECTION.. PLUS THE

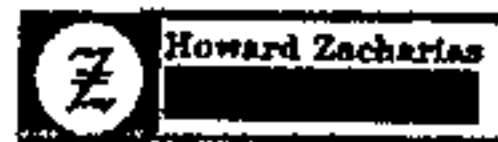
BENEFIT OF KEEPING THE UNDESIRABLE'S FROM  
BEING A PROBLEM TO THE RANGERS & CAMPHOST.

I REPEAT - PLEASE DO NOT TAKE AWAY  
OUR LAST BEAUTIFUL VACATION PLACE ON THE BEACH.

Thank you  
Howard Zacharias

P.S

I AM A RETIRED SENIOR  
AND A VET -



451-A See summary comment A.

451-A

COMMENTS

RESPONSES

September 15, 1998

To Whom It May Concern:

Thank you for the opportunity to voice our concerns about the camping allowed along the Orick beach. My husband and I own a small RV/Campground in Trinidad, Azalea Glen. Allowing free camping a few miles from our park is obviously a negative impact on our ability to make a living. But besides that issue there are other issues such as safety and health.

452-A

We find it quite frustration to be in competition with the state government. We also find it irritating to be held, by many government agencies, to strict health and safety codes while the government condones RV parking and camping on the Orick beach, creating safety and health hazards.

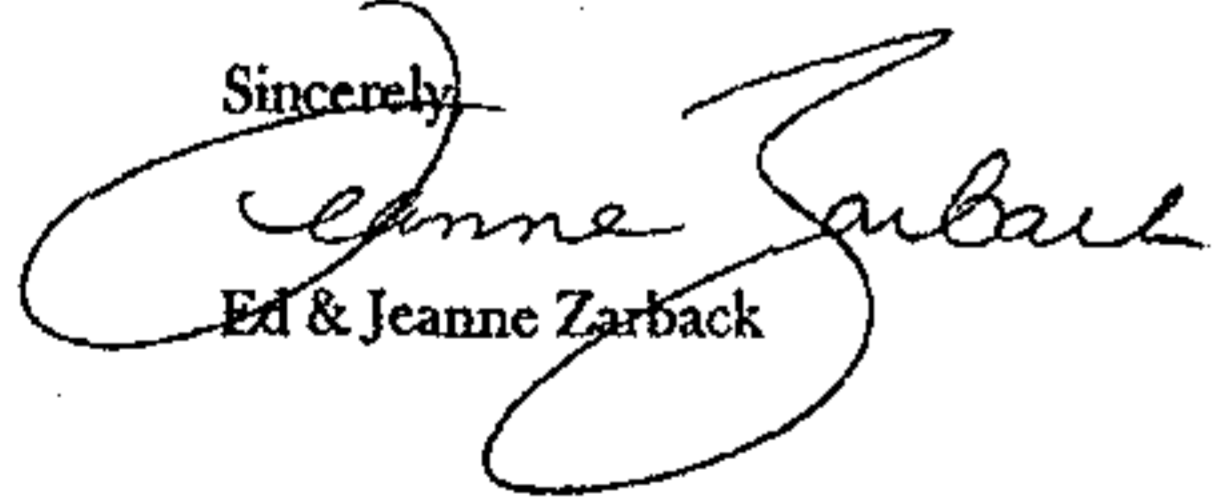
In any one-summer night there can be upwards of 200 to 300 RVs and campers along that beach. The health hazard is particularly notable. The only facilities are a few portapots. There is no running water, no electricity and no sewer disposal. We have observed RVs dumping their tanks just before they pull out. Folks allow their pets to use the beach with no thought of cleaning up after them.

We have read of vandalism and crime in the area of the beach. We wonder why the issue of safety, as multitudes of RVs and cars pull in and out onto the state highway, has not been addressed. Again we are held to strict standards for safety as we design the ingress and egress of our parks.

We understand that the campers produce revenue for the town of Orick. We would support the use of the beach for day use only. We would hope that even with the more limited use the state would continue to provide portapots.

Thank you for taking these comments under consideration as you deliberate this issue.

