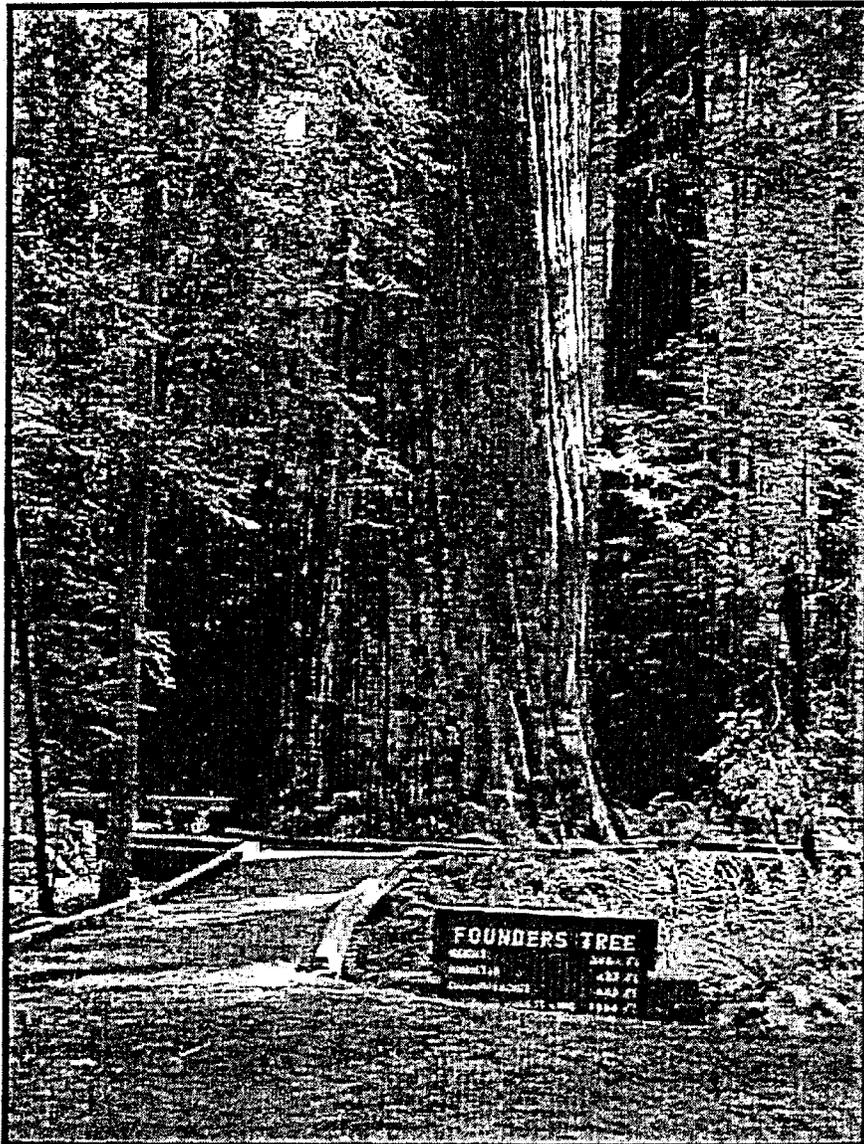


FINAL
ENVIRONMENTAL IMPACT REPORT
including
COMMENTS AND RESPONSES
for the
HUMBOLDT REDWOODS STATE PARK
GENERAL PLAN
Volume 2



June, 2002

FINAL

**ENVIRONMENTAL IMPACT REPORT
AND COMMENTS AND RESPONSES**

for the

**HUMBOLDT REDWOODS STATE PARK
GENERAL PLAN
(Volume 2)**

Lead Agency



**State of California
DEPARTMENT OF PARKS AND RECREATION
Acquisition and Development Division
Northern Service Center
One Capitol Mall – Suite 500
Sacramento, California 95814**

**Circulated for Public Review,
June 27, 2001**

Contact
Dave Keck Supervisor
General Planning Section
(916) 445-8903
dkeck@parks.ca.gov

INTRODUCTION

This is Volume 2 of the Final General Plan for Humboldt Redwoods State Park. It contains the Project Description, Comments and Responses (comments received during public review of the General Plan and DPR responses to those comments); and the Notice of Determination (as filed with the Governor's Office of Planning and Research), documenting the completion of the CEQA compliance requirements for this project. Volume 1 of the Final General Plan for Humboldt Redwoods State Park contains the Summary of Existing Conditions; Goals and Guidelines for park development and use; Environmental Analysis (in compliance with Article 9 and Article 11 Section 15166 of the California Environmental Quality Act); and Maps, Figures, and Charts relating to the General Plan. Together, these two volumes constitute the Final General Plan for Humboldt Redwoods State Park. For more detail about the project and potential impacts, refer to the Environmental Analysis in Volume 1.

LEAD AGENCY: California Department of Parks and Recreation

SCH#: 2001022063

AVAILABILITY OF DOCUMENTS:

The public review period for the Preliminary General Plan and Draft Environmental Impact Report (EIR) for Humboldt Redwoods State Park began on June 27, 2001, and ended on August 10th. The document was made available throughout the 45-day public review period at the North Coast Redwoods District Office, the park, the Piercy Sector Office at Richardson Grove State Park, and the Redwood Coast Sector Office in Crescent City, as well as at all of the county branch libraries in Humboldt County. Review copies could also be obtained by contacting the Northern Service Center in Sacramento. Both volumes of the Final General Plan and EIR and supporting materials will be available at the Northern Service Center and the North Coast Redwoods District office.

PROJECT DESCRIPTION:

The following is a summary of the proposals in the general plan, which cover an overview of changes to existing facilities and new development, resource management actions, and reclassification proposals. If the general plan were fully implemented as written, the following proposals would be carried out:

1. Proposals by management zone (refer to Map #6 in Volume 1):

Primitive Zone

- Subclassify ancient redwood forest as a natural preserve

Backcountry (Non-Mechanized) Zone

- Rehabilitate watershed functions and vegetation
- Subclassify specified ancient redwood forest areas as state wilderness
- Construct hiking and equestrian trails
- Establish a primitive backcountry equestrian camp

Backcountry (Mechanized) Zone

- Rehabilitate watershed functions and vegetation
- Install interpretive exhibits
- Establish viewing areas at appropriate sites within the Bull Creek watershed.

Frontcountry Zone

- Reclassify the Whittemore and Holbrook groves as a state reserve
- Expand the Cuneo Creek and Albee Creek campgrounds;
- Relocate group camping facilities from Williams Grove to a site within this zone;
- Develop trails and trailheads;
- Install a walk-in camp in the Bull Creek watershed;
- Develop camping alternatives, such as RV hook-ups, in existing or new camping areas;
- Develop/improve equestrian day use facilities near existing trailheads;
- Develop an environmental education center;
- Add improvements in the historic core at the Holmgren property for living history programs;
- Develop interpretive/orientation exhibits at the Dyerville Overlook and Logan-Holmgren property to serve as the park's northern and southern gateways; and
- Develop wayside interpretive exhibits

Transportation Zone

- Create a Parkway experience on the Avenue of the Giants
- Install additional park entrance/informational signs
- Create scenic vista points along highway corridors
- Provide wayside orientation and interpretation along the park's roadways

Administration/Operations Zone

- Furnish clear signage and pathways
2. Provide ongoing protection for the park's natural resources by establishing allowable use intensities, based on resource monitoring to assess impacts that could exceed the threshold of significance; placing seasonal limitations on uses in specified areas; and relocating some roads and trails, as necessary, to protect and rehabilitate impacted resources.
 3. Develop a Trails Plan to evaluate the park's entire road and trail system; design and implement improvements to protect park resources and provide expanded recreational experiences;
 4. Purchase land or conservation easements from willing sellers to create habitat linkages connecting the park to nearby lands owned by others; provide buffers to protect the park's upper watersheds and create management continuity of ancient redwood forest areas near the park's boundaries;
 5. Work closely with local jurisdictions and landowners for ongoing resource protection. Continue Department review and comment on timber harvest plans and land use proposals by others in the vicinity of the park; and
 6. Continue resource management efforts, including reforestation, landscape rehabilitation, and the introduction and use of fire as a management tool.

PURPOSE OF THE GENERAL PLAN:

The general plan is a broad policy document that sets the direction and provides the vision for the park's management and development for the next two decades or more.

It will guide resource stewardship, facilities development, and interpretation and has guidelines for future land use management at the park, including acquisitions and facilities required to accommodate an expected increased visitation. The general plan also identifies where more focused planning (i.e., management planning) must follow to address the details that cannot be addressed in a general plan.

Management plans are prepared as funding and staffing are available, and as opportunities dictate, to carry a specific management program or project forward. Management plans are usually prepared by the staff of the local district and may involve public comment and review, and coordination with other agencies.

The Final General Plan, consisting of both Volumes 1 and 2, comprise the first phase of a tiered environmental review process. As such, proposed development and associated mitigation are general in nature. As management plans, area development plans, or specific projects are proposed, they will be subject to further environmental review, in compliance with CEQA, and project-specific mitigation measures will be developed and implemented.

FINDINGS:

An Environmental Analysis was prepared to assess the first tier of the proposed plan's potential impacts on the environment and the significance of those impacts. This was incorporated in the Final General Plan, Volume 1. Until the uses, locations, and scope of facilities or management plans are specified, the actual level of impact (individual or cumulative) or need for mitigation cannot be established. However, based on the level of detail available in the first tier evaluation, it has been determined that the proposals in the plan would have no significant adverse impacts on the environment, once all proposed mitigation measures were implemented. This conclusion is supported by the following findings:

1. Improvement of the services, facilities, and recreational opportunities at the park, as proposed within this general plan, will serve to attract additional visitors and encourage extended stays. This increase in tourism is expected to translate into economic benefits for communities surrounding the park. However, this portion of the state is not heavily populated and visitation is not expected to increase dramatically. Additionally, proposed improvements will only result in modest increases in day use and campground capacities, with development occurring over an extended period to accommodate the required resource and environmental impact studies. As a result, community impacts are expected to be less than significant.
2. The park's considerable size, the modest nature of the proposed development, and the phasing of implementation will limit the cumulative impact on park resources and reduce the likelihood that impacts would be unduely concentrated in any one area. Although some of the proposed facilities, such as RV hook-ups and an environmental education center, are intended to encourage more off-season visitation, overall park usage is not expected to be appreciably increased. Cumulative impacts will be less than significant.
3. Population growth within California will eventually create an increased demand for recreational opportunities with or without facility development at Humboldt

Redwoods State Park. An increase in the general population of the area, as well as visitation to the park, will need to be considered as part of subsequent tier CEQA reviews and associated mitigation, including proportional protection for sensitive areas. However, park improvements are not expected to contribute significantly to population growth in communities surrounding the park.

4. Change in any environment is inevitable and levels of visitation, community growth, and actions of adjoining property owners could result in changes to the baseline conditions used to determine the significance of potential project-related impacts. Those changes, when combined with project impacts, could result in a cumulatively significant environmental impact. For this reason, all plans and projects will be required to be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.
5. The primary purpose for acquiring additional park land, as expressed in the general plan, is to protect existing park resources and enhance plant and wildlife habitat. Because the location, size, and possible use of these potential land acquisitions have not yet been identified, the specific project impacts cannot be evaluated. However, if the general plan objectives are adhered to, these acquisitions would have a less than significant impact, individually or cumulatively.
6. Construction of the proposed expansion and/or development of campgrounds within the park would result in potential short-term environmental impacts, including dust and noise, and changes to natural and cultural resources. Roadwork could potentially interfere with visitor access. Although most of these impacts would be construction-related and would cease as soon as work is completed, the increased public facility use could result in a more significant level of impact to the surrounding environment. Until the uses, locations, and scope of work are specified, and the baseline for the time of construction is identified, the actual level of impact (individual or cumulative) or need for mitigation cannot be determined. However, evaluation at the specificity of this first tier review indicates that the proposed projects can be mitigated to a less than significant level.
7. Providing RV hook-ups in already developed recreational areas would create short-term construction impacts, but it would reduce noise (from portable generators). It should also have a limited positive impact on the amount of soil compaction within the campgrounds over time; RV use tends to result in generally less foot traffic than tent camps. Construction will occur during the off-season, when visitation is low, to minimize impacts to visitor services and the park experience.
8. The relocation of facilities that are adversely impacting sensitive resource sites would result in short-term construction-related impacts during the demolition of existing facilities, habitat rehabilitation, and reconstruction of the facilities in the new location. This could include interruption of or interference with visitor services, damage to habitat, and a visually unappealing site. However, timing of construction to avoid peak use periods or impacts to sensitive species, along with project-specific mitigation, is expected to reduce potential impacts to a less than significant level.

9. Improvements to the trail system and the trail camps resulting from the Trails Plan would involve short-term construction impacts in the backcountry, where noise and visual disruptions are more apparent than in more developed areas of the park. However, an improved trail system would ultimately result in less erosion, as well as diminished sedimentation into park streams. The impacts, with proper design and project-specific mitigation, are expected to be less than significant.

MITIGATION

The mitigation measures indicated below will be in Full implementation of mitigation measures would reduce potential project-related visual impacts, as well as adverse impacts upon vegetation, wildlife, and cultural resources. The following mitigation measures were incorporated into the Environmental Analysis for the first tier evaluation of possible negative environmental impacts. They will be refined through future, more detailed environmental impact evaluation and implemented by DPR to avoid or minimize adverse environmental impacts at the time future management plans and projects are undertaken.

VISUAL IMPACTS **MITIGATION MEASURES**

1. Management plans and specific project designs will be developed to define aesthetically appropriate design features; limit construction methods and timing; provide resource identification; and identify optimum methods for protecting existing resources.
2. Designated management zones (see Map #6) and proposed reclassification of tracts of the park to more protective wilderness and natural preserve status will afford additional resource protections, including a significant reduction in opportunities for facilities development in sensitive areas.
3. Emphasis will be placed on reducing visual impacts by careful siting, design, and selection of construction materials on all park projects.
4. Native plant species will be used to screen developed parking and campground facilities, buffer intrusive or disruptive views or activities outside park boundaries, and enhance scenic views.
5. Construction and maintenance activities will be timed to decrease their impacts on visitors and adjoining property owners.
6. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

VEGETATION **MITIGATION MEASURES**

1. Prior to implementation of resource management projects and construction of facilities and trails, areas of potential impact will be surveyed for the presence of sensitive species, including endangered, threatened, or rare plant species. If there is a potential for significant impacts (individual or cumulative), proposed facilities, including trails, will be redesigned to avoid impacts, or appropriate mitigation measures will be taken to reduce the impacts to a less-than-significant level.
2. Designated management zones (see Map #6) and proposed reclassification of tracts of the park to more protective wilderness and natural preserve status will afford additional resource protections, including a significant reduction in opportunities for facilities development in sensitive areas.

3. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

WILDLIFE

MITIGATION MEASURES

1. Prior to construction of facilities and trails, site-specific areas of potential impact will be surveyed for the presence of federal or state protected species. If there is a potential for impact, state and federal permitting agencies will be consulted for guidance on approved/recommended mitigation measures.
2. Facilities, including trails, will be relocated or designed to avoid impacts. Potential cumulative impacts will be assessed.
3. Nesting or spawning periods will be avoided with proper scheduling of facility construction or resource management activities.
4. Designated management zones (see Map #6) and proposed reclassification of tracts of the park to more protective wilderness and natural preserve status will afford additional resource protections, including a significant reduction in opportunities for facilities development in sensitive areas.
5. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

CULTURAL RESOURCES

MITIGATION MEASURES

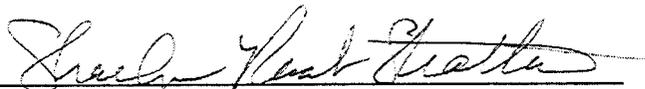
1. Designated management zones (see Map #6) and proposed reclassification of tracts of the park to more protective wilderness and natural preserve status will afford additional resource protections, including a significant reduction in opportunities for facilities development that could impact cultural resources.
2. Prior to construction or significant repairs, implementation of interpretive programs (including living history), or adaptive reuse of historic structures or sites, site-specific cultural resource surveys will be conducted to determine potential impacts on cultural resources. These surveys will cover areas proposed for development or locations where other surface-disturbing activities might occur.
3. All construction, maintenance, or improvements of historic structures will be conducted in a manner consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (1995, Weeks and Grimmer) and the California Historical Building Code.
4. All development and resource management plans will be subject to Public Resources Code §5024.5 review requirements.
5. If there is a potential for impacts, facilities, including trails and interpretive exhibits, will be relocated and interpretive programming changed to avoid impacts.
6. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

This document, including the Project Description, Findings, Mitigation Measures, Comments, and Responses to Comments, along with the Final General Plan (SCH# 2001022063) and Notice of Determination, constitute the Final Humboldt Redwoods State Park General Plan/Environmental Impact Report.

6. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

This document, including the Project Description, Findings, Mitigation Measures, Comments, and Responses to Comments, along with the Final General Plan (SCH# 2001022063) and Notice of Determination, constitute the Final Humboldt Redwoods State Park General Plan/Environmental Impact Report.

Pursuant to Section 21082.1 of the California Environmental Quality Act, the California Department of Parks and Recreation (DPR) has independently reviewed and analyzed the Environmental Impact Report for the proposed project and finds that these documents reflect the independent judgment of DPR. DPR, as lead agency, also confirms that the project mitigation measures detailed in these documents are feasible and will be implemented as stated in the Environmental Impact Report.



Shaelyn Raab Stratton
Statewide Environmental Coordinator
California Department of Parks and Recreation
Northern Service Center
One Capitol Mall – Suite 500
Sacramento, CA 95814

6-17-02

Date

INTRODUCTION TO COMMENTS AND RESPONSES TO COMMENTS

On June 27, 2001, the California Department of Parks and Recreation (DPR) filed the Preliminary General Plan and Draft Environmental Impact Report for Humboldt Redwoods State Park with the Governor's Office of Planning and Research/State Clearinghouse.

In accordance with the California Environmental Quality Act (CEQA), Section 21091 and State CEQA Guidelines, Section 15073, the Draft EIR was made available for a 45-day public review period, during which time public agencies, private groups and associations, and individuals were provided the opportunity to review and comment on the contents of the document, including the evaluation of potential project-related environmental impacts and proposed mitigation. The public review period ended on August 10, 2001.

Twenty-eight letters were received during the comment period, which ended on August 10, 2001. Two letters arrived after that date: one letter was to replace a letter that had actually been mailed within the time limit, but never arrived. The second was addressed to the State Park and Recreation Commission and requested that more "emphasis be placed on developing a non-motorized trail to parallel the Avenue of the Giants." One hundred twenty-six separate comments were isolated in the letters, each receiving a response. Copies of the comments and responses follow. Copies of correspondence that accompanied the distribution of the preliminary general plan and the final package of comments and responses are also included.

News Release



FOR IMMEDIATE RELEASE
June 25, 2001

CONTACTS: Joann Weiler
(916) 445-8907

Public Comment Period Opens For New Humboldt Redwoods Plan

EUREKA – The 45-day public comment period for the new Preliminary General Plan for Humboldt Redwoods State Park will begin on Wednesday, State Parks Director Rusty Areias announced today. Interested parties are invited to submit their comments in writing by August 10.

The Preliminary General Plan for Humboldt Redwoods State Park provides for development of more recreational and interpretive facilities within the 53,000-acre park located 45 miles south of Eureka in Humboldt County. It also proposes significantly more protection for natural resources, specifically old growth redwoods, and would establish Natural Preserve and State Wilderness designations in prime resource areas of the park.

General plans for state parks set broad policy goals for a period of 20 years. The process is dictated by the California Environmental Quality Act. Once the public comment period for the Preliminary General Plan is completed, the Department of Parks and Recreation will prepare responses to the written comments it received. The General Plan, public comments and Department responses are then submitted to the California Park and Recreation Commission for a public hearing in the early fall.

Comments on the plan must be submitted in writing, and must be postmarked on or before Aug. 10, 2001. They should be mailed to: California State Parks, Northern Service Center, Joann Weiler, Project Manager, Post Office Box 942896, Sacramento CA 94296-0001.

Copies of the plan may be obtained by writing to the above address or calling (916) 445-8907. They also are available for review at several locations throughout Humboldt County (see attached list).

The Preliminary General Plan for Humboldt Redwoods State Park will be available for public review the following locations:

California State Parks

North Coast Redwoods District Office
3431 Fort Avenue, Eureka
(at Fort Humboldt State Historic Park)
(707) 445-6547

Humboldt Redwoods State Park Headquarters

On the Avenue of the Giants, 1 mile south of the Weott off-ramp from Highway 101
(707) 946-2409

California State Parks

Piercy Sector Office
(at Richardson Grove State Park)
(707) 247-3442

California State Parks

Redwood Coast Sector Office
1111 Second Street, Crescent City
(707) 464-6101

Libraries:

- Main Library, 1313 - 3rd Street, Eureka
- Branch Library, 500 - 7th Street, Arcata
- Branch Library, 14th & N Streets, Fortuna
- Branch Library, Main Street, Ferndale
- Branch Library, 715 Wildwood Avenue, Rio Dell
- Branch Library, 715 Cedar Street, Garberville.

In addition, review copies of the preliminary general plan will be available on the County Library Bookmobile.



(916) 445-8907

June 27, 2001

Dear Reviewer,

Enclosed is a copy of the Humboldt Redwoods State Park Preliminary General Plan for your review according to the provisions of the California Environmental Quality Act (CEQA).

The Department responds to written comments only. The deadline for comments is August 10, 2001. Comments must be postmarked by that date in order to receive a written response. Comments received after that date can be taken into consideration but do not require a formal response.

If you have questions, you may call me at the telephone number shown above or write to me at California State Parks, Northern Service Center, Post Office Box 942896, Sacramento, CA 94296-0001.

The General Planning Team appreciates your taking the time and effort to review the preliminary general plan. Thank you for your interest in Humboldt Redwoods State Park and the California State Parks System.

Sincerely,

Joann Weiler, Project Manager
Humboldt Redwoods State Park General Plan

cc: John Kolb, North Coast Redwoods District Superintendent

JW/me



United States Department of the Interior

FISH AND WILDLIFE SERVICE
ARCATA FISH AND WILDLIFE OFFICE
1655 HEINDON ROAD
ARCATA, CA 95521
(707) 822-7201
FAX (707) 822-8136

In Reply Refer To:
1-14-2001-TA-863b

August 9, 2001

Ms. Joann Weiler
Project Manager, Humboldt Redwoods State Park General Plan
Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

Subject: Response to Request for Technical Assistance Regarding the Review of
Humboldt Redwood State Parks' Preliminary General Plan

Dear Ms. Weiler:

This responds to your request for U.S. Fish and Wildlife Service (Service) technical assistance, dated June 27, 2001, and received in our office July 2, 2001, requesting review of Humboldt Redwoods State Park's Preliminary General Plan (Draft Plan). This review is based on information provided in the following: the Draft Plan, our previous letter of technical assistance dated November 14, 2000 (#1-14-2001-TA-863) on the Draft Plan Goals and Guidelines, and other sources of information on file at this office. After review of the information pertaining to this request the Service provides the following technical assistance.

As you indicated in the section on Purpose of General Plans, the Draft Plan contains broad proposals on the vision and direction of the Park's management, and directs that program and project specific management plans will be developed in the future. Consultation with the Service about on-the-ground impacts and any potential adverse effects on listed species will occur during the development of these management plans. Therefore, the following is a programmatic review indicating where the potential for effects on listed species might occur.

For your reference, we have included a current species list for the Park in Attachment 1.

Park-wide Management Goals and Guidelines

Animal Life Management

Guidelines

We concur with the recommendation to inventory and monitor wildlife species, in particular, state or federally listed species. In order to fully protect a listed species, surveys to locate their breeding, feeding or sheltering areas are necessary to implement measures to avoid or minimize adverse effects from potential projects. For example, surveys for northern spotted owls and bald eagles should be conducted so that nesting areas may be identified and protected. /

Special Animals

We believe the guideline allowing trail development in suitable murrelet nesting habitat should also state that such trail development in suitable habitat will be minimized, and if necessary authorization to take will be sought under the appropriate section of the Endangered Species Act (Act). A federal nexus is necessary for consultation under section 7 of the U.S. Endangered Species Act. Without a federal nexus, an incidental take permit under section 10 of the Act may be pursued. 2

Park-wide Goals and Guidelines for Recreation

The statement that adverse impacts to critical resource areas such as riparian habitat or old-growth will be avoided (p. 55) contradicts the statement that trails will be built in nesting habitat (p. 47). 3

Environmental Analysis Section

Wildlife

Under mitigation the statement is made that facilities, including trails, will be relocated or designed to avoid impacts. If existing trails are not relocated and/or new trails are built in nesting habitat, adverse effects can be minimized, but likely not avoided. Therefore, under findings, adverse effects can be mitigated to less-than-significant with relocation, but may not be if the guidelines stated on page 47 for building trails in murrelet nesting habitat are implemented. 4

We could not find specific reference to the hazard tree removal program in the document. Though this activity is likely to be addressed in specific management plans, we believe it is worthy of mention in the general plan. The removal of hazard trees has the potential to cause adverse effects and may result in take if the hazard trees are used for nesting or contribute to buffering of a nest site of a listed species. 5

We would like to correct the statement made on page 15 under Sensitive Animal Populations, Birds, referencing the last technical assistance letter from the Service. Humboldt Redwoods contains *one* of the largest remaining blocks of marbled murrelet nesting habitat in this part of the state. *To the south*, the next closest large block of habitat is 300 miles away in San Mateo county. To the north, the Headwaters Forest Reserve is less than 10 miles away. 6

Thank you for the opportunity to provide technical assistance on your Draft Plan. We look forward to continuing to work together on issues related to endangered and threatened species conservation as you develop management plans for specific program areas. If you have any questions, please contact Ms. Lynn Roberts at (707) 822-7201.

Sincerely,



 Bruce G. Halstead
Project Leader

cc:

FWS, ATTN: J. Enbring, Sacramento, CA

CDFG, ATTN: K. Kovacs, Eureka, CA

NPS, ATTN: H. Sakai, Orick, CA

CDFG, ATTN: E. Burkett, CA

Attachment 1

Listed/Proposed Threatened and Endangered Species for Humboldt Redwoods State Park
(Candidates Included)

August 08, 2001

TYPE - SCIENTIFIC NAME	COMMON NAME	CATEGORY	
CRITICAL			
HABITAT			
Fish			
<i>Eucyclogobius newberryi</i>	tidewater goby	E	Y
* <i>Oncorhynchus mykiss</i>	Northern California steelhead	T	N
* <i>Oncorhynchus kisutch</i>	S. OR/N. CA coho salmon	T	Y
* <i>Oncorhynchus tshawytscha</i>	CA coastal chinook salmon	T	Y
Birds			
<i>Strix occidentalis caurina</i>	northern spotted owl	T	Y
<i>Brachyramphus marmoratus</i>	marbled murrelet	T	Y
<i>Haliaeetus leucocephalus</i>	bald eagle	T	N

KEY:

- (PE) Proposed Endangered Proposed (in the Federal Register as being in danger of extinction)
- (PT) Proposed Threatened Proposed as likely to become endangered within the foreseeable future.
- (E) Endangered Listed in the Federal Register as being in danger of extinction
- (T) Threatened Listed as likely to become endangered within the foreseeable future.
- (C) Candidate Candidate which may become a proposed species
- Critical Habitat Y = Designated, P = Proposed, N = None Designated
- * Denotes a species listed by the National Marine Fisheries Service



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Arcata Resource Area
1695 Heindon Road
Arcata, California 95521-4573

In Reply Refer To:
1600(P)
CA 330

August 10, 2001

Joann Weiler
California Department of Parks and Recreation
General Planning Section
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 94289-0001

Dear Ms. Weiler:

We reviewed the general plan for Humboldt Redwoods State Park. Overall, we feel that the plan is very well written and visionary. Our primary area of interest lies in how the park and nearby BLM administered public lands can be managed in a complimentary manner. We appreciate that the plan includes objectives for cooperation, especially as it relates to the Gilham Butte or "Redwoods to the Sea" corridor. The management goals for the Backcountry (mechanized) Zone in HRSP appear to be compatible with initial concept discussions between the local community, BLM, Save the Redwoods League and State Parks regarding the nearby Gilham Butte lands. A management plan for the Gilham Butte area will likely be initiated w/in the next year. We look forward to working with State Parks to carry the concepts from this general plan towards implementing coordinated management actions in HRSP and these adjoining BLM public lands.

