



Environmental Analysis

4 ENVIRONMENTAL ANALYSIS



View of rugged landscape from Bear Harbor, Source: EDAW 2003

4.1 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

4.1.1 PURPOSE OF THE EIR

This General Plan for Sinkyone Wilderness State Park (SP), with all its sections, constitutes an Environmental Impact Report (EIR), as required by Public Resources Code Sections 5002.2 and 21000 et seq. It is subject to approval by the California State Park and Recreation Commission (Commission). The Commission has sole authority for the Plan's approval and adoption. Following certification of the EIR and approval of the Plan by the Commission, the Department of Parks and Recreation (Department) will prepare management plans and area development plans as staff and funding become available. Future projects, based on the proposals in this General Plan, may be subject to permitting requirements and approval by other agencies, such as the Department of Fish and Game (DFG) and the California Coastal Commission (CCC).

4.1.2 FOCUS OF THE EIR

The Notice of Preparation for this General Plan was circulated to the appropriate federal, state, and local planning agencies. Based on known issues affecting the long-term management of the Park and on comments received during the planning process, this General Plan and EIR were prepared to address environmental impacts that may result from the implementation of the management goals and guidelines, as well as from area-specific management. Emphasis is given to potentially significant environmental impacts that may result from all future Park management, development, and uses within the Park that are consistent with these goals and guidelines.

4.1.3 SUBSEQUENT ENVIRONMENTAL REVIEW PROCESS

The tiering process of environmental review is incorporated into this EIR. Tiering in an EIR prepared as part of a general plan allows agencies to consider broad environmental issues at the general planning stage, followed by more detailed examination of actual development projects in subsequent environmental documents. These later documents incorporate, by

reference, the general discussions from the broader EIR in the General Plan and concentrate solely on the issues specific to the later projects [Public Resources Code Section 21093; California Environmental Quality Act (CEQA) Guidelines §15152]. This document represents the first tier of environmental review. As a first tier of planning, this plan provides park-wide goals and guidelines for resource management, visitor use, and administration and operations for Sinkyone Wilderness SP.

Future second tier reviews will provide more detailed information and environmental analyses. For example, each future area development plan will be subject to further environmental review to determine if it is consistent with the General Plan and to identify any significant environmental impacts and mitigation measures that may be specific to the area development plan.

Mitigation generally requires resource specialists to evaluate the scope of work, identify potentially significant impacts, determine the cause of the impacts, and specify measures to avoid or reduce the impacts to a less-than-significant level.

More comprehensive environmental reviews will be possible at the more specific levels of planning, where facility size, location, and capacity can be explicitly delineated, rather than at the general plan level.

4.1.4 CONTENTS OF THE EIR

The enclosed program EIR includes the following sections:

Introduction to the Environmental Analysis:

This section includes a brief overview of the environmental review process, legal requirements, and approach to the environmental analysis.

EIR Summary: The EIR summary represents a summary of environmental impacts associated with the implementation of the proposed General



Coastal view of jagged rocks near Jones Beach



Backpackers on Lost Coast Trail near Jones Beach Camp



Daily fog rolling into the valley



Sag ponds south of Whale Gulch

Source: EDAW 2003

Plan, an overview of the environmental effects of alternatives considered to the preferred General Plan, and a description of any areas of controversy and/or issues that need to be resolved.

Project Description: This section provides an overview of the proposed General Plan, which is the focus of the program EIR.

Environmental Effects Eliminated from Further Analysis: This section describes those environmental topics that did not warrant detailed environmental analysis and the supporting rationale for their elimination.

Environmental Impacts: This section analyzes potential environmental impacts associated with implementation of the proposed General Plan.

Other CEQA Considerations: This section contains information on other CEQA-mandated topics, including significant and unavoidable impacts, significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts.

Alternatives to the Proposed Project: The alternatives analysis describes the various alternatives to the proposed General Plan (including the No Project Alternative) that are considered in this EIR and the associated environmental effects of these alternatives relative to the proposed project.

Response to Comments: This section includes a list of comments received on the DEIR, copies of all comment letter received, and responses to these comments

4.2 EIR SUMMARY

4.2.1 SUMMARY OF IMPACTS AND MITIGATION

Implementation of the General Plan is not expected to result in significant impacts on the environment. Implementation of the Goals and Guidelines contained in Chapter 3 along with compliance with federal, state and local laws and regulations, as stated in those guidelines, avoids potential significant effects or maintains them at a less-than-significant level. Additional mitigation measures are, therefore, not necessary.

4.2.2 SUMMARY OF ALTERNATIVES CONSIDERED

Alternatives considered during the planning process include the no-project alternative, minimum wilderness alternative, and maximum wilderness alternative, as described below. In addition, a transitional wilderness alternative was considered during alternatives development, but was subsequently dropped from further analysis, because concepts associated with this alternative could easily be incorporated into the preferred alternative, while maintaining flexibility in management options and achieving the legislature's intent for a state wilderness classification. These alternatives were evaluated to determine the environmentally superior alternative.

4.3 PROJECT DESCRIPTION

Chapter 3 of this General Plan represents the project description and establishes the overall long-range purpose and vision for Sinkyone Wilderness SP. Management goals and supporting guidelines in Chapter 3 are designed to address the currently identified critical planning issues and to mitigate the adverse environmental effects of uses that would be permitted in the Park. In accordance with the goals and guidelines, more specific management and site development plans would be implemented to avoid adverse environmental impacts resulting from future developments and improvements, to the extent feasible, within the boundaries of the Park.

4.4 ENVIRONMENTAL EFFECTS ELIMINATED FROM FURTHER ANALYSIS

The following topics were eliminated for future analysis in the EIR because there is no potential for significant environmental effects resulting from implementation of the General Plan. A brief reason for their elimination is provided for each respective topic.

4.4.1 ENERGY AND MINERAL RESOURCES

The Park is not located within an area containing existing or historic energy or mineral extraction and it is not designated by the California Department of Conservation as a mineral resource zone. Therefore, no significant effects to energy or mineral resources would occur and no further environmental analysis of effects on energy and mineral resources are necessary.

4.4.2 POPULATION, EMPLOYMENT AND HOUSING

Although some visitors travel long distances to come to the Park, it primarily serves the regional population of northern California, and this population is projected to grow by an average of 1% annually through 2020. While implementation of the General Plan would not directly induce regional population growth, additional recreational facilities could attract additional visitation and potentially add to the employment base of the immediate area. Given the latest unemployment rate (2000 data) in Humboldt County (6.5%) and Mendocino County (6.6%) and the latest housing vacancy rate (2001 data) in Humboldt County (9.3%) and Mendocino County (9.1%), it is expected that the increase in demand for labor and housing would be met by the existing local market and that no additional housing would be needed to serve growth associated with additional visitation (DOF 2002). For these reasons, no significant population, employment, and housing effects would occur and no further consideration is necessary for this environmental topic.

4.4.3 AGRICULTURAL RESOURCES

Implementation of the General Plan would not convert any Important Farmland as identified by the California Department of Conservation Farmland Mapping and Monitoring Program, nor does the Park contain any lands under Williamson Act contracts. Implementation of the General Plan would not result in the conversion of any agricultural land to non-agricultural

uses. Therefore, no significant agricultural resource effects would occur and no further environmental analysis on the effects on agricultural resources is necessary.

4.5 ENVIRONMENTAL IMPACTS

4.5.1 BIOLOGICAL RESOURCES

INTRODUCTION

This section analyzes impacts related to biological resources that would result from the implementation of the General Plan.

THRESHOLDS

The biological resources analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact on biological resources if it would:

- ▶ Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- ▶ Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- ▶ Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- ▶ Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- ▶ Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy.
- ▶ Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

IMPACT ANALYSIS



Negative Impacts to Vegetation. Compliance with general plan goals and guidelines would ensure that future uses, development and improvements within the State Park would not cause substantial adverse

effects on vegetation resources. This impact is considered **less than significant**.

Implementation of the General Plan would result in the avoidance or minimization of disturbances or losses of sensitive plant communities and special-status plants. The General Plan includes goals and guidelines that ensure protection of natural resources in the Park. This impact is considered less than significant.

Forty-six special-status plant species, including one lichen, have potential to occur in plant communities present in the Park (Appendix D). Eight of these species are known to occur within the Park: leafy reed grass, Oregon Coast Indian paintbrush, Mendocino Coast Indian paintbrush, redwood lily, leafy-stemmed mitrewort, California pinefoot, maple-leaved checkerbloom, and long-beard lichen. Undocumented occurrences of these and other special-status plant species may be present in the Park. Thus, focused surveys would be necessary to accurately determine the distribution and extent of special-status plant species in the Park. Direct impacts, such as direct removal or damage of special-status plant occurrences, may occur as a result of implementation of the General Plan. Indirect impacts to special-status species may result from the degradation of the plant communities they occupy.

In the Non-Wilderness Area, potential impacts could result from future facility improvements and visitor use. In the Wilderness Area, potential impacts could result from maintenance or restoration activities. Potential impacts from visitor use, such as trampling or soil compaction, could also occur. Implementation of the General Plan would ensure that visitor use, development or expansion of facilities, and other ground disturbance activities would be conducted in accordance with Goal NR-1 and Guidelines NR-1A, NR-1B, NR-1D, NR-1F, NR-1G, NR-1K, NR-1L, and FAC-1C. As such, direct and indirect impacts to special-status plants would be less-than-significant. In addition, consistent with Guidelines NR-1B, NR-1C, NR-1D, NR-1E, NR-1H, NR-1I, and NR-1J, forest management as well as restoration and monitoring of native plant communities could potentially increase the quality and extent of suitable habitat for special-status plant species.

As discussed in the Existing Conditions Chapter, the dynamic coastal ecosystem of the Park contains a number of common and sensitive vegetation communities that are valuable habitat for plants and wildlife. Sensitive natural vegetation types in the Park include the bulrush-cattail, spikerush, red alder, sand-verbena-beach bursage, Douglas-fir, Douglas-fir-tanoak and redwood series, coastal prairies, and aquatic habitats. Future improvements, such as potential development of facilities, as well as rehabilitation and maintenance activities would avoid or minimize impacts to riparian areas, wetlands, old-growth redwood groves and other sensitive plant communities through implementation of Goal NR-1 and Guidelines NR-1A, NR-1C, NR-1D, NR-1E, NR-1F, NR-1G, and NR-1J.

Implementation of Guideline NR-1E would ensure that potential impacts from invasive weeds on native habitats and species are less than significant. Therefore, the impact of weeds on

vegetation resources resulting from implementation of the General Plan would be considered less than significant.

Currently, no Habitat Conservation Plans or Natural Communities Conservation Plans have been approved in the region. Consistency with the Local Coastal Plan and local policies is analyzed in the Land Use and Planning section.



Fish and Wildlife. Implementation of the General Plan will benefit fish and wildlife by managing the majority of the land as state wilderness, which would promote natural ecological processes. In non-wilderness areas, compliance with the Goals and Guidelines would ensure that future uses, facility developments, improvement, and maintenance within the Park would not substantially affect common or special-status fish or wildlife species directly or indirectly through habitat modifications. The General Plan also will ensure that movement of native fish and wildlife species will not be restricted. This impact is **less than significant**.

The Park supports an impressive diversity of wildlife that can be attributed to the varied terrain, habitat types, and relatively undisturbed conditions found throughout much of the area. Most of the animals present are regionally common, but at least 35 special-status fish and wildlife species have potential to occur in the Park.

Construction and maintenance of Park facilities and anticipated public use of existing facilities could result in loss and/or disturbance of wildlife habitat and could reduce the number of individuals of some species. Potential direct impacts could result from development, relocation and/or expansion of facilities, such as trails, parking, campgrounds, picnic/day use areas, and visitor center, in the Non-Wilderness Area. In the Wilderness Area, potential direct impacts could result from maintenance of campgrounds and trails. Potential secondary impacts on wildlife resulting from visitor use could include disturbance from visitor activities (e.g., hiking and camping) and introduction/expansion of invasive species.

Impacts on common wildlife species found in the Park would be less than significant because maintenance or enhancement of existing facilities and construction of additional facilities in the Non-Wilderness Area would require a relatively small amount of ground disturbance and would not be sited in important wildlife habitat areas with implementation of Guideline NR-2A, NR-2O, and NR-2R. Guidelines NR-2G and NR-2M would ensure none of the facilities would remove large tracts of wildlife habitat and none would substantially reduce opportunities for wildlife movement or fish passage. In addition, the opportunity to enhance habitat linkages and buffers around existing Park resources would be sought through Guidelines NR-2H and NR-2I.

Impacts to terrestrial special-status wildlife species would be avoided or minimized by Guideline FAC-1C, which requires the avoidance or minimization of impacts to areas known to support sensitive resources during the development of new facilities; Guideline NR-2S, which calls for mapping of sensitive wildlife species distribution and habitat; and Guideline

NR-2O which establishes protection measures for sensitive species that may use structures before major maintenance, construction or demolition.

Impacts to aquatic special-status species, including anadromous fish, amphibian and reptiles, would be avoided or minimized by implementing guidelines to protect aquatic resources and water quality. Guideline NR-2M establishes that any in-stream work would be conducted in accordance with requirements of DFG, NMFS, and the federal Clean Water Act to ensure protection of fish and other native aquatic vertebrates.

Other guidelines would require monitoring of common and special-status species within the Park (Guidelines NR-2D, NR-2F, NR-2S). Guideline NR-2C would facilitate the development of partnerships with research entities and regulatory agencies to protect and enhance special-status fish and wildlife populations and increase public education about their importance and value.

The General Plan is consistent with the Local Coastal Plan, as described in the Land Use and Planning section.

4.5.2 CULTURAL RESOURCES

INTRODUCTION

This section analyzes impacts related to cultural resources that would result from the implementation of the General Plan.

THRESHOLDS

The cultural resources analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact on cultural resources if it would:

- ▶ Cause a substantial adverse change in the significance of historical resources.
- ▶ Cause a substantial adverse change in the significance of an archaeological resource.
- ▶ Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- ▶ Disturb any human remains, including those interred outside of formal cemeteries.

IMPACT ANALYSIS



Impacts to Cultural Resources. Implementation of the General Plan would result in the avoidance or minimization of disturbances to the integrity of cultural resources situated within the Park. The General Plan includes cultural resources goals and guidelines that ensure the protection and maintenance of prehistoric and historic sites, features, and landscapes

documented within the Sinkyone Wilderness SP. This impact is considered **less than significant**.

A total of 65 prehistoric and historic sites, features, and artifacts have been documented within the Park as a result of various cultural resource investigations. These resources have been identified in the Wilderness and Non-Wilderness areas within Sinkyone Wilderness SP and include early Native American settlements, isolated prehistoric artifacts, and historic-period resources such as homesteads and railroads and traces of early logging and ranching activities. Although much of the Park has never been subjected to an inclusive systematic archaeological inventory, it is apparent that many of the prehistoric and historic sites situated in the Park show that early Native American populations were utilizing the rich and varied floral and faunal resources available in area.

Although general statements can be made regarding the cultural resources sensitivity of particular landforms within the Park, additional surveys are needed to better define the distribution of sites within the Sinkyone Wilderness SP and ensure that they are not adversely effected by Park development and maintenance proposals. The implementation of Goal CUL-1 and Guidelines CUL-1A through CUL-1H outlined in the General Plan would add considerably to the levels of research and preservation currently occurring within the Park and reduce impacts to a less-than-significant level.

4.5.3 AESTHETICS

INTRODUCTION

This section analyzes aesthetic impacts that would result from the implementation of the General Plan.

THRESHOLDS

The aesthetic analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant aesthetic impact if it would:

- ▶ Have a substantial adverse effect on a scenic vista.
- ▶ Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- ▶ Substantially degrade the existing visual character or quality of the site and its surroundings.
- ▶ Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

IMPACT ANALYSIS

Impact AES

Degradation of Viewsheds. The General Plan does not contain proposed actions, features or facilities that would degrade the aesthetic viewsheds of the Park. If new facilities, roads, trails, or interpretive features are proposed in future development plans, implementation of General Plan Goals and Guidelines would avoid or minimize degradation of Park viewsheds. Parked vehicles, signs, and the maintenance of current facilities could have potential impacts to Park viewsheds. General Plan Guideline AES-1F would limit the visibility of maintenance activities. This impact would be **less than significant**.

The General Plan includes recommendations for the potential construction of a visitor center and staging area in the River Corridor area and a potential residence or camp host facility in the vicinity of the Usal Campground. The General Plan identifies the majority of the Park to be designated a State Wilderness, thereby reducing the amount and type of uses permitted within the Park, as compared to current conditions. No new development is proposed within the State Wilderness area that would significantly impact the scenic vistas in the Wilderness Area of the Park. The General Plan identifies Goal AES-1 and Guidelines AES-1A through AES-1E to inventory and identify aesthetic features of the Park and to develop management plans to avoid and minimize degradation of Park viewsheds.

4.5.4 LAND USE AND PLANNING

INTRODUCTION

This section analyzes land use and planning impacts that would result from the implementation of the General Plan.

THRESHOLDS

The land use and planning analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact related to land use and planning if it would:

- ▶ Physically divide an established community.
- ▶ Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- ▶ Conflict with any applicable habitat conservation plan or natural community conservation plan.

IMPACT ANALYSIS

Impact LAND

Consistency with Local Coastal Plan. The Plan does not conflict with the current Mendocino or Humboldt county local coastal plans. General Plan guidelines will ensure all Park management activities and decisions will comply with the Local Coastal Plans, or a Public Works Plan approved by the Coastal Commission, therefore this impact is **less than significant**.

The Department's ownership of Sinkyone Wilderness SP and the preparation of a land management plan for the Park are specifically outlined in numerous policies in Section 4.1 Humboldt County Line to Rockport Planning Area (Lost Coast) of the Mendocino Coastal Plan. Roads and trails in the Park were identified as areas for improved hike-in camping areas and hiking trails. Implementation of the General Plan would comply with the goals and policies of the Local Coastal Plan or a Public Works Plan approved by the Coastal Commission. Guideline PARK-1D would ensure all future Park management plans, activities, and decisions would comply with the Local Coastal Plans. Guideline PARK-1E would require the Department to participate in the updates of Local Coastal Plans to ensure the Park General Plan remains compatible. Therefore this impact is less than significant.