Sincerely,



Ed & Jeanne Zarback

09 SEP 16 PM 1:26

452-A See summary comment A.

COMMENTS

RESPONSES

MARGARET KETTUNEN ZEGART

October 8, 1998

OCT 13 PM 1:25

Superintendents, Redwood National and State Parks  
Humboldt & Del Norte County  
1111 Second Street  
Crescent City, CA 95531

RECEIVED  
CRESCENT CITY  
CALIF. 95531

RE: DRAFT GENERAL MANAGEMENT PLAN AND GENERAL PLAN / ENVIRONMENTAL  
IMPACT STATEMENT/IMPACT REPORT

Dear Superintendents:

This corrects my draft mailed on October 6 to meet October 9. Although your *General Plan*, etc. is excellent, in my view, several important additions should be made. I prefer *Alternative 1* + habitats of 3:

iii, The management zone - Non mechanized should be noted to include all sensitive areas and- and to this add the

454-A

**SERPENTINE HABITAT.** Mapped and identified this important sensitive land formation of shallow, overburdened soils, often with poor drainage within the parks provides a significant ecosystem for unique species. The blind harvestman - a spider-like creature - is one. Vegetation varies significantly from the other identified sensitive areas. For example, within adjacent to Howland Hill Road southerly between Pacano camp and Little Bald Hills is one of these sensitive areas to be mapped and included, so

iv "The park's archeological, historic and ethnographic resources would continue to be identified...  
v, Add to "A regional trails system...connections between major existing trails...with other agencies.  
193 "The first overland party....reaching the coast new Crescent City before turning northward"  
Jedediah Smith trail should be established throughout the National Park land

This trail, including a crossing of Hawkins Flat (Houchi to Serpentine cliffs, crossed in reconnaissance by two men in 1828, on the existing Houchi Park Center lands, [across this], formerly known as Hawkins Flat, to climb upon Serpentine Cliff, at the entrance to the National Park Service to view the Shasta River watershed, etc. This view point should be acquired immediately as it is still undeveloped land, subdivided parcels APN124-190-09 and AEN 1224-020-22, Danny Peoples [native American heritage] and wife in 1993. This is recorded in Jed Smith's *Journal* and also verified by the Harrison Rogers *Second Journal* entry (June 19), in writings. [See books in Del Norte Historical Society, Crescent City].  
Mike Finley, Houchi Hamlet and others might assist in marking the trail which quite likely was along Highway 199 up to the bend of the river.  
Observations of Native Americans observing two white men crossing to this overlook site and back recorded by article in the *Del Norte Historical Records* (October, 1961) written by Ralph Hughes, and this narrative from his Native American ancestors. Also Ralph Hughes noted that the Jedediah Smith party crossed the river the following day near the Peacock family property and they went up the old Indian trail (Ashford into what is marked on the 1966 quad map as Jeep trail). This Native American trail should be developed at the time of relocation of the Center and new entrance to Jedediah Smith State Park across the road. An alternate route has been suggested but this seems the accurate one for too party as they went to Myrtle Creek and there is part of the original trail high on current Peoples land [some of which might correspond to Cal Trans easement lands within the Peoples property] to Myrtle Creek. Ralph Hughes, who personally told me the route the Del Norte Historical Society and the Jedediah Smith Center, Library, University of Pacific, Stockton, CA have personal information to add to this and your Crescent City history section may have these journals. The other Native American oral documents of the 1828 Jedediah Smith encampment in Del Norte is from a young boy meeting the Jed Smith party whose descendents transcribed this oral tradition in the 1930's. This second account is available known in the Del Norte Historical Museum. Other portions of the trail go along previous days' journey in Humboldt and Del Norte counties - some in Park Land. Journal descriptions can identify general areas (as the Oregon Trail signage indicates journal recorded spots. Prairie Creek can identify elk herds, etc. seen by the Smith party. Six Rivers Recreational Area could create a pull-off picnic information site below Serpentine Cliff.

