

Humboldt Redwoods State Park Draft Road and Trail Management Plan Response to Comments September 2017

In April 2017 the Department of Parks and Recreation (“Department”) released the Draft Road and Trail Management Plan (“RTMP”) for Humboldt Redwoods State Park (“HRSP”). Public comments on the draft were accepted through June 2017. The Department received comments from approximately ten individuals and organizations. Each comment was reviewed and considered for incorporation into the document. Comments in support of or opposed to the plan or elements of the plan were noted but no response will be provided. Comments outside the scope of this plan were referred to park staff for consideration but will not be addressed herein. Those comments with specific questions or concerns are addressed below. Because many of the comments addressed similar issues, a number of standard responses were developed. Those standard responses are listed below and referenced by number at the appropriate comments.

Standard Responses:

1. **Bikes:** In an effort to meet the recreational needs of all members of the public, the Department is obligated to consider those uses requested by the public and to accommodate those requests where it is appropriate to the park’s classification, where preservation of the natural and cultural resources can be maintained, and where public health and safety can be managed. Humboldt Redwoods State Park is classified as a “state park”. Pursuant to the California Public Resources Code, “improvements undertaken within state parks shall be for the purpose of making the 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. Improvements may be undertaken to provide for recreational activities including, but not limited to, camping, picnicking, sightseeing, nature study, hiking, and horseback riding, so long as those improvements involve no major modification of lands, forests, or waters. Improvements that do not directly enhance the public’s enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks.” (Public Resources Code Section 5000 et. seq.) The Department strives to balance the recreational needs of the public with preservation of the natural and cultural resources in the park and the health and safety needs of trail users. In addition, the Department strives to implement the goals of the State’s Recreational Trails Plan, which include encouraging the appropriate expansion of multi-use (hike, bike, horse) trails. Thus, the Department developed a “change-in-use” (CIU) process to objectively evaluate change-in-use requests including requests to add bikes to a trail. The CIU process includes analysis of all potential impacts of a proposed CIU to the safety and sustainability of a trail. If park management does not feel that impacts can be managed through trail design modifications, such as the addition of

speed control devices or trail reconstruction/reengineering, or through management options, such as alternate days of use or one way travel, the CIU may not be to be approved. Bikes will not be allowed where they will cause significant impacts to natural or cultural resources or cause significant health and safety concerns that cannot be addressed through design or management alternatives. During the development of this RTMP CIU requests were received and processed for 22 trails. See the CIU Summary Report for complete details. New CIU requests can be submitted through the Department’s normal CIU process as described on the Department’s website.

2. Environmental and Historic Review: This RTMP is a planning level document and the cultural and environmental impacts of specific projects have not yet been identified. Prior to the implementation of any project identified in this plan, an environmental analysis will be performed in accordance with CEQA and other applicable laws and necessary permits will be acquired. During the environmental analysis, potential impacts to plants, animals, and habitats will be considered, along with potential impacts to archeological and historic resources. Prior to maintenance, a resource expert will be consulted. In addition, the Department utilizes a set of standard project requirements, which include measures such as abiding by seasonal restrictions to noise generating activities, to limit impacts to natural and cultural resources. Where impacts cannot be properly mitigated, the project may be modified or eliminated.

#	Comment	Response
1	No bicycles on Baxter - Dangerous for horses and pedestrians! - very difficult to see bicycle/horse interface on Baxter. There will be accidents to horsemen and bicyclists as cyclist speed downhill on single track trail. - allow bikers to go up backside and come down road ONLY	See Standard Response #1. The Baxter Trail (segments 1, 2, and 3) connects Grieg Road with the Mattole Road in the vicinity of Hamilton Barn, providing further connectivity to Pole Line Road, Peavine Ridge Road, and Fox Camp Road. Baxter Trail is the most upstream route linking the northern and southern road and trail networks in the upper Bull Creek watershed. The trail is wide, well outsloped and the surface is firm and stable year-around. Due to limited sight distances and long downhill grades, speed calming devices such as durable pinch points, textured surfaces and signage will be required to limit potential safety issues with other users before the change-in-use will be implemented. If additional