4.5.5 AIR QUALITY

INTRODUCTION

This section analyzes impacts related to air quality that would result from the implementation of the General Plan.

THRESHOLDS

The air quality analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant air quality impact if it would:

- ▶ Conflict with or obstruct implementation of the applicable air quality plan.
- ▶ Violate any air quality standards or contribute substantially to an existing or projected air quality violation.
- ▶ Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- ▶ Expose sensitive receptors to substantial pollutant concentrations.
- ▶ Create objectionable odors affecting a substantial number of people.

IMPACT ANALYSIS

Impact AQ

Degradation of Air Quality. With air quality control measures, construction and operational activities that generate criteria air pollutants, odors, and air toxics would not exceed the federal, state, and local standards. Compliance with Mendocino County AQMD and North Coast Unified AQMD rules and regulations during any construction or operation activities involving the use of heavy equipment would maintain this impact at a **less-than-significant** level.

If development projects (i.e., area development plans) within the Park generate criteria pollutants, they may be required to obtain an “authorization to construct” and a “permit to operate” from the Mendocino County AQMD and the North Coast Unified AQMD. As a part of this permitting process, developments are required to comply with the Mendocino County AQMD and North Coast Unified AQMD’s rules and regulations on fugitive dust emissions, architectural coating emissions, air toxics, odors, and other air pollutants during construction and operational activities. Implementation of Guideline EHS-1A requiring the coordination with AQMDs to support compliance with air pollutant control measures would maintain or minimize the emission of criteria air pollutants from construction activities and stationary sources.

New recreational development in the Park may generate additional vehicular traffic to and from the Park. The Transportation Project-Level Carbon Monoxide Protocol (Garza et al. 1997) states that signalized intersections at level of service (LOS) E or F represent a potential for a CO violation. Due to the low traffic volume on roadways in the area and the lack of signaled intersections in the immediate vicinity of the Park, localized concentrations of vehicle-generated carbon monoxide would not be expected to exceed ambient air quality standards.

Typical recreational uses permitted in the Park are not known to generate odors that would be considered objectionable to most people. Use of air toxics (e.g., regulated herbicides) would be in accordance with state and federal rules and regulations. Given the above, impacts related to air pollutants are expected to be less than significant.

4.5.6 GEOLOGY, SOILS, AND SEISMICITY

INTRODUCTION

This section analyzes impacts related to geology, soils, and seismicity that would result from the implementation of the General Plan.

THRESHOLDS

The geology, soils, and seismicity analysis uses criteria from Appendix G of the State CEQA Guidelines. According to these criteria, implementation of the General Plan would have a significant impact related to geology, soils, and seismicity if it would:

- ▶ Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, and/or landslides.
- ▶ Result in substantial soil erosion or the loss of topsoil.
- ▶ Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- ▶ Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.
- ▶ Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

IMPACT ANALYSIS

Impact
GEO

Risk of Geologic and Seismic Hazards. Structures developed in the Park would be subject to natural geologic processes and soils conditions, as well as seismic events. Compliance with the California Building Standards Code and the implementation of General Plan Goals and Guidelines would maintain the risks of related hazards to acceptable levels. This impact is **less than significant**.

The Park is not located in an Alquist-Priolo special study zone. Active faulting has not been confirmed at the Park; however, a coastal fault named the Bear Harbor fault zone was mapped from Usal to Whale Gulch. The fault was inferred from geologic features and lineations (DPR 1989). It is generally parallel to the San Andreas Fault offshore. Because of its proximity within 1.5 miles of the San Andreas Fault, offshore seismic activity can be expected, including ground shaking and liquefaction. Due to the steep topography of the Park, seismically induced landslides along river banks are expected. Moderately strong seismic ground shaking would occur during a large earthquake, resulting in potential structural damages.

The risk of liquefaction, which is the transformation of soils from a solid state to a liquid state during ground shaking, is high within the Park along the coast due to the presence of saturated sandy soils. Liquefaction can cause buildings to sink or suffer from major damage. There are no existing structures on the shore and the General Plan does not propose any new structures in these areas. If proposed, however, all structures developed within the Park would have to comply with the standards contained in California Code of Regulations, Title 24, also known as the California Building Standards Code, through the Department's internal planning and design processes. As such, future development and improvements would include structural reinforcements and other features required by the California Building

Standards Code that would minimize seismically induced structural damage. Therefore, seismic hazards impacts are less than significant.

In terms of soils and geologic hazards, the primary risks are with soil erosion and subsidence. Most of the soils within the Park are derived from the Franciscan formation, primarily sedimentary rock, with some igneous and metamorphic rock material. The primary rock material is Graywacke, a highly variable sandstone with angular medium-sized grains. Graywacke has a low clay content and thus has a low potential for soil expansiveness, which refers to the change in soil volume in response to moisture content. The soils within the Park are capable of supporting specialized septic systems (i.e., septic tanks designed to prevent accidental release during flood events), although no septic systems are proposed at this time. Erosion risk increases with increasing slope, precipitation, river or stream current, and ground disturbance and with decreasing vegetative cover. The potential for soil erosion is high in the Park because of the steep topography, dynamic river and stream flows, and human activities in areas without substantial vegetative cover.

Goal NR-1 and Guideline NR-1E within this General Plan would minimize potential conflicts between structural development and natural river bank erosion and unstable and/or steep areas by avoiding placing new structures in areas that are likely to be in or near streams and in other slide-prone areas within the planning timeframe. Guideline NR-1G would result in additional vegetative cover within the Park. Guidelines NR-1K, NR-1L, NR-3G, NR 3K, and REC-1F would require vegetative buffers, erosion control features, and other features to minimize the potential for runoff to carry eroded soils into water bodies during construction and operational activities. Given these goals and guidelines, the potential for soil erosion would be minimized through vegetative cover. Where erosion cannot be prevented (i.e., excavation areas and bank cutting by the river), adverse effects (e.g., structural damage and water quality degradation) would be minimized to the extent feasible by doing in-stream work during low flows and by implementing best management practices including bank stabilizing, sediment catchment systems, and weather and water flow monitoring.

While new wells may be needed to provide potable water, the overall use of groundwater would not increase to a level that could cause land subsidence. As such, implementation of the General Plan would not increase the risk of subsidence. In addition, facilities that may be built in the Park would be required to comply with the California Building Standards Code, which includes mitigative structural requirements for areas susceptible to subsidence. Given these conclusions, the geologic hazard impact is less than significant.

4.5.7 HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section analyzes impacts related to hazards and hazardous materials that would result from the implementation of the General Plan.

THRESHOLDS

The hazards and hazardous materials analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact related to hazards and hazardous materials if it would:

- ▶ Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- ▶ Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- ▶ Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- ▶ Be located on a site which is included on a list of hazardous materials sites compiled pursuant to government code section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- ▶ For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.
- ▶ For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.
- ▶ Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- ▶ Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

IMPACT ANALYSIS

Impact
HAZ

Risk of Wildland Fire, Exposure to Hazardous Materials, and Other Hazards. While the General Plan would permit prescribed burns in areas for maintenance and restoration (e.g., coastal prairies) and could expose unknown hazardous materials sites from previous logging operations, implementation of the management goals and guidelines, as well as the compliance with existing codes and regulations, would maintain this impact to a **less-than-significant** level.

There are no known hazardous materials sites within the Park (EPA EnviroMapper, 2003); however, previous logging operations in the Park involved underground storage tanks (UST)

at Wheeler that were identified as causing contamination in the soil and groundwater. There is the potential for other unknown sites to be discovered during normal operations and maintenance of the Park. Guideline EHS1-B would also limit risks from any discovered hazardous materials to less-than-significant levels.

Implementation of the General Plan would not result in a substantial increase in the use of hazardous materials (e.g., propane) within the Park. Day-to-day operation of the Park does not involve the transport or disposal of hazardous materials, and the Park would continue to contract with licensed providers of propane. The Department recently installed a solar system at the Needle Rock House, which reduced the use of propane, and may reduce the need to transport propane into the Park. All use of hazardous materials, as well as the development of new storage tanks or areas, would be in compliance with state and federal laws and regulations. Furthermore, the Park is not located within one-quarter mile of a school or airport.

Implementation of the General Plan may result in increased human activities throughout the Park. The increase in interaction between visitors and wildland habitat would increase the risk of wildland fires, which may affect visitors to the Park and adjacent properties. Implementation of Goal FIRE-1 and Guidelines FIRE-1A through FIRE-1C would ensure monitoring and discouragement of activities that may start wildland fires, and would ensure the provision of information to visitors on Park rules regarding bonfires, fire crackers, and other inappropriate activities that may start fires. Also, emergency vehicle access would be maintained on Usal Road and Briceland Road to Orchard Camp under the General Plan. Given these, the increase in the risk of wildland fire is not expected to be substantial.

Given the above, impacts related to wildland fires, risk of exposure to hazardous materials, and risks associated with airport operations would be less than significant.

4.5.8 HYDROLOGY AND WATER QUALITY

INTRODUCTION

This section analyzes hydrology and water quality impacts that would result from the implementation of the General Plan.

THRESHOLDS

The hydrology and water quality analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact related to hydrology and water quality if it would:

- ▶ Violate any water quality standards or waste discharge requirements.
- ▶ Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would

drop to a level which would not support existing land uses or planned uses for which permits have been granted).

- ▶ Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite.
- ▶ Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.
- ▶ Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, otherwise substantially degrade water quality.
- ▶ Place housing within a 100-year flood hazard area as mapped on a federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map.
- ▶ Place within a 100-year flood hazard area structures which would impede or redirect flood flows.
- ▶ Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
- ▶ Inundation by seiche, tsunami, or mudflow.

IMPACT ANALYSIS

Impact HYDRO

Flood Damage and Water Quality Degradation. Implementation of the General Plan may result in the development of facilities within the 100-year floodplain, especially within the Mattole River corridor parcels. Compliance with General Plan management goals and guidelines, as well as compliance with existing rules and regulations, would limit these potential impacts to a **less-than-significant** level.

Certain areas of the Park are located within the 100-year floodplain. The General Plan would permit development in the floodplain based on compliance with floodplain management requirements (see Guidelines EHS-1C and EHS-1D). By developing in compliance with these goals and guidelines, structural damage caused by flood events is expected to be minimal.

Implementation of the General Plan would result in no or minimal alteration of river or stream courses and drainage patterns. Guidelines EHS-1E, EHS-1F, NR-1E, and NR-3G within this General Plan would minimize potential conflicts between structural development and the natural movement of rivers or streams wherever feasible. Due to the Park's location near the Mattole River and numerous streams and tributaries, additional runoff, generated by new

impervious surfaces associated with facility development, would be expected to drain directly into the waterways. Thus implementation of the General Plan would not cause localized flooding at offsite locations. Furthermore, implementation of the General Plan would not impede or redirect flood flows.

Implementation of the General Plan would result in improvements in water quality. Guidelines NR-1B, NR-1E, and NR-1G would result in additional vegetative cover, vegetative buffers and other control features within the Park in order to minimize the potential for runoff to carry eroded soils into water bodies during construction and operational activities. These requirements would minimize the contribution of sediments and other pollutants into the waterways to the extent feasible and required by RWQCB.

Recognizing the requirements for compliance along with implementing protective goals and guidelines, the General Plan would have less-than-significant impacts related to flooding and water quality.

4.5.9 NOISE

INTRODUCTION

This section analyzes noise impacts that would result from the implementation of the General Plan.

THRESHOLDS

The noise analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact related to noise if it would:

- ▶ Expose persons to or generation of noise levels in excess of established standards.
- ▶ Expose persons to or generation of excessive groundborne vibration or groundborne noise levels.
- ▶ Cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- ▶ Cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

IMPACT ANALYSIS

Change in Ambient Noise Levels. Compliance with Goals FAC-1 and NW-1, and Guidelines FAC-1B and NW-1A would ensure future development and improvements within the Park would protect and preserve the natural ecosystem elements and processes, and would not generate noise

levels that interfere with the natural ecosystem or exceed the state noise guidelines. This impact is **less than significant**.

The three primary sources of noise expected within the Park are construction activities, operations of facilities, and vehicular traffic. Based on the California Office of Planning and Research's General Plan Guidelines, 70 dBA is the maximum acceptable noise level for the most sensitive land uses (e.g., parks and playgrounds). Wildlife and nature observation areas would also be considered noise-sensitive uses.

Based on information provided by the U.S. Environmental Protection Agency (U.S. EPA), outdoor receptors within approximately 1,600 feet of construction sites could experience maximum instantaneous noise levels of greater than 70 dBA when onsite construction-related noise levels exceed approximately 90 dBA at the boundary of the construction site. The general purpose of the goals of the General Plan is to protect the State Wilderness values of the Park. Thus much of the Park itself is considered noise-sensitive.

Potential stationary sources of noise within the Park include the operations of a visitor center, which would generate occasional parking lot-related noise (e.g., opening and closing of doors, people talking). This type of noise is not expected to exceed the guidelines. If future development and improvements would generate additional visitation to the Park, then traffic volumes and the associated noise volumes along roadways would increase. Where the traffic noise level would exceed the noise guidelines at sensitive uses along the roadways and where such increases would be perceptible, an adverse noise effect may result.

Goal FAC-1 would provide essential facilities to support uses, consistent with Wilderness and Non-Wilderness areas, and public health and safety. Guideline FAC-1B would require implementation of mitigating recommendations in noise studies for any development or improvement projects within the Park that may generate unacceptable noise levels within the State Park or State Wilderness as well as at nearby sensitive land uses. The recommendations would protect sensitive uses from noise. Goal NW-1 would require proposed land uses to follow recommendations for protection and preservation of natural ecosystem elements and processes within each management area. Guideline NW-1A would require minimization of disturbances, such as the use of loud, motorized equipment and roadwork, to the minimum amount necessary. Therefore, this impact would be less than significant.

4.5.10 TRANSPORTATION AND CIRCULATION

INTRODUCTION

This section analyzes transportation and circulation impacts that would result from the implementation of the General Plan.

THRESHOLDS

The transportation and circulation analysis uses criteria from Appendix G of the State CEQA Guidelines. According to these criteria, implementation of the General Plan would have a significant impact related to transportation and circulation if it would:

- ▶ Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).
- ▶ Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.
- ▶ Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- ▶ Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- ▶ Result in inadequate emergency access.
- ▶ Result in inadequate parking capacity.
- ▶ Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

IMPACT ANALYSIS

Impact
CIRC

Traffic Patterns and Emergency Access. Implementation of the General Plan would result in a change in traffic patterns and volumes of various transportation modes to the Park, and the General Plan would permit roadway maintenance and improvements. Implementation of management goals and guidelines would ensure traffic safety and adequate capacity; thus, the impact is **less than significant**.

The General Plan requires day use and overnight Park users to park vehicles in areas provided at Needle Rock, Orchard Camp, or the Usal Beach Campground. These parking areas provide access for hiking and Usal Beach provides access for horseback riding in the Park.

In terms of traffic safety, Goal RT-1 and Guidelines RT-1A and RT-1B would ensure adequate roadway signage and coordination with Mendocino and Humboldt counties and local agencies to implement roadway maintenance and improvements. Separation of vehicle traffic from pedestrians, bicyclists, and equestrians wherever feasible and/or installation of safety signage would occur with the implementation of these guidelines. As such, implementation of the General Plan would not be expected to result in a decrease in traffic

safety. Guideline RT-1C would ensure the Park evaluates all roads and trails and provides an adequate circulation system that suits the primitive character of the Park.

Implementation of Guideline RT-1D would ensure all development areas outside of the State Wilderness would be designed to maintain adequate access for emergency vehicles to the satisfaction of appropriate entities. Given these goals and policies, as well as the compliance with applicable codes and regulations, traffic and circulation impacts would be less than significant.

4.5.11 UTILITIES AND SERVICE SYSTEMS

INTRODUCTION

This section analyzes impacts on utility and public service systems that would result from the implementation of the General Plan.

THRESHOLDS

The public services and utilities analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact related to public services and utilities if it would:

- ▶ Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, parks, and other public facilities.
- ▶ Exceed wastewater treatment requirements of the applicable regional water quality control board.
- ▶ Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- ▶ Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- ▶ Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.
- ▶ Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- ▶ Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.

- ▶ Fail to comply with federal, state, and local statutes and regulations related to solid waste.

IMPACT ANALYSIS

Impact UTIL

Increased Demand for Utility and Public Services. The General Plan would permit limited new developments and improvements in areas served by utilities that would generate a minimum increase in the demand for utility and public services. Because existing service providers and resource capacities are expected to be sufficient, the impact is **less than significant**. Further, compliance with Goals FAC-1 and NW-1, and Guidelines FAC-1A, FAC-1C, FAC-1E would ensure future development and improvements within the Park would protect and preserve the natural ecosystem elements and processes, and would utilize existing facilities where possible or implement mitigation measures to the extent feasible for new facilities.

Sinkyone Wilderness SP is very remote and public utilities are not available in the majority of the Park. Shadowbrook, which is located north of the main Park areas and on the public utility grid, houses the ranger residence and administrative building. Shadowbrook has basic utilities, such as electricity, heat, septic, telephone, and running water.

New equipment and facilities, at Shadowbrook and within the River Corridor area of the Park, may be needed to serve the future development within the Park. Adverse environmental effects associated with new infrastructure and services are expected to be typical of the equipment and facility types. Preference would be given to the use of existing infrastructure over the development of new infrastructure. This would minimize the amount of new development required to provide utility and public services. Construction and operations of the equipment and facilities are expected to be in compliance with State and federal rules and regulations, as well as management goals and guidelines of this General Plan.

Goal FAC-1 would provide essential facilities to support uses, consistent with management area designations and public health and safety. Guideline FAC-1A would provide criteria for screening future sites for appropriate uses, as well as guidelines for developing facilities after site selection. Guideline FAC-1C would require the Department to minimize degradation of the Park's environmental quality where new infrastructure is required. Guideline FAC-1E would require adequate water sources, waste disposal, and monitoring for existing and proposed facilities. Goal NW-1 would require proposed land uses to follow recommendations for protection and preservation of natural ecosystem elements and processes within each management area.