454-A The National Park Service and the California Department of Parks and Recreation recognize that serpentine areas contain several sensitive plant species (see appendix I, final plan). RNSP plans, including the *Fire Management Plan* take into account both the vegetation communities, such as the knobcone-Jeffrey pine community, and sensitive plant species that occur in serpentine areas. Any visitor use development or resource management actions that occur on serpentine soils are planned to minimize disturbance to these areas.



COMMENTS

RESPONSES

**v American Indian land use practices  
203 RNSP collection of 50 baskets, 25,000 archaeological; 52 Reaffirm relationships**

If *Native American* is the preferred term by these first peoples, then this shall be the identification used throughout the *General Management Plan/EIR*.

Brief references are made to Native American Basketry three places in *Draft*, which is the limited. More narrative and information about weavers could be gained from CIBA or by interview with local tribal leaders and collectors, i.e. Dave Stewart, 707-457-2165. In add to the RNSP artifact collection.

California Indian Basketweavers Association should be included in documentation and as a resource. (attachment). Land use is a priority and they negotiate establishment of traditional gathering material areas. No pesticides, herbicides, fertilizers. Having a Resource Protection Coordinator & Associate, 530-292-0141. They rotate statewide/regional meeting sites, having had for two years a weekend in Humboldt County at the Fernwood Fairgrounds.

land use practice: No spraying of herbicides, pesticides or fertilizer application along roadsides, (berry gathering areas), established basketry materials gathering areas and along streams (fisheries). A practice to be added as base line for all riverine and adjoining areas and road discussions within this draft document, discussion be used within the entire park lands, which requires coordination with county road management areas, BML, National Forests and Caltrans.

Tolowa Federal recognition as a tribe shall be encouraged.

Contemporary structures shall have design review standards.

Lodge should be built in materials/colors harmonious with environment with appropriate signage.

Negotiations should be developed with existing and future business or service centers adjacent to Parks, i.e. casinos along Klamath River, 101 and Holland Hill Road's entrance to Jedediah State Park with screening, landscape for parking areas (berms with plants to diminish vehicle impact) and signage more consistent with tradition and park standards.

**v ...Crescent City information and orientation services would be relocated to the new facility in the Hiouchi area  
335,333, 336,335 Impacts - Visitor Use Opportunities and Visitor Orientation Visitor Use, [Local] Regional Economic**

When the Hiouchi Area Center is relocated should be concert with recording the Native American settlement approximately on its present site and establishing the Jedediah Smith trail on the Eastern side of 101. The moved center west is into the old Zepth property. The new center should also present Native American interpretation, mining to include Myrtle Creek, and Chinese miners and the 19th century long term settlement history of this site. Resources for narrative and displays should include Friends of Del Norte, Del Norte Historical Society and long-time residents, i.e. Mary A. Wright Goetzal, 707-458-2301 with the information and photos to possibly reconstruct the old school house.

Relocating the main information center at 1111 2nd street in Crescent City is necessary since many visitors coming down 101 would not "encounter" by Jed Smith Hiouchi 199 route and this is needed as a center to encourage and coordinate the many visitor housing and services necessary and to encourage commerce that supports the movement of overnight stays into longer term experiences. This might be coordinated with Crescent City Chamber of Commerce.

**v & 59-101, 224; 353 + indexed references Freshwater Spilt Changes**

Use Alternative 1, Unusual seismic and other considerations validate relocation of the center. Convert the structure into complete RV camp/visitor service center. Develop camp sites in old parking area. Federal parking spaces must be replaced elsewhere when removed. Freshwater Spilt has over 70 years of transient camping along a 64-in Highway 101. The maximum parking 180 overnights recorded in this document) should be the base line for number of replacement RV spots in a parking area. These equivalent "mini" sites shall be no fee parking spots, replacement for the fee prior places. \$1.00 fee shower, laundry and pumpout be charged, helping 155 ft connections to septic or compost systems.

Any parking on areas on both sides of 101 at this spot should be for a hourly picnic or day use only. Visitor Centers existing boardwalks and trails, informational signing/kiosks should remain.

Tent camping spaces should be developed at Chick to increase this area's visitation opportunities.

All toilets shall be compost or connected to septic systems in park, painted in natural hues.

