



Clarence Killingsworth
01/23/2004 09:25 AM

To: Lynda Roush/CASO/CA/BLM/DOI@BLM, Gary
Pritchard-Peterson/CASO/CA/BLM/DOI@BLM, Robert
Wick/CASO/CA/BLM/DOI@BLM, Sky
Murphy/CASO/CA/BLM/DOI@BLM

cc:

Subject: King Range National Conservation Area RMP/DEIS

If anyone else should receive this...please forward.
clk

----- Forwarded by Clarence Killingsworth/CASO/CA/BLM/DOI on 01/23/2004 09:24 AM -----



**"Christopher D. Brown
AICP"**
<browncd@co.mendoc
ino.ca.us>

01/21/2004 12:04 PM

To: <ca330@ca.blm.gov>
cc: <robert@ncuaqmd.org>, "Ronda Gott" <gottr@co.mendocino.ca.us>
Subject: King Range National Conservation Area RMP/DEIS

The Draft Kings Range NCA RMP/DEIS does not identify that part (admittedly small) of the study area is in the Mendocino County Air Quality Management District and subject to our regulations (not North Coast Unified AQMD). I believe that a simple change of the text to include both Districts would address the issue, however we would want to work closely with BLM about any proposed burning near Whale Gulch School (on Usal Road just North of 4 corners). The District often imposes stricter conditions on burning activities near schools and other sensitive receptors. Otherwise the RMP and DEIS adequately addresses our air quality concerns at this time.

1-1

Please feel free to contact me with any questions.

Christopher D. Brown AICP
Air Quality Planner
Mendocino County Air Quality Management District
306 E. Gobbi Street
Ukiah, CA 95482
Office (707) 463-4354
Fax (707) 463-5707
<http://www.co.mendocino.ca.us/aqmd/>

Robert Wick
04/20/2004 08:18 AM

To: Sky Murphy/CASO/CA/BLM/DOI@BLM
cc:
Subject: King Range RMP

Please include with King Range Comments.

----- Forwarded by Robert Wick/CASO/CA/BLM/DOI on 04/20/2004 08:17 AM -----



Lynda Roush
04/15/2004 05:56 PM

To: Robert Wick/CASO/CA/BLM/DOI@BLM
cc:
Subject: King Range RMP

----- Forwarded by Lynda Roush/CASO/CA/BLM/DOI on 04/15/2004 05:56 PM -----



Patricia E Riley@USGS
04/14/2004 06:48 AM

To: Lynda Roush/CASO/CA/BLM/DOI@BLM
cc:
Subject: King Range RMP

Lynda,

The U.S. Geological Survey has reviewed the King Range National Conservation Area Draft Resource Management Plan and Environmental Impact Statement and has no comments to offer. Thanks.

Trish Riley
U.S. Geological Survey
423 National Center
Reston, VA 20192
703.648.6822

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov
www.ohp.parks.ca.gov



Bob -
WR
April 7, 2004

REPLY TO: BLM040120A

Lynda J. Roush
Bureau of Land Management
Arcata Field Office
1695 Heindon Road
Arcata, CA 95221-4573

Re: Review of King Range National Conservation Area (KRNCA) Draft Resource Management Plan/Environmental Impact Statement (DRMP/EIS)

Dear Ms. Roush:

Thank you for your January 7, 2004 submittal that initiates consultation with me regarding the BLM's implementation of a new, long-term management plan for the KRNCA. As implementation of this plan constitutes an undertaking, you are consulting with me in accordance with 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act.

The DRMP/EIS proposes four alternatives for consideration. The BLM has selected a preferred alternative that incorporates a combination of approaches for each resource type. For cultural resources, you have selected Alternative D. The report explains that

“Alternative D offers the most proactive actions for documenting and protecting prehistoric and historic resources, including increased levels of resource monitoring, calls for surveys in the Front country Zone in particular, production of a Regional Overview, development of resource stabilization projects, and nomination of King Range historic and prehistoric archaeological districts to the National Register of Historic Places.”

The report states that cooperation with the local Native American community is also included as a significant element of these efforts.

I concur that Alternative D as described constitutes the most desirable alternative for the management of cultural resources within the KRNCA. I note that several sections of the DRMP/EIS explain that specific actions, such as vegetation management or restoration, will be subject to the provisions of the BLM State Protocol Agreement. I look forward to consulting as necessary on these individual actions conducted under the Plan.

Thank you for the opportunity to comment on this undertaking. If you have any questions about my comments, please contact staff archaeologist Anmarie Medin at (916) 654-4614 or at amedia@ohp.parks.ca.gov.

RECEIVED

Sincerely,

APR 09 2004

Dr. Knox Mellon
Dr. Knox Mellon
State Historic Preservation Officer

BLM ARCATA FIELD OFFICE

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State of California • The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
P.O. Box 942896
Sacramento, CA 94296-0001

Lynda J. Roush
Bureau of Land Management
Arcata Field Office
1695 Heindon Road
Arcata, CA 95221-4573



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Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Jan Boel
Acting Deputy
Director

April 16, 2004

Bob Wick
Bureau of Land Management
1695 Heindon Road
Arcata, CA 95521-2319

Subject: King Range National Conservation Area Resource Management Plan
SCH#: 2004014002

Dear Bob Wick:

The State Clearinghouse submitted the above named Draft EIS to selected state agencies for review. The review period closed on April 15, 2004, and no state agencies submitted comments by that date. 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 call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

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APR 19 2004
BLM ARCATA FIELD OFFICE

**Document Details Report
State Clearinghouse Data Base**

SCH# 2004014002
Project Title King Range National Conservation Area Resource Management Plan
Lead Agency Bureau of Land Management

Type EIS Draft EIS
Description Draft plan / EIS will guide multiple-use management of the King Range National Conservation Area for approx. 20 years. Area encompasses 35 miles of Coastline and is a popular public recreation destination. Plan addresses all uses of public lands including recreation, grazing, commercial use, transportation / access (including coastal) as well as provisions for managing and protecting wildlife habitat, archaeological sites, threatened endangered species, etc.

Lead Agency Contact

Name Bob Wick
Agency Bureau of Land Management
Phone 707.825.2321 **Fax**
email
Address 1695 Heindon Road
City Arcata **State** CA **Zip** 95521

Project Location

County Humboldt
City
Region
Cross Streets
Parcel No.

Township	Range	Section	Base
			Humboldt

Proximity to:

Highways
Airports Shelter Cove
Railways
Waterways Pacific Ocean, Mattule River
Schools Whitethorn, Honeydew, Pedrolic
Land Use Federal Land

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

Reviewing Agencies Resources Agency; Department of Boating and Waterways; California Coastal Commission; Department of Fish and Game, Region 1; Department of Forestry and Fire Protection; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services; Regional Water Quality Control Board, Region 1; Caltrans, District 1; California Highway Patrol; Native American Heritage Commission; State Lands Commission

Date Received 01/12/2004 **Start of Review** 01/12/2004 **End of Review** 04/15/2004



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION IX
 75 Hawthorne Street
 San Francisco, CA 94105-3901

RECEIVED
 APR 16 2004
 BLM ARCATA FIELD OFFICE

April 8, 2004

Lynda J. Roush
 Field Manager
 Bureau of Land Management
 1695 Heindon Road
 Arcata, CA 95521

Subject: King Range National Conservation Area Draft Resource Management Plan and Draft Environmental Impact Statement (DEIS) [CEQ # 040001]

Dear Ms. Roush:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

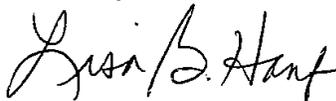
We have rated this DEIS as LO -- Lack of Objections (see enclosed "Summary of Rating Definitions"). We commend the Bureau of Land Management's (BLM) proposal to establish the Mill Creek Watershed Area of Critical Environmental Concern (ACEC) to protect water quality in this anadromous fishery and tributary of the Mattole River, as well as low-elevation old-growth Douglas fir forest. According to the DEIS, the goals and objectives for aquatic ecosystems and fisheries in the King Range National Conservation Area will be met through management actions involving sediment reduction projects, instream habitat improvements, riparian silviculture, monitoring, and estuary enhancement. We understand that, over the next couple of years, the California Regional Water Quality Control Board (CRWQCB) will be preparing an action plan to implement the Mattole River technical Total Maximum Daily Load (TMDL) developed by the U.S. EPA. We urge that your office work closely with the CRWQCB as you develop the Mill Creek Watershed ACEC Activity Plan, as well as the specific management actions to be implemented throughout the entire Mattole River watershed, to ensure consistency with the TMDL action plan for this sensitive watershed. As BLM develops specific management actions, you should carefully consider them in NEPA documents that are tiered to this Resource Management Plan, evaluating their consistency with the TMDL action plan.

We appreciate the opportunity to review this DEIS and request a copy of the Final Environmental Impact Statement when it is filed with our Washington, D.C. office. If you have

5-1

any questions, please call me at (415) 972-3854, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

A handwritten signature in black ink that reads "Lisa B. Hanf". The signature is written in a cursive style with a large, stylized initial "L".

Lisa B. Hanf, Manager
Federal Activities Office

004061

cc: California Regional Water Quality Control Board, Region 1 - Santa Rosa

SUMMARY OF EPA RATING DEFINITIONS

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

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

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

"EC" (Environmental Concerns)

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

"EO" (Environmental Objections)

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

"EU" (Environmentally Unsatisfactory)

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

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

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

"Category 2" (Insufficient Information)

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

"Category 3" (Inadequate)

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

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

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

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CMD-2

Lynda J. Roush
Field Manager
Bureau of Land Management
1695 Heindon Road
Arcata, CA 95521

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|||||





**CALIFORNIA
WILDERNESS
COALITION**
The Voice for Wild California

March 15, 2004

RECEIVED

BLM KING RANGE FIELD OFFICE

Lynda J. Roush
Field Manager
Arcata Field Office
1695 Heindon Road
Arcata, CA 95521

Subject: CWC comments on the King Range Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS)

Dear Ms. Roush:

The Draft RMP/EIS is a truly excellent document that strikes a balance between protecting the ecological values of the King Range while still providing for human use and enjoyment of the region. We offer the following comments in the hope that the final RMP/EIS will be even better than the draft.