As such, new infrastructure and services are expected to be environmentally compatible with the Park's resources, and any degradation of environmental values is not expected to be substantial. Environmental review for new development would be required. While the exact nature of the infrastructure and service needs would not be determined until the development proposal is available, it is expected that any adverse effects would be mitigated to the extent feasible. This impact is expected to be less than significant.

4.6 OTHER CEQA CONSIDERATIONS

4.6.1 UNAVOIDABLE SIGNIFICANT EFFECTS ON THE ENVIRONMENT

This first-tier environmental review indicates that the potential adverse environmental effects from proposals included as part of the General Plan, for the most part, can be maintained at a less-than-significant level with appropriate facility siting, implementation of goals and guidelines included in this Plan, and the development of specific mitigation measures during the project-level environmental review process.

At the programmatic level, it is generally difficult to identify unavoidable significant effects on the environment because the specific location and scope of proposed uses or management efforts are not known. There are features of the proposed General Plan that could result in unavoidable significant effects on the environment. However, it should be noted that the proposed uses for these features would take environmental factors into consideration, and may even improve the environmental value of the Park through habitat restoration efforts.

4.6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL EFFECTS

None of the environmental effects resulting from implementation of the General Plan would be irreversible.

4.6.3 GROWTH INDUCING IMPACT

Implementation of the General Plan is not expected to result in growth inducing impacts. While the number of visitors to the Park is expected to increase over time as California's population grows, the plan itself does not include any elements promoting growth.

4.6.4 CUMULATIVE IMPACTS

None of the facility and management recommendations included in the General Plan are expected to result in negative cumulative impacts, as the Park will be managed for resource protection and no other substantial projects are currently proposed in the vicinity of the Park. Implementation of the General Plan is expected to result in an overall positive cumulative impact on resource protection in the region, as it includes the classification of a substantial portion of the Park as State Wilderness and promotes cooperative resource management with adjacent landowners, the creation of habitat linkages, and a regional approach to conservation planning. Implementation of the plan would also work towards reducing existing non-permitted uses of Usal Beach and promote the recovery and restoration of degraded sensitive natural communities.

4.7 ALTERNATIVES TO THE PROPOSED PROJECT

The guiding principles for the analysis of alternatives in this EIR are provided by the State CEQA Guidelines (§15126.6), which indicate that the alternatives analysis must: (1) describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project; (2) consider alternatives that could reduce or eliminate any

significant environmental impacts of the proposed project, including alternatives that may be more costly or could otherwise impede the project's objectives; and (3) evaluate the comparative merits of the alternatives. The State CEQA Guidelines (§15126.6[d]) permit the evaluation of alternatives to be conducted in less detail than is done for the proposed project. A description of the project alternatives, including the No Project Alternative, is provided below to allow for a meaningful evaluation, analysis, and comparison of these alternatives with the proposed General Plan.

4.7.1 ALTERNATIVE 1—MINIMUM WILDERNESS ALTERNATIVE

DESCRIPTION

Under this alternative, only a small portion of the Park located in the Park's center would be designated as State Wilderness. The remaining portions of the Park would be a State Park managed to allow mechanized equipment for Park maintenance and operations, and public access for mountain bikes and vehicles on roads and trails. This alternative would maintain public access on Briceland Road and the Usal Beach Campground and Usal Beach, would open Wheeler Road to public access by vehicle and mountain bikes, and would provide for a new trail for hikers, equestrians, and mountain bikers from Needle Rock Area east to Usal Road.

EVALUATION

Management and operation practices under this alternative would be expected to result in substantial negative impacts to the Park's wilderness values, as it would allow for more use and public access than currently permitted in the Park. Increase of Park visitation as a result of general population growth and a more widespread awareness of the Park's scenic beauty could result in degradation of resources if unmanaged for more public access. Furthermore, the minimal acreage of State Wilderness classification associated with this alternative would fall short of meeting the Public Resources Code mandate and the legislative intent (SB 1328) associated with the classification of the Park as a State Wilderness.

4.7.2 ALTERNATIVE 2—MAXIMUM WILDERNESS ALTERNATIVE

DESCRIPTION

Under this alternative, adoption of the General Plan would immediately designate all but the disjunctive Shadowbrook and River Corridor parcels of the Park as a State Wilderness. Briceland and Wheeler Roads in the Park would be closed to public vehicle use. Camping at Usal would be permitted and vehicle access provided on designated roads only. Department personnel would have vehicle access to Briceland Road and Wheeler Road only in emergencies involving public health and safety or for the protection of wilderness values.

EVALUATION

Management and operation practices under this alternative would not be expected to result in substantial new negative impacts to the Park's resources, as it would restrict public use and

public access more than currently permitted in the Park. Visitor access and use of the Needle Rock House would be greatly restricted by virtue of closing Briceland Road into the Park and designation of the area as State Wilderness. Routine maintenance of the house and exhibits would be restricted by prohibiting vehicle access. A decrease in Park visitation would likely occur due to the closure of Briceland Road.

4.7.3 ALTERNATIVE 3—NO PROJECT ALTERNATIVE

DESCRIPTION

Under this alternative, no General Plan would be implemented at Sinkyone Wilderness SP and existing patterns of operation and management would be continued. No reclassification as State Wilderness would be implemented and the Park would remain a State Park and managed as such.

EVALUATION

Continuation of current management and operation practices is not expected to result in substantial new negative impacts to the Park's resources, as the Park is already managed for resource protection. However, continuation of the non-permitted use of Usal Beach by off-road vehicles would be expected to keep resources associated with Usal Beach in a degraded state. Increase of Park visitation as a result of general population growth and a more widespread awareness of the Park's scenic beauty could result in degradation of resources if left unmanaged. Furthermore, the lack of State Wilderness classification associated with this alternative would fail to meet the Public Resources Code mandate and legislative intent associated with the State Wilderness classification of the Park.

4.7.4 IDENTIFICATION OF THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. State CEQA Guidelines §15126(d)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. In light of this guidance, the EIR discusses whether the No Project Alternative or one of the other plan alternatives would be environmentally superior. Alternatives considered here include the proposed General Plan and the three planning alternatives (Maximum Wilderness, Minimum Wilderness, and the No Project Alternative).

It is concluded that the Maximum Wilderness Alternative is the environmentally superior alternative among the alternatives considered here. The Maximum Wilderness Alternative would minimize ground-disturbing activities and construction- and service-related impacts associated with access and facility development, which would result in the lowest level of impacts to natural resource values of all of the alternatives. However, this alternative would compromise the use and maintenance of the Needle Rock House through restrictions on vehicle use and thus would fall short of meeting provisions in the PRC 5002.45 calling for maintenance of and visitor use of the house. Recreation opportunities would be provided;

however, restriction of public vehicular access would limit access to those people in good physical condition and able to hike, or visitors willing and able to horseback into the Park. As a result, it was excluded from further consideration in the planning process.

4.7.5 THE PREFERRED ALTERNATIVE

The preferred alternative was selected, because it balances the interests of natural, cultural, aesthetic, and recreational resources at the Park and best meets the intent of the Public Resources Code mandate (PRC 5002.45). It is based on fundamental principles of land and resource stewardship, which are found throughout the goals and guidelines of the plan. Moreover, it provides the framework to establish improved recreation opportunities to Park visitors, which is an integral part of the State Parks Mission.

4.8 RESPONSES TO COMMENTS

This section provides a complete copy of the written comments received on the Preliminary General Plan/Draft Environmental Impact Report for Sinkyone Wilderness State Park, and presents responses to significant environmental issues raised in the comments, as required by CEQA Guidelines Section 15132, as well as comments pertaining to the Preliminary General Plan.

Each letter is reproduced in its entirety, including attachments. Each letter and comments correspond to Table 4-1. The responses to comments follow each letter. Revisions to text in the General Plan/EIR are shown with a ~~striketrough~~ or underline. Text that has a striketrough has been deleted from the General Plan/EIR. Text that has been added is presented as single underlined.

4.8.1 LIST OF COMMENTERS

This section provides a list of all public comments received on the Preliminary General Plan/Draft EIR during the public review period. Table 4-1 indicates the commenter/organization that prepared written comments and the date the comment(s) were postmarked and received.

**Table 4-1
List of Written Comments Received**

Letter Number	Commenter	Agency/ Organization/ Individual Represented	Date Postmarked	Date Received
1	John Feliz		June 27, 2006	June 29, 2006
1.1	Mark A. Wasser	Kronick, Moskovitz, Tiedemann & Girard/ John Feliz	Hand Delivered	August 4, 2006
2	Richard Gienger		August 7, 2006	August 9, 2006
3	Richard Gienger		August 7, 2006	August 9, 2006
3.1	Richard Gienger		E-mail	August 14, 2006
4	Ryan Henson	California Wilderness Coalition	E-mail	August 8, 2006
5	Michael D. Rydjord		August 7, 2006	August 8, 2006
6	Hawk Rosales	InterTribal Sinkyone Wilderness Council	August 7, 2006	August 9, 2006
7	Megan Aiyana Gregori		August 8, 2006	August 10, 2006
8	Jeanette Pedersen	Department of Forestry and Fire Protection	Received by SCH on August 10, 2006	August 14, 2006
9	Carole Polasek	Redwood Unit, Back Country Horsemen of California	August 7, 2006	August 9, 2006
10	Lynda Roush	U.S. Department of the Interior, Bureau of Land Management	August 15, 2006	August 18, 2006

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JUN 29 2006

June 27 20067

NORTHERN SERVICE CENTER

certified mail

California Department of Parks & Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento California 95814
Attention: Dave Keck

Re: 052-240-03 21.63 Ac Lots 2 & 3, Sec 25 24x19 WM
Reserving Rights for Relief from Taking of Access Road and Other
Acts Inimicable to Full Use and Enjoyment of the Above Captioned Land.

Dear Mr Keck,

Thank you for the mailing of the Report of Sinkyone Wilderness State Park
new Plan and Draft received here June 23, 2006.

Those records apparently omit my private ownership located at the mouth of
Duffy Creek watershed and the shoreline, including standing timber. Is
there a reason why the full and detailed report does n't show this?

My access road out to the property from 4 corners (site) County Road was
built by Sid Green, logging the area in 1957. The road was maintained and
widened and culverted as an open fire control road for a long time
afterwards, and since 1964 was my access to the parcel.

My concern is that it has been or will be is removed by grading it out in
keeping with the wilderness approach to value.

With these facts offered for your consideration,. Can you offer any
assurances to keep access along the Briceland Road into Bear Harbor?
Or A key to the gate would be helpful.

Would you please address what impact the General Plan is expected to
otherwise have or impact on this ownership? As an example, would you
consider:

1A

1B

2. If Roscoe P Barnberry wants to buy this 21.63 acres (1870 Township Survey) bordered by State lands for a certain sum (ocean frontage remember), yet feels some reluctance at the presence of the state plan, would you please write to me to show that this Program of careful management is not in anyway anything but a good neighbor, and that he is welcome to the full use and enjoyment of what the site offers?

1C

This letter is to insure use of the land. Thank you for what help you can give.

Sincerely



John Feliz
6906 NE 139th Street
Vancouver Washington 98686
e-mail: Jfeliz2@earthlink.net

Response to Letter 1 - John Feliz

- 1A The General Plan maps do not specifically show that this parcel is privately owned. However, you will note that the base maps do not include your property as part of the State Park. At Duffy's Reef, the boundary line moves inland around your parcel. However, we will amend the maps to show your private parcel identified by the County as APN 052-240-03 at the mouth of Duffy Creek. Because this land is not included in the park, it does not have a designation in this General Plan.

You have stated that you have an access road to your property from Four Corners which was built by Sid Green who was logging in the area in 1957. You also stated that this road was maintained as an open fire control road for a long time and that you have used it since 1964 to gain access to your parcel. The Department is not aware of an existing road at this location that would provide access to your parcel. However, Briceland Road does currently extend to Orchard Camp.

It is the Department's intent that the existing management that keeps the Briceland Road (a county road) to Railroad Camp open in the non-rainy season will stay the same. You and members of the public may use the Briceland Road, extending to Orchard Camp whenever it is open.

The placement and use of all park roads and trails will be subject to more detailed planning and analysis as part of a future Roads and Trails Management Plan. On page 3-27 of the Preliminary General Plan, a goal statement and related guidelines are provided for roads and trails, as indicated below:

Goal RT-1: Manage and maintain public and administrative access to the Park and its periphery through a system of sustainable roads and trails that is consistent with protecting Park resources and maintaining state wilderness values. Develop a comprehensive road and trails management plan.

Guideline RT-1C: Evaluate the Park's entire roads and trails system and prepare a Roads and Trails Management Plan with guidelines for the management of existing roads and trails. This management plan should guide the placement and use of any future roads, trails, and trail camps. Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

- 1B The Department does not anticipate negative environmental impacts to your property as a result of implementing the General Plan.
- 1C The Sinkyone Wilderness State Park General Plan does not address any use or enjoyment that you may obtain for your property. The use and enjoyment of that property is regulated by other state and local government laws, including but not limited to Mendocino County and the California Coastal Commission.

MARK A. WASSER
ALSO ADMITTED IN NEVADA

mwasser@kmtg.com

August 3, 2006

HAND DELIVERED

California State Parks
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, California 95814

Re: **Comment letter on Preliminary General Plan and Draft EIR for Sinkyone
Wilderness State Park**

Dear Sirs:

We represent John Feliz. Mr. Feliz owns 21.63 acres (APN 052-240-03) adjacent to the proposed State Park. We write this letter in comment to the Preliminary General Plan and Draft Environmental Impact Report for the Sinkyone Wilderness State Park.

1.1A

First, the Draft EIR fails to adequately disclose and analyze the significant adverse environmental impacts of implementing the General Plan.

1.1B

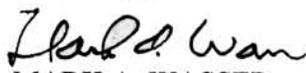
Second, the General Plan will unlawfully restrict Mr. Feliz' access to his property by closure, removal and damage to his access road. The road was built in 1957 and has been continuously used since then for access. Mr. Feliz has enforceable rights to access. Impairment of Mr. Feliz' continued use of the road for access to his property will violate the state and federal constitutions as well as state law.

1.1C

Third, the General Plan will impose unlawful restrictions on Mr. Feliz' use of his land and will unconstitutionally depreciate the value of his property.

Please consider and respond to these comments.

Very truly yours,


MARK A. WASSER

MAW/cd
cc: Mr. John Feliz

837100.1

RECEIVED

AUG 04 2006

NORTHERN SERVICE CENTER

Response to Letter 1.1 – Mark A. Wasser/ Kronick, Moskovitz, Tiedemann & Girard (representing John Feliz)

- 1.1A** The Department has followed the CEQA Guidelines to develop the Draft EIR in order to disclose and analyze any significant adverse environmental impacts resulting from implementing the General Plan. Your comment regarding the failure to disclose and analyze significant impacts cannot be adequately addressed because you have failed to provide any specific details for our response. The environmental analysis is programmatic in scope and does not contain project-specific analysis, as discussed on page ES-3 and Section 4.3.1 of the Preliminary General Plan/Draft EIR.
- 1.1B** The General Plan does not state that Briceland Road, which appears to be the road Mr. Feliz is referring to in his letter dated 6/27/06, will be closed, removed, or damaged. Please see response 1A regarding access issues.
- 1.1C** You have not identified any specific restrictions the general plan has placed on Mr. Feliz's property; therefore, we cannot specifically address this concern. Please see response 1C regarding property restrictions or possible uses of the property.

Letter 2

Richard Gienger
Box 283, Whitethorn
<rgrocks@humboldt.net>
California 95589
707-923-2931
Fax: 923-4210
7 August 2006

California State Parks
Northern Service Center
Atten: Dave Keck
<dkeck@parks.ca.gov>
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Dave Keck & other Parks' officials:

I will be trying to get comments off to you today, for me and also on behalf of the Environmental Protection Information Center (EPIC). They will be incomplete given the circumstances described below. This letter is asking for a reasonable, say 30-day, extension for public comment. The Notice of Availability was dated the 23rd of June with a deadline for comment of August 7th.

Although the Sinkyone Wilderness Coast has been a long-time high priority for me, other obligations limited the time I could really focus on the planning/analysis documents. I had a chance to briefly look at a hardcopy in the library and to skim through various sections during July. Library hours are limited and requests for a hard copy for me and/or EPIC were not successful. The limits on my computer prevent examination or printing of the maps. I have been able to slowly print sections incrementally,

It wasn't until the beginning of last week that I was able to begin a page-by-page examination of the "Preliminary General Plan/Draft Environmental Impact Report" for Sinkyone Wilderness State Park. This document is 193 pages. The appendices are a critical part of necessary review and that document is 185 pages.

Given the immensity of detail (over 130 Goals or Guidelines), the years taken to finally come up with a draft Plan & EIR (specific Plan legislation was in 1980), and the importance now and in the future of Sinkyone Wilderness -- a request for a thirty-day extension is quite modest. Please grant the request for an extension. Also, please permit e-mail filing for comments.

Sincerely,

Richard Gienger

2A

Response to Letter 2 – Richard Gienger

- 2A** An extension of the review and comment period on the Sinkyone Preliminary General Plan/Draft EIR was denied because an extended review period would have made it extremely difficult to schedule the State Park and Recreation Commission hearing this year in Northern California for consideration and adoption of the Sinkyone Wilderness SP General Plan. The Department has complied with the CEQA requirements for public review and comment. The 45-day comment period began on June 23rd and ended August 7, 2006. Copies of the Preliminary General Plan/Draft EIR were made available for review in several locations in Humboldt and Mendocino counties, as well as in Sacramento and from the State Parks Internet web page. The Department has considered all the comments received, and has provided responses to the pertinent CEQA-related issues in finalizing the EIR.