On a broader level, we also see some opportunities for providing complementary management, especially regarding recreation and interpretive information, between HRSP and the BLM managed King Range National Conservation Area (KRNCA) and Headwaters Forest Reserve. For example, the Mattole Road provides a primary access route through HRSP and into the Mattole Valley and KRNCA. Many visitors who travel this corridor as a scenic alternative to reach Ferndale are unaware of the remote nature and limited services once they leave the 101 corridor and head into the "Lost Coast". More detailed information at key locations such as HRSP visitor facilities would better inform visitors about how to prepare for a trip to the Lost Coast.

Based on the context of the General Plan, input concerning specific opportunities for coordinated management would best fit into some of the more specific plans called for under the park-wide

goals. Please keep us informed of the schedules for these plans (especially the vegetation/fire, trails, and interpretive plans). We would appreciate opportunities to comment/participate in the efforts.

As a final editorial comment, on Map #1, the "Kings Range..." should be changed to "King Range ..."

Thank you for the opportunity to comment on the plan. We look forward to continuing to work with State Parks in protecting the natural resources of the north coast. If you have any questions, please call Bob Wick of my staff at (707)825-2321.

Sincerely,



Lynda J. Roush
Arcata Field Manager



Memorandum

Date: August 15, 2001

To: Ms. Joann Weiler, Project Manager
Humboldt Redwoods State Park General Plan
Northern Service Center
Department of Parks and Recreation
Post Office Box 942896
Sacramento, California 94296-0001

From: 
Donald Koch, Regional Director
Northern California-North Coast Region
Department of Fish and Game

Subject: **Comments on Humboldt Redwoods State Park Preliminary General Plan
SCH# 2001022063**

The Department of Fish and Game has completed its review of the above document. We offer the following comments on the plan in our role as a trustee agency pursuant to the California Environmental Quality Act (CEQA). In the event that specific actions described in the plan require a discretionary approval such as a streambed alteration agreement or incidental take permit, the Department will act as a responsible agency pursuant to Section 15096 of the CEQA Guidelines.

General Comments Regarding Marbled Murrelets and Their Habitat

1. Humboldt Redwoods State Park (Park) is recognized as a critical area to the survival and recovery of the State and federally listed marbled murrelet. Protection and enhancement of habitat within the Park is vital to assure conservation of the species. We concur with the U.S. Fish and Wildlife Service's (USFWS's) comments for murrelet conservation as noted in their November 14, 2000, letter.
2. We concur with the need for predatorproof garbage cans throughout the entire Park (page 46, point #3). By utilizing standard designs which exclude bears, corvid populations will be somewhat reduced. This is vital to help increase nesting success of murrelets and other sensitive bird species. We also support an active visitor education program to help reduce the occurrence of supplemental feeding of corvids (both intended and inadvertent). Such a program should include: interpretive displays, educational pamphlets, flyers, and campfire programs as well as "clean camp" patrols through the campgrounds and elsewhere in the Park to reduce or eliminate corvid food sources. The last sentence on page 45 could be expanded as follows in italics:
"Develop and implement a program for educating park visitors and the general public

Ms. Joann Weiler
August 15, 2001
Page Two

- about the negative effects of releasing *and feeding* any animals in the park." The Department is willing to assist you in developing this program and can help provide technical expertise.
3. Protection of the Bull Creek alluvial area along Mattole Road is vital to protecting murrelets. From previous work in the Park by various entities it appears the old-growth redwood/redwood sorrel vegetative association in this area is a highly important area of murrelet use. Resource conflicts should be carefully evaluated in this sensitive zone which is subject to natural catastrophic disturbances. Increased visitor use and facility development in this sensitive area severely compromises the "Declaration of Purpose" for the park described on page 39. As stated on page 85 of the general plan, full development in Bull Creek ..." could result in significant cumulative impacts." We agree with this assessment and seek to avoid such damages.
 4. The general plan should specifically address the feasibility of campground relocation to help increase murrelet nest success and assist in recovery of the species. Additionally, the plan should contain more discussion on the potential of rotating campground use in order to minimize disturbance to wildlife, allow natural regeneration of duff and soil, and protect legacy trees. We recommend an adaptive management approach experimenting with different closure periods (e.g., at 2-, 5-, and 10+-year cycles) to gain a better understanding of regeneration time, and soil compaction which leads to vegetation and tree loss.
 5. The document does not adequately address the impacts or mitigation measures for the "hazard tree removal" program commonly conducted in State parks to protect forest visitors from falling tree hazards. This program has the potential to directly destroy murrelet nesting habitat and such legacy trees (200+ years old) cannot be replaced in a reasonable time frame especially considering the normal planning scope of CEQA documents. The nesting platforms which are unique to murrelet nest trees cannot easily be recreated (the science does not exist as tested and proven) and the environmental cues/attributes which murrelets utilize to select nest sites are not entirely understood. Therefore, it is extremely difficult, if not impossible, to offset habitat losses associated with the cutting down of legacy trees. This puts construction/maintenance of visitor use facilities including campgrounds, roads, and trails in direct conflict with murrelet conservation. This conflict is not in keeping with the intent of the plan or with the State and Federal endangered species acts. We recommend that the plan include provisions for consultation with the Department and the USFWS prior to initiating activities that may adversely affect murrelet nesting habitat.

General Comments Regarding Northern Spotted Owls and Their Habitat

We recommend that the plan include provisions for field surveys to locate northern spotted owl nest sites within the Park and provide for the protection of all known territories. Specific project activities which may negatively affect owls should not occur within 500 feet of known activity centers. Additionally, the best 300-acre habitat block around the activity center should be kept intact with no degradation. Single trees could possibly be removed for safety as long as any openings created could be fully justified as beneficial to the owls. Nonetheless, we recommend that you consult with the USFWS prior to conducting any activity which modifies vegetation structure within or adjacent to an activity center. 12

General Comments Regarding Bald Eagles and Their Habitat

We recommend the plan include a program to conduct annual nest-site surveys of known or suspected bald eagle nests under the State survey guidelines. Further, we recommend development of a territory management plan for protection and management upon discovery of any bald eagle territory. 13

General Comments Regarding Peregrine Falcons and Their Habitat

We note that Appendix C lists the peregrine as "possible;" we recommend the plan contain provisions to better assess peregrine use of the Park environment through surveys. A concerted effort to document sightings of peregrines in the park through contacts with local birders and Park ecologists would be a good first step. The Park occurs in an area of the State with a dense peregrine nesting population; thus, it is highly likely peregrines use the Park at least for foraging. Additionally, new evidence indicates they will utilize large redwood trees for nest sites. 14

General Comments Regarding Aquatic Habitats

The plan should be corrected to reflect the current status of coho salmon. In addition to being federally listed as threatened, the "Southern Oregon/Northern California Evolutionarily Significant Unit" (ESU) is currently a candidate for listing as State endangered (Appendix C). In general, the plan contains very little information regarding aquatic habitats (e.g., species and habitat requirements). Further, while there is a discussion regarding the value of the Park's habitat for bird species, the plan lacks such a discussion for aquatic species, especially sensitive aquatic species (i.e., salmonids). 15

Ms. Joann Weiler
August 15, 2001
Page Four

We believe that there should be additional discussion regarding potential impacts and conflicts between Park management activities and aquatic resources. For example, efforts to protect redwood groves from channel meanders via the placement of riprap as well as the removal of large downed trees within watercourses have the potential to reduce habitat values for fish. The plan should identify potential conflicts between management activities and aquatic resources, and discuss measures to avoid or minimize adverse impacts to these resources. In addition to maintenance and management activities, ongoing upslope watershed restoration (i.e., decommissioning legacy roads) should be discussed along with acknowledgment that SB271 monies are available to complete these activities and improve management. 16

General Comments on Mitigation Measures

The discussion on page 85 under "Mitigation" is too general and does not provide specific examples of meaningful mitigation measures. Designation of Rockefeller Forest as a "Natural Preserve" or "Primitive Zone" may not offset impacts to murrelets or other species in the sensitive streamside areas of Bull Creek. The vegetative associations and habitats are different in these two locales. Wildlife surveys will need to be expanded from general presence/absence in order to determine the effectiveness of potential mitigation measures. For example, in the case of the murrelet, protection of Bull Creek alluvial redwoods may be more important than the Natural Preserve/Primitive Zone designation of Rockefeller Forest. Establishing intensive tree climbing plots during the postbreeding season might help better assess which areas of the Park need protection for the immediate/long term needs of an endangered species and which areas warrant protection from a more general ecological perspective. 17

Comments on Species of Special Concern (SSC)

This designation is intended to result in special consideration for these animals by the Department, land managers, consulting biologists, and others. It is intended to focus attention on the species to help avert the need for costly listing under Federal and State endangered species laws, and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. 18

We recommend that the plan include specific protection, assessment, and monitoring goals for SSC. As an example, track plate surveys could be initiated by the Park to assess forest carnivore occurrence and abundance.

Pacific Fisher and Humboldt Marten

Since both of these forest carnivores have been virtually extirpated from the redwood zone, the plan should be strongly supportive of reintroduction efforts which may occur in the future through the Department, USFWS, and the Redwood Sciences laboratory. There are some references to this in the preliminary general plan, e.g., pages 45-46, points one, five, and six, but it is unclear how high of a priority this is given the language "When feasible...." Restoration and protection of key habitat elements in the Park may assist in natural recolonization such that reintroduction may not be necessary. Fishers are well documented in historic trapping accounts from the habitat west of the Park and further northwest near the headwaters of the Mattole River and to the northeast near Grizzly Creek State Park. Additionally, there have been more recent detections on private timberlands (Pacific Lumber Company and Simpson Timber Company) in the redwood habitat type. Protection of large diameter live trees (redwood, Douglas fir, tan oak, oaks), large snags, and large diameter "coarse woody debris" (dead and down trees) will benefit both fisher and marten and many other species as well. 19

Working cooperatively with the Bureau of Land Management to establish the "Corridor from the Redwoods to the Sea" habitat linkage (Appendix D, page d) would also assist in fisher habitat protection and enhancement. We support the concept of linking the different habitat types to the west of the park; such linkages are also important murrelet flight corridors to and from the sea.

We note that the "Wildlife List" in Appendix C contains no confirmation of presence for any of the mammal SSC. A goal of the general plan should be to at least confirm the presence of these species. Confirming presence will help the planning and conservation process.

Bird Species of Special Concern

As noted above for mammal SSC, some of the bird species in Appendix C also need to have their *presence* confirmed (e.g., northern goshawk). For other species noted below, *breeding status* needs to be confirmed and/or known nest sites and special habitat elements protected. The park should commit to this inventory in order to better inform the planning process and further the conservation of these species. 20

1. Vaux's swift (confirmed breeder, active nest found*)
2. Purple martin (presence noted in Appendix C; additional surveys needed per Breeding Bird Atlas [BBA]*)
3. Yellow-breasted chat (presence noted in Appendix C; probable breeder per BBA*)

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Page Six

- 4. - Olive-sided flycatcher (possible breeder recorded during the breeding season in suitable habitat per BBA*)
5. Swainson's thrush (confirmed breeder per BBA*)

It appears highly probable that these latter two species will be added to the revised Bird Species of Special Concern document which the Department is in the process of preparing (personal communication, Lyann Comrack, Department of Fish and Game).

The retention of large diameter trees including snags and dead-top live trees, and "goose pen" and hollowed-out trees will help protect the special habitat elements needed by a wide variety of species including Vaux's, swift purple martin, olive-sided flycatcher, many bat species, fisher, and marten. It is important that Park development and associated activities avoid and minimize impacts to these critical habitat elements, and allow for recruitment of replacement trees once the legacy trees and snags fall from natural causes. We appreciate that the plan notes the need to protect some historic buildings in order to protect known bat roosting/nesting sites.

Protection of old-growth trees and snags near watercourses may benefit a variety of species which forage over water (or use streams as flight corridors, e.g., marbled murrelets) but require nesting habitat nearby. Therefore, in designing Park development while trying to accommodate sensitive wildlife species, special protection needs to be afforded to the interface of old growth and riparian habitats.

In general, for protection of riparian associated songbirds we recommend: "Avoid impacts and disturbance in the riparian zone during the breeding season; riparian understory should be retained as a dense and structured vegetation layer."

For additional information on habitat needs of riparian bird species we recommend the following web site be consulted: California Partners in Flight and the Riparian Habitat Joint Venture, The Riparian Bird Conservation Plan - Version 1.0 (August 2000) available for download at <http://www.prbo.org/CPIF/Consplan.html>.

General Comments on Reptile and Amphibians

The general plan would benefit through input from the North Coast Forest Reptile and Amphibian Working Group (FRAWG) for guidance on surveys and protective measures for herpetofauna. FRAWG is a group of interested parties with representatives from USFWS, 21

* Source: Hunter, J.E., G.A. Schmidt.; J. Power, and D. Fix. in prep. Humboldt County Breeding Bird Atlas. Redwood Region Audubon Society. [data collected from 1995-1999]

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U.S. Forest Service, Department of Fish and Game, National Marine Fisheries Service, and private timber companies. Please contact Mr. Gary Falxa of the USFWS at gary_falxa@fws.gov for information about FRAWG.

Additionally, the plan should note that upland habitat is important for the northwestern pond turtle. Turtles may migrate several kilometers from waterways for winter hibernation. It is therefore important that upslope and downslope migration not be hindered by impassable fences, berms, or other structures.

General Comments Regarding Special Plants

1. The paragraph on page 44 regarding special plants only includes species listed by California Native Plant Society (CNPS) on their 1A and 1B lists as meeting the criteria for listing. However, species listed by CNPS on lists 1A, 1B, and 2 likely meet the criteria for listing and should be protected as such. Some species listed by CNPS on lists 3 and 4 may also meet the criteria for listing and thus warrant protection. Many species listed by CNPS on list 4 are locally significant (i.e., occur at the edge of their range, occur in areas where the species is especially uncommon, exhibit unusual morphology, or occur on unusual substrates) and should also be protected. 22
2. The goal for protection of rare, threatened, endangered, or endemic plants within the park and management for their perpetuation (page 45) should also include the protection and management of locally significant populations. 23
3. The guidelines listed on page 45 for protection of special plants should outline in more detail the programs or methods that will be used for the conservation or enhancement of special plant populations. We recommend that these guidelines include the following: 24
 - a. The Park's plant resources should be inventoried to produce a comprehensive plant list and identify populations of rare, threatened, endangered, and locally significant plants. This list should be regularly updated and the Park's plant resources should be managed to maintain their current diversity.
 - b. Special plant populations should be regularly monitored to ensure that recreation or other Park uses are not negatively impacting these populations.
 - c. Relationships and partnerships with local universities and other entities should be developed to encourage scientific research on the Park's rare flora.
 - d. An educational program should be developed and implemented to inform Park guests about the negative effects of picking wildflowers and trampling (straying from paths) on vegetation as well as the impacts of invasive/nonnative plants on native/sensitive plant populations.

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Page Eight

4. The list of sensitive plant species (Appendix B) should be amended as follows:
- a. Humboldt milk-vetch (*Astragalus agnicidus*) is currently classified as "Not likely" but should be classified as "Possible."
 - b. Howell's montia (*Montia howellii*) is found in several locations near the Park and should be classified as "Likely" rather than "Possible."
 - c. *Usnea longissima*, a rare lichen not on CNPS lists but tracked by the California Natural Diversity Database, should be added to Appendix B and classified as "Likely."

In closing, we ask that you hold meetings with the Department and the USFWS in a joint consultation manner to fully explore mitigation measures and project alternatives prior to developing specific projects, management plans, development plans, etc., in order to avoid future resource conflicts during the CEQA review process. In this regard, development of a multispecies habitat conservation plan as noted in the USFWS' November 14, 2000, letter would be extremely beneficial. The Department would welcome involvement in such an endeavor.

If you have any questions regarding these comments, please contact Senior Biologist Supervisor Karen Kovacs at (707) 441-5789.

cc: See page nine

Ms. Joann Weiler
August 15, 2001
Page Nine

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

Messrs. Tim Burton and Bob Williams
Department of Fish and Game
601 Locust Street
Redding, California 96001

Mss. Esther Burkett and Melanie Gogol-Prokurat
Habitat Conservation Planning Branch
Department of Fish and Game
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Mss. Lynn Roberts and Amedee Brickey
Arcata Field Office
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Mss. Maria Boroja and Catherine Hibbard
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Ms. Amelia Orton-Palmer and Mr. David Pereksta
Ventura Field Office
U.S. Fish and Wildlife Service
2493 Portola Road, Suite B
Ventura, California 93003



California Regional Water Quality Control Board
North Coast Region
Daniel F. Crowley, Chairman



Winston H. Hickox
 Secretary for
 Environmental
 Protection

Internet Address: <http://www.swrcb.ca.gov/~rwqcb1>
 5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
 Phone: 1 (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

Gray Davis
 Governor

July 27, 2001

Ms. JoAnn Weiler
 Department of Parks and Recreation
 One Capitol Mall, Suite 500
 Sacramento, CA 95814

Dear Ms. Weiler:

Subject: Humboldt Redwoods State Park Preliminary General Plan, SCH No. 2001022063

We have completed review of the preliminary general plan for Humboldt Redwoods State Park and offer the following comments.

The report describes several plans for development and/or expansion, including an educational center, a visitor's center, an administrative headquarters, and campgrounds. Recreational vehicle hookups are proposed for some of the campsites. Additional waste loading and expansion at these facilities may necessitate the need for on-site sewage system development or expansion. On-site sewer system expansion will need to comply with the Basin Plan Individual System Policy for on-site waste treatment and disposal systems.

26

In the "Significant Environmental Effects of the Proposed Project" section of the document, short-term construction is proposed for improvements to the trail system. If this or any construction project disrupts an area of five acres or more, a General Construction Stormwater permit is required. An information package about the Construction Storm Water General Permit is enclosed.

Finally, one of the goals mentioned on page 49 describes "reducing or eliminating unnatural soil erosion and stream sedimentation within the park's watersheds." Because erosion can lead to sediment deposition, turbidity and other negative effects on beneficial uses and water quality, you will need to make sure this goal is achieved.

Thank you for the opportunity to comment. Please call me at (707) 576-6725, if you have any questions.

Sincerely,

Kirsten James
 Kirsten James

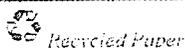
[Handwritten initials]

KLJjs Hum-statepark

Attachment: Copy of Construction SWGP Pkg. JS

cc: Karen Fowler, State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814

California Environmental Protection Agency



FACT SHEET
FOR
WATER QUALITY ORDER 99-08-DWQ

STATE WATER RESOURCES CONTROL BOARD (SWRCB)
901 P STREET, SACRAMENTO, CALIFORNIA 95814

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
GENERAL PERMIT FOR
STORM WATER DISCHARGES ASSOCIATED WITH
CONSTRUCTION ACTIVITY (GENERAL PERMIT)

BACKGROUND

In 1972, the Federal Water Pollution Control Act (also referred to as the Clean Water Act [CWA]) was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful unless the discharge is in compliance with an NPDES permit. The 1987 amendments to the CWA added Section 402(p) which establishes a framework for regulating municipal and industrial storm water discharges under the NPDES Program. On November 16, 1990, the U.S. Environmental Protection Agency (USEPA) published final regulations that establish storm water permit application requirements for specified categories of industries. The regulations provide that discharges of storm water to waters of the United States from construction projects that encompass five (5) or more acres of soil disturbance are effectively prohibited unless the discharge is in compliance with an NPDES Permit.

While federal regulations allow two permitting options for storm water discharges (individual permits and General Permits), the SWRCB has elected to adopt only one statewide General Permit at this time that will apply to all storm water discharges associated with construction activity, except from those on Tribal Lands, in the Lake Tahoe Hydrologic Unit, and those performed by the California Department of Transportation (Caltrans). Construction on Tribal Lands is regulated by an USEPA permit, the Lahontan Regional Water Control Board adopted a separate NPDES permit for the Lake Tahoe Hydrologic Unit, and the SWRCB adopted a separate NPDES permit for Caltrans projects. This General Permit requires all dischargers where construction activity disturbs five acres or more to:

1. Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) which specifies Best Management Practices (BMPs) that will prevent all construction pollutants from contacting storm water and with the intent of keeping all products of erosion from moving off site into receiving waters.
2. Eliminate or reduce nonstorm water discharges to storm sewer systems and other waters of the nation.
3. Perform inspections of all BMPs.

DEPARTMENT OF TRANSPORTATION

DISTRICT 1, P.O. BOX 3700
EUREKA, CA 95502-3700
TDDeaf Phone (707) 445-6463
Phone: (707) 441-3937
Fax: (707) 441-5869



August 6, 2001

1Hum-254-18.28
Hum Redwoods S.P. Gen. Plan
SCH#2001022063

Joann Weiler
California Department of Parks and Recreation
One Capitol Mall, Suite 500
Sacramento, CA 95814

Dear Ms. Weiler:

Thank you for giving Caltrans the opportunity to comment on the draft EIR for the Humboldt Redwoods State Park Preliminary General Plan. We have reviewed the plan, and we offer the following comments:

1. Page 21, first paragraph, *Traffic Circulation*: The document refers to "(Caltrans freeway ramp volumes, 1990-96)." Information regarding peak month traffic volumes on Route 254 is available on the internet for the year 2000, at:
<<http://www.dot.ca.gov/hq/traffops/saferest/trafdata/2000all.htm>>
2. Page 71, first paragraph, *Transportation Zone*, guidelines: Caltrans currently follows Best Management Practices (BMPs) in controlling pollution from road surface runoff, including potential erosion from roadway cut and fill slopes. We are required to do so under our Water Quality Control Board permit for the National Pollution Discharge Elimination System (NPDES).
3. Pages 70 and 77, *Transportation Zone*: The Preliminary Plan identifies a reduced speed parkway as the preferred method of travel for the Route 254 corridor and makes a brief reference to the bike and hiking trail proposed by local residents in Appendix E. Community interest in the trail was demonstrated by the formation of a committee to investigate possible routing and funding sources, and by its inclusion in the Humboldt County General Plan. The trail, as conceptualized in the Community Action Plan for Avenue of the Giants, would be a separate facility that generally follows Route 254, and, in places, assumes the shoulder. Due to the interrelated nature of Route 254 and the proposed trail, it would be advisable to analyze both projects concurrently. Because Route 254 serves both the Park and the Avenue of the Giants communities, State Parks should demonstrate that there is local support for a reduced speed parkway.
4. Page 90, *Alternative 2*, proposal 4: Designating Routes 254 and/or 101 for scenic parkway-freeway status will require coordination with the Caltrans District 1 Office of System Planning. We encourage State Parks to involve Caltrans planning staff, County of Humboldt staff, and local stakeholders in the State Parks planning process to coordinate these, and other, transportation goals.

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Also, please be aware that any work within the State highway right of way will require an encroachment permit. Requests for encroachment permit application forms can be sent to Caltrans District 1 Permits Office, P.O. Box 3700, Eureka CA 95502-3700, or requested by phone at (707) 445-6390. Encroachment permit application forms, the *Caltrans Permit Manual* and application instructions can now be found on line at:
<<http://www.dot.ca.gov/hq/traffops/trksnwim/permits>>.

If you have questions or need further assistance, please contact Jesse Robertson of District 1 Intergovernmental Review/ Community Planning, at (707) 441-2009.

Sincerely,



Mike Eagan, Chief
Office of System and Community Planning

cc: Tom Hofweber, Humboldt County Community Development Services Supervising Planner

bcc: 1. CSWillis
2. MDEagan
3. IGR
GKLuther
MGLucas
TAAsh
DLHarmon
RKHelgeson
State Clearinghouse
Chron

JGR/jgr/TP1/HumRedwoodsSPGenPlan

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**DEPARTMENT OF FORESTRY AND FIRE PROTECTION
Humboldt - Del Norte Unit**

118 Fortuna Blvd.
Fortuna, CA 95540
Website: www.cdfhnu.org
(707) 725-4413



August 9, 2001

California Department of Parks & Recreation
Attn: Joann Weiler, Project Mgr - Humboldt Redwoods SP General Plan
P. O. Box 942896
Sacramento, CA 94296-0001

Ref: Humboldt Redwoods SP Draft General Plan EIR - CDF Unit Comments

The California Department of Forestry and Fire Protection (CDF), Humboldt - Del Norte Unit is the local CDF unit with responsibility for wildland fire protection at Humboldt Redwoods State Park (HRSP). We are also responsible for administration of the Forest Practices Act and Rules for commercial timber operations. We submit the following comments for consideration on the Humboldt Redwoods SP Draft General Plan EIR.

The CDF Humboldt - Del Norte Unit has been an active cooperator with Humboldt Redwoods SP for many years. We provide wildland fire protection and emergency response within the park. As the permitting agency for prescribed burning, we have successfully used the CDF Vegetation Management Program to support the HRSP mission. And we are active within the community, supporting local events and providing training to local volunteer fire departments.

We support the planning effort that Humboldt Redwoods State Park has initiated. The Draft General Plan is broadly written and leaves several critical issues to be addressed in other planning efforts. Specific management and area plans that are of interest to CDF will include vegetation and fire management plans and road and trail management plans. Specific facility plans will also be evaluated to adequately address fire safety considerations. This evaluation of the General Plan will address the broader management issues that may shape these other planning tools.

The recital following page 5 of the introduction is titled "The Disappearing Redwood Forest." The text and accompanying map illustrate the range of the redwood forest and the locations of remaining old growth redwood forest within the range. The intention seems to be to illustrate loss of the old growth forest type. We are not aware of any decrease in the range of the redwood species as implied by the title to the page. The title appears to unnecessarily confuse and mislead the reader as to the state of the total redwood forest type. We recommend that the title be revised to reflect the information being presented.

31

The plan acknowledges that fire has had a role in the ecology of the area. Years of fire suppression have resulted in a substantial build-up of fuels and vegetation changes that increase the risk of a major wildfire. Refer to the attached fire history map for the Bull Creek Area. While we continue to encourage an active prescribed fire program, this will have a limited effect due to the relatively poor access for fire equipment for large portions

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of the park. Other opportunities for fuel reduction such as shaded fuel breaks, ground and ladder fuels reduction, and community cooperative projects should be explored and acknowledged. There must be discussion about fire history and current fuel loading in the "Natural Resources" overview. Overall fire risk, fire hazard and expected impact should be discussed and their influence addressed in the planning process.

Management area designations of State Wilderness, Primitive Zones, and Backcountry Non-mechanized Zones are likely to adversely affect wildfire suppression in the park. Any management designation that effectively restricts fire fighting tactics needs serious evaluation. Within the EIR, the specifics of the allowable activities for each zone are not clearly discussed.

33

For Wilderness area designations (two areas of undisclosed acreage, CDF estimates 12,000 acres), use of aircraft is limited to altitudes above 2000 foot AGL. No mechanized equipment would be allowed, including chain saws or portable pumps for fire fighting. Using mobile equipment such as ATVs, fire engines, or bulldozers would be prohibited. Consider the potential impact in this scenario: A dry lightning series has passed through the area (1990) with several strikes reported in the wilderness areas of the park. The lightning is followed by a period of high winds and northeasterly flow. A lightning start at mid slope in heavy timber begins putting up a large column of smoke. The standard dispatch upon fire detection would include an Air Attack, helicopter with crew, two air tankers, five fire engines, a bulldozer, two hand crews, and a chief officer. With the restrictions on equipment in the Wilderness area, the only resources that may attack the fire would be the two hand crews, provided they did not bring chain saws. Considering the work is in a heavy timber fuel, this deployment of resources would be unsafe and ill-advised. In practice, the fire would continue unchecked until it came out of the wilderness area. This would result in a large damaging fire and a substantial commitment of fire fighting resources. A fire of this size will likely adversely affect the redwood and Douglas-fir stands the park had intended to protect by the wilderness designation. The use of mechanical equipment can realistically change this scenario. Based upon CDF's experience, we recommend that any Wilderness designation within the park, not affect the emergency use of aircraft or other motorized equipment.