The wilderness survey contained in the Draft RMP/EIS is outstanding and reflects a great deal of hard work. Our only objection is that the Preferred Alternative does not propose that any of the areas with wilderness characteristics (AWWC) outside of the existing King Range WSA be managed so as to maintain their wilderness character. Indeed, even some of the areas that are proposed as wilderness in pending legislation before Congress are slated for frontcountry status. By being relegated to the frontcountry, these areas are left vulnerable to salvage logging and other activities that could degrade their wilderness values. The impact of salvage logging on proposed wilderness areas in the frontcountry is not discussed in section 4.4.8 of the draft.

6-1

6-2

We request that in the final RMP/EIS the proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA be designated as backcountry so that their wilderness values can be maintained.

6-3

Regarding mountain bike use, we have recently come to understand that the BLM's 1995 Interim Management Policy for WSA management prohibits mountain bike use on all single-track trails in WSAs and only allows bikes on roads and ways (but not trails) that existed before the WSA was created. This is contrary to the description of mountain bike policy provided in the draft at page 2-145. We hope that the final version of the RMP/EIS will be written with this new understanding in mind and will contain a list of routes in the NCA where bikes are and are not allowed.

6-4

We are quite pleased by the following elements in the draft and we hope to see them in the final as well:

- The management prescriptions for the backcountry and frontcountry zones.
- The proposed Mill Creek ACEC.
- The continuation of the already admirable watershed restoration effort.
- Retiring currently unused allotments.
- Restoring fire to a more natural role in the NCA's ecosystems.

6-5

Thank you for considering our comments. Please keep us abreast of other opportunities to participate in this planning effort.

Sincerely,

Ryan Henson
Policy Director

Reply to:

California Wilderness Coalition
P.O. Box 293
Shingletown, CA 96088
530-474-4808
Fax: 530-474-4808
ryan@calwild.org



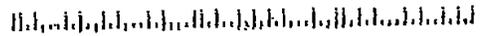
**CALIFORNIA
WILDERNESS
COALITION**

The Voice for Wild California
2655 PORTAGE BAY EAST
SUITE 5
DAVIS, CA 95616

FORWARDING SERVICE REQUESTED



Lynda J. Roush
Field Manager
Arcata Field Office
1695 Heindon Road
Arcata, CA 95521





International Mountain Bicycling Association PO Box 7578 Boulder CO 80306 USA 303.545.9011 www.imba.com

REPLY TO: 7589 Ridge Road Newcastle, CA 95658
(916) 785-4589

RECEIVED
APR 16 2004
BLM ARCATA FIELD OFFICE

April 12, 2004

Lynda J. Roush
Arcata Field Manager
Bureau of Land Management
1695 Heindon Road
Arcata, CA 95521

RE: **Draft RMP/EIS - King Range National Conservation Area**

Dear Lynda J. Roush,

Thank you for this opportunity to comment on the draft Resource Management Plan for the King Range NCA. I am a state representative for the International Mountain Bicycling Association and as such, represent thousands of mountain bicyclists who enjoy, patrol, and work on trails in California. Thousands of cyclists do not converge on trails on the Lost Coast all at once; indeed, we agree with the Bureau of Land Management's statements that mountain bike use on trails in the King Range is light. But the ones who do access the King Range do so for the *same* reasons other trail users come. As the Draft RMP/EIS states, the incredible scenic vistas of the King Range are unparalleled. It is precisely why we ride here. With this background, I write the following concerns and comments about the Draft RMP/EIS.

General Comments.

As an IMBA Representative, I would like see opportunities for mountain bicyclists to continue on the trails in the King Range. Like all mountain bicyclists who have enjoyed the beauty of the King Range, I fully support the mission statement developed for its management: that "the BLM will manage the KRNCA to conserve one of America's last wild places for use and enjoyment of present and future generations." [Page ES-2.] I feel that mountain bicyclists can be a part of this commitment to the preservation of an extraordinarily beautiful place.

When the 1974 Management Program was developed, mountain bicycles were far from popular, and their use has sky-rocketed in the past ten years. [Page 2-145.] Given this reality, under a revised management plan, we ask that BLM manage trails in a way to accommodate this outdoor activity, rather than be restrictive. 80 miles of "hall of fame" trails for the exclusive use of hikers and a few equestrians [Page 2-138] seems incredibly inequitable.

I also request that BLM begin to understand the basic desires of most mountain bicyclists. We are so thankful that BLM seeks to develop trails for bicyclists in the Front Country. However, the trails you describe in the Backcountry Zone on page 3-99, are *exactly* what many of us seek out.

At an age when multiple use trails have become the norm for many public land managers in this country, I encourage BLM to explore a combination of the alternatives in the plan, that balance the



need for resource protection with provisions for multi-use trails that *allow* mountain biking in the Backcountry Zone. I also know mountain bicyclists to be fantastic volunteers and trail stewards and would cooperate with the BLM in implementing its vision for the King Range; to “provide recreation opportunities that complement the rugged primitive character that makes the area distinctive as California’s Lost Coast.” [Page ES-2.]

**7-1
cont.**

There were only one or two instances (that I could find) where BLM *included* mountain bicycling in the lists of the “diverse array of activities” on page 2-133, under sec. 2.15.1. (Maybe we could be added to the lists of uses, on Page ES-1 and Page 1-1.)

7-2

Studies have shown that mountain bikes have about the same impact on trails as do hikers and backpackers, and less impact on trails than do horses and pack animals. We seek solitude and challenge much like any trail user. Mountain bike riding is a wonderful way to explore the backcountry. Mountain bikers are muscle powered and identify with hikers in the back country. The draft itself suggests that “appropriate use would include *non-motorized* activities with no facilities other than trails and a few primitive facilities for resource protection.” (Section 3.3.1 Backcountry Zone, Page 3-4). Let us feel included in the mix of non-motorized activities.

7-3

Alternatives.

These comments will focus on the recreation element, particularly where there is mention of mountain bicycling and trails, in the Front and Back Country Zones. Basically, we reluctantly support the preferred Alternative C for the Front Country and the Back Country, described in Chapter 4 of the Plan. I mention *reluctant* support because BLM appears reluctant in agreeing that mountain bikes belong on any back country zone trails at all.

IMBA is aware of the BLM interim management plan for public lands under WSA designation. However, we believe that under that interim management plan, BLM has the opportunity to support our continued riding on *existing* trails.

7-4

A WSA may or may not ever become a federally designated Wilderness Area. In that light, please consider that we would not degrade the trails, but would be excellent trail stewards to protect the trail resource for ANY future designation. They consider themselves great trail stewards and support the re-route of erosive trails and resolution of impacts by several tools, short of denying access. A trail within a WSA, might be “cherry-stemmed” out of a designated wilderness. Or a WSA may be released. The bottom line is that where we’ve been riding, we should have continued access, until Congress determines otherwise.

The Draft RMP/EIS is providing for an elite use by hikers and backpackers. BLM is also planning for equestrians in the WSAs despite their significant impacts on steep trails, need for large trailheads and other significant impacts. [Page 3-99] Mountain bicyclists for the most part are dedicated to working with land management agencies to mitigate environmental damage and other issues. We are generally self-regulating by not using trails after rains, and are excellent stewards with knowledge of erosion problems and proper trail design (see www.imba.com). We request that Alternative C, for *both* Zones, be more inclusive of mountain bicycling. Please consider adding mountain bicycling to other uses on trails on page 3-77.

7-5

We, of course, oppose Alternative B’s prohibition of mountain bicycling. We also completely appreciate that BLM is willing to work with mountain bicyclists on trails and trails expansion in the Front Country Zone. [Page 3-90]. We look forward to working with staff on this exciting effort.

7-6

Mountain Bike as a Special Use.

I was surprised to see that BLM categorized mountain bicycling as a “non-traditional,” “special” and “emerging” use. We are lumped somewhere between geocaching and paragliding! [Pages 2-147, 3-98 and 3-111.] We oppose these descriptions. I, personally, have been mountain bike riding on single track trails all across the United States (much of it on BLM managed lands) for 20 years. IMBA started a very close working relationship with BLM in the early 90ies. Based on the plans and comments by BLM officials to IMBA members over the years, I would suggest that mountain biking is far from an emerging sport. In contrast, it is a well-established outdoor recreational pursuit, with millions of Americans owning mountain bikes. Over the last 15 years, IMBA’s members and local clubs have devoted enormous volunteer resources to working with land managers, reaching a remarkable million hours mark in 2003 in the U.S. and abroad. Many of these hours were spent on BLM trails. The work is devoted to sharing multiple use trails as a long-term and accepted member of the non-motorized trails community.

Please note the list of reports identified at www.imba.com (go to ‘resources’, ‘agencies’ and see materials for our experience with all the public agencies, in particular the Bureau of Land Management.) Also, please note that the BLM adopted its *National Mountain Bicycling Strategic Action Plan* on October 25, 2002 (see attachment). (The ‘emerging uses’ discussed in the Action Plan involve the evolution of some mountain bikes known as free ride or downhill bikes, that one might find in urban areas, ski areas, or in mountain bike parks, and not the traditional bicycle you will find on trails in the King Range.)

I personally, and believe many other mountain bicyclists would not relate to being in an emerging or special use category after the years many of us have been involved in the sport. Many of us are long-time trails advocates who built a rapport with other user groups and land managers and are now embraced as a responsible member of the trails community. Almost every other land manager in California has embraced mountain bicyclists into the non-motorized multiple use trail mix, including other BLM offices implementing the *National Mountain Bicycling Strategic Action Plan*. It is odd to be placed in a special use management category in this Draft RMP/EIS. On the other hand, to be considered “special” might not be a bad thing!