		<p>management measures, such as one-way direction of travel for bicyclists, are determined to be necessary to enhance trail safety, they can be implemented.</p>
<p>2</p>	<p>No bicycles on Addie Johnson-already have trail access adjacent.</p>	<p>See Standard Response #1. The Addie Johnson Trail Segment 1 from the Homestead Trail to the Mattole Road is conditionally approved for the addition of bikes to provide improved circulation for bicycles with the Bull Creek Trail North, the Homestead Trail, and the Albee Creek Campground. This trail will tie together with the proposed segment of trail from the Mattole Road to the Bull Creek Trail North to complete a loop from the Albee Creek Campground. The trail segment descends from the Homestead Trail and would require speed calming devices such as durable pinch points, textured surfaces, and signage to limit potential safety issues with other users before a change in use could be approved. Trail surface hardening to protect tree roots would also be required before a change in use could be approved. The Addie Johnson Trail Segment 2 from the Homestead Trail to the end of the trail is not approved for a change-in-use. The segment is a dead-end and does not enhance circulation in the area. The trail alignment has steep fall-line grades making it difficult to maintain drainage, and overall trail sustainability, with the additional mechanical wear associated with strenuous uphill climbing and downhill braking. The narrow corridor limits the ability to add sinuosity or pinch points for speed calming.</p>

3	<p>Bikes should use single track for uphill and use roads for downhill.</p>	<p>Limiting bicycle use to one direction on a trail is a management action that may be considered prior to adding bicycle use to any trail. One-way traffic may need to be considered for all trail users. However, typically, speed calming devices are sufficient for reducing downhill bike speeds for safety purposes.</p>
4	<p>Concerns about adding bikes to both Homestead and Bull Creek trails.</p> <ul style="list-style-type: none"> -The trails are very close to Albee Campground and in the summer are very crowded. Higher speed cyclists would create unsafe situations. - Possibly allow on one trail, not both. - If allowed on one trail there is still a bike-free trail in that corridor. 	<p>See Standard Response #1. Adding bikes to Homestead and Bull Creek North trails will provide a loop trail from the Albee Creek Campground, Big Trees Day Use Area, and the Blue Slide Parking Area. Portions of the trail are relatively flat and should not enable high speeds. Trail modifications designed to reduce speed and improve visibility along the trail will be constructed prior to bicycle use being implemented. Other portions meander through a redwood grove and a prairie, so aggregate trail surface hardening will be needed to protect tree roots and prevent trail entrenchment prior to implementation of the change-in-use.</p>
5	<p>One parks person said that 5 ft would be the minimum width for multi-use.</p>	<p>Multi-use trails have a minimum tread width that is consistent with the Class 1 equestrian standard of 48 inches. In locations where the hillslopes are steep and hikers and mountain bikers may have difficulty stepping off the trail, passing areas a minimum of 60 inches wide and 60 inches long should be provided. The frequency of passing areas along the trail is determined by site conditions, including sight distance, percent of hillslope, stability of the parent soil, and characteristics of the terrain.</p>

6	I would like to see access (for horses) to Bull Creek Johnson Trail from Blue Slide.	Accessing the Johnson Camp trail from the Blue Slide area requires crossing Bull Creek. A bridge in that vicinity is not feasible due to the design challenges of the steep terrain, the required size of such a bridge, and the anticipated cost. Access to the Johnson Camp Trail for pedestrians is via the Big Tree Day Use Area and for equestrians is via the Bull Creek Trail South from Grasshopper Road.
7	Please consider an equestrian trail from Blue Slide parking area to bottom of Johnson. As an MAU member I commonly redirect riders who are creating volunteer trails in this area. A single reinforced trail would be better than many volunteer trails. A trail in that area will allow a "loop" ride from Cuneo Creek horse camp.	See Response to Comment #6.
8	Would love to see an equestrian trail from Blue Slide parking lot that runs on the south side of Mattole Rd to the Johnson Trail, parallel to the road	See Response to Comment #6.
9	Make a connector trail for equestrian/hikers from base of Blue Slide parking area across Bull Creek to the south and connect to existing trail on that side. If this trail is sensitive for horse traffic year round it could be seasonal trail as is Johnson Trail.	See Response to Comment #6.
10	Blue Slide parking should connect across Bull Creek to Johnson Camp Trail for equestrian.	See Response to Comment #6.
11	Loop trail from west side of Cuneo Creek Camp to access upper meadow to access Homestead	The current alignment of the Homestead Trail provides the most stable alignment and approach to