For Primitive Zone area designations (the Rockefeller Forest area of undisclosed acreage, CDF estimates 3,200 acres) limitations on equipment and aircraft use are unclear. We anticipate this would be treated with the same intent as wilderness. As indicated in the previous paragraph, restriction on the emergency use of motorized equipment or aircraft would adversely affect fire suppression effectiveness, and thus adversely impact both the Park and its neighbors.

Backcountry (Non-mechanized) designation includes the wilderness areas. It appears to include some area not specifically within the designated wilderness boundary. CDF has concerns similar to wilderness area and primitive zone restrictions adversely impacting fire protection issues.

Development of a Fire Management Plan for the park is discussed in the EIR. CDF and HRSP have a current Fire Management Plan in place, dated June 1998. The park's Fire Management Plan should be the operative document for guiding fire protection and management activities with CDF.

Development of a Roads and Trails Management Plan is discussed in the EIR. CDF has indicated concern to Park staff regarding the removal of roads that may be critical to fire suppression success. Most of these projects are submitted individually as CEQA Negative Declarations and have not received local CDF review. Road and trail removal often reduces access for fire suppression crews and may result in larger fires, thus increasing the potential danger not only to fire fighting forces, but also to the public at large, whether they be neighboring communities or visitors of the park. Mitigation should be considered to offset this reduction in fire fighting effectiveness. Through the development of a Roads and Trails Management Plan, the cumulative impact of these activities can be better assessed. We would recommend no further activities for road or trail abandonment until the Roads and Trails Management Plan can be completed and adopted.

34

Park facilities vary in age, historical significance, fire risk and hazard factors. New facilities need to meet Fire Safe standards and guidelines. Older facilities should be brought up to these standards where practicable. The majority of the Park is outside the local fire protection agency boundaries, thus Park facilities are unprotected, leaving facilities and visitors (the public and employees) at risk. The local departments provide emergency response to HRSP calls without compensation and potentially leave their own districts to provide this service. The Park's "General Plan" directly affects the emergency services. The HRSP "Management Plan EIR" should address emergency service issues created by the Park.

35

During the review of the entire document, we found a number of short references to the Park's relationships with its near and distant neighbors as well as its relationships with other public agencies. For instance, four such references were found in the Park Summary section, five were found in the Plan section and four more references were scattered through the Environmental Analysis section. There are passing references to the acquisition of additional lands, to the establishment of protective buffers, to the development of visual requirements for private lands to protect Park interests, to silvicultural restrictions on adjacent commercial timber lands, to concerns expressed by the public that Park development will harm local communities, and to county officials' concerns regarding the erosion of the local tax base. It is clear that the Park's relationship with its private and public neighbors is a significant matter. Some of these matters are currently dealt with in the Forest Practice Rules of the Z'Berg-Nejedly Forest Practice Act, which is a process functionally equivalent to the preparation of a CEQA Environmental Impact Report. Board of Forestry Technical Rule Addendum No. 2, Cumulative Impacts Assessment, addresses the concerns of watershed resources, biological resources, and visual resources. The matter of buffers adjacent to the State Park is covered under the Forest Practice Rules in 14 CCR 895. 1, Special Treatment Areas, and silviculture on private lands is addressed in 14 CCR 913. The Department of Parks and Recreation is already involved in this process as a member of the Timber Harvest Plan Review Team for timber harvest plans that might affect the Park. We consider it to be very important that the Park does not attempt to establish an alternative or parallel EIR process to the existing one. Therefore, we recommend that when addressing these matters in the General Plan that the Department of Parks and Recreation does so in reference to the existing process and with reference to the Park's ongoing participation in this process.

36

Our reading of the full document makes it clear that the Park's success in implementing the Plan will depend on how the community responds to the elements of the plan that are external to the park. Some of these elements could significantly affect the community and historic, legal uses of private property. We suggest that all the community related elements be combined in a separate portion of the General Plan so they can be considered in their entirety.

While we do agree with the general statement on page 80, that "Potential land acquisitions... cannot be evaluated with regard to the cumulative impacts they might have," we also believe that the document should include a more complete independent section that addresses the Park's relationships with its neighbors. The statement fully address the nature of the Park's current relationships and provide guidance for how those relationships will be nurtured to allow the implementation of the rest of the General Plan. Integral to this process is the Park's current participation in reviewing land management planning on private lands through the existing CEQA equivalent process specified by the Z'Berg-Nejedly Forest Practice Act. To fail to do so would imply that the Park exists independently of its setting within the Redwood Region.

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We look forward to working with Humboldt Redwoods State Park staff in coming to a mutual understanding on these issues. Please contact Division Chief Kevin O'Neil or Battalion Chief Hugh Scanlon at (707) 725-4413 for assistance. The California Department of Forestry & Fire Protection shares the park's concerns with protecting our irreplaceable natural resources. Working together, the Humboldt Redwoods State Park can be maintained and managed for the quality enjoyment of all.

Sincerely,



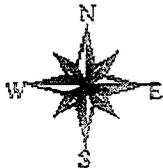
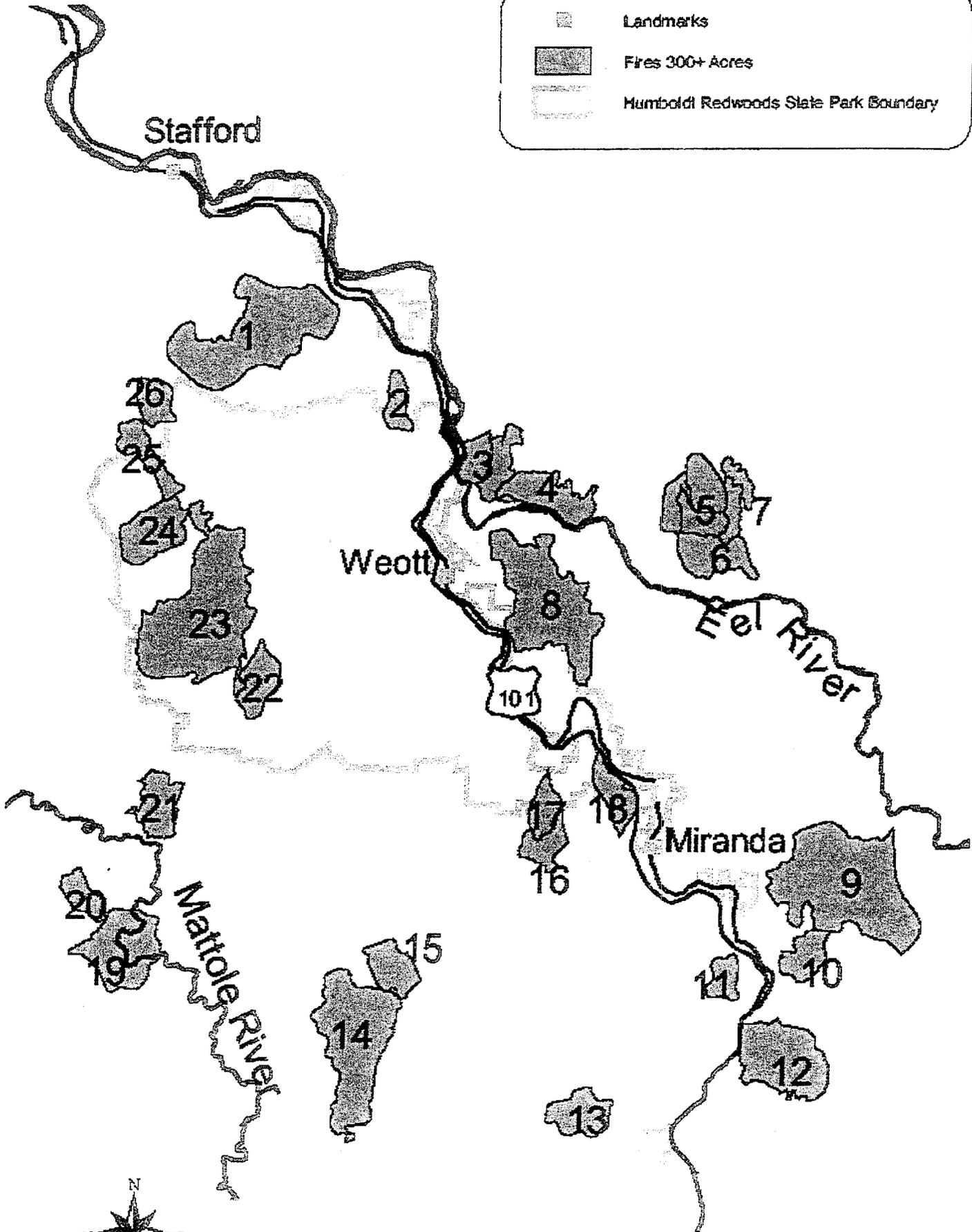
K.R. "DICK" GOINGS
UNIT CHIEF

Attachments:
Map of HRSP Fire History

cc: John Kolb

Fire#	Fire Name	Acres	Date
1	PACIFIC LUMBER CO.#5	3425	19510814
2	TURNER	387	19561006
3	T. P. L. #4	984	19580906
4	PACIFIC LUMBER CO.#7	1424	19500831
5	O.WHITLOW	611	19520918
6	WHITLOW	1940	19580927
8	CAMP GRANT	2970	19701001
10	POWELL	183	19611005
11	J.BUXTON	378	19510728
12	SYLVANDALE	1808	19790810
13	TEICHE	757	19561208
15	HAMPTON	684	19590811
16	MILL CREEK	637	19590728
17	TACOMA LUMBER SALES	433	19500903
18	CHARLES FIRNEKAS	604	19510708
19	S. KREPS	1604	19521004
21	MANN	797	19800802
22	CUNNINGHAM & QUIGLEY	701	19521008
23	C.JOHNSON	4232	19550903
24	COUNTY ROADSIDE #13	1078	19590726
25	ED LEWIS #3	626	19580927
26	BEAR RIVER LUMBER CO	495	19520927

	Landmarks
	Fires 300+ Acres
	Humboldt Redwoods State Park Boundary





HUMBOLDT COUNTY FARM BUREAU

August 8, 2001

Dept. of Parks and Recreation
General Planning Section
Northern Service Center
One Capitol Mall Suite 500
P.O. Box 942896
Sacramento, CA 94296

Re: Comments on EIR for Humboldt Redwoods State Park General Plan

The Humboldt County Farm Bureau submitted public comment on July 31, 2001 for the above EIR. We discovered a misprint on our letter and have corrected the information on the enclosed replacement letter. On page 2 of our document, we sited the Henry Cowell Redwoods in error. The corrected park name should be Wilder Ridge. Please replace the prior letter with the enclosed corrected one. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink that reads "Butch Parton". The signature is written in a cursive, flowing style.

Butch Parton
President



HUMBOLDT COUNTY FARM BUREAU

July 31, 2001

Dept. Of Parks & Recreation
General Planning Section
Northern Service Center
One Capitol Mall, Suite 500
P. O. Box 942896
Sacramento, CA 94296-0001

Re: Comments on the Environmental Analysis and Draft EIR for Humboldt Redwoods
State Park General Plan

Gentlemen:

Thank you for the opportunity to comment on the Draft Environmental Impact Report beginning on page 75 of the Humboldt Redwoods State Park, Preliminary General Plan, June 2001.

The EIR is almost entirely focused on impacts internal to Humboldt Redwoods State Park and on park visitors. With the exception of air quality, traffic, and growth inducing impacts, the EIR fails to address the impact of the park on surrounding lands, communities and Humboldt County.

The loss of resource lands, both forest lands and agricultural lands and the resulting loss of tax base and economic activity to the County was an issue raised repeatedly by numerous speakers at the public meetings. The loss or conversion of agricultural and forest lands is a significant CEQA impact. Humboldt Redwoods State Park has ongoing and continuing land acquisitions through Save The Redwoods League and other means.

The attached article from the Southern Humboldt Life & Times dated June 19, 2001, provides an example of a recent purchase to be transferred to the park. Continued land purchase is part of the project description, at item 4, page 77 and paragraph 5, page 80 of the draft EIR.

Humboldt County's General Plan, adopted in 1984, has provisions addressing public land acquisitions. In order to address this impact within an accurate context could you please answer the following questions.

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1. How much land has the State Park System acquired in Humboldt County since December 10, 1984?
2. How much land has been added to Humboldt Redwoods State Park since that date?
3. How much land acquired countywide since 12/10/84 was previously in agricultural use? How much land added to Humboldt Redwoods State Park since that date was previously in agricultural use? How much of the acquired lands have prime agricultural soil?
4. How much land is currently being held by Save the Redwoods League or others awaiting transfer to State Parks within Humboldt County and Humboldt Redwoods State Park specifically? How much land awaiting transfer is agricultural lands or has prime agricultural soils?
5. Approximately how much land would need to be protected, either through acquisition or conservation easements, to accomplish the purposes of this general plan, specifically to "create habitat linkages connecting the park to nearby lands owned by others; provide buffers to protect the park's upper watersheds and create management continuity of old growth redwood forest areas near the park's boundaries;" and for "recreational development if no suitable sites exist within the park"?

We believe you have misunderstood the position of Humboldt County regarding additional acquisitions. We doubt the County supports additional acquisitions if you define an ultimate park boundary (line). As we understand their position, they will try through their general plan and zoning to maintain compatible uses adjacent to the park if you will establish a permanent boundary. Perhaps they will clarify this point.

The Farm Bureau believes that traditional agricultural uses which maintain the rural character of areas in the vicinity of Humboldt Redwoods State Park are probably the most compatible adjacent use to the park. The Farm Bureau would support initiatives which maintain the rural character and agricultural use of adjacent lands, and thus buffer the park through easements. There are examples in other parts to the state, Del Norte County and Wilder Ridge come to mind, where agricultural lands which have been acquired

40

continue to be leased for agriculture pursuant to Public Resource Code 5069.2. Why does Humboldt Redwoods State Park not lease former agricultural lands per the cited code?

On another subject entirely, neither the plan nor the draft EIR makes any mention of the railroad. The North Coast Railroad is just across the river from the park and may adjoin the park at Dyerville. What would be the impact on the park of the North Coast Railroad Authority's plans for permanent freight & passenger service.? What impact might the park, or park expansion have on the railroad?

41

Thank you for the opportunity to comment on the Humboldt Redwood State Park draft EIR. We look forward to your response.

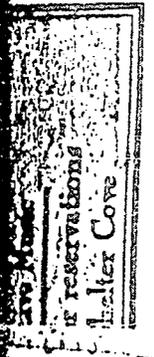
Respectfully submitted,



Butch Parton, President
Humboldt County Farm Bureau

Cc: John Kolb

Southern How bold
Life & Times
5/19/01



(Appoq aijlQ pue IIBg Aq

Ocean, the environmentalists who placed their bodies in front of the bulldozers and logging trucks, the Indian dancers who danced with reverence on the land, the Indian

Save-the-Redwoods Joins

State To Protect 17 Acres

A spectacular grove of ancient redwoods was added to Humboldt Redwoods State Park last week with the purchase of 17-acre of land located near Mirinda. Save-the-Redwoods League and the state of California through the Department of Parks and Recreation together bought the property to permanently protect the ancient grove and make it available for the public to enjoy.

The purchase is the first funded from the Redwood Fund in the voter-approved Proposition 13, the Save Neighborhood Parks, Clean Water, Clear Air, and Coastal Protection Bond Act of 2000. "For many years, Save-the-Redwoods League and the Department have worked together to pro-

ject our most valued natural and cultural resources and to create opportunities for high-quality outdoor recreation," commented Rusty Areias, Director of State Department of Parks and Recreation. "We are pleased to further the mission of California State Parks and to be able to include this stand of majestic ancient redwoods in the park," he added.

Save-the-Redwoods League donated one-half of the total purchase price to make possible the State's purchase of the grove. "We are very grateful for the contributions of our members whose donations make possible this kind of public-private partnerships so critical in protecting the ancient redwood forest," said Kate Anderson, the League's Secretary

Coordinator at (707) 485-8723; Hawk Rosales, Executive Director at (707) 463-6745; or Luwana Quidiquit at (707) 275-0405.

and Executive Director.

The grove includes an ancient redwood approximately 24 feet in diameter among a mixed old and second growth forest. "We are very excited to be the permanent stewards of this land," noted John Kolb, North Coast District Superintendent for State Parks.

Since 1918, Save-the-Redwoods League, a nonprofit organization, has worked to protect California's premier forests from destruction by including them in parks and reserves. To date, the League has assisted in preserving over 180,000 acres of forest lands in California.

For more information, please visit Save-the-Redwoods League's website at www.savetheredwoods.org.

Controversial Fire Project May Be

Federal judge Lawrence K. Karlon ruled late last Tuesday that he will halt work on a controversial fire reduction project mandated by Congress if the U.S. Forest Service continues to ignore the environmental impacts of maintenance and the use of herbicides.

An environmental impact statement prepared by the U.S. Forest Service to implement the Quincy Library Group Forest Protection Act unlawfully ignores how maintenance will be conducted on 320,000 acres of fuel breaks, Karlon ruled, and "amounts to an abuse of discretion." A revised EIS that complies with his order must be published

Pacific Lumber Receives

Sustainable Certification

The nation's leading forestry certification program has rece-

iving in the area of sustainable forestry

sible environmental business practices and control

materials, and it

A different came into play gan to be viewed as the de be stopped. After of comprehensive and manager have contributed tions, we now spectre of catast that threaten ou businesses, wild nately our own Given the l early onset of hot

Though mair addressed spec



Save-the-Redwoods League

114 Sansome Street, Room 1200, San Francisco, California 94104-3823
 Telephone (415) 362-2352 • Facsimile (415) 362-7017
 redwoods@savetheredwoods.org

August 16, 2001

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OBJECTIVES

1. To rescue from destruction representative areas of our primeval forests.
2. To co-operate with the California State Park Commission, the National Park Service, and other agencies in establishing redwood parks and other parks and reservations.
3. To purchase Redwood groves by private subscription.
4. To foster and encourage a better and more general understanding of the value of the primeval Redwood or Sequoia and other forests of America as natural objects of extraordinary interest to present and future generations.
5. To support reforestation and conservation of our forest areas.

Joann Weiler, Project Manager
 Humboldt Redwoods State Park, General Plan
 Department of Parks and Recreation
 Northern Service Center
 One Capitol Mall, Room 500
 Sacramento, CA 95814

Dear Joann:

HUMBOLDT REDWOODS STATE PARK - PRELIMINARY GENERAL PLAN

Eighty years after the League acquired the park's first 2,000 acres we are extremely pleased to be reviewing the first Humboldt Redwood State Park's General Plan. It is fair to say that without the Park the League would not exist, and without the League the ancient redwoods that are preserved forever in the park would long ago been cut for grape stakes.

We are pleased that the plan places utmost importance on the outstanding natural and aesthetic values of the ancient redwood forest, while giving people the opportunity to experience the forest in person. This is entirely consistent with the purposes for which the League was established, and in turn reflects the intent of the League's founders in placing these forests in public ownership.

Attached is a detailed review and series of comments and questions on the Preliminary General Plan. In addition we would like to highlight the following areas.

1. We support designation of portions of the park as Wilderness and Natural Preserves. We hope that once plans to rehabilitate the upper watersheds and manage the second-growth vegetation are implemented it becomes possible to expand these areas as the health of the formerly harvested forest improves with time.

42

As you are aware the League's Memorial Grove program has been critical to the development of the Park. It remains essential to our ability to raise funds that enable us to acquire land and consolidate protection of the park's ancient forest. Many of the groves that have been established in the Park lie along the Avenue of the Giants, and

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[continued]

hence in the Frontcountry zone. However we believe that several of groves lie within the Backcountry Non-mechanized Zone and possibly within the proposed Wilderness Zone. We request that the grove program be recognized as one of the park's cultural resources, in-keeping with the discussion in the Cultural Resources Overview of the Bolling Grove. Further that zone guidelines allow for continued maintenance and sensitive placement of appropriate grove signs. We have attached for your reference grove maps for the Decker Creek and Garden Club of America areas.

2. We support designation of the Whittemore and Holbrook Groves as a new State Reserve and look forward to working with the Department on a management plan for these units.
3. We are pleased the plan recognizes the important role that personal experience of the ancient redwood forest has in people's lives. Many of our members look forward to their annual trip to the Humboldt Redwoods where they can renew their connection to the forest. As the population expands it will become increasingly important to monitor use and activity patterns to ensure no significant damage is done to the resource. We hope the General Plan will include a guideline to develop monitoring protocols to track visitor use patterns and set acceptable use thresholds to ensure protection of the ancient forest ecosystem. 44
4. Collection of baseline data for use by park planners and managers will strengthen future plans for the park. We hope consideration will be given to developing a set of monitoring guidelines that ensure all of the data collected in the Park will be integrated into a common database. A consistent spatial database and data collection standards will ensure all data collection is replicable, defensible, and useable. 45
5. A park-wide resource database can form the basis for strong Adaptive Management within the Park. Monitoring trends in the health of the park's connected ecosystems will allow park managers to tailor visitor use and restoration activities to further protection of the park's ecosystems. It is hoped that high priority will be given to developing the monitoring standards before any major projects are implemented.

In addition comprehensive baseline data from Humboldt Redwoods State Park (one of the largest intact ancient redwood forest ecosystems), can act as a baseline with which to compare more intensely managed redwood forests on private lands.

[continued]

Joann Weiler
August 16, 2001
Page 3

6. California's parks play a vital role in the recovery of many endangered species and we are glad that the plan's guidelines call for studies of sensitive plant and animal species within the Park. The Department of Parks and Recreation's funding of these activities will be critical to the successful implementation of the General Plan and the recovery of these species.
7. The plan recognizes that Humboldt Redwoods is one of the largest parks in California and part of a network of parks and public reserves in the North Coast District. We are pleased to see that the plan makes reference to regional patterns in the north coast and would support more consideration of regional opportunities in other State Parks and lands managed by other public agencies, such as the BLM, in particular with respect to recreation and interpretation.

Thank you for this opportunity to comment on the Preliminary General Plan. Please do not hesitate to contact either myself, or Kate Anderton, should you have further questions. We look forward to working closely with park staff and district staff in the implementation of the General Plan.

Sincerely,



Ruskin Hartley
Conservation Planner

RKH/rkh

Enclosures (3)

cc. John Kolb, District Superintendent, Northcoast Redwoods District

Page (Paragraph)	Comment
	GENERAL
	Suggest placing maps as close as possible to the sections to which they relate to clarify.
	INTRODUCTION
1	An introduction that describes how the main sections relate to one-another and what the intent of each is might be useful.
1 (2)	The river predates the highway, hence the highway parallels the river.
2 (map)	Suggest the following amendments: <ul style="list-style-type: none"> <input type="checkbox"/> Label highway 101, 299, 36 <input type="checkbox"/> Show location of Headwaters Forest Preserve <input type="checkbox"/> Check the boundary between the King Range and Sinkyone Wilderness. It may be drawn too far south <input type="checkbox"/> Show King Range as BLM ownership <input type="checkbox"/> Suggest show Gilham Butte LSR (as not shown on other maps, but referred to in text) <input type="checkbox"/> Show Humboldt / Mendocino county line <input type="checkbox"/> Label distance to San Francisco <input type="checkbox"/> Label the Mattole and Ferndale Roads as roads <input type="checkbox"/> Suggest showing some of the main river systems (mainly the Eel)
3 (2)	<p>The League's "official history" describes: <i>"In 1917 John C. Merriam, Madison Grant and Henry Fairfield Osborn journeyed north from San Francisco along the new redwood highway through ever-widening forest destruction until they reached Bull Creek flats on the Eel River. They stood in awe, certain they were in the most magnificent ancient forest known to man. Appalled to discover that not one redwood was owned by a public agency or protected for public enjoyment, they returned home with determination to act".</i> In the following year, 1918, the League was founded.</p> <p>It is worth noting that the early acquisitions pre-date the establishment of DPR. It was created in large part to manage the newly acquired redwood land.</p>
4	Who is Ken McKowen?
6	I would be happy to provide a new version of the map, without the "north / central / south" region labels.
	PARK SUMMARY
7	<p>Suggest brief introductory paragraphs for the Park Summary and Existing Land Use sections..</p> <p>Suggest either moving Map#5 to closer, or making explicit reference to it.</p>
7 (3)	<u>Old Growth Redwood Forest</u> : the clear-cut areas "adjacent" to the park that contributed to the flooding and tree loss have subsequently been acquired and are now part of the Bull Creek watershed. I think it is important to note this, or the reader could conclude that these areas are still "adjacent to" rather than within the park. Also, reference might be made to the ongoing impacts from this timber-harvest activity despite acquisition and ongoing restoration efforts.
9 (1)	"The future acquisition of lands may be necessary to mitigate these

	adverse impacts." Please clarify that all land acquisition is done from "willing sellers".
14 - 16	<p><u>Animal Life</u></p> <ul style="list-style-type: none"> □ <i>Humboldt Marten</i> - in 1996 Dr. William Zielinski and colleagues caught a Marten on film with colorings that matched the description of the Humboldt Marten first described in 1926. Research is currently underway in and around Humboldt Redwoods State Park on this elusive species. Dr. Zielinski should be consulted for further information. □ <i>Marbled Murrelet</i> - according to the Recovery Plan for the Marbled Murrelet (USFWS, 1997) the three separate areas where the birds are found in California correspond to the three largest remaining blocks of old-growth coastal coniferous forest - namely Redwood National & State Park, Humboldt Redwoods State Park, and the Santa Cruz Mountains parks (San Mateo and Santa Cruz counties). Hence, the closest large block of nesting habitat is in Redwood National & State Park. The San Mateo/ Santa Cruz populations are the most southerly breeding populations and are separated from the Humboldt populations by 300 miles. □ <i>Amphibians</i> - the text refers to "two other" amphibian species with special significance occurring in the park and refers the reader to Appendix C. In appendix C I find no reference to "two other" species beyond the four referred to earlier in the paragraph. □ <i>Aquatic life</i> - It would be helpful to mention that these three species are all anadromous salmonids - and as such provide a link between the Park and the ocean.
18 (6)	Save-the-Redwoods League was founded in 1918.
20 (6)	<p><u>Traffic Circulation</u>: Suggest including a map to clarify the description of regional routes.</p> <p>A map showing county locations might benefit traffic count descriptions.</p>
21 (7)	<u>Overnight Facilities</u> : I have often found comfort "sleeping on the ground in tents".
22-23	<u>Campground Facilities</u> : Only passing mention is made of "private RV parks nearby". Due to the linear nature of the park and its relation to surrounding communities facilities located "outside" the park provide important visitor facilities. To more accurately set the context for the general plan it is important that these facilities are recognized and accounted for.
	PLANNING INFLUENCES
29 (1)	<p>The Department recently underwent a Statewide park visioning exercise. How does this relate to Humboldt Redwoods State Park and the development of its General Plan?</p> <p>No reference is made to the designation of this section of the South Fork of the Eel River under the wild and scenic river program. How does this designation affect the General Plan? How does the General</p>