Letter 3

Richard Gienger
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California 95589
707-923-2931
Fax: 923-4210
7 August 2006

California State Parks
Northern Service Center
Atten: Dave Keck
<dkeck@parks.ca.gov>
One Capitol Mall, Suite 500
Sacramento, CA 95814

RE: SWSP Preliminary GP & Draft EIR

Dear Dave Keck & other Parks' officials:

While the Sinkyone Wilderness State Park Preliminary General Plan & Draft Environmental Impacts are generally well written and cover extensive amounts of details, analysis, goals, and guidelines -- there are notable deficiencies and omissions. In several places cooperation with stakeholders et al. is mentioned, for instance in reference to "open communication on important issues" on pdf page 116 of the Preliminary GP, while there is no provision for a permanent and effective 'citizen' advisory group that would actually assure open communication and timely action on important issues. Such a process needs to be included and emphasized.

3A

An example of an important issue is coping with fire hazard reduction. Several places acknowledge and seemingly respond to the issue, for instance stating that a Wildfire Management Plan will be undertaken. Without an advisory group to press the issue and to seek funds for implementation, it is unlikely that the Wildfire Management Plan will come forth anytime soon. The General Plan process itself has been in the offing for over 25 years.

The Preliminary General Plan basically ignores or downplays important legislative provisions. Such response applies to the provisions and issues from Public Resources Code (PRC) 5002.45 relating to nonmotorized transportation for the elderly and disabled, as well as sportfishing and hunting. PRC Section 5093.36 of the California Wilderness Act requires that there be "no permanent road within any wilderness area". While I advocate wilderness for the Sinkyone Wilderness as well as access on the Needle Rock Road as long as nature provides it -- it seems technically incorrect to designate "wilderness" west of the Needle

3B

Letter 3

Rock Road unless the area west is included as part of the Chemise Mountain Wilderness Area. |

Again, as regards the issue of fire, PRC Section 5093.34 allows measures to "be taken as may be necessary for control of fire . . . and diseases." The General Plan and EIR should contain some basic implementable actions for fire risk reductions prior to preparation of a hypothetical Wildfire Management Plan. These actions could and should be incorporated with appropriate cultural resource protection and restoration. Because I have not been able to finish a complete page-by-page response I can't say for sure that 'Sudden Oak Death' has been sufficiently dealt with, but judging from the fire and vegetation issues I suspect it has not. |

3C

3D

There also need to be more specific descriptions of the 'spatial' vision of Sinkyone Wilderness, from lot line adjustments along the Usal Road to specific desired connectivity to various areas. |

3E

These are basically preliminary comments to the Preliminary General Plan and Draft EIR and are written by me and are also on the behalf of the Environmental Information Protection Center (EPIC). Please extend the comment period for 30 days and allow comments to be e-mailed as requested earlier today. |

3F

Sincerely,

Richard Gienger

Response to Letter 3 – Richard Gienger

- 3A** Input from the community is always valued and given careful consideration. The Department of Parks and Recreation has adopted a tiered planning approach that will provide additional opportunities for public participation as specific management plans, such as vegetation and wildfire management, are developed. The North Coast Redwoods District staff recognizes that the development and implementation of the vegetation and wildfire management plans are a high priority upon adoption of the General Plan and will solicit public input. However, we believe we can solicit input and communicate with the community without having to establish a formal Citizens Advisory Committee. General plans do not guarantee funding for the purpose of plan implementation.
- 3B** In the Sinkyone Wilderness preferred alternative, Briceland Road (Needle Rock Road), transits the northern portion of the Wilderness and provides alternate recreation opportunities within the park. Vehicle access to Needle Rock via Briceland Road is consistent with past practices, and should especially benefit elderly and disabled visitors. Although traversing a designated wilderness area, the lands on either side of this county road will be managed consistent with the values of the State Park Wilderness classification. The road itself is not part of the designated State Wilderness. It is the Department's common practice to exclude roadways from wilderness areas.

The Department envisions that universal accessibility be integrated into the Department's culture and embodied in its programs, providing visitors, regardless of their abilities, with high-quality recreational opportunities while preserving the integrity of the park's resources. The following guideline additions will be included in the final general plan:

Guideline RT-1C: Evaluate the Park's entire roads and trails system and prepare a Roads and Trails Management Plan with guidelines for the management of existing roads and trails. This management plan should guide the placement and use of any future roads, trails, and trail camps, and evaluate opportunities for non-motorized transportation for the elderly and disabled persons. Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

Guideline RT-1F: Provide universal access to all park facilities, such as buildings, trails, campsites, and picnic sites and their contents, parking, and routes of travel where feasible (see reference to accessibility guidelines in section 2.2, Planning Influences).

- 3C As previously indicated, within the Department of Parks and Recreation, the General Plan is intended as a guiding document that enables subsequent, more detailed, management plans. Management plans are more specific to a particular plan element, and typically require a more in-depth review well beyond the scope of a General Plan. For example, on page 3-26 of the Preliminary General Plan, the Fire Hazards and Management section stipulates the goal to develop a coordinated fire suppression plan and a prescribed fire management plan. Also see responses to 8F and 8G.
- 3D Please see response 8A and 8B regarding sudden oak death.
- 3E Future property acquisitions from willing sellers for the purpose of combining several small isolated parcels within the park or obtaining properties that help achieve goals within the General Plan may be considered. Additional discussion is provided in the General Plan on page 2-81 in the Existing Conditions section regarding the Department's opportunities and conditions for potential linkages and coordinating future land management and use.
- 3F Please see Response 2A regarding time extensions.

Letter 3.1

Richard Gienger
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14 August 2006

California State Parks
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One Capitol Mall, Suite 500
Sacramento, CA 95814

RE: SWSP Preliminary GP & Draft EIR
(continued comments 1)

Dear Dave Keck & other Parks' officials:

These are continued comments from August 7th and are based on further examination of the documents related to the Preliminary General Plan and Draft Environmental Impact Report, although I have still not been able to complete full review and am making my way through the Goals and Guidelines. I would like to include some pertinent process comments from my August 11th email to Mr. Dave Keck:

" Isn't it possible to have a portion of the Commission review the draft with the public in November 2006 and then have the modified draft presented to [for] approval to the full Commission in early summer 2007? Among other things, this would give a much better, less weather risky, opportunity for the Commission to visit the area involved in their critical plan decisions.

The Commission was a key factor, venue, and crucial authority in protection of the Sinkyone Wilderness Coast in the '70s and '80s. One would hope that the new 'streamlined' system doesn't compromise important decisions and public participation."

3.1A

I understand that you view the EIR as a programmatic EIR with future plans tiered to it, but I think the level of detail revealed about the Plan is somewhat disingenuous and leaves unresolved until some distant unknown future date critical issues that bear NOW on most of Sinkyone Wilderness State Park being added to the California Wilderness System. I would claim that this approach amounts to future "piecemealing" of approvals of programs and projects that greatly affect SWSP, and will greatly impair the public's ability to respond to the whole project before it now -- which is to add the greater part of SWSP to the California Wilderness System.

3.1B

Letter 3.1

An example: The Wheeler Road is currently a permanent road into the heart of the wilderness area. It goes between the Sally Bell Grove and significant remnant old growth on the adjacent spectacular 'high ground' as well as through the contiguous proposed wilderness area down to the lower Wolf Creek/Jackass Creek area. If it is left to some future road & trails plan, does this mean that the road will be actually taken out? Why isn't the issue dealt with now? It seems that the Wheeler Road and the Georgia-Pacific Haul Road (referred to as the Hotel Gulch Trail on some of the maps) need to be decommissioned with an actual trail retained -- that could perhaps accommodate "quad" emergency vehicles as health & safety warrant it.

3.1B

Another example: The way it is now in the Preliminary General Plan it would appear that the Needle Rock Road would have to be decommissioned. It is a permanent road through a proposed wilderness area. This points up the insufficiency of alternatives considered. One alternative would be all wilderness except west of the Needle Rock Road and a certain area at Usal.

On page 118 of the pdf Preliminary General Plan under "Parkwide Goals and Guidelines" and "Resource Management", it is claimed that "primeval characteristics and natural conditions [will be restored & maintained] in a manner that supports the purpose and values of state wilderness." I hope this means that millennia of California Indian influence on and with the land is considered "primeval" and part of "natural conditions". Restoration as referenced in many places should include restoration of many old growth species, not just Redwood, and include Tan Oak acorn & Chinquapin nut gathering areas, which will be very important for many values including education and reduction of risk from catastrophic fire.

3.1C

These comments are written for me and on the behalf of EPIC.

Sincerely,

Richard Gienger

Response to Letter 3.1 – Richard Gienger

- 3.1A Please see Response 2A regarding the review and approval schedule for the Sinkyone Preliminary General Plan/Draft EIR.
- 3.1B General plans are required by law prior to the development of a park unit and serve as a programmatic environmental impact report. The Department of Parks and Recreation recognizes the need for general plans having a broader scope with a focus on purpose and direction, so that these guiding documents will be more enduring and adaptable to future changing conditions. While the vision and goals of an adopted general plan remain constant, specific approaches for implementation can adjust with new technology, changing circumstances and visitor needs. Subsequent future management plans (such as a Roads and Trails Management Plan) will be consistent with the goals and guidelines presented in the General Plan and will provide a more comprehensive analysis which is not appropriate at the general plan level. General plans no longer have specified timeframes; they will be reconsidered for amendments or revisions when circumstances and needs dictate.

The General Plan proposes to change the roads referred to in your comment letter to trails. Decommissioning of these roads to trails will need to be a cooperative effort with the InterTribal Sinkyone Wilderness Council because they have part ownership in these roads.

Specific to roads and trails, the Preliminary General Plan provides the guidance for future planning as follows:

Goal RT-1: Manage and maintain public and administrative access to the Park and its periphery through a system of sustainable road and trails that is consistent with protecting Park resources and maintaining state wilderness values. *Develop a comprehensive road and trails management plan.* [Emphasis added.]

Guideline RT-1C: Evaluate the Park's entire roads and trails system and prepare a Roads and Trails Management Plan with guidelines for the management of existing roads and trails. This management plan should guide the placement and use of any future roads, trails, and trail camps. Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

The alternatives presented in the Preliminary General Plan/Draft EIR comply with CEQA Guidelines (Section 15126.6) for alternatives analysis by describing and evaluating a range of reasonable alternatives to the proposed project. The General Plan has presented an evaluation of Alternative 2 – Maximum Wilderness Alternative.

3.1C It is Department policy to manage for ecological systems as opposed to single species. Natural resource restoration efforts, as guided in this plan, will include plant composition assessments and the reintroduction of appropriate species.

August 7, 2006



**CALIFORNIA
WILDERNESS
COALITION**

The Voice for Wild California

California State Parks
Northern Service Center
Attention: Dave Keck
One Capitol Mall, Suite 500
Sacramento, CA 95814

Subject: Sinkyone Wilderness State Park Preliminary General Plan and Draft Environmental Impact Report

Dear Mr. Keck:

Our organization strongly supports the Preferred Alternative as described in the Sinkyone Wilderness State Park Preliminary General Plan and Draft Environmental Impact Report.

Though we are a wilderness advocacy organization, we agree with the Preliminary General Plan (PGP) and Draft Environmental Impact Report's (DEIR) conclusion that the Maximum Wilderness Alternative is rather undesirable. There is no reason why vehicles should be prevented from reaching the Needle Rock House. The Needle Rock House provides an important management presence in the north that is often lacking at Usal Beach in the south, and it serves as an interpretative site and staging area for recreationists. Limiting vehicle access to the facility would perhaps do more harm than good. Meanwhile, the No Project and Minimum Wilderness Alternatives are undesirable because they would fail to protect the Park's superlative natural, recreational and cultural values and because they would also fail to meet the expressed intent of the California State Legislature that a significant portion of Sinkyone Wilderness State Park be designated and managed as a state wilderness.

For over four years now we have been intimately involved in the crafting and advancement of Representative Mike Thompson's Northern California Coastal Wild Heritage Wilderness Act that would, among other things, designate over 42,000 acres of the King Range National Conservation Area (KRNCA) as wilderness, including the Chemist Mountain portion of the KRNCA which directly abuts Sinkyone. As of today the bill has passed both the House and Senate and it may be signed into law as early as September. This federal designation, combined with the Preferred Alternative's laudable proposal to protect most of Sinkyone Wilderness State Park as wilderness would preserve the Lost Coast's superlative natural, recreational and cultural values for generations to come.

Thank you for the opportunity to review the DGP and DEIR and for considering our comments.

Sincerely,

Ryan Henson
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4A

Response to Letter 4 – California Wilderness Coalition, Ryan Henson, Policy Director

- 4A The Department appreciates your comments and support for the State Wilderness designation, as described in the General Plan's Preferred Alternative.

Michael Rydjord
214 Quietwood Drive
Vacaville, CA 95688
August 6, 2006

RECEIVED

AUG 08 2006

NORTHERN SERVICE CENTER

California State Parks
Northern Service Center
Atten: Dave Keck
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Dave Keck, California State Parks:

I wish to comment on the draft of the General Plan for Sinkyone Wilderness State Park. I find the overall scope and vision of the plan to be acceptable; however, there are some areas upon which I would like to comment.

My interest and experience at the park began in 1991 when like many visitors I spent a few nights camping. But from that point I believe it differs significantly from most others. I became very involved in the host program at the Needle Rock house.

I have spent not just a few days in the park but a number of years of my life. I have been there in all seasons and all weather, working and learning. I have come to know many of the people who visit and have talked and interacted with thousands. I have watched many changes and I think most will be pleased with the plan. For the most part it provides the access necessary for the wide variety of visitor interests and meets the requirements for activities at many different levels. It continues the tradition of going to Bear Harbor that dates from over a century ago and sets aside more remote areas. As we have chosen to call the park a "Wilderness" we must continually remember that it is only that because we have decided to put a label on it as such. It is many things to many people and it is important not to forget that as the park is configured for the future it must be done with some respect for its past history and management. It is a wonderful place and is worthy of our efforts to keep it a place for all to enjoy.

The Plan is a very large document and as written it is not very user friendly for review by the public. I had the previous draft at the visitors' center and found that people would quickly lose interest in reading it. The host for July 2006 found the current document not to be a document of much interest and didn't have much public interest in it. So if you get very few comments from the public it isn't because they aren't interested in the park it is probably a result of the Form of the General Plan presentation. I would also like to point out that the vast majority of the visitors to the park have not taken part in the general planning review process nor do they know that it is happening. A select number of

5A

special interest groups and other parties have been very involved and some of their views are contradictory to the vast number of park users.

The plan addresses the formation of wilderness area but shows very little vision in how the area will be managed except to exclude the use of machinery. Since 1991 I have witnessed a steady decline in the condition of the trail from Bear Harbor to Usal. The efforts to keep it in good condition have fallen far short of those needed. This is with a management policy that currently permits the use of mechanized items like chainsaws and brush cutters. As I write there are slides that need repairing and excess brush and downed trees that all need clearing on the trail. The plan needs to address a transitional timetable that will permit the continued usage of the tools necessary to maintain the trail system in the park. The "vision" needs to meet reality. If the situation is deteriorating now it isn't going to get better if tomorrow you declare it off limits to the tools that maintenance is trained to use. As pointed out in the weather and topography section the park it is a wet, steep area with a mild climate. This makes for a rapidly growing and brushy area. It is not like the inland old growth or a desert area of the state where a trail put in and cleared one year will remain unchanged for decades. The northern coastal climate area produces large amounts of vegetation blocking and narrowing the trails and it does it annually.

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In 15 years I have never heard a single complaint in regards to areas of the trail that were obviously well maintained by the use of a chainsaw or brush cutter. Nobody has objected to a mowed campsite or a brush free trail from the trailhead to the Bear Harbor beach. All of this has happened in an area that we now call a wilderness. The visitors aren't bothered by it and most never see it happen. They do notice when it isn't maintained. Comments regarding over grown areas, downed trees and slides are frequent.

A sensible formula for transition to non-mechanized maintenance and a test of its success should be a part of the plan. If they are not I fear that the ability of even the most adventurous will soon be challenged by nature and the quality time that the plan envisions will be a thing of the past and not for future generations of visitors.

I found the following specific areas in the plan to be some that I feel should be edited. Where I thought it would be easier to read I have copied the section from the Plan and at other times I have just referenced the page numbers. I used the pdf file on the Internet as my source document.

5C

Page 2-2 top:

The Hotel Gulch trail is available for horses from Usal Beach Campground to Wheeler. Some trail camps are available along the trail.

Throughout the plan and in many other documents the Hotel Gulch Road has the distinction of being referred to as a trail. Because this is a planning document and will be read by people who will never set foot in the park I believe it is better to call it a road at all times in the plan. Images that we have of a trail in the wilderness and the actual Hotel

Gulch Road are quite different. It is a road. In fact when clear of fallen trees and debris it is one of the best roads in the park. If you have access driving on it is quite pleasant. It is mostly a long gradual incline with some pleasant coastal views. Considerable money was spent to improve it over the past few years. It is certainly the only designated horseback riding area in the park that is currently acceptable for horses. Other currently designated horse trails have not been maintained in a condition that would be considered proper for designation as such. The width and height of brush clearance no longer meets state park guidelines.

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cont.

The statement, "Some trail camps are available along the trail" sounds like you would find camping between Usal and Wheeler on this *trail*. This is not true. There are sites at Usal and Wheeler but none along the trail. There are a couple of ideal locations but at this time there is nothing other than the gated gravel road.

5D

Page 2-7 top:

The segment between Needle Rock and Orchard Camp is open to vehicular use only during the summer season. During the fall and winter, the road is closed because of the dangers and challenges of road maintenance from weather-related rock falls and landslides. The road is not designed for year-round use and would require re-engineering to be open year-round.

5E

This statement greatly exaggerates any difficulty in maintaining the road to Orchard on a year around basis. That section of road has a couple of areas that are prone to standing water, and some hilly sections that rut if not graded frequently. It would also benefit from a rock overlay in some areas and this has been done in the past. It has not been an area of any significant landslides or rock slides in the past 15 years and does not have a history of such. The majority of the road in that section is much more open than the area north to Four Corners.