COMMENTS

RESPONSES

454-B **21 Threatened and Endangered Species**  
New group of federally listed, proposed or candidate threatened or endangered plant species are known to occur within Redwood National and State Parks. This is an incorrect statement. *Darlingtonia* and water spotted owls in Jedediah State Park. The adjacent Six Rivers National Recreation Area and Forest are lacking many probable conditions (10/19/98 notice) as stated. This is a possible scientific argument.

454-B This statement refers to plant species. There are no individuals or populations of *Darlingtonia* known within RNSP boundaries. "Creatures" generally refers to animal species. Coho salmon and northern spotted owls are known in the parks, as are several other listed threatened animal species discussed on pages 182 through 189 of the draft plan.

454-C **26, 402 and bicycling references**  
low standard sub zone roads, some under county control. Bicycling under these roads would be allowed in high standard zone because of less traffic and lower speeds.  
Adding 50 miles of Mountain bike designated trails will bring multi-problems and cyclists will spread to dangerous shaded trail areas. This happens in Mt. Tamalpais State Park, Marin County. Mill Valley Herald Tribune 10/27/98 reported that 20 to 30 cyclists on fire trail impeded hikers, causing the problems in the Marin's State and National Recreation Areas, parks and municipal watersheds. Various trails use of animal trails and reckless and unsafe speeds by individuals and large groups of "bushwhacker" cyclists. This problem should be averted Mountain bikes, just like jet water ski's should not be permitted. A low travelling and mountain camper bicyclist is a different breed than high adventure cyclists. Also, some rehabilitation should be developed for parkland or adjacent forest that provide large "bushwhacker" crowds like the Harley rallies adjacent to Richardson Grove State Park.

454-C See summary comment C.

454-D **38, 108, + all alternative references: back date of ecosystems' restoration.**  
Repair and maintain the RNSP vegetation since 1850's if incorrect. The date should be since 1850's. The random land clearing, mining, and damming stream reconfigurations, etc. do not have this as a goal to restore destructive human actions or limit restoration when an intent is environmental native plant health. It is very important to remove all "exotics" especially certain brooms, ramparts, grass and all other plants and other non-native garden escaping exotics. Exotics usage should not duplicate ecosystems.

454-D There were no major disturbances to the RNSP ecosystem before the 1850s. Mining was never a significant factor in the parks.

**47+all references: Nickerson Ranch and Mill Creek Trails Backcountry Mechanized**  
In all alternatives, this shall be non-mechanized. A foot trail and neither for cyclists nor equestrian use. Both trails going through fairly level trail for families and those who wish a participatory experience and contrasting ecological forest areas. The trail character is a pedestrian look back along an unimproved road and Mill Road - to their parking area. Wet season use of the trail by wheeled vehicles and hordes will cause erosion. Also, there is a wilderness aspect to this trail because of the forest that visit the old orchard and Humayvan and native berry patches. This and Boy Scout trail (are mechanized) offer varying experiences and are readily available. Misuse of trails and difficulty in sharing with a variety of access uses would present very difficult problems to monitor and should be regulated by designation as non-mechanized.

**33; 209 Douglas Park Is not Hiouchi - Holland Hill Road - all references.**  
originally developed as a toll gate road in the late 1850's.  
Stewardship is the integration of research and planning to avoid or minimize adverse effects on cultural resources. Holland Hill Road goes through DOUGLAS PARK, Not Hiouchi a community on the eastern side of the South Fork extending over the former Hawkins Flat. Access the river is Douglas Park. To Significance Holland Hill Road as a Federal/State historical/cultural resource. Holland Hill Road has two places where the stage road's corridor exists. The character of the road with the large trees never shall be compromised by paving or widening when tree culture are required. Add pull-outs for passing cars and parking area improvements at trail heads and informational kiosks, regularly collected refuse in trash, bear proof container and a permanent toilet structure at the reconstructed Mill Creek bridge.  
Road character will be necessary by "hiking" low speed required by the gravel. Have only the existing paving of the road, begin at the Douglas Park, envelope of homes, often on parcels subdivided from the original Douglas family's ownership. The large express use it at the early stage stop.  
Another stop was the Neil's Chihansen property. Here, on a small South Fork parcel which should be acquired, now since it is forest the River adjacent to Federal property ownership. This is a prime swimming area, very congested and to control the on-bridge and into roadway casual parking, for both a safe parking area and the school house restoration could happen. Safety of swimmers and vehicles using the road or going to Stout Grove and its spectacular gorge view should be featured. This was a food gathering site for Native Americans and this neighborhood school. Native Americans and settlers children for several years, which was unusual for early 1900's. The hand bell photos, etc. exist.