I refer to following articles to be found at the IMBA website:

- Bureau of Land Management National Mountain Bicycling Strategic Action Plan, 2002;
- BLM Action Plan 1993-2000

Both plans remark that members of the mountain bicycling community need to be proactive and be involved in the updating of the various management plans that are now underway. That is one reason why this draft RMP/EIS is a bit concerning. Both IMBA staff and myself as the state representative submitted comments during scoping for the King Range NCA. We believed this to be a proactive step. The BLM Action Plan 1993-2000 states: “BLM will identify and implement diverse mountain bike opportunities into the multiple use system of trails and roads by the year 2000.” This does not line up with the determination in the Draft RMP/EIS, that we are to be treated as an emerging and special use. I am fairly certain that none of IMBA’s scoping comments could be interpreted as our desiring this type of categorization or treatment. We hope revisions to the RMP/EIS will reflect our concerns.

7-7

7-8

Impacts on Recreation.

It is noted on Pages 4-59, 60 and 69, that the “protective” management of the WSAs under Alternatives B and C represent *adverse impacts* to mountain bicyclists. It is suggested that because use is low, the impact would be *negligible*, and the impact would be mitigated because of the development of trails for us in the *Front Country Zone*. We absolutely appreciate BLM’s efforts to include mountain bicycling in areas outside the WSAs, but the adverse impact of not including mountain bicycling in the *back country* is truly significant. Mitigation efforts exist, including: odd-even days, limiting our numbers via permits (as applied to all other user groups), working with mountain bike clubs in trail work sessions, agreeing to cherry-stem certain trails upon Wilderness Designation; and other measures short of prohibiting use. We would accept Wilderness Designation should it come to that, and whatever minor imprints we make would be negligible.

7-9

User Conflicts.

I didn’t specifically get the impression that mountain bicyclists were the cause of the conflicts in the King Range. In fact some of the survey information you provided reminded me of a great report written by Gordon Cessford of New Zealand’s Department of Conservation entitled *Perception and Reality of Conflict: Walkers and Mountain Bikes on the Queen Charlotte Track in New Zealand*. (You can link to this at www.imba.com, on the home page.) Interestingly, he found:

“Walker opinions are surprisingly positive towards bikes. These opinions are found to be more positive among those walkers who have had actual encounters with bikes. By contrast, more negative opinions were found among those who had no such encounters. Such distinctions between perception of a conflict and the actual outcome from an experience have important implications for park managers responsible for providing a range of different recreation opportunities.”

We just returned from a trip to New Zealand where we both met with Mr. Cessford and rode our mountain bike tandem on the 71-kilometer Queen Charlotte Track. The Dept of Conservation restricted mountain biking to non-summer months on one stretch of the Track. In March, we encountered numerous hikers within 5 or so kilometers of the trailheads, but use was dispersed thereafter and we rode pretty much alone for the remainder of the each days’ ride. We appeared to be well received by the hikers we encountered.

7-10

Similarly, we have ridden the Lost Coast Trail between Hidden Valley and the Sinkyone Wilderness State Park boundary. We have never seen hikers or backpackers on this route. Other mountain bikers had similar experience; we would be surprised if our being there could be conceived as a negative impact or conflict.

What conflicts I could glean from the Draft RMP/EIS highlight crowded, unsanitary, and environmentally/socially unsound use by other backpackers. Backpackers seem to cause a great deal of traffic on the roads getting to trailheads as well. Then there are surfers who are using the same camps. And bears were attracted to the back country garbage. [see Pages 1-10, 2-82, 2-143, 2-150, etc.] We would hope that if mountain bicyclists were the source of these types of conflicts, appropriate solutions would be prescribed to mitigate them, short of kicking us off trails. We do appreciate mention that there have been relatively few recent reports in the KRNCA of conflicts between user groups. [Page 2-150].

Relationship with Other Plans.

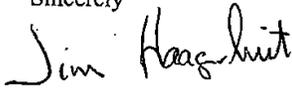
1. Please note that the California Department of Parks and Recreation is revising its management plan for the Sinkyone Wilderness State Park. IMBA submitted comments and spoke with staff regarding mountain bike use in this State Park Unit, specifically to be able to link from BLM's Lost Coast Trail, into the State Park. State Parks seemed extremely receptive and although the Draft has not been released yet, we feel hopeful about inclusion on some trails in that Unit.
2. If BLM RMPs are to be consistent with officially approved resource-related plans, IMBA asks that BLM acknowledge the BLM *National Mountain Bicycling Strategic Action Plan*.

7-11

Conclusion.

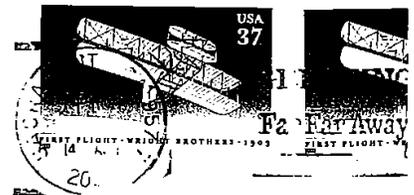
Mountain bikers truly understand that BLM has a difficult task to protect resources while allowing public access and providing for diverse recreation opportunities. We also fully appreciate that the King Range is that much more special than many other BLM lands and its scenic, "wilderness" attributes must be preserved for future generations. But given that mountain bike impacts in the King Range are light, and that we are recognized as an appropriate part of the mix of Americans who use this special place, we expect access and inclusion. We look forward to continued management plan efforts in this amazing place.

Sincerely



Jim and Cathy Haagen-Smit, State Representatives
Northern CA, International Mountain Bicycling Association

Mr. Jim Haagen-Smit
7589 Ridge Rd
Newcastle, CA 95658-9610



Lynda J. Roush
Arcata Field Manager
Bureau of Land Management
1695 Heindon Road
Arcata, CA 95521

95521+4373





United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Washington, D.C. 20240
<http://www.blm.gov>

OCT 25 2002

Dear Interested Citizen:

The Bureau of Land Management is pleased to announce the release of its *National Mountain Bicycling Strategic Action Plan*. This Action Plan reflects many of the comments BLM received on the draft document, and we greatly appreciate your interest in this issue. We welcome your continued involvement as we work together to provide for mountain bicycle opportunities on public lands.

This Action Plan will provide guidance to BLM state office and field office managers and staff, interest groups, and individuals for implementing on-the-ground actions and resource protection measures for mountain bicycle use and other muscle-powered, mechanical transport uses.

In addition to providing field guidance, the BLM developed this Action Plan to:

- update the BLM's 1992 Mountain Bike Strategy;
- recognize the changing demographics, increasing populations, increase in mountain bicycle use, emerging technologies, and issues unique to mountain bicycling;
- provide consistent management approaches among BLM states and field offices;
- encourage effective use of existing staff, resources, volunteers, and partnerships; and
- assess planning, environmental and regulatory needs.

Substantive comments voiced by the public, along with BLM's responses, are listed in Appendix 1. Where appropriate, the comments were incorporated into the Action Plan.

Many of you are involved in innovative and effective efforts to address issues associated with mountain bicycle use. Your continued involvement and cooperation with the BLM is essential to effectively implement the Action Plan. The plan can be viewed at any BLM office or online at www.blm.gov. You may request a copy of the plan from Margy Tidemann, BLM-Worland Field Office, P.O. Box 119, Worland, WY 82401-0119.

If you have any questions or would like to be involved in BLM's implementation of the National Mountain Bicycling Strategic Action Plan, please contact your local BLM field office at the address listed on BLM's website, www.blm.gov.

Thank you for your interest in the management of your public lands.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Clarke".

Kathleen Clarke
Director



Sierra Club
North Group, Redwood Chapter

P.O. Box 238
Arcata, CA 95518

RECEIVED

APR 16 2004

BLM ARCATA FIELD OFFICE

PLANNING FOR THE NEXT 20 YEARS IN THE
KING RANGE NATIONAL CONSERVATION AREA
(KRNCA)

COMMENTS ON THE DRAFT RESOURCE MANAGEMENT PLAN &
DRAFT EIS

APRIL 15, 2004

PREPARED BY
BOB WUNNER & EMELIA BEROL

FOR
THE NORTH GROUP OF THE REDWOOD CHAPTER
SIERRA CLUB

SUBMITTED TO THE BUREAU OF LAND MANAGEMENT

ARCATA OFFICE

BUREAU OF LAND MANAGEMENT,
1695 HEINDON ROAD
ARCATA CA 95521

IN CARE OF
BOB WICK, LYNDIA ROUSH

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INTRODUCTION

The comments and suggestions that comprise our report are intended to contribute to the next 20 years of management in the King Range National Conservation Area (KRNCA). Our concern is for the well being of important human and natural systems. Congressman Clem Miller's vision, of putting outdoor recreation on an equal footing with extract uses on public lands and a consolidating land ownership has become a reality in the KRNCA. We look to refine this public land conservation vision, which provides for uses (that improve the land) in the reach of all, especially local citizens and community, and to hand on a landscape legacy.

We intend our comments, rather than a critique of the Bureau of Land Management, to be supporting or adding to alternatives. The recent

work of the local district has been a model of listening and acting on public concerns. The Draft Management Plan and EIS are well written and packed with background material. This manual of facts and maps about the King Range will be a reference for a long time.

Viewpoint

Our viewpoint, in regards to suggestions, is from a landscape perspective. The King Range is thought of as something of an island, rising up relatively recently, almost encircled by water--the sea and the Mattole River. The headwaters of the Mattole are very close to the ocean and the mid point of the stream is farther away from the sea than the headwaters. The King Range creates a climate zone of its own, sieving water from storms in the rainy season and creating a fog free dry area in the dry season.

The great rise of mountain is conducive to upwelling—where ocean nutrients are pulled up into the upper ocean depths resulting in plankton blooms which fuel a world-class zone of ocean productivity. The ocean and the sea in the area we call the KRNCA are clearly related.

The suggestions are presented in 3 parts: Management within the King Range wilderness, Management bordering the KR wilderness, and KR Management policies which affect local, regional and planetary ecosystems.

Preliminary Points

Several goals of the Sierra Club for Pacific Coast lands relate to this management plan.