Continued monitoring of the road and its closure when wet is a good idea and in the best interest of minimizing the amount of money that needs to be spent on upkeep. The decision to keep the road open to Bear Harbor when dry is a very good one and greatly enhances the recreational, historic, and educational opportunities available in the Park.

Page 2-8

2.1.3 DEMOGRAPHIC PROFILE

LOCAL AND REGIONAL RESIDENTS

The local and regional residents constitute a large portion of Park visitors (40% annually). In addition, local schools and the California Conservation Corps (CCC) use the Park for educational opportunities and also provide help to Park maintenance staff in the form of manual labor (e.g., manual vegetation removal). Local schools and the CCC account for approximately 20% of the Park visitors. Another 20% of Park visitors are Bay Area residents. The remaining percentage is a combination of California residents from other regions, out-of-state and international visitors.

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The percentages on usage demographics are simply wrong in many areas in regards to anything I and other hosts have observed. Planning should not be based upon these numbers.

I have done samplings for many years, both at the visitors' center and on the trail and kept some very detailed numbers on where visitors originate their trips from and where they live. I believe that some of the percentages referenced above are from EDAW's contact with Ranger Urbach. Both he and I found them to be in error and corrected them in earlier reviews. The 302's are available for review.

The vast majority of the people spending the night in the park come from the major population centers of northern California and not from the area that would be considered as local or the surrounding communities. 70% would be a minimum number for those visiting from outside of the surrounding area and spending the night. If you break the number out for those spending the night in the trail camps the number is even higher.

The statement that local schools and CCC account for 20% of the visitors is not only an error but also such a big one that it degrades the integrity of the entire document. It is also questionable as to including the CCC's work time in the park as visitors. They are there in an employment capacity. Other work parties and volunteers have not been included.

Day use by the local community residents in the Needle Rock area has dropped considerably as a percentage of the total over the years. I would attribute this to the closure of the road to Bear Harbor when it is wet and the collection of day use fees

Meteorology Section page 2-8

Currently there are no weather recording instruments within the Park, except a precipitation gauge at Shadowbrook.

Most hosts at the Needle Rock Visitors center have maintained some weather data. It is in the daily logbook. Although the record is certainly not complete, significant deviations from the norm are usually recorded. Shelter Cove also has weather data available.

Records and personal observations indicate that rainfall is usually less along the coast than it is inland around Shadowbrook.

Fog reaches its maximum during July and August on the coast, where it can be present 15-18% of the time.

The data on fog does not compare with most other sources. Should this say coastal fog is usually present 15-18 days of the month?

Page 2-20 last paragraph

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cont.

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Similar to Bear Harbor Creek, Jackass Creek terminates in a small coastal lagoon that occasionally breaches into the ocean during peak winter storm flows.

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The lagoons at Bear Harbor and Wheeler differ significantly in size. The one at Bear Harbor is always small or not present at all many years. The one at Wheeler is much larger by comparison and almost always present except for periods of very high ocean surf or heavy winter rains.

Exhibit 2-1 Base Map

The map depicts a change in Mendocino County Road 435 just prior to its crossing Low Gap Creek and at the Jones Beach gate. Up to that point it is shown as "Major Road" and after that "secondary road". Mendocino classifies the entire road from the Humboldt County line to the point at which it ends at Flat Rock Creek the same; primary road. Not too many years ago there was a bridge across Flat Rock Creek and after the county took the bridge out, the road was considered unmaintained beyond that point. I would like to see this corrected on the exhibits, as it is very misleading. Anyone familiar with the roads in the area knows that any portion of the road to Bear Harbor is much better than major portions of the Usal road. They are all of the same status up to Flat Rock Creek. Reference Carl Mechling 707 489 9704 or Patti Black Mendocino Roads.

5J

Exhibit 2-2

Same problem with the road depiction and additionally the entire topo coloring elevation appears to be off when comparing it to known elevations. The visitor center for example is at 200 feet above msl. The area is steeper and the elevations of the Park are higher than depicted by the coloration.

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Page 2-54

Roosevelt elk were reintroduced into the Park in 1982.

5L

The elk herd that is in the park was a project intended to introduce them into the Kings Range area and not into the Sinkyone. They were released in Hidden Valley on the north east side of Chemise Mountain. They wandered a lot of the first couple of years and a majority of the population decided to locate in the Park. I believe it goes to accuracy to word this correctly. The elk are there but it wasn't a planned reintroduction into the Park. The elk probably found the former ranch's lush grazing lands located along the coastal terraces between Bear Harbor and Whale Gulch to be a much better habitat. Much of this prior grazing habitat has been lost under park management.

Page 2-63

Briceland Road (County Road 435) runs parallel to the coast within the Park starting at Four Corners and ending at Orchard Camp. The road is narrow, subject to washouts, and is closed during the rainy season. Parking is limited in most areas of the Park, but available in designated areas such as overnight parking at

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Usal Beach Campground, and day use parking at Orchard Camp and Needle Rock. Parking at Needle Rock currently is arranged in a manner that intrudes upon the scenic beauty of the area.

**5M
cont.**

The above paragraph would lead a reader to believe that the road from Four Corners to Orchard camp is closed in the rainy season. Only the portion of the road from Needle Rock to Orchard camp is closed in the rainy season and as I previously mentioned this is only a recent decision to see if it will improve the overall condition by lessening winter wear.

Overnight parking is available at both Needle Rock and the Orchard Camp trailhead and not just Usal. The ability of visitors to park at Orchard area is a significant benefit to its continued usage. It is quite large, not in a vista area, and reduces the number of vehicles that remain at Needle Rock. Parking along the Briceland Road is an option available at the Jones Beach area and is popular with many visitors, especially the locals people familiar with Jones Beach.

Page 2-64 Table 2-5

Family Camping Facilities

Primitive/undeveloped (up to 8 people and two vehicles, tent space, stove, table, and nearby piped water, chemical or vault toilet)

5N

The above quote from the table is a generic description of a typical primitive campsite. It is very wrong for the primitive sites at Sinkyone and should be amended.

There are no parking places at the sites in the northern part of the park. They are all walk in spots with adequate parking in the Orchard and Needle Rock area. These same areas provide day use parking. Only Usal has some "car" camping.

There is no piped water nearby at any of the sites. Piped water is only available at the Needle Rock Visitor Center, which is correctly referenced in another area of the plan.

Most of the sites are not large enough to accommodate two tents and some will not support larger sized tents. Listing a maximum site capacity of 8 exceeds the tenting capacity of many sites. This is also true of the trail camps, especially those at Anderson.

The vault toilet was removed from the Railroad camp and requires usage of the Bear Harbor or Orchard parking area toilets.

The table also lists 4 trails in the park. I am currently only aware of two connecting trails. The Lost Coast Trail running from the northern to the southern border of the Park and the Hotel Gulch Road, which connects Wheeler and Usal and is designated as a trail. The status of the historic Low Gap trail, which was one of the nicest trails in the Park, seems to be an unknown. A portion of it still remains but is not on the plan maps. When the

upper portion of it was taken out for restoration the public was informed that it would be rerouted and restored but the current plan does not show it. It was by far the most educational trail in the park as it covered in 1 mile almost every geological and plant form available to visitors. It was fantastic woods to beach experience.

**5N
cont.**

Page 2-67 first paragraph

Jones Beach and the beach at Jackass Creek are not accessible by road, so they experience less use compared to Usal or Bear Harbor.

5O

The access to Jones Beach via the Briceland Road is as good or better than it is to Bear Harbor. You drive by Jones Beach to get to Bear Harbor. The beach, however, is totally underwater at high tide and that is the reason for it not being as popular. It is also a more exposed beach and not as family friendly. Not mentioned is the Needle Rock Beach, which runs from Needle Rock to Flat Rock Creek. It was extremely popular until the trail access was removed following a slide. Many people would like to see a trail access to this great beach re-established and their comments are in the planning meeting notes. It has an excellent black sand beach and is a well-known spot for surf fishing.

Paragraph 2.1.10

Needle Rock pre-dates the 1920's by more than 20 years. File picture with the largest number of buildings is about 1900, operations as a loading station started prior to that.

5P

Page 2-68

Paragraph 2.1.11

The road from Orchard to Needle Rock is open in the dry season, which can differ from a traditional summer calendar or summer visitor season.

5Q

This same section reads somewhat like the Park starts at Four Corners. There is about a half mile of private property between Four Corners and entering the Park. The Park does not start at Four Corners. There is an entrance sign and informational Kiosk near the boundary.

There is also a very short section of old driveway or road at Jones Beach. This is depicted on the map exhibits and it is gated. Park maintenance frequently uses this road to access the Jones Beach area for "housekeeping" purposes. It also serves as the trail from the road and connects to the Lost Coast Trail.

Page 2-69

Parking at the Orchard parking area can accommodate a much larger number than 5 vehicles. With even a little bit of consideration for others the place easily holds 15-20 cars and with some direction it can hold many more than that. Leaving this number at 5 could greatly confuse anyone closely reading the plan and wondering where all the cars for day use and the sites at Orchard, Railroad, and Bear Harbor are parking.

5R

The wide area of the northern part of the road at Needle Rock can likewise accommodate an adequate number of vehicles and doesn't become unsightly. Park literature should encourage car-pooling as much as possible and mention limited parking.

**5R
cont.**

Page 2-70 Fire Protection

There is also volunteer fire department in Whale Gulch and they have a vested interest in responding to a fire in the Park. A communications procedure should be established with them, as they might be the closest responders.

5S

A fire hydrant is located at the Needle Rock Visitor Center.

Page 2-74

AMERICANS WITH DISABILITIES ACT AND STATE PARKS ACCESSIBILITY GUIDELINES

Historically, access to the Bear Harbor Beach and associated camping areas have been good enough over the years that many people with disabilities have been able to enjoy the opportunity to camp in that part of the Park. In addition to keeping vehicle access to the Orchard parking areas I feel it is important to maintain the trail and campsites in that part of the park so they may continue to do this. This trail was put in over the old driveway to the house that was at Bear Harbor. It is one of the few naturally very flat trail areas in the park. Weather this past winter resulted in damage to the trail that now makes it a challenge for less mobile people to get to the beach. It should be a goal of the Plan to maintain and improve this historic ADA access.

5T

Page 3-28/29 Guideline RT-1C

Work with Mendocino County to evaluate options to transfer ownership of Briceland Road from Four Corners to Bear Harbor to State Parks.

5U

A few practical aspects of the above should be considered prior to considering this action. The county road crew is on call and a much more capable resource than the park maintenance department when it comes to dealing with roads. I have lived in the Park through many road-closing storms and I take comfort in knowing that the county is in charge of the road.

They have funding for road maintenance from the state transportation budget. Removal of the road from the county system would result in placing the entire road budget upon the limited resources of the department. As State fiscal capabilities become strained this would result in money that could be used for other park projects being used for road maintenance. The future of the park road maintenance would depend upon limited grants and compete with other park projects.

It is to the benefit and not detriment of the Department to foster and maintain the current relationship.

The Park does not start at Four Corners so this would also make the Department liable for road maintenance outside of the park.

Page 3-29 Guideline RT-1E:

Explore opportunities to establish an appropriate staging area in the vicinity of the river corridor parcels.

5V

The vast majority of visitors coming to the Park have no desire stop at a location near Whitethorn. They are on a scheduled amount of time off, have driven four or more hours and desire to be at a campsite or starting on the trail down by the ocean. The area along the Mattole would hold little or no interest.

Attendance at the Park has dropped steadily over the past few years and with continued increases in transportation costs this is likely to continue. It would be foolish to start any kind of staging area or new visitors' center outside of the park until such resources are at capacity inside of the Park. Planning further development in that area would be a drain on limited resources. This is not a "build it and they will come" idea. Current State parking at a river site area near Whitethorn is a frequent dumpsite. Development along the river corridor places a much greater aquatic system in danger of a negative environmental event than any currently used area inside the Park.

Exhibits 3-1 and 3-2

Both maps have the same major road stopping before Flat Rock Creek designation error that I have previously mentioned.

Page 170 Impact Haz

The Department recently installed a solar system at the Needle Rock House, which significantly reduced dependence upon propane, thereby Reducing the need to transport propane into the Park.

5W

I worked closely in the design and installation the PV solar system. Although, I believe it will be a major cost savings and will reduce the amount of propane used I would consider it being overly optimistic to say it will *significantly* reduce the need to transport propane into the Park. That was not a design objective.

The propane storage capacity in the Park is such that even with a reduced usage the number of deliveries may stay about the same. Delivering propane is not only based upon need but also a weather-timing event done in the late fall and early spring. This eliminates the need for rainy season deliveries. A check of records will show that the truck comes about 3-4 times per year. Because of the size of the storage tank and the desire not to need delivery in the wet season the timing of deliveries should stay the same, the amount needed will be reduced. Stretching out the delivery with the result of a delivery being needed in the wet season is undesirable so it is therefore unlikely the hazard related with the deliveries, which are minimal, will change.

Implementation of the General Plan may result in increased human activities throughout the Park. The increase in interaction between visitors and wildland habitat would increase the risk of wildland fires, which may affect visitors to the Park and adjacent properties.

The General Plan does not propose any changes in Park activities that would likely cause an increase in human activities. Most visitors already believe it is being managed as a wilderness park. It is just as likely to result in a decrease.

The plan does change the management of major trail and camping areas to non-mechanized methods and this could result in a fuel build up, especially in camping areas and result in a higher potential for wild fire.

I appreciate the opportunity to comment on the General Plan and look forward to continued participation.

Respectfully,



Michael D. Rydjord

Response to Letter 5 – Michael Rydjord

5A The General Plan is the primary management document for a park, establishing its purpose and management direction for the future. This document also constitutes the Environmental Impact Report, as required by the Public Resources Code. Preparation of this document follows specific general plan guidelines adopted by the Department of Parks and Recreation.

Public involvement has been an important component throughout this planning process. The general plan review process has included various methods to involve the public and to receive public input, including public meetings and workshops, user surveys, interviews, and a formal public review and comment period. Park visitors, local residents, specific user groups, and agencies have provided important information and concerns regarding the future of the park.

5B The Department of Parks and Recreation recognizes the need for general plans having broader scope with a focus on purpose and direction, so that the guiding document will be more adaptable and enduring. While the goals of an adopted general plan remain constant, specific approaches for implementation can adjust with new technology, changing circumstances and visitor needs. Subsequent management plans addressing specific management needs, such as roads and trails, are enabled by the General Plan.

Trail construction and maintenance, including brushing and clearing of existing trails, can be accomplished with hand tools. This approach is commonly used at state wilderness park units. Your statement that the plan should address a formula for transition to non-mechanized equipment is acknowledged. Please see Response 8F regarding the Department's guidelines and policies pertaining to the management of State Wilderness.

5C The former Hotel Gulch Road is currently designated as a trail for public use and is known as Hotel Gulch Trail. The use of roads as trails is consistent with other State Parks in California. Exhibits in the final General Plan will be revised to read "Hotel Gulch Trail."

5D There are no designated camping sites along the Hotel Gulch Trail. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.1, Existing Land Use, Parkwide Land Uses

The Hotel Gulch trail is available for horses from Usal Beach Campground to Wheeler. ~~Some trail camps are available along the trail.~~

- 5E The Needle Rock to Orchard Camp section of Briceland Road is composed of native earth and gravel. As such, the road cannot withstand motor vehicle use during wet winter months. All season vehicle use on this road section will result in deep tire ruts, eventually gullies, and ultimately complete roadbed deterioration.
- 5F The Department appreciates your comments and additional information regarding demographics and visitor use at the Park. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.3, Demographic Profile, Local and Regional Residents

The local and regional residents constitute a large portion of Park visitors (~~40% annually~~). In addition, local schools and the California Conservation Corps (CCC) use the Park for educational opportunities and also provide help to park maintenance staff in the form of manual labor (e.g., manual vegetation removal). ~~Local schools and the CCC account for approximately 20% of the Park visitors. Another 20% of Park visitors are Bay Area residents. The remaining percentage is a combination of Other visitors to the Park include~~ California residents from other regions, including the Bay Area, as well as out-of-state and international visitors.

- 5G Currently there are no weather recording instruments within the Park. Park hosts have made daily weather observations and have recorded them in the daily logbook at the Needle Rock Visitor Center. We agree that observations suggest that rainfall is usually less along the coast than in inland areas such as Shadowbrook.
- 5H Thank you for the clarification. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.4, Physical Resources, Meteorology

Sunny days occur along the coast on an average of 55% of the time over the course of a year, fluctuating from 45% in the winter to 65% during the rest of the year. The same amount of sunshine reaches inland, however in the summer it can increase up to 80% inland. Fog reaches its maximum during July and August on the coast, where ~~# coastal fog can be~~ is usually present 15–18% of the time days of the month.

- 5I The Plan acknowledges Bear Harbor Creek as a small second-order ocean tributary and Jackass Creek as a larger third-order ocean tributary. Within the Plan, reference to these creeks and their respective lagoons is included to highlight their hydrologic similarities.

- 5J The road from Needle Rock to Orchard Camp, in terms of surface conditions and maintenance requirements, is essentially the same. Mendocino County no longer maintains this road from the north side of Flat Rock Creek to Orchard Camp.
- 5K Exhibit 2-2, Topography, will be reviewed. Within the Plan, map resolution varies according to the intended application. This map is intended to be illustrative, as it was derived from GIS modeling data. We will attempt to make this exhibit more accurate or substitute it with a USGS topography map.
- 5L It is correct that Roosevelt elk migrated into the Park after being introduced into the Kings Range in the early 1980s. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.5, Biological Resources, Other Forest-associated Species

Roosevelt elk were introduced into the Kings Range and are known from the Park since the 1980s~~reintroduced into the Park in 1982~~. Historically, elk inhabited moist forests and coastal areas from San Francisco Bay north to Vancouver Island, but populations were extirpated by over-hunting.