	trail would detour horses off of steep paved road with a blind corner. Old Ranch Rd alignments already exist. MAU could help.	Cuneo Creek. A reroute would have to pass through the floodplain, which is an unsustainable alignment.
12	Signage at top and bottom indicating rules for trail usage, please.	This suggestion will be incorporated as a parkwide recommendation as follows: "Improve road and trail signage to enhance safety and better facilitate way-finding and interpretive opportunities."
13	re #17: Continue horse trail to connect with existing horse trail along Bull Creek south. Reasons: Horses don't need bridge- can just walk through the water. Easy to put in and maintain. Also, many people are already doing this on "volunteer" trails and having a designated trail will reduce these extra trails and prevent damage.	See Response to Comment #6. Equestrian trail crossings through a stream channel are erosive and degrade riparian habitat over time. Existing equestrian trail crossings along the Homestead and Baxter Camp connector trails are contributing sediment to the stream and breaking down the streambanks. No stable, non-erosive crossing designs exist that will work in this location. Furthermore, equestrian use directly in a stream channel can introduce fecal matter and urine into the stream. Regulatory agencies including California Department of Fish and Wildlife and the US Department of Fish and Wildlife discourage the use of these types of crossings due to the impact to natural resources.
14	Please consider a re-route out of Cuneo to Homestead to eliminate the danger of equestrians on a narrow steep road with blind curves.	The terrain north and west of the Cuneo Creek Horse Camp is steep and chronically unstable, preventing the development of new, sustainable trails in this area.
15	Horse access trail from Fox Creek Road to Cuneo Horse Camp	See Response to Comment #14.
16	Make Fox Camp a loop back to campground Cuneo Camp-	See Response to Comment #14.

	connect trails- Cuneo across Rd to Grieg-	
17	Propose: Connecting trail from Fox Camp to Cuneo halfway to make a loop.	See Response to Comment #14.
18	Cuneo Creek needs a short trail around.	A short (2+) mile loop can be made from Cuneo Creek via two seasonal crossings: one for the Homestead Trail and one for the Indian Orchard Trail.
19	Ensure access to the Eel River at all access points. (Commenter provided multiple suggestions of how access could be controlled.)	All current Eel River access roads are to remain open. Temporary, short-term closures may be implemented for high water or other safety reasons.
20	Concerns regarding the potential environmental impacts created by the maintenance of roads and trails and/or the development of new campsites in the backcountry, including increased corvid abundance, particularly in areas with endangered species such as the marbled murrelet.	See Standard Response #2. See response #24 and #27.
21	Under the parkwide recommendations is "Maintenance activities shall be coordinated with the district environmental staff prior to being scheduled, to avoid adversely impacting rare plants or other sensitive resources." What about rare or sensitive animals?	See Standard Response #2
22	Why not require the use of weed-free feed and "bun bags" for horses?	The invasive plant star thistle has been detected at the Lou Moran Grove Terrace adjacent to the equestrian trail. It will be monitored and control measures taken as necessary. However, at this time there are no on-going resource impacts from invasive species being introduced by equestrians. Until invasive plants are

		determined to be a problem, the Department will not require these protective measures.
23	There should be seasonal restrictions to creating noise, such as using power tools, and performing work, such as road resurfacing, to avoid impacts to marbled murrelets and spotted owls during nesting season.	See Standard Response #2
24	Page 32 (BCNW #9 & #10) – Re: Backcountry campsites - Will additional campsites include corvid-proof containers and other restrictions to limit corvid habituation? How close are these to old-growth?	Predator-proof containers will be included in any new campsites. Generally, no new campsites will be developed closer than one quarter mile from old growth.
25	Pages 32 & 33 – (BCNW #12 et al.) – Re: “Brush portions of the trail beyond regular cyclical brushing standards to provide and maintain the proper sight distance and trail width necessary for trail safety per the Department's Trails Handbook. “ - Does brushing of trails require any motorized tools? If so, noise effects could be an issue if not completed outside the MAMU breeding season	See Standard Response #2.
26	Are there areas in the backcountry where the use of mechanical tools will be prohibited?	Pursuant to California Code of Regulations §4351, “there shall be no use of motorized vehicles, motorized equipment, or motorboats, no other form of mechanical transports [herein 'mechanized equipment'], and no permanent structure or installation within any state wilderness, cultural preserve, or natural preserve....except to the extent the Director...or his/her designee makes a finding that the use of such equipment is a "minimum