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	<p>Plan implement this designation?</p> <p>No reference is made to section 303 of the Clean Water Act, under which the South Fork Eel River has been listed as "sediment and temperature impaired". How will the General Plan help the State of California and Regional Water Control Board to implement a program to address sediment and temperature problems?</p>	49
29 (4)	<p><u>Demographics - The Visitors:</u> It is worth noting that the low visitor numbers in 1997-98 coincided with the record-breaking El Nino years.</p> <p>This section includes aggregate data on park visitor numbers. Please include the sources for these statistics. Because there is no use-fee to drive along the Avenue and "visit" the park please include a description of the methodology used to derive this data. A breakdown showing the difference between day-use and longer stays would be informative. Also, a sample month-by-month breakdown would be illustrative at this point in the document.</p>	50
29(7)	<p>Do you have any comment now that (a) we appear to be suffering a downturn in the economy, and (b) gasoline prices are unstable and appear to be trending upwards?</p>	51
32 - 33	<p><u>Carrying Capacity:</u> I'm not sure I understand the last paragraph. It seems important to establish carrying capacity levels for the Park as a priority task to ensure resources are protected while allowing optimal public use. Collection of baseline data and the establishment and implementation of monitoring procedures that ensure these limits are not exceeded will be critical. Subsequent planning studies, at a more detailed level, could then tier off this park-wide information base.</p> <p>Consideration should be given in the General Plan to establishment of criteria and indicators to monitor carrying capacity and natural resources so that collected data will trigger appropriate evaluation and adaptive management.</p>	52
ISSUE ANALYSIS		
33 (1)	<p>"Land acquisition" is one of several tools by which objectives in resource management, recreation planning, and other issues can be addressed. Placing it first on the list may have the effect of giving it more importance than the other tools.</p> <p>Suggest that you give equal attention to all the issues identified, whether by district staff in advance, or by the planning team as the project was developed.</p> <p>Rather than presenting "problems" to be solved, perhaps the tone could focus on what's good and how to make it even better.</p>	
33 (4)	<p><u>Land Acquisition:</u></p> <p>The League's mission has remained essentially unchanged since its foundation in 1918 - that is to preserve, in perpetuity, America's primordial redwood forests. The primary tool used has been acquisition of land from willing sellers at fair-market value. Initially, most land acquired was virgin redwood forest. As our understanding of what it takes to sustain an ancient forest has grown, so too has the types of</p>	

	<p>acquisitions we have entered into. In the 1950's and 1960's the focus of our work was the acquisition of cutover forestland in Upper Bull Creek - bringing the upper watershed land into conservation management allowed nature, and the park, to function on a larger scale. With the publication of <i>The Redwood Forest</i> in 2000 our understanding of what a functioning ancient forest ecosystem needs to sustain itself expanded - the principles of conservation biology suggest that by connecting large blocks of protected habitat their conservation value can be multiplied. Our recent work in the <i>Corridor from the Redwoods to the Sea</i> seeks to put this science into action - by protecting ancient forests and their watersheds between Humboldt Redwoods State Park and the King Range National Conservation Area we believe the natural values of the ancient redwood forests will be sustained. As it was at our founding in 1918 the focus of our work continues to be the ancient redwood forest.</p> <p>It is suggested that this section focus on the purposes for which land acquisition is an appropriate tool, rather than land acquisition in abstract. In this case, size is of secondary importance to ecological integrity.</p> <p>Acquisition from willing sellers will continue as appropriate to ensure watershed protection, establish landscape-scale connectivity to benefit forest processes, wildlife and flora, to benefit park management, and to protect adjacent stands of ancient redwood forest.</p>
34 (2)	<p>Optimal Resource Protection and Preservation: It is suggested that this section becomes the first "issue" to be analyzed - there is nothing more important in a General Plan than protection of the prime resource.</p> <p>The following threats should be addressed in this section:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Invasion by non-native species <input type="checkbox"/> Pathogens, for example sudden oak death syndrome <p>A more detailed description of the watershed impacts of old road and skid-trail networks present in upper Bull Creek would be helpful.</p>
34-35	<p>Recreation and Interpretation</p> <p>While overnight use in the Park is limited to camping and RV's, there are several communities adjacent to and close to the Park that provide overnight accommodation to visitors.</p>
THE PLAN SECTION	
39 (1)	<p>Please describe in more detail what "subsequent management and development plans" are?</p> <p>It is essential that the plan incorporate new <u>information</u> as well as new technology and management concepts. This is commonly referred to as <u>adaptive management</u>. While a general plan cannot predict the future with accuracy it can attempt to characterize the future as a basis for current action. Managers can learn more as each action is implemented and its results monitored.</p>

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	<p>We are pleased to see that many of the guidelines address the collection of baseline and monitoring data. Implementation of this General Plan and subsequent management plans will be greatly enhanced by this. As mentioned in paragraphs 4 and 5, we advocate the development of standards and procedures for capturing and cataloging diverse information in a replicable and accessible format and system. A spatial database, a GIS, would be a good basis for this system.</p> <p>We recommend that the General Plan identify the criteria and indicators that will trigger reevaluation of management prescriptions.</p>	
39	<p><u>Declaration of Purpose:</u> rather than "succeeding generations" I suggest "current and future generations" to emphasize that the Park is for use now, as well as the future.</p>	55
40	<p><u>Park Vision:</u> The end of the second paragraph is unclear. Due to its size the Park acts as a "node" or "stepping stone" as well as a link.</p>	
42	<p><u>Park-wide goals and guidelines for natural resources:</u> The purpose for which the park was established was to "protect, preserve and perpetuate...the ancient redwood forests", yet the goal for natural resources makes no specific reference to the ancient redwood forest. It is suggested that the goal be amended to make specific reference to the ancient redwood forest for which park was established. We note that the content of this section could be applied to any State Park.</p>	
42	<p><u>Plant Management – Redwood Forests:</u> The first statement is misleading. Since its inception the vast majority of the ancient redwood forest has been logged commercially – the best estimate is that less than 4% remains today compared to pre Euroamerican times. It may be true that of the remaining 4%, some 55% is managed by DPR.</p>	56
44-45	<p><u>Plant Management – Special Plants:</u> It is suggested that inventory and monitoring guidelines be established to assist in the protection of special plants.</p>	
46-47	<p><u>Animal Life Management – Special Animals:</u> Studies are currently underway in Redwood National and State Park to determine the sensitivity of marbled murrelets to human presence. It is strongly advised that before any new trails are constructed the sensitivity of these highly endangered birds to human presence is determined. It would be useful to consult with scientists at Redwood National Park, U.S Fish and Wildlife Service, and B.L.M. so as not to duplicate efforts.</p> <p>This is a good example of how interaction on a regional level between State parks and other publicly managed lands could result in heightened resource protection region-wide. This is also an example of where monitoring and survey information will provide the scientific basis to determine whether increased visitor use is having an impact on the breeding of sensitive species.</p> <p>It is suggested that inventory and monitoring protocols be established to assist in the protection of special animals.</p>	57
47	<p><u>Habitat Linkages</u></p> <p>We are pleased to see consideration of habitat linkages between old-</p>	

	<p>growth coastal coniferous forests in the General Plan. It is important when considering linkages to consider the species you are creating a linkage for, and how that species uses the landscape. For some species "continuous connectivity" is less important than "functional connectivity" whereby the daily or seasonal life-history requirements of animals are met as they disperse from one area to another. Functionally connected landscapes can be connected through a series of habitat patches that meet the life-cycle requirements of target species and allow movement between larger non-contiguous habitat blocks.</p>	
48-49	<p><u>Buffers</u></p> <p>Suggest that the first guideline directs studies of effects of surrounding landuse on park resources (remove reference to "adverse" to maintain neutral language and integrity of the scientific method).</p> <p>Suggest consideration of conservation easement acquisition that retains lands in private ownership but managed to protect the prime park resource in addition to fee title acquisition.</p>	58
49	<p><u>Watershed Management</u></p> <p>Suggest discussing the TMDL / C.W.A. section 303 designation of the South Fork of the Eel River as sediment and temperature impaired.</p> <p>Consideration should be given to developing Watershed Management Plans for the park's primary watersheds including, where appropriate, private land owners in the watershed.</p>	59
50-51	<p><u>Fire Management</u></p> <p>Are the proposed Wildfire Plan and Prescribed Fire Plan two faces of the same plan? The links between wildfires and prescribed burns would appear to be close.</p>	60
51-53	<p><u>Cultural Resources</u></p> <p>Reference should be added to the Memorial and Honor Grove's established within the Park. We believe these are an important part of the Park's cultural landscape, representing the efforts of those who struggled to preserve these magnificent forests.</p> <p>As with recreational opportunities, it is hoped that cultural interpretation is set within a regional perspective.</p>	
53-54	<p><u>Circulation</u></p> <p>Please consider visitor's who arrive by or wish to visit the park by public transport, bicycle, or other alternative means.</p>	61
54-55	<p><u>Recreation</u></p> <p>It is suggested that inventory and monitoring guidelines be established and implemented to monitor recreation demand and impacts on natural resources. Consideration should also be given to the needs of, and potential conflicts between, different recreation user-groups. Experience in more populated areas, such as the Santa Cruz district</p>	62

	<p>parks, suggest that as the user base grows and becomes more diverse the potential for conflict between user groups (real and perceived) grows along with the potential for increased resource impacts. Establishing a monitoring protocol and collecting baseline data will be critical to successful development of Recreation Management Plans.</p>
56-58	<p><u>Interpretive Themes</u></p> <p>We are concerned that describing the "contrast" between Native American and Euro-American practices encourages a "them-us" mentality that could increase the division (real and perceived) that currently exists. Interpretation and education about forest use related to both groups without reinforcing this division will be important to encourage an environment where all people can take responsibility and ownership for stewardship.</p>
63	<p><u>Primitive Zone</u></p> <p>Please provide a description from the Resource Code of a Natural Preserve sub-classification.</p>
65-66	<p><u>Backcountry (mechanized) zone</u></p> <p>The last guideline refers to the "promotion of expansive views within the Bull Creek watershed from ridge roads". To ensure ecological integrity of the Park, natural vegetation should be allowed to re-establish itself. Where natural ridge-top vegetation allows such views, for instance meadows and prairies, then we concur with management that will maintain these meadows (for instance prescribed burns). Where vegetation would naturally revert to a closed canopy we trust that management will allow this to occur, even if views are lost over time.</p> <p>In keeping with the Second-growth management guideline (page 43) it is hoped that vegetation management within this zone will promote old-growth forest characteristics.</p>
67-68	<p><u>Frontcountry Zone</u></p> <p>We believe that the health of the ancient redwood forest must be first and foremost in all park management decisions. We support sensitive interpretation of cultural resources and we believe it is not necessary to maintain each clear-cut, historic trail segment, or home-site, within the park. Interpretation of the early settlements and uses of the Park can be told by selecting the best of these locations, and allowing natural processes to be established elsewhere.</p>
	<p>Glossary</p> <p>Suggested terms to be added</p> <ul style="list-style-type: none"> <input type="checkbox"/> Late-successional / Late-seral <input type="checkbox"/> Anadromous <input type="checkbox"/> Mycology <input type="checkbox"/> Carrying capacity <p>Terms needing clarification</p> <ul style="list-style-type: none"> <input type="checkbox"/> Forbs (A broad-leaved herb other than a grass especially one

63

64

65

	<p>growing in a field, prairie, or meadow)</p> <ul style="list-style-type: none">□ Old-growth forest (a forest dominated by redwood trees in the canopy that are 200 years or older, sometimes with co-dominants of other species. Old-growth redwood forests are characterized by complex canopies, multiple vegetation layers, and abundant snags and coarse woody debris in various size classes – from a definition written for the League by Reed Noss)□ Reforestation – the definition should be broadened to include more tree species and appropriate ground cover, as other tree species are found in a redwood forest.
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Mattole Restoration Council

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August 10, 2001

Ms. Joann Weiler
State Parks Northern Service Center
P.O. Box 942896
Sacramento, CA 94296-0001

Dear Ms. Weiler,

The Mattole Restoration Council (MRC) has several comments concerning the Humboldt Redwoods State Park (HRSP) General Plan:

1. The MRC opposes development of public access through Perimeter Road. MRC has serious concerns about the nature of public access into the Gilham Butte area. This area provides rare habitat for old-growth dependent species. Human use of the Butte should be minimized by encouraging low-impact recreation in the area. Automobile access to the Butte through Panther Gap is not consistent with the conservation and restoration efforts undertaken in the Mattole River watershed. 66
2. The MRC supports targeted acquisition through conservation easement or fee title purchase of lands adjacent to HRSP. Ideally, acquisitions should be prioritized by ecological factors such as presence of rare habitats, creating habitat connectivity, or watershed protection rather than recreational considerations. A conservation easement-focused acquisition strategy is the most beneficial for furthering local stewardship and restoration efforts. 67

In general, we are supportive of the direction that the Department of Parks and Recreation in resource planning for HRSP. Thank you for considering these comments in the development of the HRSP General Plan. Please feel free to contact MRC for further clarification or input.

Cordially,

Chris Larson
Executive Director

Richard McGuiness
637m Humboldt Street
Eureka, CA 95501

Department of Parks and Recreation
General Planning Section
Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 942896-0001

Comments On the Humboldt Redwoods State Park General Plan

As a long time restoration activist working above Bull Creek in the areas so devastated by events leading to the flood of '64, I am happy to present my wish list for your consideration. Most of the general plan keeps the park to itself. I would like to see it as a player in larger landscape management concepts, such as the Redwoods to the Sea Wildlife Corridor. Other corridors may exist for the benefit of wildlife and future generations. Acquisitions based on these concepts may be a key role the Park could play in the future.

The primary focus of the Humboldt Redwoods State Park will of course be the redwood groves that form its core. As the premier redwood State Park, it makes sense that qualities other than old growth should be demonstrated in the Park. Redwoods are a unique species that have some useful properties for land managers, especially in our type of area. One great quality is the shade they provide, cooling air and water in the summer. Another is fire resistance, allowing low level fires to burn without killing the trees or destroying the canopy. Screens of redwoods across small side creeks can slow down drafting of fire through chimney drainages. Redwoods also withstand silt burying their root crowns, unlike many other trees. This makes them ideal when stabilizing streams below slide-prone lands that will probably continue to slide in the future. When a redwood root crown is buried, it just grows a new whorl of roots from adventitious tissue. Massive new plantings should be planned for areas of blown out stream sides below active slide areas to absorb the amount of sediment reaching the creeks. Redwood as a restoration tool should be studied and documented, and seed made available to groups for trials, nursery growing or direct seeding programs. A demonstration with two weather stations by creeks could show the effects of shade and sun on temperature, humidity, light intensity and moisture by way of fog drip in summer and rainfall in winter, and so forth. It should also illustrate redwoods rooting style, and the effects of soil compaction on such shallow rooted species. While in the root zone a survey of mycorrhizzia and its importance could be presented. This is an unknown to the casual visitor.

I feel Humboldt State Redwoods Park should be an active party in the recovery of the lands acquired to protect the ancient groves. It would be a disservice to the people to hope the land will restore itself without help, and a poor decision not to speed recovery along in an area with so many at risk species. The environment was disturbed by unusual events and these types of events are precluded in the future. It should be the goal to return the area to pristine forest and stream conditions, and keep it that way for generations to come. Along the way you will influence other landowners of the importance and

68

practicality of managing watersheds in a comprehensive manner. You must see yourselves as educators in this role.

1. Native American landscape management techniques are continually proven effective after our style of economy has nearly destroyed a resource. Science is trying to restore resources effectively managed by Native people for millennia. People that live here now are anxious to have proven techniques of sustainable management. We have not been here long enough to have this in hand. Science allows us to learn faster but only in the directions we point it at. The Park has some unique opportunities to enhance our understanding as we learn new ways of interacting with the landscape while drawing on the cultural heritage of the landscape itself. The Park is under longer-term management than most any other property and therefore is the ideal place to study forest conditions. This combined with new technology makes many promising ideas worthy of consideration.

2. Some knowledge of Native techniques is still available to us through living history. Fisheries, forest/fire management for food crops, browse, fungal and insect reduction in acorn crops, medicinals, basket and fiber materials, all teach restorationists what had been shown to work through time. This is not the case for those of us in the range of the Lolangkok Sinkyone, for they no longer exist.

3. Managed forest conditions under this set of practices provide the needs of the people and wildlife while retaining the characteristics of virgin forest. High canopy shaded much more air than regrowth, influencing summer temperatures. Tall trees often comb measurable water from the fog in high summer. Canopies support their own wildlife communities. Many species suffering habitat destruction will benefit from a cohesive wildlife management plan, not only in the park, but so that the species may spread to areas outside the park where conditions have improved. The park, especially in the Redwoods to the Sea Wildlife Corridor area, should be involved with other agencies and groups for restoration of wildlife on a regional basis. We hope to see a lot of wildlife continue to move into and through the corridor as habitat regenerates itself, and for this reason we would rather not put in a hiking trail for the duration of this plan (20 years), at which time this should be reevaluated. A long term goal should be creation of enough habitat to support condors, which need a lot of territory and large carrion. This would require some research but we hope to see elk move through the corridor regularly soon.

4. Reduction of the forest and duff, road building, land clearing and grazing and other development lead to greater runoff, as well as less trickling and dripping recharging the aquifers and springs. Domestic water supplies cannot account for all the dry creeks late in the summer. The low flows and denuded stream banks let the water get too warm for young salmonids to survive. Most of the solutions are high on the hillside above the stream. Some type of system to retain runoff so it will percolate into the ground is necessary. Cisterns and tank systems should be developed for facility use to reduce demand wherever possible. Restoration of the retention processes has become a crucial issue. Recharge ponds may be a quick and relatively cheap fix while forest conditions restore themselves. Park BMPs should address this issue with an eye toward developing a model for public and private use. Controlled use of beaver may be appropriate in some circumstances.

5. Demonstration areas of these techniques, as well as insulation from economic failure are crucial for finding the earlier land managers methods. For this reason we feel it is important for the parks to manage some lands in the manner of the Native Americans here before, especially in areas where the entire culture has vanished or where resources such as stands of acorn oaks are all that remain. Many years of selection for white oak is evident locally- the improved food sources will vanish before they are recognized. Historical research and interviews with tribal members of other tribes involved in similar management systems are in the public interest. Fire management of acorn forests of white and tan oak acorns for food should be an essential demonstration project in parks suitable for or formerly in production, mostly in the hills above the redwoods. In these areas fire management values for other materials should also be part of the planning. A new system of renewing Special Forest Products for private and public lands may develop. Information about forest pests and threats should be distributed as conditions demand.
6. The Park system should leave no land above fish bearing streams denuded. This should be policy- cover all the bare ground. Most areas would get a one time treatment. Damaged lands should be replanted quickly with native pioneer species as soon as possible. Long left scars like the one above Cuneo Creek should be aggressively tackled with vegetation. Seeding of hillsides with wind-borne seed like Bacchus (coyote brush) can be fairly easily done with a few people and will restore health to the creek below while conditioning the soil for other species to move in. Methods such as clay balls with seed in them can be dumped, sprayed or shot across the landscape without the need for people actually planting it. Grass should be avoided except native perennial grasses. Management and reduction of nonnative grasses should be considered as a step in restoration of natural process. Their use as feed for horses is another consideration. This could be a study for direct seeding of hardwood and conifers, again for the public education and benefit.
7. Blown out areas of river bottom such along the Mattole road should be channelized and planted. The approach is the standard creek restoration of stabilizing the channel and restoring riparian vegetation so the creek bed will be shaded. The surrounding disturbed area should be direct seeded for cover and conditioning, and tree planted or direct seeded once the pioneer species are established. Pools should be checked for sedimentation and measures taken if necessary, including dredging and pool building. These should only need to be done once after the hillsides have stabilized and no further man caused problems are likely. The sediment plugs should travel and conditions begin to improve. Another way to improve conditions would be to increase the volume and/or velocity of the streams. This can be accomplished using water retention systems to run high water later in the year. Think of breaching a beaver dam built right where you wanted it, cleaning out the down river streambed. Probably take a couple of years in one place. Beaver reproduction and migration would have to be controlled. Document it, photograph it, move the beaver. Clean the next stretch.
8. Vegetation management is an important aspect. Parks should consider various management schemes with an eye on long-term solutions and a "nudging" toward previous conditions. Fire must be reduced from threat to tool. Restoring these conditions should "moisten" the forest and help reduce fire danger. As mentioned before, burning

should be a major tool. Wood stoves and hot water heaters should be used as incinerators for excessive woody material. Volunteer days for thinning and management practices can be rewarded with a logbook and photo display of groups and projects completed, handouts about the management project and a comprehensive plan so that any group can pull a "needs to be done" file showing what where when and how, all previously agreed and planned out by Park management. These plans should result directly from field data but not likely to be funded or manned. Similar activities can be used to grow native plants currently scarce in the Park or difficult to spread by seed or other labor-intensive activities.

9. Alternate energy and composting toilets should be built or used at all facilities, public and administrative. Facilities should have large tank systems for capturing rainfall in the "off season" and use it in the drier months, saving summer water supplies. The Park especially must conserve water for fish until the natural water retention systems recover. Energy sources must be safeguarded from vandalism and theft. Parking near buildings should be arranged so maximum use of sunlight and runoff from the opening in the canopy can be captured.

I am wondering what to do about the fruit trees remaining from settlement. While not native, they must be an important wildlife food source. Chestnut trees are very worthy of study as a potential wildlife food source, especially if one fears sudden oak death attacking us up here. The King apple, a very popular variety in the West, was developed in Bull Creek. This could be memorialized along with what it takes to find and develop new varieties of useful plants. In this way more educated people would be in the field with a better understanding of the selection and development of superior trees, something that is not happening with hardwoods in this region at all.

10. I feel the Park is in a unique position to study long term management and find methods that will work for other landowners and managers in the area. The Park can observe long-term undisturbed or enhanced recovery, and professionally document it. The Park should be a repository of information for restoring these types of lands, educators of interested residents and leaders in cooperation with other landowners and agencies having similar goals in the region Thank you for your consideration.

Sincerely, 

Richard McGuinness, V.P. Gnyce Corp., Middle Mattole Conservancy,
Mattole Restoration Council

August 8, 2001

Joann Weiler, Project Manager
California State Parks (N.S.C.)
Sacramento, CA

Dear Ms. Weiler;

My husband John and I have lived and worked for extended periods in four continents. Coastal northern California has been home base since the 1950's, primarily because there is no place on the planet that comes close to it in rugged topography and fragile beauty. This curve of the coast, as you best know, is an unparralled national resource as a refuge as well and a biological treasure trove.

The State Park Commision's view to designate significant portions of humboldt redwoods state park as wilderness is extremely perceptive and demonstrates the long view to a tenable future.

Thank you, thank you, sincerely,

Handwritten signatures of Carol and John Wiebe in cursive script.

Carol & John Wiebe
1026 S. Westhaven Dr.
Trinidad, CA 95570

(707) 677-0969

Re: Humboldt Redwoods State Park

Helan Bourne
7040 Avenida Encinas
Ste. 104, PMB 207
Carlsbad, Ca. 92009
July 22, 2001

Ms. Joann Weiler
California State Parks
Northern Service Center
P.O. Box 942896
Sacramento, Ca. 94296

Dear Ms. Weiler;

I am writing to submit my comments on the preliminary general plan for the Humboldt Redwoods State Park. I visit this park quite frequently, and I am concerned for the welfare of the Redwood ecosystems in Northern California. I want the Redwoods to still be there for future generations, and for our forests to be undisturbed and left wild.

Please designate this park--as large an area as possible, and preferably the entire park as wilderness and as critical habitat for wildlife, to be undisturbed by business, corporate, or recreational pursuits. I ask that this be permanently designated as open space, to be held in perpetuity as wilderness and critical habitat for wildlife.

I thank you for considering these comments.

Sincerely,

Helan M. Bourne

Helan M. Bourne

6.29.01

Dear Ms. Weiler,

I strongly urge (general plan)
No! logging! + full protection
for Humboldt Redwoods State Park!
for the wild life + all future
generations! Be part of the
solution - not the problem.
Your attention to this most
urgent matter would be much
appreciated.

Thank you,



Ms. Lydia Garvey
P.O. Box 487
Rosebud, SD 57570

10985 Dyerville Loop
Myers Flat, CA 95554
August 6, 2001

Joann Weiler
California State Parks
Sacramento, CA

Dear Joann,

In my review of the Preliminary General Plan for HRSP I have the following comments.

TRAIL USAGE

It is well understood that hikers and equestrians are often disturbed in their enjoyment of the park by mountain bikers who are on trails that are non-designated for their use or are simply riding in a reckless manner.

Although the designation of Backcountry Mechanized and Non-Mechanized Zones attempts to address this issue, it is simply not adequate by itself. The Non-mechanized Zones are heavily compromised by roads directly adjacent and bisecting them. If user conflicts are to be avoided, there simply must be a more precise focus on how individual trails are actually used. This focus already exists to some degree under current park management and needs to be reinforced by the general plan. The proposed Zones by themselves are simply too general to meet the need to establish usage on a more site-specific basis.

Also, Grasshopper Trail seems to be included in a Mechanized Zone corridor virtually all the way down to the S Fork Eel River. Hopefully, this is simply a mistake and does not reflect the actual intention. Currently, the lower half of Grasshopper Trail is off-limits to bikes and is only a single-track trail.

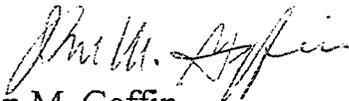
Therefore, I suggest that you place language in Appendix E, Sec A to the effect that: Increasing visitor's enjoyment and safety by designating, signing and enforcing trail usage limits and/or designations so as to minimize user conflicts between mechanized and non-mechanized uses.

Appendix C - Wildlife List. There are two avian species on this list that I am surprised to find here; golden eagle and ruffed grouse. Perhaps, you could let me know your source, as I would definitely like to know when and where these birds were seen.

71

Thank you very much for the significant work that you and your staff have put into the development of the plan, thus far.

Sincerely,


John M. Gaffin

8-6-01

Dear, Joann Weiler, Project manager.

I have mostly read the complete Humboldt Redwoods State Park, preliminary general plan. Thank you for sending it. I still have a concern about hiking only trails, bicyclists and enforcement.

Hopefully there will be enforcement 72
by park rangers to make sure bicyclists stay off trails that are designated for hiking only.

Otherwise you can post signs at trail-heads but signs will not be followed by ~~some~~ bicyclists. In other parks they use of ticketing offenders works. I know that hiking trails can quickly become degraded by repeated bicycle use.

If, I encounter from a bicyclist a bad experience on a hiking only trail, I just don't feel safe and may never go back there.

Received 8/2/01

over please

(pg-2)

I go to my state parks for a nature experience and not to have to jump out of the way from some joy-hiding bicyclist.

So, please do all you can to enforce no bike riding on narrow or hiking only trails. Keep the bikes on larger paved roads or paths. What rule will you set for bicycle speed limits on trails, or roads and when they ride down hill? I'm not opposed to bike riding in the park. But some bicyclist create problems for others.

Thank you for taking time to read my letter. Please reply as soon as possible.

Sincerely
Michael L. Kella

7-18-01

Dear Joann Weiler

I'm writing to you regarding
Reinboldt Redwood State Park and the General
Plan.

Hopefully the general plan for
Redwood park will include some Wilder
ness area. And if wilderness areas are 73
established that No hunting, bicycle
riding or commercial camping structures
be allowed. (like horse corral, water
systems or landing strips within even then
the park boundaries of wilderness areas.

Its important that the fall natural
areas be protected as if man or woman
werent even there. Thank you for taking
time to read my letter. Please reply as soon
as possible. Thank you again.

Sincerely
Michael L. Killa

July 31, 2001

Joann Weiler
California State Parks
P.O. Box 942896
Sacramento, California 94296-0001

Dear Madam:

One of the issues that I would like to discuss is the potential adoption of additional land in the future adjacent to the proposed "PZ - Primitive Zone" (Re: Map #6). If Humboldt Redwoods State Park is able to acquire additional land north of the "Primitive Zone," how will it be zoned? I believe the future acquisitions of land in that region should be set aside as "Primitive" so as to prevent an island effect on the sensitive ecosystem. If more land is designated as BMZ or BNMZ north of the "PZ", disruption will take place in the PZ due to pollution, trafficking, etc.

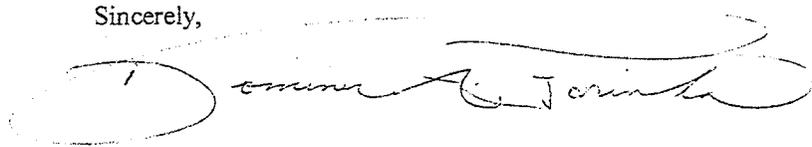
74

Secondly, with the "BMZ - Backcountry Mechanized Zone" located to the west of the "PZ- Primitive Zone," just how much of a barrier is there to prevent trespassers that innocently or intentionally cause disruption in the most sensitive section of the park (the proposed Primitive Zone)?