- Permanent protection of the remaining ancient forests on the KRNCA.
- Adoption of the King Range Wilderness boundaries as given in Senator Boxer and Rep.Thompson's, to be managed in its entirety as backcountry
- We understand the 'land' in BLM at the same time an offshore marine sanctuary along the Lost Coast and stringent regulations for preservation and enhancement are needed along the order of NOAA's Olympic Peninsula Marine Sanctuary.
- Adopt 'wild and scenic rivers' designation for rivers and streams that support anadromous fish on both seaward and leeward King Range slopes.

MANAGEMENT WITHIN THE KING RANGE WILDERNESS

Wilderness

Roaming the coast, prairie, or forest of the King Range one can sense the excitement of the land. The long walk down Spanish Ridge prairie in the face of a strong wind, imagining how Native Americans thrived on coastal sea food, acorns, and deer, thinking of the discovery of a burial place where a woman was put surrounded encircled by a obsidian flakes.

The wildness of the Lost Coast and King Range make it one of the few places where one can experience forested mountains and prairies meeting the ocean in a setting free of human development. Due to the remoteness, except for the grazing lands and harbor of Shelter Cove, few Euro American filed land claims here,

Due to weather and sea, the King Range--whether its northern rolling hills or the strip of land along the ocean--is a dangerous place. Ocean hazards have killed hikers on the Lost Coast Trail; many lost their lives here in the era of sail from a sudden wreck on off shore rocks. The coast was cut off from civilization for the same reasons that workers and servicemen had mental difficulties at Punta Gorda Lighthouse --year-round fierce winds, flooded streams for much of the winter, and heavy fogs in summer. We think more of the story of the wilderness, history, and pre history should be told.

8-1

Boundaries

There are some who say that ranchers have pressured BLM to set wilderness boundaries on the north end of the KRNCA. We would like to see the boundaries of the wilderness to go as far north as BLM owns (1B). In analogous places of the Pacific Coast developers have exploited similar settings (Pt. Reyes). Lights from settlements in the view shed of the Lost Coast would be very intrusive to the wilderness experience. Also in this north part of the wilderness the archeological sites between Windy Pt and the mouth of the Mattole need to be in Backcountry Zone. The Mill Creek (ACEC) is an integral part of the Mattole King Range wilderness and needs to be included. The Squaw Creek units (1H and 1Ha) have fine stands of old growth need to be included in the wilderness.

8-2
8-3

We request that in the final RMP/EIS the proposed wilderness portions of areas 1A, 1B, 1Ea, 1E, 1F, 1G, 1H, and 1Ha be designated as backcountry so that their wilderness values can be maintained. Adopt Senator Boxer and Rep. Thompson's proposed King Range wilderness be managed in its entirety as backcountry. Logging and road construction, of

8-4

course, would also be prohibited in the proposed wilderness. Alternative B for Backcountry zone.

Management of the Backcountry Zone needs to be for HIGH opportunities for solitude. BLM's Preferred Alternative is to manage for moderate levels of solitude in spite of overwhelming public opinion for HIGH opportunities for solitude. We do not see how we can settle for an area to be managed for mediocre levels of solitude, especially if this plan is the goal for time to come!

8-5

Grazing

Land use by Elk and deer is not equal to grazing and browsing by cattle and sheep. Given the intensity of past use and the fragile nature of the soils on many grasslands in this region we would like to see more information to support the idea that the lack of plant cover and erosive features are natural.

8-6

The economic impact report notes that losing all livestock grazing from the KRNCA by following Alternative B would cost very little. We believe that this cost is small compared to the costs of erosion control projects related to grazing and the costs of vegetation management programs to restore the allotments that are already needed.

8-7

Big Flat

Big Flat at the base of the King's crest, a large flat with sand and forest, pleasing long and short views of ocean and land with a perennial stream, is a major center of use of this wilderness. Big Flat is a Mecca for surfers and has been featured in many magazine articles. There is also private land and some in-holding owners need to drive, or fly in. Still others boat in. Several trails go through Big Flat: Rattlesnake Ridge, Shipman Creek, and the Lost Coast trail.

Big Flat is the most popular visitor destination in the wilderness. But popularity has its price. Too many people spoil the wilderness experience, which is the goal of backcountry. The area is compromised by litter and other human wastes and by traffic noted above. We would like the BLM to consider the following.

1. A ranger needs to be on the ground in the Big Flat area 24/7.
2. Compost toilets.
3. Boat drive ins with supplies are the same as cars in the wilderness. The practice should not be allowed. Trash from these parties is creating an unneeded job for BLM. This practice needs to be controlled before a constituent lobby builds.

8-8

4. The airstrips into Big Flat need to be contested, especially in the long term to protect wilderness values. Part of one of the airstrips is on public lands and should be retired. The other airstrip should be only for property owners, or absolute emergencies-- definitely not for activities such as pilot practice in touching down.

8-9

5. Agree with beach closures to ORV's; however, reliable sources note ORV closure is not enforced at night.

6. Cut down on publicity. We don't need to recruit numbers of people to show that the KRNCA is a wonderful place to go.

Spanish Flat

While Big Flat is the center of visitor focus in the Lost Coast, Spanish Flat is the heart of the wilderness for us. There are no wild beaches in California that compare with Spanish Flat. Spanish Flat is a rare coastal prairie. The view of the wind ruffled grass covered terraces rising up out of the ocean to form Spanish Ridge is beyond the space to describe it here. One the beach you can see the remains of shipwrecks. Throughout the year the ocean washes up a beachcombers delight. For hours or days one can poke through remnants of living things, through logs and complex tangles of driftwood. Occasionally casting a view to the ocean with series of waves to the sound of their pounding persistence.

We urge protection for this heritage area, for the Coastal Prairie and Archeological sites. We heartily support the rationale for eliminating the Spanish Flat Grazing Unit and further investigation of the relationship of steelhead trout populations in Spanish Flat streams to determine their genetic relationships

8-10

The grazing allotment should be permanently retired to protect native grasses, steelhead habitat, and archeology, and to heal the steep erosive slopes. The amount of income generated from grazing does not warrant the damage.

MANAGEMENT BORDERING THE KING RANGE WILDERNESS

The kind of management on land surrounding wilderness lands is important to the quality of experience. The management of forest and scrublands, including salvage logging, water rights on streams flowing off of the King Range, Growth of the Shelter Cove looms most important in this regard.

Water Rights and Rights of Way

We support the Wild and Scenic Rivers designation to protect public water in the King Range. No applications for water rights of way that propose to divert surface water from public should be considered. BLM should apply for water rights in all King Range watersheds to protect public resource values such as adequate flow, temperature, riparian and fisheries needs.

8-11

Management of Vegetation

We propose that forested areas outside the potential wilderness boundary be managed to retain old growth characteristics this will allow a range of vegetation management techniques and allow a legacy to be handed on with essentially the same characteristics as was before entry. Alternative A

8-12

Salvage logging

No salvage logging should be allowed on lands inventoried for wilderness or other King Range lands. We believe that fire killed trees are a part of the reforest process. Burned trees play an important role in erosion control, slope stabilization, and the ‘recovery’ of the green forest, besides providing showers of carbon over time. We believe runoff from the burned forest plays a role in the productivity of the ocean ecosystem as well as the productivity of the King Range slopes. We support Alternative B

8-13

Shelter Cove

The human population of Shelter Cove is growing fast. Part of the growth is based on speculative housing construction. A scenario presented to us is that local young people who would like to have their own land and place simply cannot afford it. A sure way to make money is to buy a lot, build a house and sell making enough to repeat the cycle. There is no shortage of buyers as ‘urban refugees from the SF bay and other affluent areas move on to greener pastures

At Shelter Cove 49 houses are under construction right now (April 15, 2004). Humboldt County Building Department is not doing its job, for example, building on rock terrace in ocean--Shelter Cove. Another example is the sewage treatment facilities. Since the growth and development of Shelter Cove is so important to the quality and kind of use in the KRNCA, BLM needs to take an active role in contesting and

8-14

safeguarding public and community resources, however unpopular in the short term.

8-14
cont.

REGIONAL, HABITAT, AND ECOSYSTEM LINKAGES

Socioeconomic

The economic impact from losing all livestock grazing from the KRNCA by following Alternative B, ranging between, \$10,060--\$13,670 (based on the estimated value of cattle grazing in Humboldt County) is a small price to pay considering the costs of erosion control projects related to grazing and the costs of vegetation management programs to restore the allotments.

We are impressed by the worth of the recreation use and the amount of financial benefit projected through 2025. We believe in large part this may happen. Population will continue to grow, land both vacant and recreational, will be more valued. There is cause for a certain caution however. Please note Freeman House's articles describing the boom and bust cycles in our area. From gold, to petrochemicals, to ranching, to wood products, to marijuana abundances, now tourism--something new around the corner is not always foreseeable. Many factors could reduce future worth. How do we plug this in to the calculus of socioeconomics for a conservation area? We think the best bet is through wilderness and protected wild lands with adaptable enlightened management, use, and reserve is the proven path to travel.

8-15

Links to region.

The King Range is becoming increasingly isolated as an ecological island as time passes and human settlement increases. Biological diversity is diminishing, as ecological processes operate on a smaller connected wild landscape. We appreciate BLM partnership programs such as the Redwoods-to-the-Sea-Corridor with the Sanctuary Forest Land Trust for a biological corridor from the Mattole headwaters to Sinkyone State Park and the KRNCA and expect continued efforts in league with organizations such as the North Coast Regional Land Trust. We also support the 5,000 to 15,000 acres of lands expected to come under conservation ownership. Please continue BLM efforts to further a corridor connecting the Mattole River/Gilham Butte/Humboldt Redwoods State Park to connect the Mattole River with Bull Creek and South Fork of the Eel River. An ocean front corridor is needed north to protect and connect coastal prairies, view shed, and public interests.

8-16

King Range Marine Sanctuary

Our oceans face unprecedented devastation from increased human use. While we have made great strides on land to set aside areas to protect and restore biodiversity, less than 1% of our oceans are currently protected. The King Range Coast has, with this RMP and DIS a good plan for future management, a good one to the edge of the sea. Conservation ocean habitats is still in early stages, looking out over the ocean it's hard to see or even imagine what is going on under the uniform surface of the sea. However reference to charts of the sea bottom offshore of the King Range reveals noteworthy features of the ocean bottom. Sea mounts and submarine canyons that rival on shore topographic features.