		management requirement" that will make use of the "minimum tool" necessary and that the result of the work will be a condition as near to natural as possible." At HRSP, Bull Creek State Wilderness consists of 10,450 acres and Carl "A" Anderson Redwoods Natural Preserve has 3,520 acres.
27	What is the current and future plans for corvid control and avoidance in the park? I have gathered that HRSP is collecting corvid data for a before and after treatment of predator proofing campsites.	A study of corvid densities in the park was conducted in 2012 and 2013, during which corvid populations were monitored prior to installation of predator-proof infrastructure. Additional studies are planned to monitor corvid structures following the installation of predator-proof infrastructure but are dependent on funding. The corvid management program includes management of native and resilient ecosystems, predator-proofing infrastructure in visitor areas that could provide a food reward, maintaining predator-proof infrastructure, and sharing the "Crumb Clean" campaign with park visitors.
28	Harper Creek needs a connector to Bull Creek North.	Staff is unclear about the meaning of this comment. The Homestead Trail has a direct connector to the Bull Creek Trail North. Clarification may be submitted for response to trails@parks.ca.gov .
29	Provide "nest egg" budget to open trails, especially at creek crossings before horse camp opens. People pay to ride in redwoods and can only get there by trailering. Homestead Trail crossing at Bull Creek is impassible and needs heavy equipment to repair. Paying	The park's trail budget is apportioned based on needs across the entire sector. No specific sites are earmarked for funding within current budgetary processes. No fees are charged for access to the Bull Creek backcountry. Modifications to channel banks are done by hand to reduce impacts to riparian corridors.

	customers already angry and complaining.	
30	Utilize MAU more for trail maintenance.	This suggestion will be incorporated as a parkwide recommendation as follows: "Volunteers from organizations such as the Mounted Assistance Unit have been critical partners in the development and maintenance of the park's trails. Continue to work with these types of organizations to develop volunteer resources."
31	I encourage trail planners to meet specifically with members of the MAU. We have the best interests of the park at heart.	Throughout this process, staff have sought input from as many park users and stakeholders as possible. Seven stakeholder meetings were held between October and December 2010 at the HRSP Visitor Center and included representatives from adjacent landowners, local non-profits, equestrian, mountain bike, and hiking groups, and local utilities.
32	Create a volunteer trail hiker group like the MAU.	See the Response to Comment #30
33	Better maintenance of poison oak on trails and in camp. Use spray to control poison oak.	Poison oak will be removed as part of regular trail maintenance as staffing resources allow. Typically, herbicides are not used to control poison oak due to the potential impact to the environment.
34	Trim clean up poison oak on trails along Albee creek.	See the Response to Comment #33.
35	Would like to see Old Log Road open at top of Pole Line to Thornton also (the old logging deck).	Peavine Ridge Road is available to visitors as a multi-use trail and links the top of Poleline Road to Thornton Trail. The terrain between Pole Line Road and Thornton Trail was thoroughly investigated for a trail route. Several large inner-gorge channels and steep,

		unstable terrain do not allow for a route through the area.
36	Trails should be marked yield to horses.	This suggestion will be incorporated as a parkwide recommendation as follows: "Improve road and trail signage to enhance safety and better facilitate way-finding and interpretive opportunities."
37	Add equestrian uses to more trails, including the Addie Johnson Trail	Nine trails were evaluated for possible addition of horses: Bull Creek North Trail, Bull Creek South Trail, Drury-Chaney Loop Trail, Founder's Grove Trail, Grasshopper Trail, High Rock River Trail, Mahan Plaque Loop Trail, River Trail, and Rockefeller Loop Trail. Only Blue Slide to Homestead Trail-Bull Creek Trail North Connector was identified as appropriate for the addition of horses following implementation of appropriate design and management options. It was determined to be too impactful to the natural and cultural resources and/or the safety of the trail to allow horses on any of the other eight trails. Additional trails can be considered for the addition of equestrian use upon request.
38	The backcountry could use some more trail loop options.	There is a parkwide recommendation to give preference to loops and connections to regional trail systems to give users more choices for the length and duration, as well as a greater diversity of terrain and experiences. To that end, a number of new trail segments, such as the Grasshopper Saddle Trail, the Johnson Camp Crossover Trail, Decker Creek Trail, and the Upper Gould Barn Trail are proposed to create more backcountry loops.