Lastly, because so much land is dedicated to recreation compared to the small amount allotted for a pure reserve, how feasible would it be for Humboldt Redwoods State Park to include a few more acres of the BMZ (1-10 or more) to the Primitive Zone (to the west) to create a stronger buffer zone for the most pristine and delicate region of the park? Also, can the northwestern most section of the BMZ that is adjacent to the "Primitive Zone" be added to the "PZ" to again minimize disruption and/or destruction.

Aside from my comments, the plan is well thought out and planned. It comes across as logical and cohesive.

Sincerely,



Dominic A. Farinha

.....

Received

NICHOLAS KENT
28751 Skyview Road
Willits, CA 95490
(707)984-8322 phone
(707)984-7492 fax

August 10, 2001

California State Parks
Northern Service Center
P.O. Box 942896
Sacramento, CA 94296-0001

Re: Humboldt Redwoods SP Preliminary General Plan

Dear State Parks,

I have reviewed the General Plan, and have the following comments:

I think the plan is well documented, and many relevant issues were raised. The maps are very good, and help to understand the biological issues that are relevant.

- I would encourage the park to develop more family campgrounds, which would be several individual sites clustered together with a buffer in between other sites. California's demographics are changing, and larger family groups are using parks more. The current individual campsites do not work well for these small groups. 75
- I would encourage the development of more low impact walk in sites that are dispersed with buffers to give a more natural camping experience for non-backpackers. The typical campsites built in the past have sites in close proximity to other sites can cause irritation to neighboring campers from noise, smoke, radios, etc. When I go camping I want to get away from noise and have a buffer from other people, and it is difficult to find this experience at the campgrounds at Hidden Springs and Burlington. Albee Creek has more dispersed sites generally.
- Establish a base inventory of wildlife and plant species, frequency, and dispersion. This baseline can be used to compare changes over time of threatened, rare and/or endangered species. The park is a very important natural refuge, and is the largest old growth stand left in the coastal redwoods range. It is important that the Park Service determine what biological resources currently exist on the park lands. This information will help in terms of the needs for future acquisitions, and also serve as a comparison to managed lands outside the park. The larger old growth forest in particular should be surveyed for plants and animals, as other parks can compare their wildlife and plant populations and quality of habitat to this area to determine what measures may need to be taken to achieve better habitat such as buffers, etc. 76

breeding populations of yellow-legged frogs, steelhead, newts, and northwestern pond turtles. I have seen the young of those species in Bull Creek. When campgrounds are near water sources, there seems to be an increase in the disturbance of amphibian species due to children from the campgrounds capturing, and often removing, amphibians from the waterways. For example, I recently found the only bullfrog tadpole I have ever seen in Humboldt Redwoods State Park. Unfortunately for this tadpole, it happens to live in a pool landlocked on the gravel bar near the Eel River below Burlington Campground. Unsupervised children from the campground have been near the pool trying to capture this animal for several weeks. Now, the bullfrog isn't native here and probably should be removed, but it provides an example of what happens to the many other luckless amphibians who live in close proximity to the campgrounds. With some luck, some of these animals may live to metamorphose into an adult frogs.

A group camp facility would be better suited in a location such as the upper Holmgren property or the Daly Ranch. This is not an old growth redwood area, nor is it near a major wildlife thoroughfare. The concern at Holmgren would be protecting the historic resources located there as well as the riparian and tree plant areas. However, this location is almost ideal for an RV camp with electric hookups or a group camp facility. Its location at a major freeway offramp gives it excellent access for the larger motorhomes that many campers are traveling in today. The Daly Ranch would also be an ideal location for either type of facility.

Developing an environmental education center in the Bull Creek watershed doesn't seem feasible either. The existing visitor center provides a large meeting area and has volunteer and seasonal interpretive staff who can provide educational programs for local schools. The visitor center's facilities are underutilized by the local schools as it is. Why build another facility when we already have one that is perfectly suitable for this purpose? If environmental education field trips into the Bull Creek area are desired, those can be arranged. It just doesn't seem necessary to build more infrastructure in this area given that existing facilities can handle the demand. There does not seem to be an increase in the demand for the visitor center's facilities. The Bull Creek watershed is in recovery from the intense logging of the past. Developing or expanding facilities here (Albee, Cuneo) would increase habitat fragmentation for some of the species here. It would seem best to keep any further development out of this area.

A new interpretive facility at Holmgren and augmented interpretive exhibits at Dyerville Overlook would create more infrastructure. These new resources would need protection, particularly from vandalism. Due to their isolated nature, yet relative closeness to areas of inhabitation, there would likely be increased vandalism to these structures. The existing interpretive and memorial exhibits in the more isolated areas of the park already experience a lot of vandalism. For example, the interpretive map at the south end of the Avenue of the Giants is frequently the target of graffiti and carving. The Blue Star Memorial Byway plaque at the north end of the Avenue of the Giants has been stolen. These are just some of the examples of the vandalism that occurs to these isolated interpretive exhibits. As much as we hate it, vandalism to park facilities does happen,

particularly in isolated locations where the vandals may feel more secure. Is there a plan to increase protection staff to cover these areas?

Another historic resource that is regularly vandalized is the Johnson Tie Camp. I have found evidence that campers there have pulled roof shingles from the structures to use in starting campfires. A big problem at this site has been the illegal fires that campers frequently use despite staff telling them when they register that fires are not allowed in the backcountry. If it is possible to move the trail camp to a less historically significant location, it might be a good idea.

It was mentioned in the draft that slower visitor traffic conflicts with the high-speed local traffic on the park roads. Mattole Road is no exception, and in fact, is the more dangerous road of the two main travel arteries in the park. The narrow road with blind curves, combined with frustrated local drivers who know every curve and drive the road much too fast anyway, makes this a risky place for a visitor to venture. Many come back with harrowing tales of narrow escapes from accidents. I have had one accident on this road and several near-miss experiences. My accident was caused by a driver cutting short a curve and driving at much too high a speed for a blind corner. He ran me off the road and continued on. I had to chase him down to get a license plate number as he failed to stop after causing the accident. Perhaps the need for road signs indicating that "Slower vehicles must pull over to permit passing" should be addressed. The roads are made dangerous because the combination of slow vehicles whose drivers are relaxing on vacation and high speed, frustrated local drivers sometimes leads to bad decisions, such as passing slower vehicles in frustration. Many of the drivers of larger vehicles refuse to yield and allow faster traffic to pass them. This, combined with the paucity of turnouts for them, leads to lines of vehicles piling up behind them and being stuck there for miles. The frustration of the local drivers, who are going about their daily lives, trying to get to work on time, etc. is understandable. "Slower traffic must use turnouts to allow passing" signs could encourage courteous behavior from all drivers that share these roadways particularly in the busy summer months.

81

The park would greatly benefit from a thorough survey of wildlife and other resources. Given the existing staff, there just are not enough people who have time or are qualified to do this work. Will the staffing inadequacies be addressed? Many of the recommendations in this draft plan would require the input of resource ecologists, archaeologists, geologists, and others that are not on the staff at Humboldt Redwoods. Nor does there seem to be extra funding for these positions. How will this work be accomplished? There is a limit to what can be expected from university student volunteers.

82

My highest priority comment, I save for last. I think it would be wise to acquire, or list on a "highly desirable acquisition" list, the Camp Ravencliff site located between Whittermore and Holbrook groves. Not only would this protect an existing wildlife corridor through the area, it would save a significant archeological site from destruction. This site, CA-HUM-945, is one of the few surviving Sinkyone village sites and contains the highest concentration of bedrock mortars (BRMs) anywhere in Humboldt County.

83

The Sinkyone village was called To-Cho-Be. This site has significant value as one of the few locations that could add to the presently limited body of knowledge of the Sinkyone way of life. Many Sinkyone village sites were located along waterways and frequent flooding has wiped out all traces of them. This intact site is an important archaeological treasure. Preservation of this site should be a high priority and acquisition should be pursued by the state. The current private landowners are not capable of giving adequate protection to this significant resource. An example of the nonchalance and inattention given by the current owners to this site is provided by the following incident from last week. When I pointed out to one of the YMCA staff the mortar holes that one of their trucks was parked on top of, she said, "It would be better if this was a recent find. It is old, so who cares?" The private landowners have no idea how to manage this resource and seem not to care. Wildlife species that use this parcel, based upon my own observations, include mountain lion, black bear, deer, gray fox, bobcat, river otter, bald eagle, yellow-legged frog, porcupine, pond turtle, Cooper's hawk, sparrow hawk, steelhead, Coho salmon, and many more. It has value as a historic site, prehistoric site, and interpretive location. It would provide a wildlife habitat linkage between Holbrook Grove and its adjoining lands and Whittemore grove and its adjoining lands. There was a recent sighting of a mountain lion (less than a week ago) traveling through the YMCA camp facility. Two reputable witnesses observed the cougar walk through the camp in the early morning hours while the camp was in use. There were also tracks found. A black bear was observed by myself and one other person in May of this year. It was on the YMCA property and I filmed it crossing the river and disappearing into Holbrook Grove. To me, this is proof that this is an actively used wildlife corridor. I think this parcel would be a valuable addition to the park and that the resources here need the protection that only the park can provide.

After reading the draft cover to cover, that is my input. The plan looks good and a lot of work seems to have gone into it. Thank you for the opportunity to give my input. Best of luck with the project.

Sincerely,



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August 1, 2001

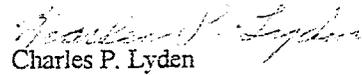
Joann Weiler, Project Manager
Humbolt Redwoods State Park General Plan
Northern Service Center
Post Office Box 942896
Sacramento, CA 94296-0001

Dear Joann:

Thanks for the opportunity to read a copy of the Humboldt Redwoods Preliminary General Plan. I thought the plan was well done. You and your staff and the Area District Staff are to be complimented. I enjoyed reading it at my leisure.

I hope you will be able to have the Park Commission visit the park for visits overnight this summer and in the fall to experience the beauty of this park.

Sincerely yours,


Charles P. Lyden

Humboldt Redwoods State Park
Preliminary General Plan
Comments

In the introduction section: On page 1 highway 101 is described as a "Moderately Traveled Rural Freeway". On page 8 it is described as a "Heavily Traveled Freeway".

The Natural History and Park History sections are very well presented.

The Planning Influence Section: The term "High Quality" should be changed to "Quality" Recreation and Interpretation.

The Preservation of Rural Agriculture: The suggestion made seems to me to be mostly a Farm Bureau and Private Land Owners proposal. I don't believe the park is changing the rural scene but over commercialization could change it. There are a number of State Parks that have had and still have a resource management and a public visitor conflict with short term and long-term land leases. All of a State Park's land is essential in supporting the individual Parks' purpose.

General Plans, Goals, and Guidelines: "Prescribed Fires" A controversial topic. I believe the guideline in this case is Continuing Review.

Guidelines for Recreation section: I suggest deleting the word "multitude". Some of the suggested recreation items should be advanced as great opportunities for private development on private land around communities to improve their economy. Such as, lodges, stores, shuttle systems, full hookups for RV's and trailers, and disposal systems. The overnight facilities in the park should be minimal to allow for relocating at a later time when over used or conflicts with the natural features. Most of the RVs and trailer vehicles are self-contained and need only a firm road base and room to turn around to a central water source and garbage container. Tent camping and today's SUV need sanitary, water, portable tables, and fire rings and should be separated from the RVs and trailers. (In my opinion)

84

Transportation Zone: Considering the vehicle speeds on Highway 101 additional signing a half a mile before turn offs will be helpful the traveling visitor. The Avenue of the Giants should be a Parkway and Interpretive station at wide roadway locations has merit.

Administrative Zone: The plan mentions preservation of remnant orchards. Were these orchards identified in the acquisition as requiring care-taking when they were acquired and funded for maintenance been on a volunteer basis? Could or would the Interpretive Association sponsor the orchards upkeep?

85

Alternative to the preliminary General Plan; Did the public meetings generate any responses to the Alternatives stated in the plan?

86

The Preliminary Plan has, I believe, been very well prepared and documented. It should with stand the scrutiny of public review and Government overview. One final question, and note, will an alternatives be listed in the final plan. I would not believe they would be once your Preliminary plan is approved.

87

One last question? In the event priorities were requested for a five year budget plan. Which goals, needing funding, would be considered at this time?

88

7-5-01

Joann Weiler, Project Manager
Humboldt Redwoods State Park General Plan
California State Parks, Northern Service Center
Post Office Box 942896
Sacramento, CA 94296-0001

Dear Ms. Weiler:

Thank you for the copy of the Humboldt Redwoods State Park Preliminary General Plan and Environmental Impact Report (GP/EIR). Following are my comments.

VISITOR USE

Page 29. The source of information on the significant 13 percent drop in visitor days from 1994 to 1999 is "statistics from the Department's annual records". **Details on the existing visitor use should be shown in a graph and include at least back to 1980 so the past trends can be better judged and a future 20 year visitation projected.** The preponderance of the Visitor section is speculation on the idea that surely the visitor use will increase dramatically because the population of other areas many miles away is increasing. Page 35 says "Although the park's visitation has remained flat or declined during the past decade" indicates that the drop in visitation really extended back past 1994 to 1990, and perhaps even before 1990. When did it start?

89

Page 29. Increased gasoline prices, particularly in the Humboldt County area are a constant and vocal item of discussion in the local newspapers, yet the one sentence dismisses its effect with "It is anticipated that, as California's population grows, assuming no major national or statewide economic issues, such as increased gasoline prices, use of the park will also continue to increase." **The relationship of Humboldt County gas prices to State prices should at least be recognized by a few more words or a graph.** Page 35 says "it is likely that demand for its recreational facilities will increase in the future, given the overall population growth in the region and in the state". **On the contrary, the regional population growth has already been documented and projected to be very minimal** by the County Planning Department, by the State, and by the U.S. Census. State growth, on the other hand, has been projected to increase significantly in the next 20 years, as it has in the past 20 years, but **there has not been any relationship shown between State growth and increased visitor usage.**

90

Documentation of park visitation for the past 10 years or more has shown a decrease. Page 39 implies that the General Plan is concerned only with present issues. Page 88 refers to "the life of the general plan". **A decision should be made by the State whether the General Plan is meant to be for 20 years ahead or 100 years ahead.**

91

The GP should realistically address the needs of the next 20 years, not fantasize about the next 100 years. Page 35 cites some of the problems that "limit development possibilities", but if there is no need to "develop" in the next 20 years because the

visitation will not increase in that time period, then some considerations of “development” should be deferred for another 20 years and the year 2021 GP (or is the next GP coming in the year 2101?).

CUMULATIVE IMPACT OF NEVER ENDING PARK LAND ACQUISITION.

Page 5, 1st paragraph. “The development that now exists occurred prior to the implementation of today’s more restrictive legal requirements”. **CEQA has been in effect since about 1975, about 26 years ago,** and much of the park has been acquired and developed since that time.

92

Page 44, 49, 53, 77 mentions “Consider acquiring land from willing sources ...” Acquisitions from willing sellers or from gifts (such as Save the Redwoods League) are still acquisitions.

93

Page 43. “Consider creating continuity of old growth forest by utilizing sufficiently large areas of high quality second growth redwoods ...” doesn’t make sense. How can second growth redwoods suddenly create a continuous old growth forest? So-called environmentalists use the nonsensical “old growth second growth”, but I assume you aren’t changing the terminology. It appears you are referring to further land acquisitions, such as the specific “Corridor to the Sea”. Page 47, 48 say “priority for corridors should given to those lands that connect such forest ecosystems” sounds the closest to the “Corridor to the Sea”, but “establish new effective habitat linkages between the park and other protected lands” involves **acquisition of new lands outside the existing Park boundaries.**

94

Page 9 says “future acquisition of lands may be necessary to mitigate” impacts of adjacent land uses. Page 80 says “the primary intent of additional acquisitions expressed in the general plan is to protect existing park resources and enhance plant and wildlife habitat. As such they would have minimal potential for contributing to cumulative adverse impacts”. I don’t believe your intent or your conclusion.

Page 5, 2nd paragraph. “While much of the state prospers... the park’s local communities have yet to fully share in these benefits. Many contributing factors exist:” and Page 57 mentions again the “once thriving agricultural community”. Will Park interpretation include how unrestricted land acquisition affected the local communities?

95

“Farms” are an “interdependent ecosystem” that should be added to the vegetation types on Page 13.

96

Page 30 on public input does not describe the Avenue of the Giants Community Plan and Planning Commission comments on preparing an EIR before accepting land acquisitions. Page 79 finally refers to the plan. **Please quote the Community Plan’s final approved recommendation regarding park land acquisition.**

97

Page 37. **Agricultural land acquired by the park should be leased back to local farmers and not converted to other park uses. The farms provide a nice contrast to the redwoods and enhance their character. Farms are another “interdependent ecosystem”. Many people are stomach oriented, and the local produce would add to the visitors’ experience.** The GP points to the increasing population of the State, yet people must eat in the future too, and the GP should address this future need. Perhaps in the far future, fickle government policy will change to chopping down trees in order to make room for agriculture so that people will not starve.

98

I suggest that government ownership of land in Humboldt County be compared in a graph over time, such as for 1920, 1940, 1960, 1980, and 2000. Page 80 says “The plan also recommends future land additions for recreational development if no suitable sites exist within the park. Because of their relatively small size of developments projected in the general plan, these are not expected to increase park usage to any appreciable extent.” Increased park “Usage”, however, is not the problem, **the problem is unrestricted and unlimited increase of government owned property which has not been evaluated in an EIR as required by CEQA.**

99

Page 75, 80. **The GP does not address the cumulative impact of continuing land acquisitions.** Page 80 says “Potential land acquisitions, because their location, size, or specific use are not yet identified, cannot be evaluated with regard to the cumulative impacts they might have.” Many land acquisitions have created the Park and in the future it is implicit that many more land acquisitions will be made. The Park has a very good idea where the future acquisitions will be, it has already identified where some of the acquisitions will be, and **the “General Plan” should “plan”, not ignore, how these acquisitions will be handled.** If the GP does not address the procedures proposed to be followed on land acquisitions, then I request that each and every individual land acquisition or gift be considered a potential **negative cumulative impact under CEQA and each evaluated with a separate EIR.**

100

All acquisitions, whether from willing sellers, unwilling sellers (condemnation), and gifts (Save-the-Redwoods League), are still acquisitions. Prime agricultural land is being converted to non-productive land, and this conversion is a significant environmental impact. Private property which paid taxes is no longer paying taxes, and this reduction in County revenues is a significant environmental impact. The amount of private property is being diminished considerably, and this reduction in the opportunity to own property is a significant environmental impact. The Humboldt County Avenue of the Giants Community Plan hearings and EIR (per CEQA requirements) has already identified that one of the ongoing community problems is the purchase of land for parks by the Save-the-Redwoods League and the State (willing or not) and the continual increase in land ownership by the State. The GP EIR must evaluate these significant impacts and evaluate any mitigation measures. Any acquisitions (willing, unwilling, and gift) must comply with CEQA 15168 (b)(2) **before** the property title is accepted by the park.

101

Page 43, 48, 77. "Monitor and take appropriate actions to protect old growth redwoods from possible impacts caused by development and reutilization of adjacent or nearby private property." Apparently what land isn't bought will be **confiscated** by a State Park which considers itself to be the **highest and best use over all the surrounding land**.

RACIAL DISCRIMINATION

Page 57. **Only Lolankok Sinkyone Indians inhabited the area, not the all encompassing "Native Americans"**. The two are entirely separate. Almost all Indian tribes make the distinction. The Yuroks, for instance, have published a four tier system of discrimination, 1) their own tribal members, 2) other tribe's members, 3) spouses of their own tribal members, 4) all other Indians not affiliated with any tribe, blacks, asians, caucasians, and Hispanics. The Wiyots have a similar tier system where they discriminate against other tribe's members as well as all other Indians not affiliated with any tribe. One proposed GP guideline is "Enhance visitor's understanding of Native American cultures ...", whereas there is not a plural culture in the park, only one single Indian culture, the Sinkyone. Outside Indian tribes should not be artificially brought in and should not be discussed. **I request that "Interpret the Native American history of the park area, highlighting George Burt" be changed to "Interpret the Lolankok Sinkyone Indian history of the park area, highlighting George Burt"**.

102

Page 53. The "Department's gathering policy" is mentioned, presumably in reference to **discriminating in favor of tribal members** who have "traditional ties to resources within the park". "Native American" appears to mean "tribal members", not Native American non-tribal peoples who constitute about 90% of the "Native American" population of California. The term "traditional ties" is not defined, but could also be applied to families that have been here 150 years or 50 years. The citizens of California overwhelmingly approved Proposition 209 and made it very clear that racial and ethnic discrimination was not legally acceptable, but **the Park is apparently resurrecting this "fashionable" discrimination. All basketweavers using traditional materials, for instance, should be allowed to collect within the park, not just tribal basketweavers.** The Park policy appears to be an unconstitutional violation of the 14th Constitutional amendment. The Park has no compelling reason to discriminate against other races, ethnic groups, and non-tribal Indians. The Park has no court order compelling it to make amends for previous discriminating gathering policy. **I request that all races, ethnic groups, and non-tribal members be treated equally as required by the U.S. Constitution and be allowed equal rights in any gathering policy.**

103

Page 57, Fb. The term "Euroamerican" is used many times in the GP, presumably to provide contrast with the "Native American". By using a lower case "a" for american and by running the word together, **the GP is offensively disenfranchising Americans.** There is already enough contrast provided by disavowing that there are Americans who are "native Americans". If your family has been in America for 360 years (and more) and is a blend of many American cultures after 18 generations (about 500,000 direct

104

ancestors), what do you call yourself? I request that “American” be substituted for “Euroamerican”.

Page 16. “The incoming Euroamericans viewed the Native Americans as impediments to their “manifest destiny.” This created a serious conflict between resident Native Americans and the land-hungry settlers. The Sinkyone were not prepared for dealing with these unfamiliar aggressors. The traditional manner of settling disputes through ceremony and payment could not match the deadly intent of the settlers. So alien were the immigrants to the Indians’ experience that the Indians did not even consider the new arrivals humans, but referred to them as “Kyoï,” which means “spirit.” **We get enough of this slanted ethnic name calling and fanciful distorted speculation from other sources without hearing it in State GPs. This politically slanted and emotionally charged rhetoric should be deleted. It adds nothing to the rest of the description and indicates a vindictive racial bias.**

105

Page 57. “contrasting Native American and Euroamerican land use practices” presumably will show a negative view of “Euroamerican” land use while lauding “Native American” land use. The population of the Indians was not very large and consequently had little impact. I suggest that the populations of the various land use cohorts be included along with all the derogatory remarks. Prescribed burning by Indians will also probably be cited, however, there is little factual basis and much romantic fantasy. In an Indian culture where there were no Smokey bears, no shovel, no ax, and no pail of water next to every untended campfire or campfire tended by children, there were a lot of accidental fires.

AIR POLLUTION IMPACTS

Page 78 points out that “**The Basin is in nonattainment with California standards for particulate matter (PM10)**”. **The GP/EIR does not address either campfire pollution or bicycle dust.**

106

Page 60. “Ensure ... standards ...are followed both in the park and on surrounding lands ...” applies also to air pollution.

Page 35, 78. The photo shows “A typical campsite at Humboldt Redwoods”. The reproduction of the photo is not clear enough to determine if there is a fire ring. Open fires are a significant source of these PM10 particulates. **There are more campsites in the Park than there are residences near the Park.** Private citizens on non-government property are required to abide by the “no burn days” which are intended to reduce the amount of air pollution. These “no burn days” are separate from the regulations administered by the California Division of Fire and Forestry which are intended to reduce uncontrolled fires. **People burning open fires on government land are also required to conform to the State air pollution laws.** Burn day information should be posted at all campgrounds, and park rangers should enforce the no burn regulations. **HRSP management does not have the authority** to decide that it can ignore air quality regulations in allowing campfires on non-burn days.

Page 35. "Additional types of shelters, such as **wood stove-heated** tent cabins, could be incorporated into the park." Private citizens on non-government property are required to have expensive fireplaces or wood stoves that are EPA approved and that contain a catalyst to reduce unburned smoke. **Fireplaces and wood stoves on government land are also required to be EPA approved.** Julia Morgan's fireplace in the Federation Grove would appear to be "grandfathered" or a historic structure, and it may not need the catalytic devices as long as it is not rebuilt.

Page 65, 66. Most **unpaved roads** on the interior of the park are accessible to bicycle traffic, and mountain bicyclists like to create dust when they skid around corners. Dust is one major constituent of PM10, yet the GP makes no effort to measure or control bicycle dust. Perhaps mountain bike use on dirt roads should be restricted to damp periods in order to reduce dust.

OTHER ITEMS

Page 6. "The Disappearing Redwood Forest" is incorrect and misleading. I understand that the acreage of coastal redwood forest is greater now than 150 years ago. **You should be emphasizing instead the preservation of "ancient forest" or "old growth forest".** Your subsequent statement "Today, only spotty remnants of this once thriving ancient forest still survive" still puts the emphasis on "spotty remnants" that "still survive" rather than "ancient forest", and seems to give the impression that redwood trees no longer exist. On the contrary, redwood trees are very fast growing and have regenerated. I put this deception in the same category as the "most unique" phrase so often thrown out by environmental groups or the "60,000 acres of old growth redwoods" that were going to be saved in the Headwaters area. The map should be clarified to show both 1850 and 2000 coverage of redwoods as well as the remaining "ancient forest". The separation of the map into "north", "central", and "south" is not referred to in the GP and should be deleted as irrelevant and distracting. The statement that HRSP "contains one of the world's largest remaining contiguous areas of the original coastal redwood forest" again borders on effusively grandiferous verbage. At least delete the word "world's", please. Or go for it big and use the word "universe's" or "galaxy's".

107

Page 9. The political buzzword for "humid mesothermal" in redwood country is "temperate rain forest", a variously ill-defined concept that apparently is used only for solicitation of funds by Save-the-Redwoods League, Earth First, and other organizations. The terms "ancient forest", "temperate rain forest", "most wild forest", "old growth forest", "old growth second growth forest", "closed canopy forest", and similar **redwood forest terms should be discussed since they are routinely used in solicitations.**

Page 15. The northern spotted owl is mentioned, but **hasn't this species been politically split into the northern spotted owl and the California spotted owl**, both with different treatment?

108

Page 15. "largest remaining block of marbled murrelet nesting habitat in this part of the state" seems to ignore the vast government holdings of "habitat" in Redwood National and State Park. Humboldt County newspapers keep referring to "old growth redwoods" as being the habitat for murrelets, so **why isn't the RNSP land any good for murrelet habitat?**

109

Page 16. After mentioning salmon and steelhead it says "A variety of other fish have been documented in the park, including the Pacific lamprey...", but there **is no mention of squawfish and its impact on the other fish**. Only degradation of spawning habitat, fishing pressures, etc. are mentioned as reducing stocks of anadromous fish. Also **no mention is made of the impact of the diversion of water to the Russian River**.

110

Page 44. "Employee housing" on park land is mentioned. **It should be park policy not to use park land for employee housing unless 24 hour presence is mandatory**. The park should not be an employee housing project, and **no exception should be made for non-native species planted in areas adjacent to employee housing**. If employees want exotic plants, then they should live outside the park. The park should not compete with privately owned housing. How many park residences are there?

111

Page 45. "**develop a monitoring and control plan ... to reduce the numbers of non-native animals, such as feral cats**" is an excellent idea. Feral cats kill and kill. It is no wonder that 99% of the cats at the Humboldt County Humane Society are not picked up. My first (unpleasant) memory of Singing Springs Campground 35 years ago was a black feral cat at our campsite. Red foxes and coyotes are other non-native animals that should be removed if they appear.

Following are additional comments for which I don't expect a response.

Page 2. Map#1 has a good graphic scale and a good, clear north arrow. The "Map Area" detail is good.

Page 2. Map #1 shows the "Kings Range National Conservation Area" in a darker shade which makes it much more prominent than the faintly tinted "Humboldt Redwoods State Park", giving the impression that the KRNCA is the subject of the proposed General Plan. I suggest that the colors be reversed. If the Sinkyone Wilderness State Park is not clearly differentiated from the KRNCA it does not matter for this GP.