There are early protection models existing for the ocean bordering the KRNCA. To satisfy requirements of the Marine Resources Protection Act of 1990 the Fish and Game Commission established four ecological reserves along the coast; the King Range State Marine Reserve and the Punta Gorda reserves were two of them. The Act specified that the specific purpose of these reserves was "to provide for scientific research related to the management and enhancement of marine resources".

Subsequently it was found that these areas were too remote to monitor (20-30 mi. to nearest port). "Access is very difficult and ocean conditions are unsuitable most of the time for at sea patrol. Patrol from shore is not possible due to lack of road access." The locations of these preserves are: seaward to the furthest of either 1000' or the 100' isobath for Kings Range, seaward to the 180' isobath leg origins from the 18' isobath given as degree coordinates for Punta Gorda.

Given the comparable coastline in public ownership and the similarity of features of the submarine seascape, we suggest that a National Marine Sanctuary similar to the Olympic Coast National Marine Sanctuary administered by the National Oceanic and Atmospheric Administration (NOAA) be established for the Lost Coast area. The Olympic Coast National Marine Sanctuary encompasses about 3,300 square miles off of Washington State's Olympic Peninsula, extending 135 miles along the Washington.

The seaward boundary of the Sanctuary varies from about 25 to 40 miles offshore. This includes most of the continental shelf, as well as parts of three important submarine canyons, the Nitinat Canyon, the Quinault Canyon and the Juan de Fuca Canyon. The Sanctuary shares 48 miles of coastline with Olympic National Park, including some of the last remaining wilderness coastline in the lower 48 states. Olympic National

8-17

Park and the Sanctuary share resource management jurisdiction in the intertidal zone.

About the Authors:

Bob Wunner first came to the Lost Coast area in 1957 and has spent many exciting hours on Lost Coast and King Range trails. His life's work is to learn and teach about rivers, streams, ocean systems, and their biota.

Emelia Berol is a student of bioregional well being and conservation. Her specialty is in water and forest issues.

Community Wilderness

ALLIANCE

RECEIVED

APR 16 2004

BLM ARCATA FIELD OFFICE

Ms. Lynda J. Roush
Arcata BLM Field Manager
1695 Heindon Road
Arcata, CA 95521

Dear Ms. Roush and BLM,

April 14, 2004

Below are our comments on the King Range National Conservation Area Draft Resource Management Plan and Draft Environmental Impact Statement dated January 2004.

The Community Wilderness Alliance is an informal group of wilderness advocates working toward permanent protection for the roadless parts of the King Range National Conservation Area. We support inclusion of over 43,000 acres of King Range public land into the Federal Wilderness Preservation System.

9-1

Generally speaking, we support Alternative B. BLM's Preferred Alternative C manages for MODERATE opportunities for solitude in spite of overwhelming public opinion for HIGH opportunities for solitude. We support Alternative B for Backcountry Zone, which manages for high opportunities for solitude. Hikers in the KR overwhelmingly request and desire HIGH opportunities for solace, connection with this coastal wildland thru a primitive experience, and protection of the place for generations.

9-2

None of the alternatives adequately protect public water in the King Range. No applications for water rights of way that propose to divert surface water from public should be considered. BLM should apply for water rights in all King Range watersheds to protect public resource values such as adequate flow, temperature, riparian and fisheries needs. We support Wild and Scenic status for all waterways in the King Range to further ensure water is not diverted for human habitation, wine production, general agriculture, cattle grazing or the like.

9-3

Spanish Flat is a rare coastal prairie. The grazing allotment should be permanently retired to protect native grasses, steelhead habitat, and archeology, and to heal the steep erosive slopes. The amount of income generated from grazing does not warrant the damage.

9-4

We request that in the final RMP/EIS the proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA be designated as backcountry so that their wilderness values can be maintained. These areas are not considered eligible for wilderness in the preferred alternative. We have surveyed and studied these areas and know they meet the criteria of the 1964 Wilderness Act.

9-5

CACHE CREEK • SNOW MOUNTAIN ADDITIONS • BLACK BUTTE WILD AND SCENIC RIVER
SKELETON GLADE • YUKI • SANHEDRIN • YOLLA BOLLY / MIDDLE EEL ADDITIONS • CAHTO
SOUTH FORK EEL RIVER • RED MOUNTAIN • KING RANGE • MT. LASSIC
MAD RIVER BUTTES • UNDERWOOD • SISKIYOU ADDITIONS • TRINITY ALPS ADDITIONS

No bikes on King Range trails!! Bicycles are appropriate on Paradise Ridge.

9-6

No boats dropping people on the beach, bringing all their stuff in and often not taking trash out. Walking the beach is a primitive experience not to be compromised by boats. Keep it wild!

9-7

The airstrip at Big Flat is way overused. We hope soon Big Flat will be void of buildings and airplanes

9-8

Thank you for doing a fine job managing the King Range for primitive values. It is a national treasure.

Sincerely,

Rich Tolley

For the Community Wilderness Alliance

*of
Riverend Woodworking & Design
707-668-5370*

*Rich Tolley
P.O. Box 54
Blue Lake, Ca
95521*

*Ms. Lynda Roush
Natura Blue Field Manager
1695 Heendon Road
Natura, Ca 95521*

King Range Comments

P.O. Box 173 Petrolia, California 95558

a forest preserved in memory of Bill Clow



RECEIVED

APR 19 2004

BLM ARCATA FIELD OFFICE

April 12, 2004

Lynda Roush
Bureau of Land Management
1695 Heindon Road
Arcata, CA 95521

Dear Lynda,

I am writing on behalf of the Mill Creek Watershed Conservancy (MCWC) with our comments on the King Range National Conservation Area (KRNCA) Resource Management Plan (RMP). We appreciate the planning process and wish we could give you suggestions on how to make the document more accessible. However, we only have time to focus on our comments. Primarily we will address those resources that directly affect Mill Creek watershed. Secondly we will comment on those that affect Lighthouse Road and the Mattole Beach/estuary. Finally we will comment on the remaining resources to the level that we have come to agreement on.

ZONES:

First and foremost the designation of zones that the RMP has categorized are not in line with our thinking of the long-term management of Mill Creek lands. On page 3-5 is a map that depicts the parcels in the Mill Creek watershed as Frontcountry. Although this seems appropriate for short-term restoration projects, we strongly feel it far more appropriate to designate only the most northern parcels that are located along Lighthouse Road as Frontcountry into the future. They are the public interface of what we consider a very private backcountry. The remaining parcels, those that reside primarily within the Mill Creek watershed, should be designated as backcountry into the future. For the same reason that we support these lands being an Area of Critical Environmental Concern (ACEC) and a Research and Natural Area (RNA), a higher degree of protection from public use is written in to the backcountry definition. As a recreation resource, we want the Mill Creek watershed to be backcountry. The old-growth forest and the clear waters of Mill Creek need your utmost protection from any management activities into the future. Further, as you know, we have submitted these parcels for inclusion in the CA Wild Heritage Bill (Boxer) and the Northern California Wild Heritage Bill (Thompson). However, we hope to implement certain restoration and/or fuel load reduction projects before actual wilderness legislation takes place as will be outlined in our Cooperative Management Plan.

We would also like to see the new Squaw Creek parcel to be included in the



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backcountry zone as it truly is a backcountry place.

10-1
cont.

AREA of CRITICAL ENVIRONMENTAL CONCERN (ACEC):

As mentioned above, we wholeheartedly support the designation of the Mill Creek watershed lands as an ACEC and have written a supporting document to that effect (submitted January 2004). The only resource where Mill Creek was listed as an ACEC was alternative C and therefore that is our choice. However, there appears to be a glaring omission, in that Mill Creek watershed lands should also be a Research and Natural Area (see letter January 2004). Please ensure that both designations are included in the final management plan.

10-2

WILDERNESS CHARACTERISTICS:

For this resource the board has had to choose alternative B because it includes all the Mill Creek parcels in the wilderness characteristics. As I mentioned earlier, however, the three northernmost smaller acre parcels (along Lighthouse Road), should not be designated wilderness as the road bisects one of them and they primarily reside outside of the watershed. On the map on page 3-19, many of the interfacing lands are considered frontcountry, however, the southern boundary of Shelter Cove is designated as wilderness. Because of the fragility of the watershed, we suggest including as backcountry and wilderness the Mill Creek watershed land, and a strip that extends all the way to Johnny Jack Ridge Rd., if possible. Alternative C only includes southern portions of the watershed. However, 1E is primarily old growth and should be considered for wilderness above all else. We understand that the east side of Mill Creek is listed as a medium priority for fuel loads reduction. We hope to implement management actions such as fuel load reduction along the trail as a buffer from the cutover lands on the east side of Mill Creek, instream weir removal, and the restoration of an upslope stream diversion prior to being pursued as wilderness. Therefore, we support alternative B with an allowance for interim restoration measures of the above. As a special note, the board would like to wholeheartedly support the inclusion of all of the Squaw Creek watershed parcels as wilderness, as well.

10-3

WILD and SCENIC RIVERS:

Although we feel that all 28 river segments should enjoy eligibility, this body can only recommend alternative D for sure. MCWC feels it does not know the other segments and their issues intimately enough to comment on their behalf.

10-4

AQUATIC ECOSYSTEMS and FISHERIES:

We support the preferred alternative (C) as this choice affords the most opportunities for restoration in the Mattole watershed.

WILDLIFE MANAGEMENT:

Again, we support the preferred alternative (C) for the most affordable wildlife protections. We applaud the BLM for their steps to ensure protection and recovery of many rare, threatened, endangered species.