- 5M Briceland Road from Four Corners to Needle Rock is typically open during the rainy season as road conditions allow. However, during this season periodic closure of the road for emergency repairs is not uncommon. The section of road from Needle Rock to Orchard Camp is closed during the rainy season to reduce the surface damage associated with motor vehicles. Overnight parking occurs at Needle Rock and Orchard Camp. The following text revision will be made in the final General Plan/EIR:

Section 2.1.9, Recreational Resources, Recreational Facilities

Briceland Road (County Road 435) runs parallel to the coast within the Park starting at Four Corners and ending at Orchard Camp. The road is narrow, and subject to washouts, ~~and~~ The section of road from Needle Rock to Orchard Camp is closed during the rainy season.

- 5N The Department appreciates your comments regarding camping facilities. The following revisions will be made in the final General Plan/EIR:

Section 2.1.9, Recreational Resources, Recreation Facilities

Table 2-5 Existing Recreation Facilities in Sinkyone Wilderness State Park		
Facility Description	Total	
	# Sites	Visitor Capacity
Family Camping Facilities		
Primitive/undeveloped (up to 8 people and two vehicles, tent space, stove, table, and nearby piped water, chemical or vault toilet)	52	416
Developed	0	0
RV Hookup	0	0
Trail Campsite	12	96
Hike-in or Bike Campsite	0	0

The Low Gap Trail was determined to have a problematic alignment and it was in poor condition. It has been removed. Determinations regarding an alternative alignment for the Low Gap Trail will be made during the development of a Roads and Trails Management Plan.

- 5O The Needle Rock Beach trail was removed due to chronic geologic instability and archeological issues. The Department does not plan on providing a trail to this beach.
- 5P Needle Rock was definitely in existence prior to the 1920s. The following text revisions will be made in the final General Plan/EIR:

Section 2.1.10, Operational Facilities, Buildings

Sinkyone Wilderness SP includes 14 buildings that are located throughout the Park and 21 vault toilets. The most well known and most often used buildings are the Needle Rock Visitor Center and the old barn house, both located on the north end of the Park on Briceland Road. Needle Rock was a small settlement that was well established in by the early 1900s-1920s as a shipping point and dairy operation. The Needle Rock Visitor Center was the home of the Calvin Cooper Stewart family that settled at Needle Rock.

- 5Q Your comments regarding roads and park circulation have been noted. Revisions to the general plan are not recommended.
- 5R The Department appreciates your comments regarding parking at Orchard Camp. Further development of a Roads and Trails Management Plan will review and establish appropriate parking densities for parking throughout the Park. The following revisions will be made in the final General Plan/EIR:

Section 2.1.11, Circulation, Parking

Limited parking is available in the Park. Several parking places are available at the Needle Rock Visitor Center and ~~approximately 5 are available~~ at Orchard Camp. At the southern end of the Park, Usal Beach Campground and Usal Beach also provide parking areas.

- 5S The Preliminary General Plan/Draft EIR emphasizes cooperation among fire suppression agencies, as stated in the following guideline on page 3-26 of the Preliminary General Plan/Draft EIR:

Guideline FIRE-1A: Coordinate with appropriate fire suppression agencies, such as the California Department of Forestry and Fire Protection (CDF) and local volunteer fire departments, to develop a Wildfire Management Plan for the Park. The plan should address all aspects of wildfire planning, including prevention, pre-suppression, and suppression. The plan should identify modified fire suppression methods and ways to protect sensitive park resources. Wildfire protection and suppression activities will be accomplished in accordance with the existing Memorandum of Understanding (MOU) between the Department and CDF and the wildfire management plan, once approved.

- 5T The Department is committed to achieving programmatic access throughout the State Park System and in each of the parks. Although this trail does not currently meet ADA standards, it may be evaluated for opportunities to improve accessibility.
- 5U The Department appreciates your comments and understands your concerns and the on-going costs of road maintenance.
- 5V The Department of Parks and Recreation must explore all opportunities to provide high quality recreation experiences for future generations. Increasing demands for access to Sinkyone Wilderness State Park may require the creation of alternative staging areas near the Park in an effort to maintain the intended wilderness values within the Park.
- 5W The use of a solar system at Needle Rock House should reduce the use of other forms of energy. For clarification, the following text revisions will be made in the final General Plan/EIR:

Section 4.5.7 Hazards and Hazardous Materials, Impact Analysis

Implementation of the General Plan would not result in a substantial increase in the use of hazardous materials (e.g., propane) within the Park. Day-to-day operation of the Park does not involve the transport or disposal of hazardous materials, and the Park would continue to contract with licensed providers of

propane. The Department recently installed a solar system at the Needle Rock House, which significantly reduced dependence upon the use of propane, thereby and may reducing the need to transport propane into the Park. All use of hazardous materials, as well as the development of new storage tanks or areas, would be in compliance with state and federal laws and regulations. Furthermore, the park is not located within one-quarter mile of a school or airport.

- 5X As California's population continues to increase and diversify, the demand for coastal and inland recreational opportunities at Sinkyone Wilderness SP is likely to increase, both in the number of visitors and in the types of recreational activities and facilities future visitors might seek. This general plan presents goals and supporting guidelines to provide a high quality recreational experience to visitors as well as to provide essential facilities to support wilderness and non-wilderness uses.

As explained in Chapter 4, Environmental Analysis, this general plan and EIR were prepared to address environmental impacts that may result from the implementation of the management goals and guidelines, as well as from area-specific management. Emphasis is given to potentially significant environmental impacts that may result from all future Park management, development, and uses within the Park that are consistent with these goals and guidelines.

The General Plan states that: "Implementation of the General Plan may result in increased human activities throughout the Park. The increase in interaction between visitors and wildland habitat would increase the risk of wildland fires, which may affect visitors to the Park and adjacent properties." Although the precise amount of increased future use is unknown, these statements are made as a disclosure of potential impacts that may occur. This assessment was based on the permitted use and opportunities described in the guidelines for recreation, facilities, interpretation and education in Section 3.2.1 of the General Plan. As stated in the Chapter 4, Environmental Analysis, page 4-18, "Implementation of Goal FIRE-1A through FIRE-1C would ensure monitoring and discouragement of activities that may start wildland fires, and would ensure the provision of information to visitors on Park rules regarding bonfires, fire crackers, and other inappropriate activities that may start fires."

Please see Response 5B regarding the use of non-mechanized maintenance methods in the wilderness areas.

InterTribal Sinkyone Wilderness Council

Mail: P.O. Box 1523 Ukiah, Ca. 95482 Office Location: 200 S. School St., Suite 1

Protecting and Managing America's First InterTribal Wilderness

(707) 463-6745

August 7, 2006

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Letter 6

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ADMINISTRATION

Hawk Rosales
Executive Director

Attn: Dave Keck
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

Re: Comments on Sinkyone Wilderness State Park Preliminary General Plan and Draft EIR

Dear Mr. Keck:

The InterTribal Sinkyone Wilderness Council, a consortium of ten federally recognized tribes, has been an active partner with State Parks' North Coast Redwoods District for the past fifteen years. The Council owns and manages the 3,845-acre InterTribal Sinkyone Wilderness, which is located adjacent to and upslope of the Sinkyone Wilderness State Park. In working together, the District and the Council have achieved benchmark successes through collaborative projects addressing cultural-natural resource protection, education, wilderness restoration, and public recreation. We look forward to many more years of partnership with the District and we realize that the completion of the Park Plan will present even more opportunities for working together.

Enclosed are initial suggestions our Council has regarding the wording for the main Cultural Resources section of the Plan. Although we had provided these comments to the Department in April 2004, we are disappointed that none of our comments were incorporated into the current Preliminary General Plan draft. We hope that the Department will seriously consider the Council's enclosed comments. The Council is currently reviewing the Plan to address additional concerns relating to other sections of the Plan that pertain to cultural resources, as well as various other elements of the Plan.

6A

Because the period for commenting on the current draft of the Plan has been rather short, the InterTribal Sinkyone Wilderness Council respectfully requests a period of thirty (30) additional days beyond August 7, 2006 to fully review and provide the Department with these additional comments.

6B

Due to our unique relationship with State Parks, we believe that our request for such an extension is reasonable. The comments the Council will provide will be a valuable contribution toward completion of this important Plan.

Sincerely,

Hawk Rosales
Hawk Rosales
Executive Director

cc: Steve Horvitz, Superintendent North Coast Redwoods District

encl: InterTribal Sinkyone Wilderness Council's comments on Cultural Resource Section

InterTribal Sinkyone Wilderness Council is a Non-Profit Consortium of California Indian Tribes

Native Stewardship Cultural Preservation Watershed Rehabilitation and Management Ecology Education

INTERTRIBAL SINKYONE WILDERNESS COMMENTS

August 7, 2006

2.1.6 CULTURAL RESOURCES

NATURAL HISTORY

The topography, coastal setting, presence of numerous perennial and seasonal water sources, wide range of floral and faunal species and other natural resources made this region a prime location for ~~human~~indigenous peoples' habitation and economic pursuits over thousands of years. The region's history is rich in native Indian peoples' cultural heritage and land stewardship. Activity associated with tanbark processing, shipping, logging, grazing and recreational industries is associated with the arrival of the area's non-native settlers.

PREHISTORIC SETTING

Archaeologists identify ~~the~~ Paleo-Indian Period (10000 B.C. to 6000 B.C.) saw as being the first demonstrated entry and spread of humans into California with most known sites being situated along lakeshores. Characteristic artifacts noted in the lithic assemblages include fluted projectile points and flaked crescents. ~~Numerous occurrences~~ Examples of this P~~pattern's distinctive artifacts are reported and~~ can be affiliated with documented assemblages in California and throughout North America.

It is important to note that many North American Indian peoples do not subscribe to the theory that they migrated to those areas that are considered to be their historic territories. Rather, most Indian tribal histories assert that its peoples were created within their lands.

The beginning of Lower Archaic Period (6000 B.C. to 3000 B.C.) coincides with the middle Holocene climatic shift to more arid conditions that brought about the drying up of the pluvial lakes. Indigenous peoples' S~~subsistence~~ appears to have been focused ~~more~~ on plant foods although hunting clearly ~~still~~ provided important food and raw material sources. Settlement appeared to be semi-

Letter 6 attachment

sedentary with little emphasis on material wealth. ~~Distinctive artifact types include large projectile points, milling slabs and handstones.~~

The Middle Archaic Period (3000 B.C. to 1000 B.C.) starts at the end of mid-Holocene climatic conditions when weather patterns became similar to present-day conditions. Discernable cultural change was likely brought about in response to these changes in climate and accompanying variation in available floral and faunal resources. Economic systems were more diversified and ~~likely included the introduction of acorn~~ various food processing technologies. Hunting remained an important source of food and raw materials although reliance on plant foods appears to have dominated the subsistence system. ~~Typologically and technologically important artifacts characteristic of this period include the bowl mortar and pestle and the continued use of large projectile points.~~

A marked expansion of sociopolitical complexity marks the Upper Archaic Period (1000 B.C. to A.D. 500), with the development of status distinctions based upon material wealth. Shell beads gained in significance as possible indicators of personal status and as important trade items. ~~This period retained the large projectile points in different forms, but the milling stone and handstone were replaced throughout most of California by the bowl mortar and pestle.~~

The Emergent Period (A.D. 500 to 1800) is distinguished by the advent of several technological and social changes. The bow and arrow were introduced, ultimately replacing the atlatl. [If the atlatl is being replaced, then why isn't it mentioned previously?] Territorial boundaries between groups became well established and were have been documented in early historic accounts.

~~Cultural traits that distinguish this pattern include pre-interment grave-pit burning, tightly flexed burials and cremation. Artifact assemblages include *Dentalium* shells, bone and antler harpoons, adzes, wedges and mauls, net sinkers, *Haliotis* ornaments, mortars and pestles (Moratto 1984).~~

ETHNOGRAPHIC SETTING

The area from the northern Mendocino coast to southern Humboldt was occupied by a group of five tribes collectively ~~called~~ referred to by ethnologists as the Sinkyone. These five groups spoke related Athabascan dialects and shared cultural similarities (Evans 1987). ~~Numerous villages were recorded by Baumhoff (Evans 1987) though only one, Usal, was noted as being on the coast. Estimates of Ppre-contact populations estimates range from 740-4,000 individuals, based on various formulae, however Kroeber (1925) estimated that only approximately 200 remained by 1910.~~

The eastern boundary of Sinkyone territory is defined roughly by the main ridgelines immediately east of and parallel to the reaches of the mainstem and South Fork Eel River located between the towns of Scotia and Leggett. From there, Sinkyone territory extends to the Pacific Ocean, its western boundary being the coastline located between the mouths of Four Mile Creek and Usal Creek. It is bordered to the west and to the north by the Mattole, the Bear River, and the Wiyot territories; to the east by the Nongatl, the Lassik, and the Wailaki territories; and to the south by the Cahto and the Coast Yuki territories. These territories comprise the homelands of the indigenous Indian peoples bordering the Sinkyone Indian territory.

~~Sinkyone villages were habitation was mainly located largely inland and in some instances along the coast, along rivers and drainages. These would have been used primarily during winter. In the other months, Seasonally, family groups would go to the hills to hunt or gather plant foods or to the coast to collect shellfish, fish, sea mammals, waterfowl or seaweed (Evans 1987). Seasonal salmon runs were especially important as a source of winter food.~~

~~Other products collected by the Sinkyone included iris, spruce, fern, hazel and redwood fibers for basketry or rope, skins for blankets or clothing, wood and horn for chisels, obsidian traded from distant locations, redwood for building slabs, madrone bark for structures, and shells for beads. Obsidian was traded from distant locations.~~

The "Indian Wars" of Humboldt and Mendocino (1860-1865) were spurred by the increasing American population in the area following California's

admittance to the Union. In 1850, the California legislature passed laws making it possible to force Indians into labor and to bind their children over to white citizens. These acts were met with some resistance, including a range of events from theft to murder. ~~A number~~ Large numbers of Indian families and tribal groups were massacred during these times.

One such event has become infamous locally. Sally Bell, a Wailaki-Shelter Cove Sinkyone woman interviewed by Kroeber, saw her family massacred at near Needle Rock as a child. She hid in the woods ~~for several months until she was found by her brother, taken to Philipsville,~~ and was subsequently raised by a white family. She ~~had either two or three Indian husbands, and eventually received a 160-acre allotment of land in the Sinkyone region, where she and at least one of her husbands and her family lived~~ (Evans 1987).

HISTORIC SETTING

The first European settlers known in the project area were Archibald Hamilton and William Oliver, who claimed land in Shelter Cove in the 1850s (Roscoe 2002). Oliver was subsequently killed by Indians whom ~~they~~ he had accused of stealing cattle. Hamilton then left the area, which was next homesteaded by the three Ray brothers, who ~~married Indian women and settled at Shelter Cove Ranch.~~

Settlers began occupying land around Bear Harbor in the 1860s, using the land for cattle and sheep grazing. Until then, the only ~~paths in~~ routes leading into and through the area were Indian trails ~~which generally followed ridgelines in from the coast.~~ The European settlers built the Humboldt Trail in 1862, which went to Eureka [from where?]. Another trail was built from the Eel River valley to Bear Harbor in 1865. New settlers, including the Kaiser brothers, added to the industry in Bear Harbor. [Why mention the Kaiser brothers if you don't state how they added to the industry]. Ranching, logging and tanbark operations expanded. Surf landing spots for shipping soon gave way to wharfs and wire chutes (Roscoe 2002). By 1890, a railroad had been constructed to run between the coast at Bear Harbor and J.B. Stetson's sawmill, 3 miles inland.

Bear Harbor continued to grow as a port, with concomitant expansion of the wharf and railroad line, as well as local ranches, timber shipping ports and other businesses, residences, and a school. Damage from the 1906 earthquake started the decline of the local industry. The local school closed in 1908 because of lack of work (and presumably people) in the area. The town of Needle Rock likewise enjoyed a lumber boom, then bust (Roscoe 2002), and later converted to ranching. Needle Rock Ranch included two residences, bunkhouses, other outbuildings, and a railway (DPR 1988).

Northport (Anderson Landing) began as a shipping point developed by Robert Anderson in the 1870s using a wire chute (Roscoe 2002). Wheeler, located in the old Northport area, was one of the last logging company towns established in California. Sawmill operations there commenced in 1948 and had shut down by 1959.

Usal began as a ranching area, but lumber interests had moved into the area by 1888 (Roscoe 2002). A small town, population approximately 160, grew to support the business. There were approximately 40 buildings, a wharf, and sawmill.

The towns of Bear Harbor, Usal, Wheeler, Northport and Needle Rock [should be listed in geographical order, North to South: Needle Rock first, ending with Usal] all supported working communities, however successive waves of industry recycled or removed construction from the previous one, leaving little surface evidence of these activities today (Resource Protection Division 1988).

BACKGROUND RESEARCH

Background research began with an interview with National Park Service archaeologist Karin Anderson, who provided an overview of archaeological efforts in Sinkyone Wilderness SP. Documents regarding archaeology, historic documentation, and copies of State Parks site record forms for most of the resources within the Park were obtained from the State Parks North Coast Redwood District Office in Eureka.

An information request was submitted to the North Coast Information Center (NCIC), for the project area as a whole. The purpose of the NCIC search was to

determine whether there were previously recorded historic resources or if archaeological surveys had been performed within or in the vicinity of the project area. The NCIC had records of almost 20 archaeological surveys that had been conducted within the project area (Appendix E, not publicly available). Site record forms pertaining to resources identified during those surveys are on file with ~~Sinkyone Wilderness SP~~ the State Parks North Coast Redwood District Office. ~~Archaeological surveys within the Park have focused on the interior sections of the Park, rather than the coastal strand.~~

Archaeology of the Project Area

Formal archaeology in the Park vicinity began in the late 1970s. Archaeological surveys have been conducted in relation to prehistoric resources, logging operations, road repair, and slope restoration, as well as other projects.