## COMMENTS

## RESPONSES

**Little Bald Hills and Pacamo Camp**

Pacamo Camp, at the entrance to Jedediah State Park, was given by the Tracy family to Save the Redwood's League to enable a transfer of property to the park system to continue an educational use. For several decades Tracys had an international camp for young people here during the summer. Later they constructed a lovely log home from which Mrs. Helen Tracy, an outstanding Crescent City educator, held University and College credit courses in on-site environmental education. (This area includes a serpentine habitat) and is adjacent to the Park's lands. Local and University teacher-training workshops and special education courses from California State University, Arcata and Dominican College, San Rafael.

To use this ~~area~~ <sup>as a home for any Park ranger</sup>, (Orick assigned at this time) is a violation of a gift of this valuable land and surely will be considered by potential giving property owners.

A training center for park service interns in conjunction with the College of the Redwoods, or a focus for "wilderness" activities for young people or an environmental orientation center for the Park's temporary employees would be appropriate modifications. This should not be administrator's housing.

An unfortunate use of 23.25 acres, Little Bald Hill, private land adjoining Pacamo Camp was by a hippie colony in the 60's to 80's, with public health and safety violations as well as fire risks (validated by Gasquet Six Rivers National Forest). However, since 1985 under one ownership and with vehicle access precluded, and now gone, this land should be a primary acquisition and restoration site.

**256 Artificial impoundments and water quality - all references**

Pre-planning conferencing and pre-application meetings by one baseline are established in the work with individuals whose lands adjoin the park - either up or down stream - like the Six Rivers National Forest and its NFS Recreation Area in Del Norte County, the Army Corps of Engineers (or any other agency will make a more effective process. For example, works that continue to be done in the Redwood-Creek Area and the regulatory permit issuance of gravel excavation. Both sedimentation with logging and road reconstruction/removal processes also affect habitat and water quality. Particularly on the Smith River, and not noted in the document is the impact of waste treatment. Holding ponds of the prison and older septic systems previously flooded out, now too close to the river become barely adequate. Up stream erosion, very poor stony soil - percolation problems - and only 100' setbacks required for the many new homes along the Smith as well as the failing older septic systems are causing a visible [aerial photos] and personal experience of river deterioration around home communities. Particularly in Gasquet where a sewer system should be developed and in Houchi, a rapidly developing community stress is placed upon water quality.

**Special Regeneration Areas:** These are scattered areas that meet all criteria for timber suitability, but would require extremely high investments for successful regeneration within five years of harvest as required under the National Forest Management Act. No regulated timber harvest should occur within any management area of *existing shallow soils, slope and within 150' minimum riverine edge*, for *seedling growth stages, natural areas and successful native specie reforestation and restoration of natural areas.*

**267 and other references, Noise**

Not only does the noise from construction and motorized vehicles, activities such group concerts or amplified sound equipment use adversely impact endangered species, this noise volume seriously impairs the quality of visitor use in campgrounds or in existing park uses. Jet or motor vehicles on lakes and rivers should be prohibited.

Inflated rafting or canoeing groups down the Smith River (from the Slant Bridge to Jedediah State Park or along a designated portion of the North Fork should be by permit.

No water or land mining or mechanized extraction should be allowed.

Thank you and sincerely,

*Maragret Kettunen Zegart*

Maragret Kettunen Zegart

M



The mission of the California Department of Parks and Recreation is to provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.

As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

California Department of Parks and Recreation  
United States Department of the Interior / National Park Service