FOREST MANAGEMENT:

We chose alternative C with some exceptions. The management of our forest is one of the most perplexing challenges that awaits us in the next 40-75 years. In many

areas the fuel load is severe and in need of thinning and treatment. In other areas thousands of acres of what are now second growth forests will reach maturity. Regardless, the King Range is now a national treasure and should remain free of resource extraction. **Salvage logging should never be permitted.** There is no need to promote any merchantable timber, however, there is ample room for restoration, stand enhancement projects, and thinning for fuel load reduction. Where access is easy, I see no problem in contributing fuel wood back to the community. Yet, there is no need to remove timber in order to aid the restoration of a fire area. Ultimately, the slow decomposition of burned trees will aid in restoring nutrients and guarding the slopes from erosion. We are also against the opening of old haul and skid roads for the purpose of stand treatment projects as suggested in alternative D. Therefore with careful consideration, we choose alternative C so long as the King Range remains extraction free.

10-5

FIRE MANAGEMENT:

Again we support the preferred alternative C with one caveat. Broadcast burning shall not be allowed until there is developed a far safer way of burning brush than what is currently known. The exception to this would be to allow the tribes to burn their beargrass sites. We applaud the ideas in alternative C that explore stewardship contracts with the locals to meet the goals of hazardous fuels reduction and vegetative management.

10-6

RECREATION:

This one was a tough one to get through. Although table 4-1 does a visitor projection for 2025 based on each of the alternatives, the preferred alternative is just too invasive for us to consider. We are absolutely against the development of a backcountry ranger station, additional kiosks, a children's playground (sticks, rocks, sand and water are great toys!), fees associated with backpacking and an additional bunch of campspots on the Mattole River bar for overflow camping. The river bar is an ACEC and should be protected for the fragile systems that it nurtures. Basically, alternative D is overkill at its worst. The KRNCA does not need to be a peep show, it is something to be experienced.

10-7

We do agree that a trail is to be established in the Mill Creek watershed that connects with the Cooskie Ridge Trail (alternative C) so long as it is understood that camping and campfires are not allowed due to the ACEC/RNA status AND pets only on a leash.

We do agree that commercial outfitters should not be allowed during peak seasons such as July 4th and Memorial Day weekends. (Alt. A, B, and C) We do agree to disallow competitive events in the backcountry. We do agree in avoiding sensitive areas (Alt. C).

We do not agree with a fee system for individual backcountry use.

10-8

We also agree with alternative C which would institute a restriction on mountain bikes in the backcountry. However, if a geologist has thoroughly surveyed/engineered a few appropriate trails in the interface that would not be a source of erosion, perhaps there could be a niche for the bikers (for instance: ridgetop trails) that are not within the Wilderness Study Areas (WSAs). We feel the same for horse people. Development of certain trails that could allow this niche is preferable to widespread use.

All in all the board decided on Alternative A as it seemed that changing to other alternatives really set up increased administration and infrastructure. However, other than the above-mentioned exceptions, it is imperative to include a visitor registration system at the Mattole Beach. We do agree that visitor numbers are a problem and suggest a tighter

10-9

control of visitor use, one that puts a cap on the amount of visitors on each trail, each day. This is a difficult proposition when we also want to avoid any fee associated with the permit/registration. However, not choosing alternative C and avoiding the campground upgrades and associated new infrastructure, could funnel some funds directly to visitor management, in the least at both ends of the Lost Coast Trail. Within 5 years, it should be known that one must pre-register during peak months before hiking the Lost Coast. This could be done by phone or web. And then a place to actually put registration materials in at either end is necessary. This could then be checked daily with a posting of closed trails due to numbers. Unorganized backpackers might be forced to wait a day or two in a campground.

10-9
cont.

Just last weekend there was a huge festival at the Mattole Beach campground. What are the current limits for camping at Mattole Beach? Though the crew managed to clean much of the area, the uncontrolled use of the willows as a bathroom left little piles with toilet paper throughout. This is not acceptable. Also, perhaps the biggest problem of such a festival is the increased danger to the undeveloped narrow road that the locals must use to get home. It is amazing that only one accident occurred, and it was fortunately, at the safest place in the roadway. A cap on the numbers of people should be publicized and enforced.

10-7
cont.

10-9
cont.

TERRESTRIAL/VEGETATIVE ECOSYSTEMS:

For vegetative issues we have chosen Alternative B with the caveats that follow.

1) Absolutely no herbicide use ever. Applying chemical combinations goes against the mission of the KRNCA: "The BLM will manage the King Range National Conservation Area to conserve one of America's last wild and undeveloped coastal landscapes for the use and enjoyment of present and future generations." The key word here is wild. The whole idea of minimal impact and the restoration of natural processes only points to manual release as the only alternative to brush control. Although manual release is a more expensive methodology of weed/invasive control, it does have the positive impact of employment opportunities.

10-10

2) Do not broadcast burn until a far more safe method is developed.

3) Please implement a management action to rid the prairies of the rusting vegetation pyramids that I believe were originally set up to study grazing impacts. Many of them are broken and dangerous for wildlife and people. They are definitely an eyesore and are not being monitored and haven't been for years.

10-11

TRANSPORTATION and ACCESS:

For this issue, we have chosen Alternative B with the exception of the necessity to leave Telegraph Road open for emergency fire access. For instance, you could close the first 1/2 mile of road so the public couldn't see it. Alternative B also benefits fisheries by keeping the Mattole estuary road closed. To open it further as Alternative D suggests would degrade the estuarine system. This area was designated as an ACEC and we can't imagine why alternatives C and D were suggested in light of this designation.

Alternative B also benefits marine fisheries by making it harder to access the abalone off of Windy Point. We have seen the numbers of vehicles escalate in the past 5 years during abalone season dramatically. Deep ruts have formed in the meadow. Closing Windy Point Road will improve the area by allowing the meadow to grow back over the horribly eroded road scars. Closing these roads supports the mission of the KRNCA by keeping the coast wild.

10-12

CULTURAL and HISTORIC RESOURCES:

We chose Alternative C as it proposes some additional protection measures short of bringing in the patrols to monitor the sites.

LANDS and REALTY:

We chose Alternative B as it best represented our concerns on this issue. We do not think that the BLM should be open to acquiring land in the residential zone. We also support that the water rights on public land need to stay on public land.

10-13

SPECIAL FOREST PRODUCTS:

As we are against using the KRNCA for an extraction economy, we are therefore against any commercial permits for special forest products with the exception of tribal uses. Personal permits are ok as suggested in Alternative B. However, it is imperative to allow tribal groups to collect and maintain the native beargrass sites. Although this sounds selective, it is the least we can do as we ripped off the land from the tribes in the first place.

10-14

VISUAL RESOURCE MANAGEMENT:

We support the preferred alternative C so long as Mill Creek is changed from Frontcountry to Backcountry status. Therefore it would have a VRM class 1.

10-15

GRAZING MANAGEMENT:

The MCWC Board did not select an alternative because of the following varying sentiments:

- 1) grazing is a subsidy
- 2) 28 years of management have degraded riparian water quality wherever cows have been
- 3) a lack of grazing will potentially lead to a decrease in prairie or grassland which is an extremely important ecosystem that is already disappearing.

10-16

INTERPRETATION and EDUCATION:

Let's face it, the BLM has been doing a dynamite job on this front and we support the preferred alternative A.

Thank-you for considering our comments in a thoughtful way. Because of our Cooperative Management Agreement, it is important to continue to work cooperatively on the vision of protection of our wild Mill Creek and the rest of the beautiful King Range NCA.

Sincerely,



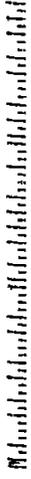
Jim Groeling,
President, Mill Creek Watershed Conservancy

P.O. BOX 173 PETROLIA, CA 95558



*Lynda Roush
BLM
1695 Heindon Road
Arcata, CA 95521*

95521#4573



April 16, 2004

Bob Wick
Bureau of Land Management
1695 Heindon Road
Arcata, CA 95521



Re: King Range National Conservation Area Resource Management Plan and Environmental Impact Statement – Comments on the DEIS [See 1600 (CA-330).]

Dear Mr. Wick,

I'm submitting the following comments on behalf of the Environmental Protection Information Center ("EPIC") for your consideration in fine-tuning the Draft Resource Management Plan ("DRMP") and associated Draft Environmental Impact Statement ("DEIS") for the King Range Conservation Area.

The King Range National Conservation Area ("King Range") is a unique and spectacular part of our natural heritage, offering rare backcountry opportunities on a stunning piece of the U.S. coastline. EPIC's members include hundreds of individuals who live in close proximity to the King Range and others who extensively use this area for recreational activities, scientific exploration, and spiritual health. EPIC supports full protection and restoration of the King Range in all future management activities.

We appreciate that the BLM has taken many steps to advance the protection and recovery of the King Range, including deconstructing roads and closing beach access to off-road vehicles. We particularly want to note our appreciation for the outstanding work of current BLM/King Range staff and the general direction you are taking toward restoration of the King Range as a fully functioning wild area. The comments which follow are necessarily focused on areas where we feel the DRMP and DEIS can and should be strengthened. In many instances, such changes are necessary primarily because we cannot be certain that the present staff and management direction of the King Range will be carried forward for the life of the plan under consideration.

EPIC requests that revisions to the DRMP and DEIS reflect the following comments:

1. Wilderness Designation and WSA Management

The King Range certainly deserves formal Wilderness designation, and EPIC appreciates that the BLM has supported such designation for much of the area. We strongly support the inclusion of wilderness-suitable additions to the King Range to the BLM's proposed Wilderness designations and their management as Wilderness Study Areas pending Congressional action. We support the Wilderness boundaries proposed by the California Wild Heritage Campaign and the Mill Creek Conservancy.

We note with no little dismay that of the more than 10,000 Wilderness-suitable acres identified in your inventory, only 200 are actually proposed for management designations that

will fully protect their wild characteristics. EPIC urges the BLM to include all of the subunits 1A through 1J, inclusive, in the King Range WSA and to manage all these areas to protect their outstanding natural values. Failing even to examine an alternative that would provide full protection for these areas is, we believe, a violation of both the King Range's mandate and of NEPA. We request that the FEIS consider full protection for all Wilderness-suitable lands in the King Range and that the RMP mandate such management pending Congressional action.