<p>39</p>	<p>Re: BCSW#6: Panther Gap Rd. Alt Rte- appreciate the proposal of this route. I hope that if this route is completed, the other route through private property (mazzone-clementi parcel) will be used only for admin purposes (rangers, maintenance, etc) and not for public access. This issue was raised during public comments for the Gen. Plan in 2001. An alternate route is better for public safety as well due to vehicle traffic.</p>	<p>The intent of developing the road segment through park property is to abandon public use of the segment passing through private property. Administrative use will continue as necessary for park management and public safety. However, additional research is required to determine the Department's authority to manage public access to the road.</p>
<p>40</p>	<p>There are very few long hiking trails in the park like the River Trail- need more. I would love to see the Addie Johnson trail extended to become a connecting loop with the Thornton MUT. More options for ~6-12 mile loop trails. More possibilities for connecting loop trails, less road hiking</p>	<p>The park has numerous long hiking trails. In addition, a number of new trail segments, such as the Grasshopper Saddle Trail, the Johnson Camp Crossover Trail, Decker Creek Trail, and the Upper Gould Barn Trail are proposed to create more backcountry loops. New trails will be designed as trails and not roads. Although existing logging roads are not ideal for hikers, they provide readily available recreational opportunities. The development of new trails is dependent on funding. In addition, the potential for environmental impacts often prohibits the development of new trails.</p>
<p>41</p>	<p>The trails at Cuneo were built for hiking and equestrian use. The trail is not sustainable or safe for use by bicycles. There is already a lot of dangerous, illegal use by bicyclists. This high speed use of the horse trail system will have disastrous consequences eventually. Moreover, the equestrian groups of Northern California have all realized what a jewel Cuneo Creek campground and trail system is. They have</p>	<p>See Standard Response #1 and Response to Comment #4.</p>

	<p>long been involved in the planning and building of this outstanding facet of the park. Please allow safe and relaxing equestrian use of the trails we have work on developing for equestrian users.</p>	
42	<p>Why were changes in use to add bicycles considered? Mountain bikers already have a variety of trails to use in the immediate area.</p>	<p>Please see Standard Response #1. To ensure maximum recreational opportunities for the public, Department policy directs that trails be made compatible for multi-use (hike, bike, and horse) to the extent possible. Following requests by the public, 54 segments from 18 trails were evaluated for the addition of bicycles. Bicycles were approved for addition to 29 of those segments (53%). Pursuant to the change-in-use evaluation, only six segment were approved for the addition of bikes without any modifications. However, bikes will not be allowed on any of the remaining trail segments until design modifications to control bike speed and ensure user safety and trail sustainability have been implemented.</p>
43	<p>Please consider a short loop trail around the horse camp- there was a historic trail that was removed. This could also be used to resolve the problem of equestrians on a narrow steep road with blind curves.</p>	<p>The Cuneo Horse Camp – Indian Orchard Connector is a road that forms a short loop out of the Equestrian Camp to the north and west. No roads or trails have been removed in the area.</p>
44	<p>Trails that are for bikes should be open for horses as they ride on our trails – they should be shared.</p>	<p>Trail standards for bicyclists and equestrians are not the same. Trails are evaluated for each use separately given the conditions and concerns of each trail. A trail that is approved for bicycle use is not necessarily appropriate for equestrians and vice versa.</p>

45	Concerns: Bikes and horses – bikes go really fast downhill - danger	See Standard Response #1. Bicycles will not be added to equestrian trails unless the health and safety of trail users can be adequately ensured.
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