~~Prehistoric and historic use of the project area appears to be well understood. Historic maps and deeds round out the historic picture.~~

Cultural resources within Sinkyone Wilderness SP have been subjected to a number of impacts, including theft, that have caused damage or total destruction. Chiefly, past logging activities have resulted in widespread damage and destruction of cultural resources. Chiefly Also, erosion of various types (~~coastal, stream, alluvial~~) has washed away site components. Other factors, such as removal, destruction or recycling of structures in the historic lumber towns and mill areas have left little surface evidence of the large-scale exploitation of lumber in the 19th and 20th centuries in the project area. Foot or equestrian traffic, looting, construction or maintenance of Park facilities, and road removal or re-contouring have caused cumulative damage to some sites. In spite of the imposing terrain of the project area, it clearly has been the focus of significant prehistoric and historic development. ~~The potential for retrieving important data from known and as-yet undiscovered resources is significant.~~

Native American Concerns

The InterTribal Sinkyone Wilderness Council (Council) was formed in 1986 to address local Indian ~~tribe~~ tribal concerns in the Sinkyone region. The Council consists of ten (10) federally recognized tribes whose memberships include

~~descendants of original Sinkyone Indian families, whose~~ The Council's goals include the preservation, protection, and restoration of cultural-natural resources and the reinstatement of local Indian peoples' traditional values and land uses in the Sinkyone region. The Council owns lands located adjacent to and east of the Sinkyone Wilderness SP. The Council developed and executed conservation easements to protect in perpetuity the cultural and natural resources within the InterTribal Sinkyone Wilderness. The Council administers projects in cultural resource protection, land management planning, ~~reforestation~~forest stewardship, salmon stream restoration, and watershed rehabilitation. The Council emphasizes traditional cultural uses by local tribal members, resource restoration and stewardship, and ecology education. InterTribal Sinkyone Wilderness Council priority projects include: (1) ~~development of limited~~ public access low-impact InterTribal campgrounds and trails that will link ~~directly to the Lost Coast Trail in the Sinkyone Wilderness State Park, which traverses the longest stretch of coastal wilderness in the lower~~ 48 states; (2) continued salmonid habitat restoration work at Wolf Creek (Jackass Creek) and other Sinkyone streams; (3) planning for Watershed Rehabilitation-Roads Removal Program on the Council's InterTribal land; (4) ~~development of a Forest Management Plan and an Integrated Resource Management Plan to guide the InterTribal Parks possessive long-term stewardship;~~ (4) advocacy during the timber harvest plan process for protection of Sinkyone cultural resources on neighboring industrial timberlands; and (5) resource management partnership projects with California State Parks in the adjacent Sinkyone Wilderness State Park.

The Council has formally commented during the entire planning process to express ~~their~~its concerns and ideas for the Preliminary General Plan/Draft Environmental Impact Report. Among the topics brought for discussion were Council ownership and management of Four Corners, protection of cultural resources in cooperation with Council and other stakeholders, cooperative management of Park resources, watershed restoration, road to trail conversions, and maximum wilderness designation.

sCultural Resources

Culturally significant areas within the Park were identified as part of the planning process and the General Plan/ Environmental Impact Report aims to protect these resources and includes coordination with authorized Native American ~~stakeholders~~ tribal representatives to identify and preserve the important Native American sites.

Protection and management of significant resources are important issues addressed in the General Plan/ Environmental Impact Report.

Historic lumber towns and mills existed at Needle Rock and Bear Harbor. Removal, destruction, or recycling of structures has left little surface evidence of the large-scale exploitation of lumber in the 19th and 20th centuries in the Park. Foot or equestrian traffic, looting, construction or maintenance of Park facilities, and road removal or re-contouring has caused cumulative damage to some historic sites. Adequate protection and interpretation of appropriate resources and the evolution of cultural landscapes for their historic significance are addressed in the General Plan/ Environmental Impact Report.

Letter 6 attachment

Cultural Resources

Cultural resources consist of significant and potentially significant prehistoric and ethnographic sites, historic and ethnographic resources, and cultural landscapes. Sinkyone Wilderness SP includes an abundance of important cultural resources, including numerous significant Native American sites, historic roads and trails, and historic structures. The following goal is aimed at protecting significant cultural resources in the Park:

Goal CUL-1: Protect significant prehistoric and historic cultural resources in the Park.

- < Guideline CUL-1A: Develop an inventory, GIS mapping system, and database for those cultural resources within the Park that may be eligible for inclusion in the National Register of Historic Places and/or the California Register of Historic Resources. The database shall be treated with the strictest of confidentiality and shall be accessible only by authorized Park personnel and authorized Native American tribal representatives.

- < Guideline CUL-1B: Consult regularly with local Native American ~~people and groups~~ tribes and tribal organizations who have traditional ties to resources within the Park to ensure productive, collaborative working relationships, especially when considering management practices, such as the Department's gathering policy, and interpretation involving the Park's natural and cultural resources of interest and concern to them.

- < Guideline CUL-1C: Prepare a parkwide Cultural Resources Management Plan (CRMP) that establishes an ongoing management process to record and develop findings of significance for cultural resources in the Park that

Letter 6 attachment

are historically or archaeologically important. Consistent with other Park goals, including the protection and preservation of the prime natural resources, develop a long-range management strategy that includes preservation, stabilization, rehabilitation, or reconstruction for the Park's significant cultural resources.

- < Guideline CUL-1D: Identify and evaluate potential cultural landscapes within the Park. Cultural landscapes are defined, in part, as landscapes that evolved through use by people whose activities or occupancy shaped them. They can be comprised of aggregates of such cultural resources as agricultural communities, homestead sites, ethnographic or ethno historic landscapes, trails, old roads, cemeteries, orchard remnants and homestead sites, as well as natural resources, topography, and their associated features. Potential cultural landscapes at the Park that need additional investigation, research, and evaluation include the Needle Rock House and Barn, Orchard Camp, Bear Harbor, Wheeler, Usal, and other historic items such as the old railroad bed.
- < Guideline CUL-1E: If a finding of significance for cultural resources has not been made, determine significance prior to undertaking programs for development or rehabilitation of an area to natural conditions. Any plan for restoration, remodeling, adaptive reuse, or non-use should be evaluated using adopted standards such as the Secretary of the Interior's *Standards for the Treatment of Historic Properties* and will require careful consideration to ensure the widest public benefit and greatest protection of the resource, until such time as the more comprehensive CRMP can be completed.
- < Guideline CUL-1F: Establish a program to protect significant cultural resources from adverse effects resulting from Park use, development of facilities, and resource management programs (~~when determined to be subordinate to the cultural resource~~).
- < Guideline CUL-1G: Work with groups interested in ethnographic studies and research programs that will address past ways of life of the Sinkyone within the Park. Research topics should address settlement patterns, land management techniques, subsistence technology, trade and exchange, ~~and~~ sociopolitical functions, and the impacts of Euro-American settlement and genocide. Any proposed research should include the opportunity for Native American tribes and tribal organizations to provide input and comments to ensure that no inappropriate infringement of sacred sites or other culturally-sensitive areas occurs as a result of these studies and research programs.
- < Guideline CUL-1H: Provide a buffer for the protection of especially significant Park historic, prehistoric, and archaeological sites or properties of concern to Native Americans by considering the acquisition of

letter 6 attachment

additional land or conservation easements from willing sources. [Work with groups such as the InterTribal Sinkyone Wilderness Council to achieve conservation of these culturally important lands.](#)

- < Guideline CUL-11: Develop interpretive and educational programs/facilities that educate visitors about the significance of the cultural resources found in the Park and how they can help protect and preserve those resources.

Letter 6 attachment

4.5.2 CULTURAL RESOURCES

INTRODUCTION

This section analyzes impacts related to cultural resources that would result from the implementation of the General Plan.

THRESHOLDS

The cultural resources analysis uses criteria from the State CEQA Guidelines Appendix G. According to these criteria, implementation of the General Plan would have a significant impact on cultural resources if it would:

< Cause a substantial adverse change in the significance of historical resources.

< Cause a substantial adverse change in the significance of an archaeological resource.

< Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

< Disturb any human remains, including those interred outside of formal cemeteries.

Environmental Analysis Sinkyone Wilderness State Park
June 2006 4-10 Preliminary General Plan and Draft EIR

Impact

CUL

IMPACT ANALYSIS

Impacts to Cultural Resources. Implementation of the General Plan would result in the avoidance or minimization of disturbances to the integrity of cultural resources situated within the Park. The General Plan includes cultural resources goals and guidelines that ensure the protection and maintenance of prehistoric and historic sites, features, and landscapes documented within the Sinkyone Wilderness SP. This impact is considered less than significant.

A total of 65 prehistoric and historic sites, features, and artifacts have been documented within the Park as a result of various cultural resource investigations. These resources have been identified in the Wilderness and Non-Wilderness areas within Sinkyone Wilderness SP and include early Native American settlements, isolated prehistoric artifacts, and historic-period resources such as homesteads and railroads and traces of early logging and ranching activities. Although much of the Park has never been subjected to an inclusive systematic archaeological inventory, it is apparent that many of the prehistoric and historic sites situated in the Park show that early Native American populations were exploiting the rich and varied floral and faunal resources available in area.

Letter 6 attachment

Although general statements can be made regarding the cultural resources sensitivity of particular landforms within the Park, additional surveys are needed to better define the distribution of sites within the Sinkyone Wilderness SP and ensure that they are not adversely effected by Park development and maintenance proposals. The implementation of Goal CUL-1 and Guidelines CUL-1A through CUL-1H outlined in the General Plan would add considerably to the levels of research and preservation currently occurring within the Park and reduce impacts to a less-than-significant level.

Letter 6 attachment

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Letter 6 attachment

IMPACT ANALYSIS

Impact
CUL

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Letter 6 attachment

Tribal Status of Sally Bell

The *Sinkyone Wilderness State Park Preliminary General Plan and Draft EIR*, in its section on “Ethnographic Setting,” states on page 2-57 that:

Sally Bell, a Wailaki woman interviewed by Kroeber, saw her family massacred at Needle Rock a child. She hid in the woods for several months until she was found by her brother, taken to Philipsville [*sic*] and was subsequently raised by a white family. She had either two or three Indian husbands, and eventually received a 160-acre allotment of land in the Sinkyone region, where she and at least one of her husbands lived (Evans 1987).

The claim that Bell belonged to the Wailaki tribe is in error. It apparently results from a garbling of Evans’s report when her information was summarized in the *Preliminary General Plan and Draft EIR*. Here is what Evans actually said about Bell’s tribal identity:

The ethnography of the Sinkyone culture recorded by Gladys A. Nomland (1935) was collected from three elderly *Sinkyone* consultants in 1928 and 1929. *Sally Bell, Jack Woodman, and Jennie Young were fullblood Sinkyone most probably of the To-cho-be keah or Shelter Cove division* [Emphasis added]...Sally Bell was also interviewed by Kroeber (1902) and Merriam (1976) for Shelter Cove Sinkyone data. On their census applications for the California Indians’ Jurisdictional Act of 1928 (45 Stat 602) Sally Bell and Jack Woodman both responded that they were *Wailaki* (BIA Tribal Operations: personal communication 1987). Powers’ [*sic*] (1976) explanation for this California Indian behavior is especially appropriate for youthful survivors raised by white families, who were particularly fearful of the Wailaki, in isolation from their culture and family. He stated that “If the whites call a certain tribe by a certain name, no matter what, they soon learn to use that, whether speaking to whites or one another” (Powers 1976:115). (Evans, Nancy. Native American History. Coastal Conservancy contract agreement # 86-082:9)

A *close* reading of Evans’s statement shows that she clearly stated that Sally Bell was a “fullblood Sinkyone most probably of the To-cho-be keah or Shelter Cove division” and that while Bell had once indicated that she belonged to the Wailaki tribe, there was an explanation for this inaccurate statement, as provided by Powers. The *Preliminary General Plan and Draft EIR* ignores all of this information, focusing only on the statement that Bell once claimed to be Wailaki, while also incorrectly implying that this information came from Kroeber’s 1902 interview. Evans, incidentally, incorrectly cites the Kroeber information, giving the year of the interview, 1902, rather than the year his “Sinkyone Tales” appeared in the *Journal of American Folk-Lore*, which was 1919 (346-351). In his article, Kroeber refers to Sally Bell as “Mrs. Tom Bell,” and indicates that “her origin, on her mother’s side, [is] from Garberville” (346), while referring to the “mythical tales” he was told by George Burt and “Mrs. Tom Bell” as coming from the Sinkyone (346). Kroeber’s field notes for the interviews are not classified by the tribal name Sinkyone and have not yet been located for use in this statement; however, a record from another notebook indicates that on September 28, 1902, he purchased a “salmon line cup & ball” and an “acorn buzzer” for 50¢ at French [Four Corners] from a “South Fork Eel River Athabascan,” which is what he termed Sally Bell at the time (Kroeber, Alfred L. Papers. Microfilm reel 127:433). It may be the latter object that Kroeber later had depicted as part of Figure 15 in his *Handbook of Indians of California* (148).

For its ethnographic coverage the *Preliminary General Plan and Draft EIR* cites only two sources:

Letter 6 attachment

1. The Evans report, the relevant sections of which come from secondary sources (at least one of which is improperly cited) and which are then inaccurately rendered in the *Preliminary General Plan and Draft EIR*;
2. Kroeber's *Handbook of Indians of California*, which is used to provide a population estimate that is apparently based on secondary information, since it is for the year 1910 and Kroeber's only fieldwork in the area was his brief 1902 visit noted above.

Responsible scholarship, and a proper respect for the Indian peoples described in and affected by the report, would dictate a far more careful and comprehensive study than what was provided by the *Preliminary General Plan and Draft EIR*. At least three ethnographers conducted substantial interviews with Indians generally considered to be Sinkyones, but none of their information was used in the "Ethnographic Setting" section. If these sources were to have been used, the following would have been apparent:

1. Pliny Goddard interviewed Bell on September 30, 1907. She stated that she was "born at Shelter Cove" and that "she talks like the Briceland people," whose village she names "to-ko-bi" (Goddard, Pliny E. Field notes. Boas reel 43).
2. C. Hart Merriam interviewed Sally Bell between August 24 and 26, 1923. He described her as "a full-blood old woman" of the "To-cho-be ke-ah" tribe. In the interview, Bell indicates that this tribe was from Briceland, while a tribe called the "Tahng-i ka-ah" was from Shelter Cove (Merriam, C. Hart. Papers, vol. 1. Microfilm reel 30:422). Merriam explains the discrepancy elsewhere:

The name *To-cho-be-ke-ah* or *Taw-chaw-be keah* means literally the Briceland tribe or band (*To-cho-be* was the name of the Briceland rancheria) but my informants also used the term in a larger sense to include all bands speaking the same dialect from the west side of the South Fork River to the coast....

The four most important bands in this division are the Briceland band (*To-cho-be-keah*); the *Nahns-lin-che keah* just south of Garberville on west side of South Fork River; the Shelter Cove band, *Tang-i-ka-ah*; and the *Yo-sawl* south of the *Tang-i-ka-ah* to Usal Creek and easterly to South Fork River.

The name *Sinkyone* is synonymous [*sic*] with my two divisions the *To-cho-be-keah* and *Lo-lahn-kok* (Merriam, C. Hart. Papers, vol. 1, microfilm reel 9: folder A/1h/G10).

3. Gladys Ayer Nomland also interviewed Sally Bell, stating that "informants used in the field were Sally Bell, Jenny Young, and Jack Woodman....The were all fullblooded Sinkyone..." (Nomland, Gladys Ayer. "Sinkyone Notes." *University of California Publications in American Archaeology and Ethnology* vol. 32 #2 (1935):149).

Other sources also identify Sally Bell as Sinkyone. Malcom Margolin, in *The Way We Lived*, describes the story of the massacre of Bell's family at Needle Rock, listing it as a "Sinkyone" story (162-163) The original version appears in Nomland (166-167).

Bell made no mention of any Wailaki connection in her interviews and specifically claimed affiliation with the To-cho-be keah branch of the Sinkyone group. It is also important to remember that the term Wailaki was known and accepted by government officials, as witnessed by its use in federal census reports, while the term Sinkyone was not. The primitive, inaccurate, and racist classification system found in the 1900 and 1910 special Indian censuses, used such

Letter 6 attachment

tribal names as “Wailaki,” “Mattole,” “Siaz,” “Redwood,” “Coast Range,” and “Digger.” George Burt, for example, who was one of Nomland’s and Kroeber’s Sinkyone informants, is listed on the 1910 census as a “Siaz,” apparently a form of “Siah,” which Merriam describes as the Wiyot and Whilkut “name for ‘way off’ tribe” (Merriam, C. Hart. “Ethnogeographic and Ethnosynonymic Data from Northern California Tribes.” *Contributions to Native California Ethnology from the C. Hart Merriam Collection*. Berkeley: Archaeological Research Facility, 1976:88).

The most accurate assessment of Sally Bell’s tribal status can be made from reviewing the primary information supplied by Bell herself to ethnographers. This information indicates that Bell considered herself to be a To-cho-be keah, a group that is usually subsumed within the Sinkyone tribe but which is never grouped with the Wailakis. Other information, which comes either secondhand from later generations or reflects the categories imposed by the federal government, often proves inaccurate, and should not be relied upon, as was the case with the *Sinkyone Wilderness State Park Preliminary General Plan and Draft EIR*, as the sole factor in determining an Indian person’s tribal status.