**11-1
cont.**

BLM must and should manage the WSA as Wilderness by excluding motorized vehicles and equipment, logging operations, and otherwise protecting the Wilderness characteristics of the area. We note a few areas where potential and current issues may affect the quality of potential Wilderness:

A. Salvage Logging

While there seems little pressure at present to conduct any logging in the King Range, we are concerned that the DRMP and DEIS do not completely foreclose the possibility of commercial logging in the King Range. Of particular concern to EPIC and its members is the prospect of salvage logging in up to 40% of the King Range. We are implacably opposed to any salvage or other commercial logging in any portion of the King Range, especially any part which might be suitable for Wilderness-level protection. We oppose the inclusion of any language in the RMP which might contemplate the removal of any large trees from the King Range. We oppose the selection of the preferred Forest Management Alternative D and generally prefer Alternative B, which would foreclose salvage logging operations.

11-2

We would oppose the construction or reconstruction of any road for logging purposes, however temporary. Too much of the existing road network in the area already needs too much work to countenance adding any additional burdens to the King Range's streams. In general, EPIC sees the prospect of logging in the King Range, including salvage logging, as flatly contrary to the purposes for which the King Range was established. The RMP and FEIS should provide assurances that future BLM officials will not be able to authorize any logging in the area without amending the RMP and conducting full environmental impact review of the proposed actions under NEPA and CEQA.

B. Wild and Scenic Rivers

EPIC supports the maximum feasible protection for the King Range's free-flowing rivers and streams. While we do support the BLM's recommendations for protection of eight stream segments under the Wild and Scenic Rivers Act (WSRA), we strongly encourage the agency to endorse the maximum feasible level of protection for all 28 stream segments, totalling more than 100 miles, which your own inventories have shown to be eligible for designation as Wild, Scenic, or Recreational under the WSRA. (Thanks for conducting such thorough inventories, by the way.)

11-3

Of those 28 segments, the BLM is recommending that Congress consider designating eight as Wild & Scenic, including the lower Mattole River, Mill Creek, Big Creek, Big Flat Creek, Gitchell Creek, Honeydew Creek, and two segments of the South Fork Bear Creek.

These streams represent slightly more than half of the eligible mileage. They include Big, Big Flat, and Gitchell Creeks, which tumble from the King Rang crest nearly 4,000 feet to the Pacific Ocean. They also include the lower four miles of the Mattole River, and several important Mattole tributaries, including Mill Creek, Honeydew Creek, and South Fork Bear

Creek. These streams provide important spawning habitat for the threatened Coho salmon and steelhead, old growth forests for the endangered Northern spotted owl, outstanding and unique opportunities for coastal recreation with unsurpassed scenery, pre-historic and cultural values, and sensitive plant habitat.

Protection of these stream and river segments under the WSRA would ensure that the free flowing character of the streams are retained in perpetuity, and that the public lands along the streams are managed to protect outstanding natural and cultural values. The FEIS should fully consider an alternative, such as Alternative B in the DRMP, which provides maximum feasible protection for all eligible stream segments, and should analyze and disclose the environmental benefits of management under such designations. Of course only Congress can actually designate stream segments for protection under the WSRA; but as with Wilderness, the BLM can take steps in its RMP to protect these outstanding watercourses from actions which might reduce their future eligibility for protection.

11-3
cont.

C. Bicycles

Given the incompatibility of bicycles ("mechanical transport") and designated Wilderness, EPIC opposes opening any areas in Wilderness-suitable areas of the King Range, including recent additions, to use by bicycles. However, opening properly sited, designed, and managed single-track trails to mountain biking in those few areas of the King Range which are not Wilderness-suitable may be an acceptable way to provide for low-impact recreation in an outstanding natural area where there are very few mountain-biking options.

11-4

D. Air Access at Big Flat

The FEIS should document and analyze the impact of continuing access by airplane to the Big Flat airstrip. The operation of an airstrip is clearly incompatible with Wilderness-level protections. It is our understanding that much of the airstrip itself is on public land. There is no question that operation of aircraft from the Big Flat airstrip results in a number of undesirable effects on the environment of the King Range, of which noise and human overcrowding are only the most obvious. Given these impacts, the issue of aircraft operations at Big Flat clearly rises above the level of private consultation with the landowner; these are issues of importance to the public. It is by no means clear that the operation of aircraft at Big Flat is in fact the legitimate exercise of a valid pre-existing right. As custodian of the public interest BLM is obliged to ensure that any actions in the King Range which are not fully compatible with protection of the public resources in the area are strictly limited to the legitimate exercise of valid pre-existing rights.

11-5

The FEIS should document and analyze aircraft operations in the King Range in greater detail, with particular attention to the issue of the Big Flat airstrip. EPIC would support RMP direction toward phasing out use of the Big Flat airstrip and providing for future uses more compatible with the wild nature of the area.

2. Front- and Backcountry

It is far from clear that the proposed designation of Front and Backcountry zones is the optimum method for protection of the King Range's resources. The mere fact that some areas of the King Range are more accessible by road than others does not necessarily mean that those areas are, in the larger regional and national context, less deserving of full protection. We don't see why the northern sections of the King Range can't be designated Backcountry, just as some

11-6

of the more accessible and relatively heavily-traveled areas in the southern part of the King Range arc. We are concerned that the designation of Frontcountry areas will lead to diminished protection for those areas, especially of the characteristics that make them suitable for Wilderness designation. In general, the "recreation" section of the DRMP/DEIS is the most difficult to follow, in large part because of the Front/Backcountry distinction.

11-6
cont.

3. Expansion of the King Range

BLM should continue to acquire private lands for addition to the King Range where landowners are willing and interested. However, such expansion should not overshadow "Acquisition Priority 1 (and) 2" private lands identified in the Arcata Resource Area ("ARA") RMP. BLM should also acquire additional lands in and near Shelter Cove to help alleviate development pressures on the coastline. These intentions should be reflected in the RMP, and their probable positive environmental effects documented in the FEIS.

11-7

4. Protection and Restoration of Native Plant Species

There are enormous opportunities to reestablish native plant species in the King Range. EPIC believes the BLM should maintain a program to reintroduce rare species that historically occupied the King Range. EPIC also believes the BLM should take all efforts to protect existing populations of rare plants in the King Range, including the Leafy reed grass (*C. foliosa*) and *Layia Carnosa*, and also work to expand the distribution of these species.

11-8

5. Research and Action to Protect Rare Aquatic Species and Wildlife

EPIC believes the BLM should prioritize the protection of imperiled species in the King Range and should continue and expand its research work on the status and distribution of rare aquatic creatures and wildlife in the area, including the Cape Mendocino snail and Humboldt marten. BLM should work with Humboldt State University and other researchers to advance scientific understanding and knowledge of the natural diversity in the King Range.

11-9

While most of the work to restore salmonids in the Mattole watershed is taking place outside the King Range proper, management of the King Range should always take into account the importance of these restoration/recovery efforts. Protection of downstream fish and their habitat is one of the most important reasons that existing roads in the King Range should be fully removed and restored, and that salvage logging and road construction should be avoided.

11-10

6. Recovery of Roosevelt elk and Reintroduction of Other Native Wildlife

EPIC believes the BLM should explore the feasibility of reintroducing Roosevelt elk to the northern and central portions of the King Range. The herd of Roosevelt elk that occupies the Sinkyone State Park and southern portion of the King Range has made a remarkable recovery, but the species remains extirpated throughout the majority of its historical range. There are limited public lands in which reintroduction of Roosevelt elk is possible, and the northern and central portions of the King Range are among the most suitable anywhere. EPIC urges the BLM to examine this possibility and implement a program to reestablish the Roosevelt elk in the central and northern portions of the King Range if it proves feasible. We are disappointed that the DRMP/DEIS lets this opportunity slip by leaving the question of elk recovery in the King Range entirely in the hands of California Fish and Game. BLM can and should take a more proactive stance in the RMP on the question of elk recovery, and the FEIS should document and analyze the environmental benefits of elk recovery across the King Range and the North Coast.

11-11

EPIC members and staff have observed many tire tracks on the land on the eastern side of Chemise Mountain Road at its juncture with Shelter Cove Road. This is a very important area for Roosevelt elk, and EPIC urges the BLM to close this area to vehicle access and ensure that vehicles no longer transgress the area. BLM should increase its environmental education efforts to help local residents better appreciate and understand the importance of Roosevelt elk.

11-12

Additionally, EPIC requests that the BLM explore reintroducing the California condor into the King Range. The California condor historically ranged as far north as British Columbia, and like the Roosevelt elk, there are few areas large enough for its reintroduction. The King Range could be one of the few places that would allow such reintroduction efforts to occur so this majestic bird may one day again soar above Northern California. The RMP should contain language that would permit Condor reintroduction to proceed with minimum delay, should the stars of other agencies align to make such an action possible.

11-11
cont.

Finally, the RMP should contain similar language embracing the return of key predators to the King Range landscape. While the King Range alone is likely insufficient to provide viable habitat for a sustainable population of grizzlies or wolves, the potential return of large predators to the Klamath/Siskiyou complex, together with the restoration of viable wildlife corridors from the King Range to the Klamaths, could result in the return of large predators to the King Range within the life of the RMP. The FEIS should reflect the findings of recent research in Yellowstone National Park detailing the ecosystemic benefits of wolf recovery in that region. This is an issue where the King Range can continue to lead other public lands units by example.

7. Grazing Allotments

EPIC believes the BLM should work with ranchers, landowners, and local non-governmental organizations to retire grazing allotments in the King Range over time. Ongoing grazing in the King Range is degrading the cultural and ecological values of the area as well as the recreational experience. EPIC believes the allotment that encompasses Spanish Flat should be prioritized for closing due to impacts that cattle grazing is having on this important cultural site.