Page 2. Map #1 does not label Highway 101, one of the most prominent lines on the map, nor does it label the other major highways.

Page 2. Map#1 does not show the Humboldt County boundary, a significant local government jurisdiction.

Page 4. Ken McKown may be well known to some, but he has a very awkward, wordy style which makes reading very difficult. This page adds little to the report but poundage.

Page 5. "construction of the freeway, which diverted the majority of passing motorists away from local businesses" avoids comparison of the traffic volumes which have significantly increased specifically because of the freeway. Without the freeway, most of the passing motorists would have avoided the narrow and winding Avenue of the Giants entirely, and the traffic into Humboldt County would not have increased. Traffic volumes on Ave. of the Giants before and after the freeway might indicate the relevance of the freeway. Caltrans has all these traffic counts for years.

Page 8. The Transportation Corridor paragraph repeats itself three times and is somewhat verbose. Several political claims are hidden in the wording which are irrelevant. "The freeway was constructed during the late 1950s and early 60s, ~~providing a faster travel option than the twisting and narrow two-lane Avenue of the Giants. The freeway construction and~~ required removal of numerous old growth redwoods, ~~but made traveling through the area faster and safer for those not interested in visiting the redwoods. Motorists wishing to enjoy a slower paced driving experience on the Avenue, with its meandering path through the park, are now free to~~ may enjoy the scenery at a more leisurely pace on the meandering Avenue of the Giants. Mattole Road is even narrower and more winding ~~than the Avenue.~~"

Page 8. "logging companies. Most of this land is currently under the management" has an indefinite reference. I suggest "logging companies, most of which is under the management".

Page 8. "With the potential for clear-cutting occurring so near the park's boundary ..." hassles the lumber companies, but no mention is made about the dehydration and killing of upper portions of the trees by the State freeway.

Page 11. The impact of Sudden Death Oak fungus on the tanoaks might be mentioned. Page 44 mentions "Take measures to prevent the spread of tanoak disease and other potentially problematic plant diseases", and this may be adequate. Also the effect of the other fungus on Port Orford cedar might be mentioned if there are any significant numbers of them.

Page 11. The paragraph beginning "This association is best exemplified" would be better combined with the previous paragraph. The reference of the "this" is indefinite, and the other three associations are all kept to one paragraph.

Page 11. "redwood forest existing in the world today" could just be "redwood forest." This cliché resembles the "most unique" phrase so commonly used in environmental writings.

Page 12. ".../Arbutus menziesii Association" should have a space to separate the paragraph from the previous paragraph since it is the fourth Association referenced. The Association name should be underlined.

Page 13, 45, 83, Ba. “White-flowered rein orchid” is used several times in the GP, but is the word “rein” or “rain”?

Page 16. “They controlled all of the South Fork” seems to expand the political significance of “control” when in actuality they occupied only a small portion of this area, not “all”. “the many Native American Athabascan languages” might be better as “the many Athabascan languages”.

Page 18. The paragraph starting “During the 1950s and early 1960s “ is out of sequence and should be placed after the CCC paragraph on page 19 which ends “when the United States entered World War II.” It has a better description of the highways than the paragraphs in the Transportation Corridor section.

Page 18. “What they found was Bull Creek Flats. Here, they saw widespread destruction of the forest ...” gives the impression that the Bull Creek Flats area was pretty completely logged, but if it was, then how did any old growth redwoods remain? I suggest that you change “Here, they saw” to “Nearby they saw” or something like that.

Page 28. Table 3 is given without any description of how the information was obtained. 99 responses seems like a very small, non-representative sample. The apparent description of the survey on page 31 still does not explain how it was obtained or what kind of questions were asked.

Page 35. The “need for a comprehensive planning effort to examine the park’s entire road and trail circulation” is a good consideration. The attempt to create a bicycle trail paralleling the Avenue of the Giants is very poor. A parallel bikeway would be inherently unsafe to bicyclists, to pedestrians, and to equestrians. Improving the existing Avenue of the Giants to provide shoulders is a safer alternative for bicyclists. Providing shoulders would also help pedestrians. Park bikeways littered with slippery redwood leaves and used by bicyclists attempting to get somewhere quickly is a sure recipe for lawsuits. The park is intended to preserve redwoods, but the increased acreage of asphalt and grading needed for bikeways would help kill the redwoods. The traffic volumes on the Avenue are very, very, low, much lower than many residential streets. **Bicycle use on the Avenue has not been measured**, and it appears to be low also. Are any bicycle traffic studies going to be made? **Bicycle conflicts have not been measured or evaluated**. Bicyclists can use either Highway 101 or the Avenue, but pedestrians and equestrians cannot. **There appears to be no justification for a third parallel unused bikeway.**

Page 36. “because the Avenue passes through towns and occasionally freeway” is not clear. How does the Avenue “pass through” a freeway?

Page 36 mentions more “interpretive opportunities”. **Hopefully this “interpretation” will not be in the form of more signs to clutter the landscape.** The park already has too many distracting tombstone signs at the memorial groves.

Page 36 mentions disability access. **Provision of “equivalent experience” certainly may be necessary and certainly is acceptable** because the world is not flat, wheelchairs cannot go everywhere, and money doesn’t grow on redwoods either. Most of the more significant trees are accessible already. Support for the disabled suffered recently when some die-hards insisted that \$40,000 be spent to provide handicapped access at a remote Forest Service cabin which was not accessible without a crew of about 10 people carrying the handicapped person many miles.

Page 40. “Interpretation can promote a strong conservation ethic.” should be deleted. The park should not promote a political purpose.

Page 40. “Canyon bottoms” is mentioned twice, but the river valleys are not typical canyons. Page 64 uses “canyon of the South Fork of the Eel River”. Canyon is a more dramatic word, perhaps, but it is not an accurate description. I suggest you use “valley bottoms” or “valley”.

Page 43. The Black Cottonwood Series is cited along with the alluvial flat Redwood Series, “These rare plant communities are essential habitat for both rare and locally important wildlife species, such as the marbled murrelet and the northern spotted owl.” At one time only old growth redwoods were “determined” to be suitable habitat for these two birds. Here you say that black cottonwoods are also essential habitat for them.

Page 44. “Use only species that are appropriate to the site and that are obtained from native plant species within park boundaries ...” is a good concept. I remember in Southern California where the Audubon Club was trying to force planting of only “native” trees in an area that had thirteen inches of rainfall. 75% of the trees on the Audubon approved list were non-native to California (most were from outside the U.S., like Brazilian Pepper), and the remaining 25 % had never grown within 20 miles of the area. Their list did include “native” coastal redwoods, although the nearest redwoods were about 450 miles away. The reverse would be true of the park -- no yuccas.

Page 46. Reducing the numbers of corvids (ravens and Stellar’s jays) should be considered. Your campgrounds artificially encourage them, so you should figure out a way to balance the natural population by discouraging them.

Page 49. “Design and maintain a watershed database to ...” is a good concept. GIS has been around for over 25 years, but it is only recently becoming used. Funding and keeping knowledgeable personnel will be problems, but maybe the Save the Redwoods League GIS program will help.

Page 51. Prescribed fires are a useful tool and should be utilized to the fullest.

Page 54. Providing appropriate warnings of potential hazards is a good concept. Remember that pedestrians do not have any right of way perpendicular across a highway unless it is an intersection or a marked cross walk. Private driveways or park roads are not an "intersection", and pedestrians do not have the right of way. Bicyclists using any of the pedestrian crossings while riding do not have any automatic right of way, and any park signs implying this altered non-approved law should not be installed. Bicyclists have the same right of way as other vehicles, but they do not have superior rights. Bicyclists must dismount in order to be considered pedestrians.

Page 59. "the world's largest pristine old growth redwood forest" would be better as "the largest old growth redwood forest". Redundancy and effusively grandiose adjectives cheapen the redwoods.

Page 60. All the "additional services" should be provided by the nearby communities, not by using government land and government subsidies to compete with private citizen enterprise. **"High end" accommodations such as a lodge have no place within the park.**

Page 63. No interpretive developments should be provided within the Primitive Zone.

Page 63-73. The management zones and special classifications seem appropriate. The goals and guidelines sound consistent and useful.

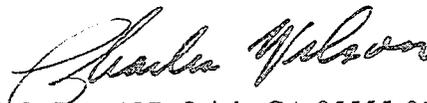
Page 72. It might be good to describe the distinction between the "Natural Preserve" and the "Wilderness". Why are there two separate classifications? Is the Natural Preserve all old growth, while the Wilderness has only intermittent old growth?

Page 79 cites the "Avenue of the Giants Community Action Plan", which should be the "Avenue of the Giants Community Plan".

Appendix E page a. "developing bicycle trails" should be "developing bikeways". It is questionable whether bicycle paths (not bicycle trails) would improve safety or would not impact the park trees. The Avenue of the Giants cannot be used as a "trail", however, the shoulders might be used for a "route". Keep bicycles on their legal side of the road, not illegally combined on one side. Remember pedestrians do not have the right of way longitudinally on a road, only when they cross at an intersection or at a crosswalk.

Thank you for the opportunity to review and comment on the proposed plan. Please keep me on your mailing list.

Yours truly,



Charles Wilson, P.O. Box 127, Orick, CA 95555-0127
cc: John Kolb, District Superintendent, HRSP

State of California Department of Parks and Recreation
POB 942896
Sacramento, CA 94296-0001

August 7, 2001

RE: Humboldt Redwoods Preliminary Plan

I live in Miranda just off the Avenue of the Giants, but Redway/Garberville is the center of my business, cultural, social and service community. What happens there impacts my life as intimately as what happens in my residential neighborhood. The good management of Whittemore Grove and Holbrook Grove is of immediate benefit to me, and the poor management of the adjacent Pacific Lumber CO. land is something that does me harm. For this reason I have found it in my interest to involve myself in the effort to find a good, reasonable, sustainable, peaceful resolution to the problems caused by the threat of logging Redway Ridge.

The enclosed letter from Taun Moondy represents the concerns of many Redway residents and many others who, like me, are stakeholders in this issue. I support everything she has to say.

Moreover, I believe an extension of Whittemore Grove to include the 581 acres presently scheduled for logging under THP 0044 would be of immense benefit to Southern Humboldt, its businesses, its residents, its visitors. The land has been badly damaged, has had two major landslides, is crossed and recrossed by roads that do not conform to current forest management standards. There is a clear and continuous impact on the South Fork of the Eel River which already has massive turbidity problems.

To create a sustainable forestry project or a conservation zone on the lands now scheduled for unwise, dangerous and destructive logging, to place those lands within the California State Parks and Recreation system would, I believe, enhance the already appealing natural resources of Southern Humboldt. Conservation, restoration, sustainable use of resources are now of international interest. Hiking trails, demonstration projects, educational activities would increase the value of our existing parks and provide additional recreational use areas.

An end to the threat of landslides, visual blight, pollution from pesticide use, destruction of fish habitat because of erosion and subsequent siltation of the Eel river, an end to all of these negative impacts could be accomplished by acquisition of the Pacific Lumber lands included in THP 0044 by the State Parks and their addition to Whittemore Grove. I believe that the communities of Southern Humboldt support such an acquisition and will noisily tell you so if you ask them.

I urge you to examine the benefits of acquiring these lands and of creating a whole new focus for California parks facilities in Redway. Shelter Cove, the King

Range, the Sinkyone Wilderness Area, the riches of the Avenue of the Giants and all its magnificent groves, a huge wealth of natural beauty and bounty can be spoiled in the public eye by what happens in Redway. Please be thoughtful of the consequences.

Sincerely,



Patricia S. Bernstein
P.O. Box 244 Miranda,
CA 95553 - (707) 943-1948
rancho@asis.com

The following is the text of a letter sent to your by Taun Moondy of Redway California.

State of California Department of Parks and Recreation
POB 942896
Sacramento, CA 94296-0001

RE: Humboldt Redwoods Preliminary Plan

The focus of my comments is on Holbrook and Whittemore Groves. As a resident of southern Humboldt I am fond of our local parkland and hope that these groves along with the area called Lower Redway, which has been designated as a "Qualifying Zone" by the county, will retain their integrity throughout the upcoming years.

113

I saw no mention of Lower Redway in this plan. I hope the parcels that Parks holds there are considered part of Whittemore Grove. This is a residential area that is part of the network of the grove and of important value to our community. It is also very important to maintain considering it interfaces with the Eel River. To maintain the health and preservation of the river I hope Parks will be very careful to expand its holdings in Lower Redway when possible, maintain vigilant monitoring of the condition of these trees and interact with the residents living in this section.

The detached location of Holbrook and Whittemore Groves from the rest of the park currently has rangers and staff coming up from Richardson Grove near Piercy to monitor and answer calls. I think Holbrook and Whittemore along with Lower Redway and Benbow Park should be made their own district. This would help in management and monitoring of the area. This would also add to the available jobs in the county.

114

A pertinent question I hope to have answered is this: how are "state

115

reserves" managed differently than "natural preserves" within your system? From the description on page 72 of a state reserve it sounds as if visitor traffic would be encouraged in the groves but not as much as other parts of the park. If a reserve were a piece of land that has outstanding characteristics than preservation would be in order. If the two groves in Redway are unique than I would think they would be excellent locations for biological study and hiking trails that show the public what much of California used to look like. Having participated in prairie restoration in the Midwest I know the value of historic remnants. These locations seem to qualify as remnants. Along with this, would a reserve classification change the access issue that Parks now has with Maxxam/Pacific Lumber Company regarding PL's THP 044? I encourage Parks to hold fast on their decision to not grant access to Maxxam/Pacific Lumber Company.

Also, I am curious as to what the markers recently found in Whittemore Grove indicate. These markers found on the trees were labeled "SEA Forest".

116

If Holbrook and Whittemore were classified as reserves could restoration efforts be applied? Could the Department of Parks and Recreation hire and encourage the much needed and soon to be wide spread occupation of restoration? Holbrook Grove was effected by the slide of 1995, which took out sections of Redwood Drive, a highly traveled road used by local residents. Through Whittemore Grove there are roads that are used by vehicles. In the section southwest of Briceland Road there is a road that has been used by timber extractors. This is the road I mentioned in the previous paragraph that is the source of debate between Parks and Pacific Lumber Company. I think this particular road, as restorationist says, should be "put to bed". In the past, a resident who built a house adjacent to the grove used this road. The house is not a residence any longer, is owned by PL, and sits very close to the lip of the still unrestored, bleeding source of the 1981 Redway slide area. It has been said that this road is needed for CDF access in case of fire. Even if the road were put to bed properly emergency vehicles could use the opened area to get up on the ridge

117

I encourage the Department to acquire the 581 adjacent acres currently held by Maxxam/PL. Maxxam claims they are not a willing seller however in the same breath they will say "show us the money". The citizens of southern Humboldt do not want Pacific Lumber logging in this area and have been working hard to find ways of acquiring this property. Residents see the value of this land if it is held in what we believe to be better stewardship than Pacific Lumber gives it. According to botanical survey results completed by SHN Consulting Engineers and Geologists, Inc. in May 2000, the "species diversity is exceptionally high within this [581 acres], due to the congregation of

118

grassland, redwood forest, mixed evergreen forest, and oak woodland plant communities together in a small area." This alone should prompt preservation. The area in question has been hammered by past logging operations and needs to rest. Along with preservation, restoration would be an excellent path to take for the health of the land, the safety of the community and the health of the Eel River and its tributaries. Since there is at least one slide area that needs restoration, which could be contracted to local professional restoration companies, the question of liability arises. Liability is based of culpability, of which Parks is not guilty. In addition, it is possible to have the state legislature protect the Department of Parks & Recreation from liability.

I propose that Holbrook Grove, Whittemore Grove with the extension of the previously mentioned 581 acres, and Lower Redway be held in preservation and specifically set aside as unique California remnants of Redwood forest. There are many learned and capable people in Humboldt County who would be able to contribute to this. If the Department would incorporate the assistance of local community participation I believe the Redway parkland could be maintained in excellent biological health. This area can be of great interest and an educational tool for botanists, ichthyologists, zoologists, geologists and the public.

Thank you for preserving the ever-decreasing amount of Redwood forest in California. I hope the area I live in will be subject to the Department's help and continued consideration.

PO Box 2213
Redway, CA 95560

August 3, 2001

State of California
Department of Parks & Recreation
Attn: Joanne Weiler
PO Box 942896
Sacramento, CA 94296-0001

Re: Humboldt Redwoods State Park
General Plan Update Draft EIR

Dear Ms. Weiler:

With regard to the above draft EIR, I would like to address the issue of acquisition in the area of Whittemore and Holbrook Groves, and in the area known as "lower Redway."

I moved to Redway from San Francisco in 1991, largely to enjoy the proximity of the redwood forest and river, after vacationing in HRSP and the surrounding area for many years. For the past six years I have served on the board of directors of the Redway Community Services District, which supplies water and sewer services to the town of Redway, and for the past two years, I have been chairman of the board. RCSD's water intake, which supplies approximately 85% of Redway's water, is a short distance upstream of Whittemore Grove. Our wastewater treatment plant is accessed through Whittemore Grove. I am writing this letter as a private citizen and resident of Redway, and not officially as a director of RCSD; however, I feel this information is important to keep in mind while deliberating the future of HRSP's jurisdiction in the Redway area.

As an RCSD director, I recognize that the acquisition of residential property in lower Redway reduces our revenue base and creates financial difficulty for RCSD. As a private citizen, however, I believe that the gradual acquisition by HRSP of properties from willing sellers is appropriate and desirable. Most of the area accessed by Forest, Eel River and lower Oakridge Drives (on both sides of the Briceland Road) is in the 100-year flood plain, making it inappropriate for future residential development. This is not an area in which Redway should be expanding its housing stock. What it does have are many small groves of beautiful mature and old-growth redwood, currently protected by special zoning, and lots of river access, including access to several excellent beaches and swimming holes. Ultimately, it can only benefit the town of Redway to have an expanded state park or reserve in its backyard, both for the quality of life of residents who can enjoy the area year-round and for the economic benefits of increased tourism in the Redway area. Furthermore, residents of lower Redway have expressed to me their willingness to work with Save-the-Redwoods League and HRSP. Regardless of the complaints you may have heard from Humboldt County about loss of tax revenue, etc.,

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the majority of lower Redway residents seem to favor the gradual metamorphosis of this residential area to park.

I would also urge State Parks to seriously consider acquisition of "Redway Ridge," across the river from lower Redway, and contiguous to the southern boundary of Whittemore Grove. Residents of Redway are outraged by Maxxam/Pacific Lumber's plans to harvest timber on these steep, unstable slopes, which are still bleeding sediment from timber harvesting in the late 1970's. We consider timber harvesting on this land to be a threat to our safety and property values due to the danger of landslides. It is also a potential threat to our water supply. Last but not least, timber harvesting would damage our viewshed, and the noise, disturbance, and heavy equipment traffic on our roads would diminish our right to "quiet enjoyment" of our Redway properties. For State Parks, this is an opportunity to protect Whittemore Grove, to preserve an area described as "exceptionally high" in species diversity, and to open a new area to visitors, with opportunities for education in redwood forest rehabilitation.

Thank you for your consideration.

Yours truly,

A handwritten signature in cursive script that reads "Virginia Graziani". The signature is written in black ink and is positioned above the printed name.

Virginia Graziani

Joann Weiler, Project Manager
Humboldt Redwoods State Park General Plan
California State Parks, Northern Service
PO Box 942896
Sacramento, CA 94296-0001

Marie Montagne
Box 1373
Redway, CA 95560
August 5, 2001

Dear Ms. Weiler,

Regarding Park owned property in lower Redway, please do not sell, as has been done with other property in the neighborhood, Parcel number 77-09205 on Eel River Lane. This parcel not only has several fabulous old growth redwoods, but it is the only public river access on that side of Briceland Road. Look at the path; it is well used by the public. The path in the Robinson Grove is far too steep to be considered public river access.

I hope the Parks will never give up Robinson and O'Meara Groves. They too are used and appreciated by the public.

And it would be a good idea, if you sold other property which the Parks has acquired in lower Redway, to retain timber rights. People have bought property in the area and cut down the trees to sell, or simply because they don't want them, with no consideration of the other trees in the neighborhood, which need a forest environment to survive (I'm sure you know all about redwoods needing certain atmospheric conditions, and their roots interlocking with the roots of other trees for support, etc). A determined party could get around the Q-Zone regulations to remove a tree they didn't want or wanted to sell.

In regards to the 581 acres across the river from Redway, please seriously consider purchasing them from Maxxam/PL, so they will not be logged. Logging those slopes has in the past caused serious problems--flooding, damage to residential property on both sides of the river for miles, and bridges wiped out. The ecology of the river would be damaged. And the aesthetics of Redway will be ruined, affecting tourism and the economy, if those acres are logged. The health and condition of the Redway Eel River slopes are important in many ways.

Thankyou,

Marie

Marie Montagne

August 8, 2001

Joann Weiler, Project Manager
Humboldt Redwoods State Park General Plan
California State Parks, Northern Service Center
P.O. Box 942896
Sacramento, CA 94296-0001

Dear Ms. Weiler,

I appreciate this opportunity to comment on the Preliminary General Plan.

My husband and I moved to Lower Redway in the early 1970's. We were impressed with the beauty and the many old trees in this forest neighborhood. Being dedicated bicyclists and walkers, we spent a lot time here and up the Avenue of the Giants in the groves, on the river and searching for wildflowers. We barely scratched the surface of all there was to see and learn.

I grew up in this county and have lived and worked here for many years. I am shocked and disheartened by the prejudice and abuse of power of the logging industry. Their need to cut trees at whatever cost to the land and residents is unacceptable. Massive slides, loss of habitat and biodiversity and ugly areas of clear-cut cannot justify the logging.

After some serious logging incidences in our neighborhood, which is an R1 zone, we worked very diligently with the county planning department to have a qualifying zone enacted that would protect redwoods with a DBH of 12". It took three years of meetings and hearings to succeed. Some of us feel it does not go far enough. We were pleased and enthusiastic when the parks started to expand here and surprised to learn several weeks ago that suddenly this has changed. Parcels that were headed for the parks were surreptitiously put back on the market and sold. It does not make a lot of sense to cut trees in such a special area for more summer homes. This does not help with housing for local residents.

Considering the configuration of trees and property lines here in Lower Redway, I think this area needs all the protection possible. Like other residents, my property has old growth redwood trees that I cannot protect by

myself because their root structures extend to and exist on neighboring properties. We know that the over all forest health of this neighborhood is dependent on all of us working together to consider the needs of the trees as we continue to live here.

I'm hopeful you in the California State Park System will advocate for the trees and the land when it seems people cannot see beyond their own immediate gratification and selfish needs. Stewardship of the land and resources must consider actions and practices that serve and will serve present and future generations equally well. I think our society is irreparably diminished when we fail to make wise decisions about our resources or how to manage them.

I encourage you to keep, protect and manage all the parcels in Lower Redway presently in the Park system or headed for transfer to it and to acquire additional parcels with old growth redwood trees and/or that are adjacent to the Eel River. In particular, please value parcel #7709205 for the only accessible public path to the beach and to the Eel River in that area and for its recreational uses such as hiking, boating, swimming and picnicking. If there are problems, I ask that you communicate and work with the individuals in this neighborhood.

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If designating Whittemore and Holbrook Groves as "state reserves" brings more resources, more oversight, more opportunity for trail development and has equal protection, it sounds fine. I have often walked parts of Whittemore and Holbrook Groves. Is there a reason there is barbed wire along part of Holbrook Grove?

After the massive slide of 1981, I am anxious to see some other solution than more logging for the slopes across from Redway. This area is very diverse with redwood forest, grassland, mixed evergreen and oak woodland. It has been seriously degraded by logging and is in need and deserving of restoration. I urge you to be supportive of community efforts to save this 581 acres. It would be wonderful if, in the future, there could be a separate park district for Whittemore, Lower Redway, Holbrook, Benbow and the slopes across from Redway. From a bird's eye view, it seems like a logical grouping.

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I am hopeful you will continue to do all that you can to save, manage and protect the many glorious trees and lands that exist in Humboldt County. They are the jewels that make this county so beautiful.

Sincerely,



Linda B. Sutton
PO Box 631
Redway, CA 95560

707 923-2574 home
707 923-2759 work

State of California Department of Parks and Recreation
P.O. box 94296-0001

Re: Humboldt Redwoods Preliminary plan

For the past twenty-seven years we have lived in Lower Redway. When we heard that the California Park System planned to put all the parcels that they received from Save the Redwoods back on the market, I was hoping that they would exclude parcel #07709205. This piece of land along the Eel River is forested with trees of various sizes. The reason it is special to the area is because it is the most accessible way down to the river. This is obvious by the well-worn path leading down to the Eel. The adjoining pieces of property have already been sold and they are beginning to build. Owners do not welcome people using their land for river access. This is understandable and all the more reason to set aside one site that the public can use

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Over the years this neighborhood has seen lots purchased and the trees cut for profit and then putting the stripped land back on the market.

We wanted to prevent this from continuing. All the Lower Redway owners (and renters) banded together and hired a lawyer to put an end to this practice. It took three years, countless hours and a lot of money but we persevered. We were delighted when Save the Redwoods purchased land in our area, then donating it back to the Parks for we felt the beauty of Lower Redway was now protected.

I strongly urge you to reconsider putting all the parcels back on the market, but especially hoping that number 07709205 will be set aside for the benefit of many, rather than a few.

Sincerely,

F. R. Evans
Carol Evans
F. R and Carol Evans

F. R. Evans

Fran Clever P.O.Box 155 Weott, Ca. 95571

California State Parks
Northern Service Center
Joann Weiler, Project Manager
P.O.Box 942896
Sacramento, Ca. 94296-0001

For over 50 years the residents of the community of Weott have enjoyed pure, excellent tasting water from springs located on the eastern facing slope of Grasshopper Mountain. These springs were developed long before the Humboldt Redwoods State Park acquired the location in which they are situated.

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Now the community of Weott has been notified that within the next two years, vehicular access to those springs will be denied, thus effectively cutting off our water source as the springs must be periodically cleaned and repairs made.

A plan to drill a well on the east bank of the South Fork of the Eel River has been advanced. Past history will show that any well water obtained from that location is unfit to drink. Surely some compromise can be worked out to allow the Weott Community Service District limited access to our decent, pure fresh water supply that fully complies with the Clean Water Bond Act mandated by the state of California.

I have lived in Weott for over 25 years and one of the joys of living here has been our wonderful water, unlike other communities where the water is so foul tasting it is unfit to enjoy.

Fran Clever

Twenty-one years ago Ranger Carl Chavez was promoted to the position of Eel River District Superintendent with instructions to attempt to heal the breach between the Humboldt Redwoods State Park and the Southern Humboldt residents. He succeeded then, and a peaceful harmony has since existed. Now this shocking denial of our water rights will serve to once more widen the breach.

The access road leading to our springs also serves our TV translator, which is our only source of receiving local TV stations. We can live without the TV but we cannot live without pure water.

Sincerely,

A handwritten signature in cursive script that reads "Frances R. Clever". The signature is written in black ink and has a long, sweeping horizontal line extending to the right.

Frances R. Clever

AUG 01 2001

July 30, 2001

State of California
Department of Parks and Recreation
North Coast Service Center
P.O. Box 942896
Sacramento, CA 942-0001

RE; PRELIMINARY GENERAL PLAN

Dear Sirs:

As a 30 year residence of Weott, CA we protest several parts of your general plan for Humboldt Redwoods State Park.

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The most glaring is your failure to address any of Weott residences concerns. The main concern is water. You do not address our water rights in the Humboldt Redwoods State Park. We have the right to water from three springs within an area you list as BNMZ backcountry Non mechanized zone. Within this zone are located fire and access roads another issue you do not address. Weott has a TV translator for Eureka TV stations that is permitted by the state park and operated under permit issued by th Humboldt Redwoods State Park. We also have in this area three springs, ^{excising} piping dams, and water storage equipment that supplies all the water that is required in Weott. This water is also used by the Humboldt Redwoods State Park in their hike and bike camp.