Jerry Rohde, M. A.
Ethnographic and Historical Consultant
August 2006

Response to Letter 6 – InterTribal Sinkyone Wilderness Council, Hawk Rosales, Executive Director

- 6A** The Department acknowledges the suggested text revisions regarding cultural resources provided to us in the letter attachments. Thank you for this information. The majority of these suggestions will be incorporated into the General Plan. Revisions will be made for clarity and accuracy in Section 2.1.6 Cultural Resources (pgs. 2-55 to 2-60 in the Preliminary General Plan/Draft EIR); Section 2.3 Issues Analysis, Cultural Resources (pg. 2-81 in the Preliminary General Plan/Draft EIR); Section 3.2.1 Parkwide Goals and Guidelines, Cultural Resources (pgs. 3-15 to 3-17 in the Preliminary General Plan/Draft EIR); and Section 4.5.2 Cultural Resources (pgs. 4-9 to 4-10 in the Preliminary General Plan/Draft EIR). The specific text revisions are located in Chapter 4 of this Response to Comments document.
- 6B** An extension of the review and comment period on the Sinkyone Preliminary General Plan/Draft EIR was denied because an extended review period would have made it extremely difficult to schedule the State Park and Recreation Commission hearing this year in Northern California for consideration and adoption of the Sinkyone Wilderness SP General Plan. The Department has complied with the CEQA requirements for public review and comment. The 45-day comment period began on June 23rd and ended August 7, 2006. Copies of the Preliminary General Plan/Draft EIR were made available for review in several locations in Humboldt and Mendocino counties, as well as in Sacramento and from the State Parks Internet web page. The Department has considered all the comments received, and has provided responses to the pertinent CEQA-related issues in finalizing the EIR.

Dear Director of Parks & Recreation,⁸⁻⁵⁻⁰⁶ 7A

I am in full support of the proposed Sinkyone wilderness bill, & especially of the proposed corridor. I believe this is of vital importance for the Sinkyone Wilderness is necessary for the earth & for people to maintain contact & joy in our lives. We have much to learn from the wild. I have grown up & visiting the Sinkyone wilderness & have hiked its entire length more than a few times since I was a young child.

I love the Sinkyone & feel it needs to become fully protected wilderness.

We need your support.
Please do not let us down.

Sincerely,
Megan Aiyana Gregori
<megan.ayiana@hotmail.com>

Response to Letter 7 – Megan Aiyana Gregori

7A The Department appreciates your comments and support for the proposed State Wilderness designation.

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

Resource Management
17501 North Highway 101
Willits, CA 95490
Website: www.fire.ca.gov
(707) 459-7440

Letter 8

August 7, 2006

California State Parks
Northern Service Center
Attn: Dave Keck
One Capitol Mall Suite 500
Sacramento, CA 95814

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NORTHERN SERVICE CENTER

Project Name: Sinkyone Wilderness State Park General Plan
State Clearinghouse #: 2003022115
Project Applicant: State Of California, Department of Parks and Recreation

The California Dept. of Forestry & Fire Protection (CDF) provides the following input on this project:

1) Forest Pest Issues:

Planners cannot foresee specific forest pest outbreaks, and thus may not have a plan for specific pests, but the Sinkyone Wilderness State Park (State Park) is within Mendocino County, and therefore within the State's (California Department of Food And Agriculture) regulated (quarantined) area for *Phytophthora ramorum*, the cause of sudden oak death. It also lies within two Board of Forestry and Fire Protection declared Zones of Infestation (ZOI): the Coastal Pitch Canker ZOI and the Sudden Oak Death ZOI. There is no mention in the draft General Plan/Environmental Impact Report (GP/EIR) of these pests, or mention of any concerns or management strategies should either introduced pest occur.

The State Park is only a couple townships from active sudden oak death mortality sites near Garberville in SW Humboldt County. Tanoak mortality is increasing in Humboldt Co., and its relevance to this State Park is to the preservation and protection of natural resources, cultural resources, and aesthetic values, as outlined in the draft GP/EIR, which emphasizes the intended protections are:

- Page 3-2. "California State Parks will preserve, protection, restore, interpret and manage the unit's natural, cultural and scenic resources, features, and values, making them available to the public for their educational, inspirational and recreational benefits."
- Page 3-3. This page further revises the above bullet point's Declaration of Purpose for the State Park to "protect, restore, and perpetuate the outstanding natural, cultural and wilderness values ..."

8A

- Page 3-5. "Resource management practices applies in the Park will be tailored to promote, maintain and, when feasible, restore the wilderness character of the Park."
- Page 4-7 lists Douglas-fir-tanoak as a "sensitive natural vegetation community" that is "valuable habitat for plants and wildlife."

The Draft GP/EIR's specific resource management section is 3.2.1, and is found starting on page 3-7. Resource Management is divided into three sections: natural resource management, cultural management, and aesthetics.

Under the first subsection, Natural Resource Management, it states "Allowing natural processes to occur is crucial for the perpetuation of healthy ecosystems at Sinkyone State Park." And where these ecosystems "have been substantially altered or interrupted by human influences, attempts should be made to restore processes to more natural conditions." The human influences affecting or altering the ecosystems does not address the potential for non-human spread of *Phytophthora ramorum* or *Fusarium circinatum*, the cause of pitch canker in pines. Pitch canker is an issue depending upon pine presence in the State Park, particularly native populations of pine.

8B

Also under this subsection are goals and guidelines addressing invasive weeds. The GP/EIR describes Invasive Weeds as potentially degrading to natural plant communities, but does not address invasive pests, especially invasive exotic pests like *Phytophthora ramorum*, which could also be degrading. In fact, a concern of sudden oak death mortality centers is the potential for invasive weed species to occupy the newly disturbed or cleared areas.

Under the Cultural Resources subsection, Guideline CUL-1c promotes the protection and preservation of the prime natural resources ..." Tanoak and bay are cultural resources of Native Americans. These two tree species are capable of becoming infected and spreading *Phytophthora ramorum* to new hosts and extended areas. How will the State Park address protecting these cultural resources, yet allow "natural processes to occur"?

8C

The final subsection deals with Aesthetics and retention of a dynamic landscape. Pest suppression to protect these values is not specifically noted.

8D

For the protection of all Natural Resources, possible alternatives to suppress forest pests capable of significantly altering the natural, cultural, and aesthetic values of the State Park should be considered.

2) Fire Protection issues:

Page 3-26 of Appendix G includes a section entitled "Fire Hazards and Management" and acknowledges the major objective of protecting the State Park and neighboring properties from fire as well as using fire as a management tool for natural succession

8E

and ecosystem renewal processes. As part of this goal the GP/EIR includes four guidelines outlining the objectives.

Guideline FIRE - 1A describes the development of a Wildfire Management Plan (WMP) for the State Park in cooperation with CDF and local volunteer fire departments. The State Park is located on lands designated as State Responsibility Area for wildland fire suppression. The GP/EIR does not include a specific timeline for development and implementation of the WMP. It is important that the WMP be developed and implemented concurrently or soon after the certification of the proposed GP/EIR.

Because of the wilderness status, the GP/EIR should clearly outline permissible suppression activities since an emphasis is placed in the GP/EIR on restricting mechanized equipment and does not clearly outline exceptions such as for fire suppression. Such restrictions will prevent fire fighting ground forces with engines, bulldozers, helitenders, etc. from accessing the park for initial attack suppression activities in the event of a wildfire. The GP/EIR should also address whether fixed wing firefighting aircraft utilizing fire retardant and rotary wing firefighting aircraft are allowable for fire suppression activities on the wilderness portions of the State Park.

8F

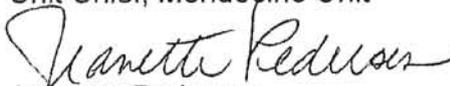
Guideline FIRE-1D describes educating visitors about the importance of fire as an ecological process. The GP/EIR should also educate visitors on risks of wildland fire as well as fire prevention methods to which park users must adhere.

8G

CDF appreciates the opportunity to provide comments on the draft GP/EIR and requests a written response to this letter ten (10) days prior to the final certification of this project's EIR (PRC §21092.5) sent to the above listed address.

If you have questions or need further information please contact Jeanette Pedersen or Jack Marshall, CDF Forest Pathologist at the above address.

MARC ROMERO
Unit Chief, Mendocino Unit

by: 
Jeanette Pedersen
Division Chief, Forest Practice

/jp

cc: Marc Romero, Unit Chief, CDF Mendocino Unit (MEU)
Bruce Strickler, Deputy Chief, CDF Resource Management, MEU
Jack Marshall, Forest Pathologist, CDF Pest Management
Allen Robertson, CDF Environmental Protection, Sacramento Headquarters
State Clearinghouse

- 8A Our Department acknowledges the stated fact that the Sinkyone Wilderness SP is located within the State’s regulated area for *Phytophthora ramorum*, the known cause of sudden oak death; also, that the park lies within two Board of Forestry and Fire Protection declared Zones of Infestation (ZOI): the Coastal Pitch Canker ZOI and the Sudden Oak Death ZOI. We will include this reference in the final General Plan, Section 3.2.1, with the following guideline for resource management and coordination with CDF and other jurisdictions:

The new general plan guideline will read as follows:

Guideline NR-1N: Develop management strategies to reduce and, where possible, eliminate causes and effects of forest pest outbreaks, specifically the occurrence of pitch canker and/or sudden oak death.

- 8B Our Department agrees that the spread of forest pests and their effects on resources is a concern for park management. The following text revisions will be made in the final General Plan/EIR:

Section 3.2.1, Subsection: Natural Resources Management

The unique hydrologic and geomorphic processes of the California Coast Range and the influence of the Pacific Ocean have resulted in a mosaic of natural communities providing important habitat for many plant, fish and wildlife species. Allowing natural processes to occur is crucial for the perpetuation of healthy ecosystems at Sinkyone Wilderness SP. Where natural processes have been substantially altered or interrupted by human influences, attempts should be made to restore processes to more natural conditions. Restoration activities should be directed toward self-maintaining levels, where possible. The non-human spread of forest pests can also significantly affect forest conditions and the health of specific plant species, such as native populations of pine and oaks, necessitating effective management strategies for their control.

Section 3.2.1, Subsection Plant Life

Invasive Weeds

The presence of invasive weeds disrupts natural processes and may degrade natural plant communities, including sensitive riparian areas and other important wildlife habitats that are critical to maintaining naturally functioning ecosystems within Sinkyone Wilderness SP. Proactive control of invasive weeds at Sinkyone Wilderness SP, therefore, is an important component to natural resource management.

Invasive Pests

The presence of invasive pests, especially the invasive exotic pest *Phytophthora ramorum*, the cause of sudden oak death, can also degrade natural plant communities. A concern of sudden oak death mortality is the potential for invasive weed species to occupy the newly disturbed areas.

- 8C The parkwide Cultural Resources Management Plan (CRMP), as proposed in Guideline CUL-1C, will address protecting tanoak and bay tree species, which are cultural resources of Native Americans.
- 8D The Aesthetic goals and guidelines included in the general plan (section 3.2.1, Aesthetics) will guide the Department in defining characteristics, developing objectives, and working with others to ensure that aesthetic standards and alternatives are identified and implemented in a cooperative Aesthetic Resource Management Plan. Alternatives to suppress forest pests may also be addressed in specific management plans for cultural and natural resources.
- 8E General plans prepared for State Park System units do not specify exactly “how” and “when” plan implementation will occur. Implementation of most general plan proposals is subject to available funding and staffing requirements. Management plans called for in the general plan are based on more detailed information and could include priorities or timelines for implementation of program measures. However, a Wildfire Management Plan was prepared for Sinkyone Wilderness State Park and submitted to CDF in 1999. We would like to work with CDF to update that plan as needed, and review specific prescribed burn plans as appropriate.
- 8F The Department recognizes the importance of access into designated wilderness for fire suppression activities. Please see Response 5B for further discussion. State Parks will follow the guidelines and policies in the Department Operations Manual (DOM), Chapter 0300, Natural Resources, pertaining to the management of state wilderness. DOM Section 0304.2.6, State Wilderness, states:

“State Wildernesses shall be protected and managed so as to preserve their natural conditions. There shall be no commercial enterprise and no permanent road within any wilderness area. *Management measures may be taken as necessary for the control of fire, insects, and diseases.*”
[Emphasis added].

The authorized use of mechanized equipment in state wilderness areas is described in DOM Section 0304.5.4, Management Use of Mechanized Equipment in State Wilderness, which states:

“Based on wilderness statutes and their intent, and statutes mandating that the Department restore and maintain resources, the use of motorized equipment, motor vehicles or vessels, or other forms of mechanized transport in designated wilderness areas may be considered only when necessary for emergencies involving the health and safety of persons or when the primary management purpose is for necessary natural or cultural resource protection and restoration. In balancing the need to protect solitude and primitive recreation, the following conditions apply to the Department’s use of mechanized equipment, including vehicles, in wilderness areas:

- a. Reasonable alternatives to mechanized equipment do not exist;
- b. A significant resource management need exists, and the result of the work will be substantially unnoticed;
- c. The use of the mechanized equipment is non-recurring, and shall be minimized; and
- d. The District Superintendent shall provide prior written approval, assuring the above requirements will be met.”

8G The Guideline FIRE-1D will be revised as follows:

Guideline FIRE-1D: Educate visitors about the importance of fire as an ecological process that is essential to the health of the Park’s plant and animal communities. This would include the risks of wildland fire, as well as fire prevention methods.

Letter 9



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NORTHERN SERVICE CENTER

Carole Polasek
Chair, Public Lands Committee
Redwood Unit, Back Country Horsemen of California
PO Box 792
Ferndale, CA 95536-0792
707-786-9637

California State Parks
Northern Service Center
Atten: Dave Keck
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Mr. Keck:

Back Country Horsemen of California are committed to the common sense use and enjoyment of California back country and wilderness and the use of recreational pack and saddle stock. Copies of the Mission Statement of Back Country Horsemen of America and the Objectives and Purpose of the Back Country Horsemen of California are enclosed for your information.

9A

The Redwood Unit, Back Country Horsemen of California, does not have any suggested changes or concerns with the proposal for the Sinkyone at the present time.

Thank you for this opportunity to provide input.

We would like to remain on your mailings for all future information concerning the Sinkyone Wilderness State Park.

Sincerely,

A handwritten signature in cursive script that reads "Carole Polasek".

Carole Polasek
Chair, Public Lands Committee
Redwood Unit, Back Country Horsemen of California

Letter 9 Attachment

Mission Statement Back Country Horsemen of America

1. perpetuate the common sense use and enjoyment of horses in America's back country and wilderness
2. work to ensure that public land remains open to recreational stock use
3. assist the various government and private agencies in their maintenance and management of said resources
4. educate, encourage, and solicit active participation in the wise and sustaining use of the back country resources by horsemen and the general public
5. foster and encourage the formation of new state backcountry horsemen organizations

Objectives and Purpose of the Back Country
Horsemen of California
from the BCHC Bylaws

- To improve and promote the use, care and development of California back country trails, campsites, streams and meadows; to advocate good trail manners.
- To promote the conservation and utilization of our back country resources in concert with livestock transportation.
- To keep the back country trails and forage areas open to horsemen on all public lands.
- To keep current information before the Corporation membership and its local Units regarding new legislation or management plans related to government regulations of the back country.
- To support or oppose new proposals, plans and restrictions as related to the interest of horsemen and those persons interested in recreational stock use and enjoying the back country.
- To promote the interest of people who, due to health or physical factors, need transportation other than by foot on back country trails.
- To promote public awareness and interest in the historical aspect of horsemen and stock in the back country and to help educate back country users on ways to use the trail and forage in a manner that conserves the back country resources.
- To assist in keeping the public informed of the vital need for a clean back country.
- To promote a working relationship with and keep the work and interests of the Corporation before our local, state and federal officials.
- To assist in the formation and continuation of local Units to carry out these purposes.

Response to Letter 9 – Redwood Unit, Back Country Horsemen of California, Carole Polasek, Chair, Public Lands Committee

- 9A The Department appreciates your comments and support for the proposed Wilderness and backcountry recreational uses.



United States Department of the Interior



BUREAU OF LAND MANAGEMENT

Arcata Field Office
1695 Heindon Road
Arcata, CA 95521
www.ca.blm.gov/arcata

August 11, 2006

In Reply Refer To:
1610 (CA330)P

Mr. Dave Keck
California State Parks
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

RECEIVED
AUG 18 2006
NORTHERN SERVICE CENTER

Dear Mr. Keck:

The Bureau of Land Management (BLM) Arcata Field Office has reviewed the Draft Environmental Impact Report for Sinkyone Wilderness State Park (SWSP). The BLM is pleased to see that the management plan calls for a Wilderness Area along most of the Sinkyone coastline, including lands that adjoin the King Range National Conservation Area (NCA). This land use designation complements the goals of the "Backcountry" management zone of the King Range NCA coastal slope. Together these two areas make up one of the largest segments of undeveloped coastline in the U. S., and both agencies management plans reflect a commitment to protect the primitive values of the "Lost Coast".

As California State Parks moves forward with the development of specific implementation level plans for SWSP, the BLM would like to be involved in those plans that either affect, or that can be complemented by management of adjoining BLM managed lands in the King Range NCA, Upper Mattole River, and California Coastal National Monument. Specific areas of interest include fire and fuels management, noxious weed management, recreation management. Coordination is especially important in the areas of visitor information, interpretation, and outfitter permitting, as many visitors cross between BLM and State Park lands on the Lost Coast National Recreation Trail.

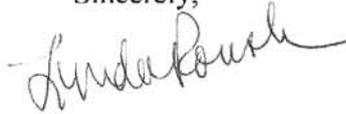
The BLM appreciates the inclusion of the California Coastal National Monument (CCNM) within the management plan. As a core management partner for the CCNM, California State Parks plays a major role in interpretation and protection of monument resources.

10A

Letter 10

The King Range NCA and SWSP field staffs have a long history of coordination in protecting the resource values of the Lost Coast while providing quality recreation experiences. We look forward to this continued relationship. If you have any questions, please contact Bob Wick of my staff at (707)825-2321.

Sincerely,

A handwritten signature in cursive script that reads "Lynda Roush".

Lynda Roush
Arcata Field manager

cc: Mr. Roger Goddard
California State Parks
North Coast Redwoods District
P. O. Box 2006
Eureka, CA 95502

Response to Letter 10 – Bureau of Land Management, Lynda Roush, Arcata Field Manager

- 10A The Department appreciates your comments and support for the proposed State Wilderness designation along the Sinkyone coastline. At the time that specific management plans are prepared, our Department will contact the BLM Arcata Field Office to coordinate resource and recreation management programs and provisions for visitor access between State Park lands, the King Range NCA, and the Lost Coast National Recreation Trail.