The Weott Community Service District has a State of California Water Resources Permit for water use on the three springs that are located in this BNMZ zone. We have the right to use and service these springs and water lines. We hear that John Kolb District Superintendent has decided to abandon the use of the access roads to our springs, the Translator and to

replace our water supply by drilling in the eel river basin. There has never been acceptable well water delivered out of the south fork of the eel river. Many have tried and the town of Weott tried it during the flood of 1964 the well produced water that was unusable. It was not fit to drink, ruined washing machines and hot water heaters, springs were finally located on private land, with sufficient water to maintain Weott .

Further, to abandon these fire access roads, that give fire access to the whole hillside that is on the west side of Weott, does not make sense. I am sending copies of my objection to the State of Calif. Forestry and Fire Protection, and hope they will comment on the loss of fire access.

Sincerely:



Orrin C. Scott
P.O. Box 219 63 School Road
Weott, CA 95571
707-946-2267

cc: John Kolb, North Coast Redwoods District
Superintendent
cc: State of Calif. Forestry & Fire Protection
cc: Wes Chesbro State Senate
cc: Virginia Strom-Martin State Assembly
cc: Roger Rodoni Humboldt Co. Supervisor
cc: Weott Community Services District

State of California Department of Parks and Recreation
POB 942896
Sacramento, CA 94296-0001

RE: Humboldt Redwoods Preliminary Plan

The focus of my comments is on Holbrook and Whittemore Groves. As a resident of southern Humboldt I am fond of our local parkland and hope that these groves along with the area called Lower Redway, which has been designated as a "Qualifying Zone" by the county, will retain their integrity throughout the upcoming years.

I saw no mention of Lower Redway in this plan. I hope the parcels that Parks holds there are considered part of Whittemore Grove. This is a residential area that is part of the network of the grove and of important value to our community. It is also very important to maintain considering it interfaces with the Eel River. To maintain the health and preservation of the river I hope Parks will be very careful to expand its holdings in Lower Redway when possible, maintain vigilant monitoring of the condition of these trees and interact with the residents living in this section.

The detached location of Holbrook and Whittemore Groves from the rest of the park currently has rangers and staff coming up from Richardson Grove near Piercy to monitor and answer calls. I think Holbrook and Whittemore along with Lower Redway and Benbow Park should be made their own district. This would help in management and monitoring of the area. This would also add to the available jobs in the county.

A pertinent question I hope to have answered is this: how are "state reserves" managed differently than "natural preserves" within your system? From the description on page 72 of a state reserve it sounds as if visitor traffic would be encouraged in the groves but not as much as other parts of the park. If a reserve were a piece of land that has outstanding characteristics then preservation would be in order. If the two groves in Redway are unique then I would think they would be excellent locations for environmental study and hiking trails that show the public what much of California used to look like. Having participated in prairie restoration in the Midwest I know the value of historic remnants. These locations seem to qualify as remnants.

Along with this, would a reserve classification change the access issue that Parks now has with Maxxam/Pacific Lumber Company regarding PL's THP 044? I encourage Parks to hold fast on their decision to not grant access to Maxxam/Pacific Lumber Company.

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Holbrook Grove was effected by the slide of 1995, which took out sections of Redwood Drive, a highly traveled road used by local residents. Through Whittemore Grove there are roads that are used by vehicles. In the section southwest of Briceland Road there is a road that has been used by timber extractors. This is the road I mentioned in the previous paragraph that is the source of debate between Parks and Pacific Lumber Company. I think this particular road, as restorationist says, should be "put to bed". In the past, a resident who built a house adjacent to the grove used this road. The house is not a residence any longer, is owned by PL, and sits very close to the lip of the still unrestored, bleeding source of the 1981 Redway slide area. It has been said that this road is needed for CDF access in case of fire. Even if the road were put to bed properly emergency vehicles could use the opened area to get up on the ridge

I encourage the Department to acquire the 581 adjacent acres currently held by Maxxam/PL. Maxxam claims they are not a willing seller however in the same breath they will say "show us the money". The citizens of southern Humboldt do not want Pacific Lumber logging in this area and have been working hard to find ways of acquiring this property. Residents see the value of this land if it is held in what we believe to be better stewardship than Pacific Lumber gives it. According to botanical survey results completed by SHN Consulting Engineers and Geologists, inc. in May 2000, the "species diversity is exceptionally high within this [581 acres], due to the congregation of grassland, redwood forest, mixed evergreen forest, and oak woodland plant communities together in a small area." This alone should prompt preservation. The area in question has been hammered by past logging operations and needs to rest. Along with preservation, restoration would be an excellent path to take for the health of the land, the safety of the community and the health of the Eel River and its tributaries. Since there is at least one slide area that needs restoration, which could be contracted to local professional restoration companies, the question of liability arises. Liability is based of culpability, of which Parks is not guilty. In addition, it is possible to have the state legislature protect the Department of Parks & Recreation from liability.

I propose that Holbrook Grove, Whittemore Grove with the extension of the previously mentioned 581 acres, and Lower Redway be held in preservation and specifically set aside as unique California remnants of Redwood forest. There are many learned and capable people in Humboldt County who would be able to contribute to this. If the Department would incorporate the assistance of local community participation I believe the Redway parkland could be maintained in excellent environmental health. This area can be of great interest and an educational tool for botanists, ichthyologists, zoologists, geologists and the public.

Thank you for preserving the ever-decreasing amount of Redwood forest in California. I hope the area I live in will be subject to the Department's help and continued consideration.

Sincerely,

Tamm Moody

POB 2174 - Redway CA 95560



Simpson-Vance House 1892

Redwood Community Action Agency

October 15, 2001

State Park and Recreation Commission
P.O. Box 942896
Sacramento, CA 94296

I commend the park staff for the high quality of the Humboldt Redwoods State Park General Plan. The document does a great job of addressing many of the complex resource management issues. I am writing to request that more emphasis be placed on developing a non-motorized trail to parallel the Avenue of the Giants area. In appendix E of the preliminary General Plan, the potential for developing a multi-use trail along the Avenue of Giants is mentioned.

There is considerable local and regional support for developing a safe, non-motorized corridor linking the communities and the park together. During the American Planning Association (APA) awarding winning planning process for the Avenue of the Giants, the residents specifically called for a non-motorized trail. Residents established their interest in this parallel trail linking the existing trails within the State Park, as well as linking those trails to other nearby areas. The Avenue of the Giants Community plan, section 4300, has a goal "to create multi-use trail along the Avenue with connection to the local communities." The County General Plan also supports the multi-use trail in section 4311.

The Natural Resource Services division of Redwood Community Action Agency (NRS/RCAA) is working on a Redwood Region Pathway Implementation Strategy. This

70 mile pathway assessment includes the Avenue of the Giants. The goal of developing a system of non-motorized routes for travelers is to encourage more economic development to the rural communities in the region. Increasing trail opportunities and linkages would encourage travelers to stay in the region longer, rather than passing through this spectacular region en route for other communities that offer more services. This in turn would stimulate local business development. While developing this project, we have received numerous letters of support from organizations, governmental agencies and citizens that call for a multi-use trail.

I would like to see more focus on the development of non-motorized access along the Avenue of the Giants in the Humboldt Redwoods State Park Plan. Some of the benefits of developing a trail are heightened traveler and resident safety, enhanced recreational enjoyment of the region, and an increase in economic development in the local communities.

Thank you for your consideration of this issue. I look forward to hearing from you on the development of the Humboldt Redwoods State Parks Plan.

Sincerely,



Nora Wynne, Natural Resources Planner
Natural Resources Services Division of RCAA
904 G Street
Eureka, CA 95501
(707) 269-2062
(707) 445-0884 fax



Gray Davis
GOVERNOR

STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse



Steve Nissen
DIRECTOR

August 13, 2001

Joann Weiler
Department of Parks and Recreation
One Capitol Mall, Suite 500
Sacramento, CA 95814

Subject: Humboldt Redwoods State Park Preliminary General Plan
SCH#: 2001022063

Dear Joann Weiler:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 10, 2001, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures

cc: Resources Agency

**HUMBOLDT REDWOODS STATE PARK
GENERAL PLAN
FINAL ENVIRONMENTAL IMPACT REPORT**

The preliminary general plan, comments received during the public review, and the Department's responses to those comments constitute the Final EIR as required by the State CEQA Guidelines (California Code of Regulations, Section 15132). The preliminary general plan was circulated for review to state and federal agencies, interested members of the public, conservation organizations, and local planning agencies. Comments were received from the following:

U.S. Fish and Wildlife Service
Bureau of Land Management
California Department of Fish and Game – North Coast Region
California Regional Water Quality Control Board – North Coast Region
California Department of Transportation
California Department of Forestry and Fire Protection – Humboldt-Del Norte Unit
Humboldt County Farm Bureau
Save-the-Redwoods League
Mattole Restoration Council
Richard McGuiness
Carol and John Wiebe
Helen M. Bourne
Lydia Garvey
John M. Gaffin
Michael L. Rilla
Dominic A. Farinha
Nicholas Kent
Kim A. Cabrera
Charles P. Lyden
Charles Wilson
Patricia S. Bernstein
Virginia Graziani
Marie Montagne
Linda B. Sutton
F.R. and Carol Evans
Frances R. Clever
Orrin C. Scott

The Final Environmental Impact Report will be used by the State Park and Recreation Commission in its consideration of approval of the Humboldt Redwoods State Park General Plan.

Humboldt Redwoods State Park
Preliminary General Plan

RESPONSE TO PUBLIC COMMENTS

September 14, 2001

1. Performing surveys of wildlife is a resource management action that would follow approval of the general plan as a second, more detailed phase of planning that the Department calls management planning.

General plans are broad policy documents. They define an overall framework for a park's future resource stewardship, visitor use and services, and interpretation. Management plans identify more definite objectives and methods and/or designs for attaining the goals set in the general plan. The level of detail at this second level of planning is shaped by the complexity of the issues being addressed, regulatory and legal requirements, and departmental standards.

Management plans are prepared as funding and staffing are available and as opportunities or urgencies dictate to carry a specific management program or project forward. Unlike general plans, individual management plans are more specific and can be adapted as necessary to serve a park's management needs. Some examples of management plans are resource management plans and surveys, development plans for circulation and facilities, operation plans, interpretive prospectuses or plans, and concession plans.

Management plans are usually prepared by the staff of the local District and may incorporate a process that involves public comment and review. Additional environmental review consistent with the level of detail is also an essential part of the management planning phase. Likewise, coordination with other agencies is often initiated.

Under the Department's current planning structure, environmental review is "tiered." The EIR for the general plan addresses the amount of detail possible at the broad policy level. A more in-depth examination of potential adverse environmental impacts and possible mitigation measures commensurate with the greater level of detail is part of each management plan or specific project plan.

A number of reviewers' comments requested additional studies, particularly inventory and monitoring, and increased protections for sensitive wildlife species and their habitats. Though the preliminary general plan includes a number of protective measures and guidelines recommending future studies and management plans, the final general plan will include additional guidelines in the following paragraphs.

In the Animal Life Management Section, a new guideline will read "Avoid impacts and disturbance to critical wildlife habitat areas, such as riparian zones, during the breeding season; riparian understory should be retained as a dense and structured vegetation layer. Activities, such as mowing in redwood reforestation plots, should be done after the breeding season to avoid disturbance of ground nesting birds."

Another new guideline will be added to the Special Animals Section: "Implement a program of field surveys to record locations of nests and map the distribution of sensitive species about which little is known. These studies may include species such as the northern spotted owl, bald eagle, peregrine falcon, Humboldt marten, Pacific fisher, and other Species of Special Concern. Once their distribution is more fully understood and documented, this data will be included in resource planning and management activities. These activities shall include protection of special habitat elements, such as snags and hollowed-out trees."

2. In the final general plan, the first guideline under Special Animals in the Animal Life Management Section will read: "Minimize trails in marbled murrelet and spotted owl nesting habitat. Trail building and maintenance activities in these areas, including the hazard tree removal program, should be minimized during the breeding season and shall comply with the Endangered Species Act and applicable federal and state regulations." Please refer to Response #1.
3. The final general plan will be revised so the second sentence of the fourth guideline under Park-wide Goals and Guidelines for Recreation will read, "In particular, avoid adverse impacts to critical resource areas where possible and follow all applicable protocols."
4. The final general plan will contain revised language in the third sentence under Mitigation for Wildlife in the Environmental Analysis Section, that will read, "In accordance with general plan guidelines, facilities, including trails, will be designed according to established protocols. The Department will seek consultation with appropriate agencies with the intent of achieving less than significant impacts to listed species. Additional research on impacts to species and construction technology will help to achieve this."
5. To address the concern of hazard trees, please refer to the first paragraph in Response #2, above.
6. Thank you for your corrections. In the final general plan, this paragraph will be changed to read "Humboldt Redwoods State Park contains one of the largest remaining blocks of marbled murrelet nesting habitat in this part of the state. To the north, the Headwaters Reserve and Redwood National and State Parks also provide large areas of nesting habitat. To the south, the next sizeable block of nesting habitat is 300 miles away in San Mateo and Santa Cruz counties."

7. The Department intends to work closely with the Bureau of Land Management to attempt to inform people who will be accessing the Gilham Butte area and other lands between the park and the King Range National Conservation Area, as well as the Headwaters Forest Reserve, to make them as well prepared as possible. See Response #1.

The correction, "King Range," will appear on Map 1 in the final general plan.

8. Thank you for your recommendations for visitor education at Humboldt Redwoods to help prevent visitors from feeding corvids and other animals. The final general plan will expand the language in the fourth guideline under Animal Life Management to read: "Initiate a program for educating park visitors and the general public about the negative effects of releasing and feeding any animals in the park." In regards to an active visitor education program, guidelines in the general plan also state "educate the public about the detrimental effects that supplanting wildlife food sources with human food can have on the ecological balance of the park and surrounding regions." The methods you suggest for conducting such an educational program will be brought to the attention of park interpreters to be addressed in interpretive programs, utilizing the most appropriate media for the location and circumstances.
9. We share your concern about the alluvial flats along Mattole Road. Please refer to Response #1 to see how the Department's project planning strategy is intended to deal with future environmental impacts to sensitive resources. The Bull Creek alluvial area along Mattole Road, which is largely characterized by the ancient redwood/redwood sorrel vegetative association, has a high degree of protection proposed in the general plan. Most of this area is either zoned primitive, with a natural preserve subclassification, or backcountry non-mechanized, with a wilderness subclassification. Based on this management zoning alone, potential future facilities development is limited. In the Primitive Zone, no new development of park facilities will be permitted. In the Backcountry Non-mechanized Zone, facilities will be limited to those appropriate for non-mechanized uses, such as hiking, backpacking, and horseback riding. In short, the general plan does not allow for any new facilities development in the Bull Creek alluvial flat area, except for potential trails, which would require further environmental review. The statement cited regarding development in Bull Creek appears in the Environmental Analysis and actually reads "Bull Creek watershed." The potential developments listed are proposed for areas outside of ancient redwood forest altogether, farther up the watershed along Mattole Road in clear areas.
10. The general plan's intent is that campgrounds should not be located within ancient redwood forest areas. In addition, it addresses the topic of campground relocation more than once. The first guideline under Redwood Forests in the Plant Life Management Section states, "Identify those developed locations in ancient redwood forests most heavily impacted by visitor use and design and implement vegetation rehabilitation and soil compaction reduction programs, consistent with the need to provide visitor services. The program may include such measures as fenced

enclosures and temporary or permanent relocation of visitor use areas.” Under the Frontcountry Zone guidelines, the plan states “Where excessive resource impacts have occurred, consider relocating existing facilities to more suitable sites within the Frontcountry Zone. The Williams Grove Group Camp is an example of a facility that should be removed to another acceptable location . . .” State park general plans usually do not provide more in depth guidance than the above guidelines. Details will be addressed in future programs and management plans, and the newest techniques that have been shown to be successful for avoiding or reversing adverse impacts to sensitive resources will be utilized by managers at that time. Please refer to Response #1. Currently, the District is experimenting with fencing off areas within Burlington Campground and has had success with regenerating vegetation.

11. Please refer to Response #2.
12. Field surveys to locate northern spotted owl nest sites within the park and provide for the protection of all known territories are addressed in the fifth guideline in the Animal Life Management Section of the preliminary general plan, which states, “Inventorying and monitoring of special animals and other species is desirable to identify population trends of these sensitive ancient coniferous forest species. When feasible, the Department should support scientific research studies within the park that provide mapping, establish monitoring programs, and furnish data and analysis about the distribution and condition of natural resources. For the successful long-term management of wildlife populations, establishment and maintenance of a process to track and analyze species presence and population health within and movement through the park is recommended.” Please refer to Response #1.
13. Regarding the inclusion of provisions for a program to conduct annual nest-site surveys of known or suspected bald eagle nests in the final general plan, please refer to Response #1.
14. Regarding including provisions in the final general plan to better assess peregrine falcon use of the park environment through surveys, please refer to Response #1.
15. The final general plan will be updated to reflect the most recent status of coho salmon. Regarding the comment that the plan lacks a discussion of the value of the park’s habitat for aquatic species, especially sensitive aquatic species (i.e., salmonids), the last subsection under Sensitive Animal Populations in the Park Summary has a description of the aquatic life found in the park, including coho salmon, Chinook salmon, steelhead, and Pacific lamprey. This discussion includes an account of the habitat, and past and current impacts to the aquatic habitat for these and other species.
16. The issue regarding potential impacts and conflicts between park management activities and aquatic resources, as well as measures to avoid or minimize adverse impacts to these resources, will be addressed in the Watershed Management Plan proposed in the first guideline under Watershed Management. This guideline directs park managers to “Cooperate with regulatory agencies to address and remedy

sediment discharge issues affecting the park, especially its ancient redwood forests. The Department should work in concert with these agencies to develop a plan for specific management actions intended to achieve watershed management goals.” While developing this management plan, issues such as potential conflicts between park management activities and aquatic resources will be studied and addressed. After studying conflicts and potential solutions, measures to avoid or minimize adverse impacts to aquatic resources, and ultimately improve them, will be proposed.

17. As future projects are implemented following this general plan, state and federal permitting agencies will be consulted for guidance on approved and/or recommended mitigation measures. When potential environmental impacts are fully understood, actions to mitigate them will be planned and implemented. Please refer to Response #1.
18. A number of guidelines in the plan recommend monitoring to assure the continued preservation of sensitive park resources, including Species of Special Concern. Please refer to Response #1.
19. The Department supports reintroduction of extirpated species, such as the Humboldt marten and Pacific fisher. However, it is not always feasible to implement programs such as these due to a lack of funding and resources. Various other factors may also make such a project more or less feasible. The statement “when feasible” is not intended to signify or allude to any prioritization.

Thank you for the historical documentation of the presence of fishers in areas near the park. It will be used as a reference for future potential reintroductions of this species. Please refer to Response #1.

20. The Department is committed to inventorying sensitive species and their habitats at Humboldt Redwoods State Park contingent on the availability of sufficient funds and resources. Please refer to Response #1
21. The Department appreciates the contact information supplied in your comment. Department staff are aware that pond turtles rely on upland habitat for nesting and can travel large distances over land. However, the purpose of this plan is to provide the broad guidelines to assure avoidance of adverse impacts to sensitive habitats. The particulars of how to do this are not usually discussed in general plans. As future projects are funded, sensitive species and their habitat requirements will be more fully discussed in CEQA documentation for specific projects and locations. Please refer to Response #1.
22. The probabilities of the species to which you refer occurring in the park will be changed as you recommend.

23. The final general plan will contain a broadened goal under Special Plants in the Plant Life Management Section, stating "Protect special (rare, threatened, endangered, endemic, or locally significant) plant species within the park to manage for their perpetuation in accordance with federal and state law."
24. The final general plan will contain a guideline reading "Ongoing efforts should occur to perform inventories to contribute to an updated comprehensive plant list for the park and to identify special plants, to monitor the condition of special plant populations, to develop partnerships with other research entities, and to provide public education to park visitors about respecting plant resources." The specific methods for implementing these programs will be developed in the future Vegetation Management Plan. Please refer to Response #1.
25. The sensitive plant species you mention will be added to Appendix B in the final general plan.

Your suggestion for meetings between this Department, your agency, and the U.S. Fish and Wildlife Service to consult about possible mitigation and project alternatives during future project planning in areas of the park with sensitive plant or animal species would be an efficient method for resolving conflicts during CEQA reviews. Please refer to Response #1.

26. Please refer to Response #1 regarding compliance with regulations and permit requirements for future projects at the park.
27. The traffic volume information in this paragraph will be updated to reflect data for the year, 2000.
28. The proposed Trails Plan will consider the feasibility of a trail along the Avenue of the Giants as part of an integrated trail system for the park. The District will invite participation from the public at the time the plan is prepared. The Avenue Parkway proposals for thematic treatments of such elements as railings, barriers, and interpretive media to present a continuity and unifying quality to the Avenue, as well as a possible speed limit, should also be part of these deliberations. Please see Response #1.
29. Not all of the proposals in Alternative 2, which was presented at the second public involvement meeting for public review, were carried forward into the preliminary general plan. The Department is not pursuing Scenic Highway status for any road in the vicinity of the park. Proposals for preservation and enhancement of views from the park will be further refined in future studies and project planning during which coordination with all interested agencies will occur. Please see Response #1.
30. Please see Response #1.

31. The illustration, "The Disappearing Redwood Forest," will appear in color in the final general plan and will be entitled "The Disappearing Ancient Redwood Forest" to more effectively convey the point that California's (and the world's) ancient redwood forest has indeed been reduced to 4% of its former size. Though the range of the trees has not changed appreciably, there has been some shrinkage, especially near urban areas, and it is now mostly occupied by young trees and lacks the rich and diverse ecosystems of the ancient redwood forests.
32. The descriptions of Natural Preserve, State Wilderness, and State Reserve from the Public Resources Code (Sections 5019.65, 5019.68, and 5019.71) will be added to the final general plan to clarify the legal strictures that govern their management. Planning for the management of the park's proposed natural preserve and wilderness areas, as well as other proposed "non-mechanized" areas, will include consultation with the Department of Forestry and Fire Protection to deal with the problems of fire management. See Response #1.
33. See Response #1 and # 32.
34. The Department is delighted to receive the fire history map for Humboldt Redwoods State Park. The District has noted that roadless areas within the park do not have a history of fire. Current and planned improvements to backcountry roads will allow CDF to better meet its firefighting responsibility. See Response #1.
35. The particulars of emergency services response issues will be worked out between this Department and its sister agencies, pursuant to the direction furnished by the second guideline in the general plan under Park-wide Goals and Guidelines for Community Relations. See Response #1.
36. The statement that the Department will continue to "review and comment on timber harvest plans" (item 5 under the Project Description in the Environmental Analysis) is not intended to establish a separate review process but, rather, to underscore the Department's continuing commitment to participation in the existing review process for proposed timber harvest plans located in the vicinity of the park that might affect park resources.
37. The General Planning Team believes that the general plan sufficiently addresses community relations in the Issues Analysis and Goals and Guidelines. The Department continues to welcome contact with other agencies and local residents.
38. From a strictly legal standpoint, the California Environmental Quality Act review process was initiated to assess only the environmental impacts of proposed projects. However, this Department also uses the CEQA process as an opportunity for public review and comment on preliminary general plans. The General Planning Team shares your concern regarding the loss of the traditional rural landscape of southern Humboldt County. However, it is not the mission of the Department of Parks and

Recreation to maintain agriculture within state parks. The Department's mission appears in the preliminary general plan.

39. A general plan does not provide this level of information. Questions 1 and 2 may be answered by contacting the Department's Office of Acquisition and Real Property Services in Sacramento (phone 916-653-5720), specifying your purpose and the intended use for this information.

The Department does not maintain a record of the requested category of information to provide a response to Question 3.

For an answer to Question 4, we recommend that you contact the Save-the-Redwoods League directly (phone 415-362-2352).

Regarding Question 5, at this time the Department is not in the position to determine how much land is needed to accomplish the stated purposes in the general plan. The success of county zoning and private property owners' abilities to manage adjacent lands with compatible land uses could minimize the need for future acquisitions.

The Department cannot establish a permanent park boundary. Land acquisition needs to be based on future requirements, the presence of willing sellers, opportunities for purchase, and variable selection criteria and circumstances. Acquisition is just one of the many options available to the Department to achieve planning goals and objectives.

40. We agree that agricultural uses on adjacent lands under most circumstances can be compatible with resource management and provision of visitor services at a state park. To answer your question why the Department has not acquired former agricultural lands and leased them back for agricultural uses, please see the following excerpt from the Public Resources Code Section 5069:

"Any portion of any parcel of real property acquired for state park system purposes, which had been farmed or grazed, or otherwise used for agricultural purposes, within the 24 months immediately preceding acquisition, may be made available for lease for agricultural purposes by the department if the director makes written findings that use of the real property for agricultural purposes would be compatible with the ultimate use of the real property as a unit, or part of a unit, of the state park system and with the sound management and conservation of resources within the unit." (Section 5069.1, emphasis added)

Most of the rest of the Agricultural Leasing Section are procedural. What is relevant is that the state and Humboldt County define agricultural lands differently. The county defines any land with prime agricultural soils as "agricultural land."

The Department has only preserved agricultural lands in production where the use has been in conjunction with other Department goals. Usually in these cases, the land has been sold to the Department as a package with that understanding and purpose. In the case of Wilder Ranch State Park, land was acquired with the specific agreement that parts of it would be retained in agricultural uses because the purpose of that park is, in part, to highlight the historic and innovative agricultural activities that occurred at the Wilder Ranch during the nineteenth and twentieth centuries.

While the mission of the Department of Parks and Recreation does not include preservation of local agricultural traditions in and of themselves, there are state agencies whose missions do embrace that purpose. For example, the Department of Conservation has a grant program intended for funding easements that will continue agricultural uses. The Coastal Conservancy is also charged with this purpose.

41. The Department does not normally include planning for lands or facilities it does not own in general plans. The possibilities for regional connections presented by the proximity of the railroad make it an ideal subject to take up when preparing the park Trails Plan.
42. Except where otherwise explained, the helpful changes and additions you included will appear in the final general plan.

The preliminary general plan provides that, "after re-establishment of natural processes in formerly logged areas," the Department will "consider inclusion of these lands within the State Wilderness." The natural preserve is more limited in that it is hemmed in by roads on all sides.

43. The Department acknowledges the long-time contribution of the Save-the-Redwoods League to the State Park System through its memorial and honor grove programs and will continue to coordinate with the League regarding the recognition and designation of the groves. However, how best to accomplish this in the future is a policy matter that transcends any single redwoods state park or general plan and will be the subject of ongoing discussions.
44. The final general plan will carry forward the existing guideline under Vegetation Management: "Assess factors affecting the health of the redwood forest ecosystem through monitoring identified key measures and important indicator species for ancient and recovering redwood communities. If monitoring shows a decline in health, natural resource specialists will attempt to determine the cause and take action to reverse the decline, where possible." In addition, the final plan will also contain a new guideline under Park-wide Goals and Guidelines for Recreation: "Periodically appraise prime natural and significant cultural resources with respect to recreational use."

45. As data sharing becomes more widespread throughout the State Park System and between our agency and other researchers, a common database is being sought that will ease the transmission of information. This will ultimately benefit not only the park but also other parties who might desire to share and exchange data. Please see Response #1.
46. The Department appreciates the information on the Humboldt marten. Dr. Zielinski will be consulted.

Amphibians: The text in the final general plan will be revised, with this sentence deleted: "Park records list two other amphibian species with special significance as probably occurring in the park."

Aquatic Life: The final general plan will include a sentence following the fish species names in the first paragraph of the Aquatic Life Section in the Park Summary, "These three species are all anadromous fish, linking the park to the ocean, as adult fish travel from the ocean upstream into the waters of Humboldt Redwoods State Park to lay their eggs in the places where they hatched years before."

47. The results of the visioning exercise are embodied in the Department's strategic plan, *The Seventh Generation*, which can be found on the Department's website at www.parks.ca.gov/allpages/default.asp?page_id=1082. The Strategic Initiatives (page 19 of *The Seventh Generation*) indicate the Department's continued commitment to increasing leadership in natural resource management and protecting and managing the biological diversity and self-sustaining natural systems that support individual park units.
48. Manage the middle and south forks of the Eel River within the park to preserve their natural qualities and to maintain their recreational values. Recreation and other uses will be permitted to the extent that the natural and ecological characteristics of the river are not degraded. Protect the free-flowing conditions and natural character of the river.
49. The Department only has the ability to deal with sediment and temperature problems in the South Fork of the Eel River that might be created by sources within the park. It has been unfortunate that large amounts of sediment have entered the river from activities that occurred before some properties were added to the park. Current landscape restoration efforts are aimed at correcting this situation.
50. Park staff with whom we have discussed the low visitation numbers for 1997-98 agree that the heavy rains that extended through June probably were the main factor. Park visitation statistics are recorded by the districts in accordance with methods set forth in the Department's Operations Manual and are compiled and kept at Sacramento Headquarters. Monthly statistics are recorded for people using the visitor center. Day use figures are derived through observation by counting cars and calculating the average number of people in each car. The park applies this factor

during the different use seasons to estimate park attendance. Traffic counters are also utilized to detect traffic movements as an aid in determining visitor access at various locations in the park. Charts showing annual and monthly visitation figures will be included in the final general plan.

51. We would like to believe that any fluctuations in the economy are short-term and in the long-run will not influence the general trend of park visitation.
52. Determining carrying capacity is a matter that has received a great deal of attention and research for decades, with no single method being accepted. These discussions are ongoing between the Department and other state and federal land managers. At Humboldt Redwoods, the proposed approach will be to monitor for indications of resource damage. Criteria and indicators that would trigger modification of management prescriptions will be provided in future management plans. Please see Responses #1 and 44.
53. Optimal Resource Protection and Preservation will be the first issue to appear in the Issue Analysis Section in the final general plan. A new third paragraph will be added that will read "Invasive non-native plant species have the potential to impact park resources by decreasing biodiversity, creating abnormal competition with native species, and providing poorer quality habitat for wildlife. Unintended introduction of pathogenic organisms, such as sudden oak death syndrome, could decimate native park vegetation. Park management will make every effort to develop programs and measures needed to minimize introduction of non-native species and pathogens."

In addition, the following text will be added after the third sentence in the first paragraph of the issue, Optimal Resource Protection and Preservation: "Although rehabilitation efforts are underway, miles of untreated haul roads and associated skid trails from the logging period continue to contribute unnaturally large amounts of sediment, rock, and debris to a very impacted watershed, especially in the upper portion of the watershed."

54. Please refer to Response #1.
55. The Department concurs. The Declaration of Purpose in the final general plan will read "current and future generations." The last sentence in the second paragraph of the Park Vision will read, "As the heart of one of the largest remaining ancient redwood forest, the park serves as a significant and critical natural area that is connected to other natural areas by a network of habitat linkages that allows for free movement and interaction of plants and animals."
56. Guidelines regarding plants: The Department concurs, and the new goal under Park-wide Goals And Guidelines For Natural Resources will state, "Preserve, maintain, interpret and, where necessary, manage and rehabilitate the park's numerous interdependent ecosystems, especially its ancient redwood forests, in order to

protect physical features and perpetuate the natural and sustainable functions of plant and animal life.”

Also, in the final general plan, the guideline under Special Plants will be amended to state, "Protect all special plants to the degree necessary to maintain or enhance populations. Establish a monitoring program for known special plant locations on a long-term basis to assess health of populations and take corrective management actions when necessary."

57. A general plan does not provide specific inventory and monitoring protocols to assist in the protection of special animals. A large number of protocols are already established and in use by other agencies, groups, and individuals. Additionally, the Department has an Inventory, Monitoring, and Assessment Program (IMAP) that has established inventory and monitoring protocols for state parks statewide for vegetation and wildlife. These protocols are the same as are used by other agencies and organizations in most cases. For most special animals, there are species-specific protocols that will be provided/recommended by the California Department of Fish and Game and/or the U.S. Fish and Wildlife Service. These protocols might change over the life of the general plan as more information becomes available, and therefore they are not appropriate for a park general plan.
58. The discussion of conservation easements will be expanded in the final general plan.
59. In the final general plan, the following paragraph will be added to the preamble of the Watershed Management Section, "In 1998, under the federal Clean Water Act (Section [303]), the State of California listed the South Fork of the Eel River as 'water quality limited' due to sediment and temperature concerns, requiring a TMDL (Total Maximum Daily Load) analysis. The U.S. Environmental Protection Agency (EPA) is charged with establishing TMDLs at levels that will meet state water quality standards for sediment and temperature. An implementation plan is to be prepared by the North Coast Regional Water Quality Board and the State Water Resources Control Board to achieve compliance with established TMDL levels."

In addition, this guideline will be added to the section: "Develop watershed management plans for the park's primary watersheds."

60. These are two separate plans developed and implemented by the same staff.
61. The final general plan will contain an expanded discussion on the means of transport used by visitors to get to the park.
62. The potential effects of changing user groups constituting the visitation to Humboldt Redwoods State Park will be a part of these investigations. Please refer to Response #52.

63. The second guideline under the Primary Theme concerning the Lolangkok Sinkyone will read "Enhance visitors' understanding of Native American cultures" in the final plan.
64. Please refer to Response #32.
65. Specific methods for interpretation and preservation of significant cultural resources will be determined in subsequent management plans. Please see Response #1.
66. The Trails Plan proposed in the general plan will include opportunities for public input. The Mattole Restoration Council should be a part of that planning effort to be sure that these concerns are taken into account for any trail proposals in the southwestern sector of the park.
67. The Department also believes that conservation easements are a possible option for habitat connections and resource protection.
68. Please refer to Response #7 for a discussion of coordination with other agencies to address landscape management on a regional scale. Also see Response #1.
69. Thank you for your many suggestions for public education topics and resource management practices with respect to the redwood forest at Humboldt Redwoods State Park. These comments will be directed to the North Coast Redwoods District and the Department's resource management staff for their attention.
70. Your concerns should be a part of the discussions that go into the development of the future Trails Plan.
71. The sources for citing the presence of these two birds in the park were the *Birds of Humboldt Redwoods State Park* brochure provided by the Humboldt Redwoods Interpretive Association (HRIA) and other lists prepared by local residents. Due to funding and time restrictions, Department staff has not been able to completely survey the park during preparation of the general plan. Much of the information stated in the general plan must be based on reliable local sources and research that has been completed by local experts and organizations. For more information, you might contact the HRIA.
72. Please refer to Response #70.
73. The preliminary general plan does recommend a significant area of undisturbed ancient redwood forest be reclassified as State Wilderness. Please see Response #32.
74. Because of the necessarily small scale maps in the general plan, it is not possible to accurately indicate exactly where the boundaries of the management zones will be "on the ground." In most cases, the maps illustrate the zones with natural or human-

made features as their boundaries. In actuality, future park management will determine what resource sensitivities and other factors will more clearly indicate where one zone ends and the adjacent one begins.

75. At this time, there is no demonstrated demand for additional camping at Humboldt Redwoods State Park (refer to Response #50). Nevertheless, your comments regarding the need for more widely dispersed and larger-sized campsites, as well as walk-in camping opportunities, are noted for future reference. Please see Response #1 regarding planning for camping when studies ascertain the required demand exists.
76. Please refer to Response #1 regarding wildlife and plant surveys at the park.
77. The second guideline for Redwood Forests under Plant Life Management in the Park-wide Goals and Guidelines for Natural Resources will propose management of "second growth redwood forest to encourage ancient forest characteristics." Thank you for your suggested methods.

Prescribed burns are also currently used as a vegetation management tool at Humboldt Redwoods.

78. Thank you for the information about the Hamilton Barn area, traffic on Mattole Road, and the use of the Bull Creek corridor by wildlife with reference to the preliminary general plan's proposed relocation of the group camp now at William Grove. A final site lacking sensitive and vulnerable resources could not be selected until more specific management planning could occur (see Response #1). Nevertheless, the final general plan will omit the phrase, "the flat near Hamilton Barn," so as not to limit future options.
79. The environmental education center proposed in the preliminary general plan would in concept be smaller than the park's visitor center and developed specifically as a teaching facility. It would not be expected to attract large amounts of traffic, and it could be managed so that much of its use would be off-season. This kind of experience was enthusiastically recommended at the campers' meeting during the first public involvement phase of general planning and also has support in the local community. If the current visitor center is capable of furnishing classes and is underutilized, perhaps such a facility is not necessary at this time. The phrase "within the Bull Creek watershed" will not appear in the final general plan to allow other parts of the park to be considered should this ever become a feasible project in the future.
80. It is demoralizing to all visitors to see vandalism at the park. Nonetheless, the proposed interpretive facilities at the Holmgren property and the Dyerville Overlook are integral to the strategy of attracting visitation from motorists on Highway 101 to the park and local communities. How best to manage such facilities, as well as other

unstaffed sites, to discourage or cope with vandalism would be addressed by District and park staff and not in the general plan.

81. The details of signage and the promotion of easier circulation on park roads are the responsibility of the District and park management, not a general plan matter. Thank you for your suggestion.
82. Approved general plans do not carry a source of funding for their implementation with them. The ability to secure monies and staff to carry out the proposals in a general plan is dependent upon departmental priorities and available funding. Please refer to Response #1.
83. General plans do not normally recommend specific properties for acquisition by the Department. Rather, they are constrained to suggesting attributes that properties might possess or management objectives they could fulfill if they became available from willing sellers and funding were available.
84. In the final general plan, the word "multitude" in the preamble to the Park-wide Goals and Guidelines for Recreation will be changed to "variety." The final plan will also reflect your suggestion, and that of others, that proposed developments, such as lodges, be provided by the local communities, rather than the park. Specific methods for finding appropriate sites for RV hook-ups will be part of future management planning for the park's campgrounds. Please refer to Response #1.
85. Maintaining the historic orchards within the park are sensitive vegetation management and cultural resource issues that will need to be dealt with in future management planning. Please refer to Response #1.
86. The alternatives appearing in the Environmental Analysis were presented to the public at the second public involvement meeting and in the workbook distributed at that meeting. The public's comments were part of the basis upon which the preferred alternatives were chosen, which became the general plan proposals presented at the third public meeting.
87. The alternatives to the Preferred Project (the general plan proposals) will appear in the Environmental Analysis in the final general plan. This is required by the California Environmental Quality Act guidelines because the general plan is considered an Environmental Impact Report.
88. Which specific projects would be chosen were a five-year budget plan prepared at this time would be dependent upon subsequent proposals and statewide priorities, which cannot be determined at the time a general plan is prepared.
89. The Department does not normally chart visitation figures for more than ten years when preparing a general plan. A general plan is not intended to project future demand with specificity. Specifics are determined at the times projects come forward

because of need. This general plan recommends that studies to ascertain that demand has indeed increased will be undertaken before any further recreational development occurs at the park.

90. Refer to Responses #52 and 89.
91. In the past, the Department considered general plans to have a 15- to 20-year lifespan. Under the recently-adopted planning structure of broad, goal-oriented general plans and subordinate, more specific management plans, general plans are no longer considered to have endpoints or finite lifespans. They will only be reconsidered for amendments or revisions when circumstances and needs dictate. Because of their broader scope and focus on purpose and direction, they are expected to be more enduring and adaptable to changing circumstances. Goals will remain constant, while specific approaches for implementing those goals might change.
92. With few exceptions, the facilities at Humboldt Redwoods State Park were built before the mid-1970s in compliance with provisions in the Public Resources Code. Facilities development since the 1970s has occurred in compliance with CEQA and the PRC. (*Department of Parks and Recreation Facilities Inventory for Humboldt Redwoods State Park*) The initial park land acquisition occurred in 1921, and the majority of lands, specifically 87.9%, were acquired prior to 1975. (*Department of Parks and Recreation Land Ownership Status Records for Humboldt Redwoods State Park*)
93. The Department may need to continue to acquire land to meet specific purposes necessary for the effective management of the park. The general plan outlines these purposes. The Department is also committed that all necessary acquisitions will continue to be from willing sellers.
94. Thank you for bringing this to our attention. The final general plan will read "Consider creating connections of ancient forest by utilizing sufficiently large areas of high quality second growth . . ." Regarding connections to habitat linkages, refer to Response #93.
95. It is the opinion of the General Planning Team that the devastation of past flooding and economic consequences of constructing the freeway affected local communities at least as much as the growth of the park, with the exception of the town of Bull Creek. On the other hand, the potential benefits of the hundreds of thousands of tourists drawn to the area annually by the park remain largely untapped.
96. Although farmlands could (strictly speaking) be considered ecosystems, they usually lack species diversity and are often maintained using techniques anathema to the natural processes that are the goal of state park vegetation management. The vegetation types under Plant Life in the Park Summary are those found within the

park. As no active farms exist in the park, adding them to this list would be inappropriate.

97. The county asks that the Department make a finding of consistency with the County General Plan and Community Plan prior to accepting land. This does not take into account the fact that the Department must retain the right to acquire land from willing sellers that conforms to its mission and meets its management needs; the Department's future needs may or may not conform to those of the county. The CEQA process is a part of the acquisition process.
98. See Response #40.
99. See Response #93.
100. The objectives of the California Environmental Quality Act, according to the *CEQA Deskbook*, are a) to disclose to decision makers and the public the significant **environmental** effects of proposed activities; b) to identify ways to avoid or reduce **environmental** damage; c) to prevent **environmental** damage by requiring implementation of feasible alternatives or mitigation measures; d) to disclose to the public reasons for agency approval of projects with significant **environmental** effects; e) to foster interagency coordination in the review of projects; and f) to enhance public participation in the planning process (emphasis added). See Response #38.

Application of CEQA Section 15168 (b)(2) regarding cumulative effects would be inappropriate for acquisitions at Humboldt Redwoods State Park because specific sites have not been identified at this time. The intent of a general plan is that the Department would acquire property, in most cases, as a reaction to a threat to its resources. Therefore, the acquisitions would reduce the risk of environmental degradation, not increase it.

101. See Response #100.
102. The Department has followed the guidance of the Native American Heritage Commission in developing its contacts in connection with this general plan and in coordinating with them. Your suggested change in the language of the first guideline under the Primary Theme dealing with the Lolankok Sinkyone people in the Park-wide Goals and Guidelines for Interpretation will appear in the final general plan.
103. Removal of materials from state parks is governed by Title 14 of the California Administrative Code. Section 4306 forbids damaging or taking plants or other materials from units of the State Park System, while Section 4309 grants the Department authority to allow exemptions from the provisions of Section 4306 and grant permits for removal of certain materials for ceremonial or scientific purposes. Section 5097.9 of the Public Resources Code prohibits the Department from interfering with Native American religious activities and extends the exemption from

Title 14 to Native Americans for gathering materials for ceremonial, not commercial, purposes. This policy is based on the Department's charge to preserve our California heritage.

104. Euroamerican is the conventional term employed by the Department to describe settlers coming to this country during the early and mid-nineteenth century.
105. The General Planning Team has received no other comments indicating that this account deviates from fact.
106. Generally, campfires in designated areas within state parks are exempt from PM 10 regulations. Section 4423.3 of the Public Resources Code reads "The use of a campfire is not restricted or prohibited by a proclamation issued pursuant to Section 4423.1, unless specifically restricted or prohibited in that or a subsequent proclamation. If restricted by proclamation, campfires shall be confined to facilities constructed for that purpose within the confines of a campground established, maintained, and open for public use, whether publicly or privately owned."

In the event that shelters, such as tent cabins, were constructed at Humboldt Redwoods State Park that would use wood-burning stoves for heat, they will be subject to the same regulations as any other such stoves, being under the purview of the Environmental Protection Agency, as well as the California Air Resources Board.

The purpose of general plans is to provide broad guidance, not the details of park administration. Also see Response #70.

107. The general plan refers to the redwood forest at Humboldt Redwoods State Park using the terms, "one of the world's largest remaining contiguous stands," to drive home the point that this is the prime redwood forest in the world of this size. It has importance to hundreds of thousands of people worldwide as the cornerstone of the redwoods preservation movement. In addition, parts of the ancient redwood forests at the park are the least impacted by the human presence worldwide, so the word, "pristine," is appropriate to depict these forest areas. Viewed as such, this language is not inflated but, rather, simply descriptive. Also see Response #31.
108. A discussion of treatment for the California spotted owl would not be relevant in this general plan because its range does not include Humboldt Redwoods State Park.
109. See Response #6.
110. The introduced squawfish has had negative impacts on native anadromous fish populations in some portions of the Eel River. It is unclear if the squawfish is present in large numbers or causing problems in the waters of Humboldt Redwoods State Park. Surveys completed by the California Department of Fish and Game and others

during the 1990s indicated that squawfish were not present in most of the streams within the park at that time, but they were present in the main and south forks of the Eel River. The first and third guidelines under Animal Life Management in the general plan both propose protecting native wildlife populations and, if necessary, regulating animal populations. The first guideline also directs preparation of a comprehensive list of species requiring special management attention. If it is determined that squawfish are adversely impacting native anadromous fish populations within Humboldt Redwoods, then they will be addressed in future management programs.

Diversion of Eel River water to the Russian River is not the type of issue addressed in a state park general plan. Although increased water flow in the Eel River would improve habitat within Humboldt Redwoods State Park, this type of decision is out of the jurisdiction of the California State Parks Department.

111. Park housing is a matter within the purview of the District, not the general plan. If you have questions regarding the need for or numbers of park residences, please contact the North Coast Redwoods District office at 707-445-6547. In some cases, park staff residences are cultural resources, including the plantings around them. In these few cases, non-native, non-invasive plants are permitted to be maintained within state parks.
112. Please refer to Response #83.
113. Please refer to Response #83.
114. The Department's organizational structure is not a general planning matter. Such decisions require careful consideration on a statewide basis.
115. Management of state reserves is governed by their description in the Public Resources Code (see Response #32) and is implemented by the District. The new state reserve will receive its own general plan at some time in the future, which will further clarify how it in particular will be managed.
116. The SEA Forest signs are not associated with the state park. Thank you for calling them to our attention.
117. Current and future management and restoration efforts at the Holbrook and Whittemore groves are under the jurisdiction of the North Coast Redwoods District.
118. Please refer to Response #83.
119. Please refer to Response #83.
120. Thank you for drawing this property to our attention. Please be assured that no final decision has been made regarding its disposition. The general plan includes

guidelines making it possible for the Department to consolidate its holdings as necessary. In some cases, this may require sale of property it owns. When selling property, the Department must go through a CEQA process. That is the appropriate time to comment, but we appreciate knowing the value of this property to the residents of Redway at this time. Please also refer to Response #115.

121. Please refer to Response #83.
122. Please refer to Response #120. The General Planning Team cannot answer your question regarding the use of barbed wire at Holbrook Grove. We suggest you contact the North Coast Redwoods District about it.
123. Please refer to Responses #83 and 114.
124. Please refer to Response #120.
125. The specifics of park management are under the jurisdiction of the District, and cannot be part of the general plan. Please contact the North Coast Redwoods District regarding the continuation of the Weott water source.
126. Please refer to Response #125.

NOTICE OF DETERMINATION

CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF DETERMINATION

TO: Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

FROM: California Department of Parks
and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 of the Public Resources Code.

Project Title: HUMBOLDT REDWOODS STATE PARK GENERAL PLAN

State Clearinghouse Number: 2001022063

Contact Person: ROBERT HARE

Phone Number: (916) 445-8911

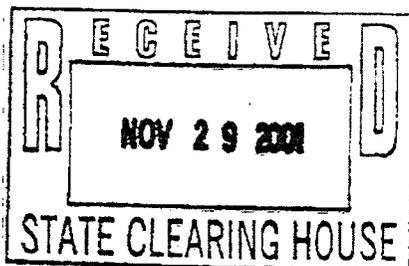
Project Location: HUMBOLDT REDWOODS STATE PARK, HUMBOLDT COUNTY

Project Description: GENERAL PLAN FOR THE DEVELOPMENT, OPERATION, MANAGEMENT,
AND INTERPRETATION OF HUMBOLDT REDWOODS STATE PARK

The California Department of Parks and Recreation has approved the project and has made the following determinations regarding the project:

- The project will not have a significant effect in the environment.
 - The project will have a significant effect on the environment.
 - A Negative Declaration was prepared and adopted pursuant to the provisions of the California Environmental Quality Act (CEQA).
 - A Final Environmental Impact Report has been completed in compliance with CEQA and has been presented to the decision-making body of this Department for review and consideration of the information contained in the Final EIR prior to approval of the project.
- Mitigation measures were were not made conditions of project approval.
 A Statement of Overriding Considerations was was not adopted for this project.
 Findings were were not made on environmental effects of the project.

The EIR and record of project approval may be examined at the Northern Service Center, California Department of Parks and Recreation located at One Capitol Mall, Suite 500, Sacramento, California.



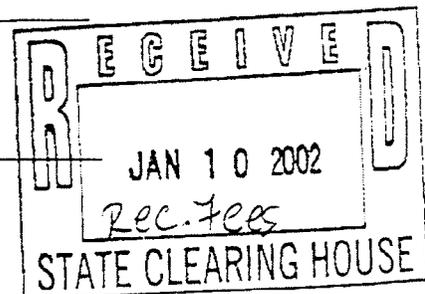
Date Received for Filing

Dick Troy
 Signature: Dick Troy

DEPUTY DIRECTOR,
Park Operations

Title
NOV 26 2001

Date



**Document Details Report
State Clearinghouse Data Base**

SCH# 2001022063
Project Title Humboldt Redwoods State Park Preliminary General Plan
Lead Agency Parks and Recreation, Department of

Type EIR Draft EIR
Description The Preliminary General Plan provides long-term guidelines, directions, and goals for the operation, development, management, interpretation, and resource management for the entire State Park.

Lead Agency Contact

Name Joann Weiler
Agency Department of Parks and Recreation
Phone 916-445-8907 **Fax**
email
Address One Capitol Mall, Suite 500
City Sacramento **State** CA **Zip** 95814

Project Location

County Humboldt
City
Region
Cross Streets Avenue of the Giants & Bull Creek Flats Road
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways 254
Airports
Railways N.W.P.R.R.
Waterways Eel River, South Fork Eel River, Bull Creek
Schools South Fork H.S.
Land Use Humboldt Redwoods State Park/Recreation

Project Issues Aesthetic/Visual; Agricultural Land; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 1; Department of Forestry and Fire Protection; Office of Historic Preservation; Office of Emergency Services; California Highway Patrol; Caltrans, District 1; Department of Housing and Community Development; Air Resources Board, Major Industrial Projects; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 1; Native American Heritage Commission; State Lands Commission

Date Received 06/27/2001 **Start of Review** 06/27/2001 **End of Review** 08/10/2001

HUMBOLDT REDWOODS STATE PARK GENERAL PLAN STATEMENT OF FINDINGS MITIGATION MONITORING

VISUAL IMPACTS

IMPACT

Significant, unless mitigated.

MITIGATION

The development of management plans and specific project designs will define aesthetically appropriate design features; limit construction methods and timing; provide resource identification; and identify optimum methods for protecting existing resources. General plan-designated management zones (See Map #5) and proposed reclassification of tracts of the park to more protective wilderness and natural preserve status will also afford additional resource protections, including a significant reduction in opportunities for facilities development in sensitive areas. Throughout the park, emphasis will be placed on reducing visual impacts by careful siting, design, and selection of construction materials. Native plant species will also be used to screen developed parking and campground facilities, buffer intrusive or disruptive views or activities outside park boundaries, and enhance scenic views. Construction and maintenance activities will be timed to decrease their impacts on visitors and adjoining property owners. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

Responsibility: The Department of Parks and Recreation (Department staff/Landscape Architect) and other mandated contracting authorities

Monitoring/Reporting: Completion of required resource evaluations and development plans prior to implementation of specific projects. Subsequent tier CEQA review of all proposed projects.

FINDINGS

Until the uses, locations, and scope of facilities or management plans are specified, the actual level of impact (individual or cumulative) or need for mitigation cannot be determined. However, evaluation at the specificity of this first tier review indicates that the projects proposed in this general plan, subject to subsequent tier review and development of corresponding mitigation measures, can be mitigated to a less-than-significant level.

VEGETATION

IMPACT

Significant, unless mitigated.

MITIGATION

Prior to implementation of resource management projects and construction of facilities and trails, areas of potential impact will be surveyed for the presence of sensitive species, including endangered, threatened, or rare plant species. If there is a potential for significant impacts (individual or cumulative), proposed facilities, including trails, will be redesigned to avoid impacts, or appropriate mitigation measures will be taken to reduce the impacts to a less-than-significant level. General plan-designated management zones (See Map #5) and proposed reclassification of tracts of the park to more protective wilderness and natural preserve status will also afford additional resource protections, including a significant reduction in opportunities for facilities development in sensitive areas. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

Responsibility: The Department of Parks and Recreation (Department staff/Resource Ecologist) and other mandated contracting authorities

Monitoring/Reporting: Completion of required resource evaluations and development plans prior to implementation of specific projects. Subsequent tier CEQA review of all proposed projects.

FINDINGS

Until the uses, locations, and scope of facilities or management plans are specified, the actual level of impact (individual or cumulative) or need for mitigation cannot be determined. However, evaluation at the specificity of this first tier review indicates that the projects proposed in this general plan, subject to subsequent tier review and development of corresponding mitigation measures, can be mitigated to a less-than-significant level.

WILDLIFE

IMPACT

Significant, unless mitigated.

MITIGATION

Prior to construction of facilities and trails, site-specific areas of potential impact will be surveyed for the presence of endangered, threatened, or animal species of special concern. If there is a potential for impact, state and federal permitting agencies will be consulted for guidance on approved/recommended mitigation measures. Facilities, including trails, will be relocated or designed to avoid impacts. Potential cumulative impacts will be assessed. Nesting or spawning periods can be avoided with proper

scheduling of facility construction or resource management activities. General plan-designated management zones (See Map #5) and proposed reclassification of tracts of the park to more protective wilderness and natural preserve status will also afford additional resource protections, including a significant reduction in opportunities for facilities development in sensitive areas. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

Responsibility: The Department of Parks and Recreation (Department staff/Resource Ecologist) and other mandated contracting authorities

Monitoring/Reporting: Completion of required resource evaluations and development plans prior to implementation of specific projects. Subsequent tier CEQA review of all proposed projects.

FINDINGS

Until the uses, locations, and scope of facilities or management plans are specified, the actual level of impact (individual or cumulative) or need for mitigation cannot be determined. However, evaluation at the specificity of this first tier review indicates that the projects proposed in this general plan, subject to subsequent tier review and development of corresponding mitigation measures, can be mitigated to a less-than-significant level.

CULTURAL RESOURCES

IMPACT

Significant, unless mitigated.

MITIGATION

General plan-designated management zones (See Map #5) and proposed reclassification of tracts of the park to more protective wilderness and natural preserve status will afford additional resource protections, including a significant reduction in opportunities for facilities development. Prior to construction or significant repairs, implementation of interpretive programs (including living histories), and adaptive reuse of historic structures or sites, site-specific cultural resource surveys will be conducted in areas proposed for development or where other surface-disturbing activities might occur to determine potential impacts on cultural resources. All construction, maintenance, or improvements of historic structures will be in conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (1995), Weeks and Grimmer). Additionally, all development and resource management plans will be subject to compliance with PRC 5024.5 review requirements. If there is a potential for impacts, facilities, including trails and interpretive exhibits, will be relocated and programming changed to avoid impact. All plans and projects will be in compliance with local, state, and federal permitting and regulatory requirements and subject to subsequent tier CEQA review and project-specific mitigation.

Responsibility: The Department of Parks and Recreation (Department staff/Cultural Specialist) and other mandated contracting authorities

Monitoring/Reporting: Completion of required resource evaluations and development plans prior to implementation of specific projects. Subsequent tier CEQA review of all proposed projects.

FINDINGS

Until the uses, locations, and scope of facilities or management plans are specified, the actual level of impact (individual or cumulative) or need for mitigation cannot be determined. However, evaluation at the specificity of this first tier review indicates that the projects proposed in this general plan, subject to subsequent tier review and development of corresponding mitigation measures, can be mitigated to a less-than-significant level.