Additionally, the BLM needs to take all efforts necessary to ensure that cattle grazing or other activities (such as recreation) do not damage the population of *Layia Carnosa* (located south of the mouth of the Mattole River). The RMP should direct the phase-out of existing livestock grazing in the King Range. The FEIS should document and analyze the effects of grazing by elk in place of domestic livestock. The FEIS should reflect on the relationship between grazing in grassland and prairie zones and the alteration of fire regimes in those systems. As well, the FEIS should document and analyze any relationships between domestic livestock grazing and the introduction and/or spread of noxious or otherwise undesirable non-native plant species.

11-13

8. Recreation

The King Range is an absolutely world-class recreational resource, offering unparalleled solitude and wildness along a stretch of undeveloped wild coastline without equal on the mainland U.S. and rivalled by few spots on the planet. The steady growth of the local population, burgeoning of metropolitan populations to the south, and accelerating popularity of recreation in and around wild areas make it imperative that the BLM continue to focus on maintaining and enhancing the qualities that make the King Range unique. Forms of recreation that are available

11-14

in other areas and which detract from the high-quality experiences available only at the King Range should be generally discouraged. Thus, large group camping and hang-gliding can be relatively low-impact, but are probably not the best use of the unique King Range resource.

**11-14
cont.**

As well, recreation is one important use of the King Range, but it is not the most important. Where recreation conflicts with the protection and maintenance of important wildlife habitat, it is the recreation that should be curtailed. EPIC believes that all recreation in the King Range should be low-impact and limited to hiking, surfing, horseback riding, and other forms of muscle-powered recreation. As another commenter has noted, it appears that the BLM's preferred alternative would point toward medium to high levels of recreational use in the King Range; EPIC agrees that low or low/medium levels of use would be more appropriate to maintaining the King Range's key values.

11-15

EPIC applauds and fully supports the closure of the King Range to motorized beach access, and believes that recreation in the King Range should exclude off-road motorized vehicles of all types. EPIC members and staff have observed off-road vehicles and dirt bikes in places in which they are not authorized on numerous occasions. BLM should step up its enforcement efforts to ensure these illegal activities do not continue. The FEIS should disclose and analyze existing and reasonably foreseeable off-road vehicle impacts. Because of their completely unacceptable impacts on wildlife and the natural qualities of the King Range, the RMP should contain unambiguous management direction to curtail the use of off-road vehicles everywhere in the King Range.

11-16

EPIC is very concerned by the prospect that BLM may be reinterpreting the "Redwoods to the Sea Corridor," intended as a biological connector between the King Range and inland wild areas, as a recreational corridor. Particularly if BLM were to attempt to allow or encourage motorized recreational use of the proposed corridor, such misdirection could badly damage an important initiative and undermine its many potential benefits for the wildlife of the King Range and other wildlands of the North Coast. EPIC will vigorously oppose any attempt to open recreational trails in these key wildland connectors to motorized recreation. The RMP should contain language foreclosing such potential action, and the FEIS should disclose the incompatibility of motorized recreation with the establishment and maintenance of functional wildlife corridors.

11-17

As noted above, given the incompatibility of bicycles and designated Wilderness, EPIC opposes opening any areas in Wilderness-suitable areas of the King Range, including recent additions, to use by bicycles. However, opening properly sited, designed, and managed single-track trails to mountain biking in those few areas of the King Range which are not Wilderness-suitable may be an acceptable way to provide for low-impact non-motorized recreation in an outstanding natural area where there are very few mountain-biking options.

**11-16
cont.**

As reflected in our comments above on air access to Big Flat, EPIC is concerned by the heavy recreational use of the Big Flat area. Overuse of the limited area of Big Flat is incompatible with the protection and maintenance of the King Range's outstanding natural qualities and Wilderness-eligible landscape. The RMP should reflect the need for the BLM to continue to work with private landowners at Big Flat and elsewhere to minimize incompatible uses of the overall King Range landscape. At a minimum, BLM should insist that uses of the Big Flat property not result in unacceptable resource impacts on the surrounding wild public landscape.

11-18

EPIC urges the BLM to maintain the camping and other recreational facilities in the King Range in their present form, with no further expansions, and to include in the RMP assurances that no additional campgrounds will be developed in the life of the plan.

11-19

On the question of recreation fees, EPIC has yet to be convinced of either the justice or the utility of charging recreation fees for undeveloped/dispersed recreation in the King Range and other public lands. While we are acutely aware of the ongoing budgetary crisis afflicting public lands agencies, and are more than willing to work with King Range staff to help seek adequate and sustainable funding, we are quite concerned by the potential for the agency to become dependent on recreation fees generated by activities that conflict with protection of King Range resources.

11-20

Finally, we regret not being able to more closely direct our comments on recreation to the alternatives developed in the DRMP/DEIS. As near as we can tell, we tend to support Alternative B's emphasis on maintaining high-quality wildland recreational opportunities.

9. Road Removal and Other Restoration Activities

EPIC supports the BLM's road removal projects and encourages the BLM to deconstruct roads and re-contour and re-vegetate slopes where erosion and sediment delivery resulting from such disturbance will not be greater than if the area were left alone. If work will return an area contiguous with the WSA to natural conditions, the restored area should be included in the "Potential Wilderness" area and receive Wilderness-level protection upon completion of the work. BLM should also seek cooperative management partnerships with neighboring landowners and local non-profit organizations, including the Mattole Restoration Council, Mattole Salmon Group, and others, to work towards landscape-scale restoration of the forests and watersheds.

11-10
cont.

The DRMP and DEIS do not adequately address the need to close some existing roads, and the even more pressing need to remove many closed but still-existing roads. The RMP should direct full removal of all closed roads and foreclose the possibility of any new roads being constructed in the King Range, except in the very rare instances where re-routing a stretch of existing road that must be kept open will result in less impacts to the environment over the long run. The FEIS should document and analyze the ongoing effects of existing roads in the King Range, including closed roads, and should give similar attention to the potential impacts of the development of any reasonably foreseeable roads, including "temporary" roads proposed for logging.

11-21

10. Fire Management

As noted above, EPIC is firmly convinced that any form of commercial logging in the King Range is inappropriate, and that any vegetative removal conducted for fire hazard reduction should only involve very small diameter trees. EPIC believes that plants, fish, and wildlife should be given the highest and maximum protection in all fire treatment activities.

11-22

EPIC urges the BLM to exclude all pesticides, herbicides, and other chemicals from its fire treatment plans. As well, the RMP should specify that heavy equipment will not be used for firefighting within WSAs and other Wilderness-suitable lands.

EPIC does support the focused use, where appropriate, of shaded fuelbreaks along roads and ridgetops where necessary to protect concentrations of human habitations in the King Range.

In general, the RMP should focus on management actions that will return fire to the King Range ecosystem. The FEIS should fully disclose and analyze the reasonably foreseeable environmental effects of fire suppression and fire-fighting in the King Range.

11. Invasive Species

EPIC encourages the BLM carry out a program to remove and eliminate invasive plant and other species from the King Range, but to exclude the use of herbicides and other toxic chemicals from such a program. EPIC encourages the BLM to work with non-governmental organizations and local schools to remove invasive species, including the California Native Plant Society, Mattole Restoration Council, and others.

11-23

12. Cultural Sites

There are numerous cultural sites in the King Range, and EPIC urges the BLM to fully protect such areas. Some of these sites, such as that located at Spanish Flat, are currently being degraded and/or destroyed and protection measures need to be immediately increased. EPIC also encourages the BLM to expand its work to educate the public on the use of the King Range by Native Americans. The RMP should contain specific language prioritizing the protection of cultural resource sites over recreation, livestock grazing, and other nonessential human uses.

11-24

13. Coordination with the "Resort Improvement District," California Coastal Commission and County of Humboldt

BLM should work with adjoining land managers, including the Resort Improvement District of Shelter Cove ("RID" of Shelter Cove), County of Humboldt, and the California Coastal Commission, to ensure the King Range is fully protected from encroaching development, noise impacts, and other effects that degrade the natural values and experience of the King Range. EPIC urges the BLM to also work with RID, the County of Humboldt, and the Coastal Commission to ensure that lighting in Shelter Cove does not degrade the Wilderness character of the King Range. BLM should work to ensure that large, visually obtrusive structures that do not conform with and/or enhance Wilderness values (such as communication towers) are not built in locations that would degrade the King Range. Additionally, BLM should be involved in the County of Humboldt's General Plan update and revision process to ensure that the General Plan is compatible with the Wilderness values of the King Range.

11-25

13. Water Quality and Quantity and Wild and Scenic Rivers

The BLM should reserve a water right on its stretch of the Mattole River and assist in efforts to ensure there are adequate and sufficient water flows for all life stages of salmonids and other aquatic species. BLM should evaluate streams and rivers for their eligibility and suitability under the Wild and Scenic Rivers Act, including the BLM stretch of the Mattole River, Bear Creek, Honeydew Creek, Horse Mountain Creek, Big Flat Creek, and others. BLM should also work with the County of Humboldt and others to ensure Best Management Practices are implemented for all road maintenance in and affecting the King Range.

11-26

14. Marine and Coastal Resources

The BLM should actively oppose any attempt to "bag" water from the Mattole River for export to other cities. The BLM should also oppose any oil drilling off the coast of the King Range. The BLM should work with other agencies to ensure that the marine environment and

11-27

coastline of the King Range are protected in a manner that preserves its unspoiled wilderness character. The RMP should reflect these priorities with specific and clear language.

EPIC appreciates this opportunity to share our concerns and ideas for the future management of the King Range. This magnificent area deserves the highest degree of protection possible, and we hope the direction of all future management decisions for the King Range lead to its ultimate preservation and restoration.

Again, many thanks to the local BLM staff for their work to preserve and enhance this very special place. Thank you also for your time and consideration of our comments.

Sincerely,



Scott Green

National Forest Program Coordinator

Mattole Salmon Group
P.O. Box 160
Petrolia, CA 95558

BLM King Range Management Plan Comments

4/16/04

Dear BLM ,

The following are comments prepared by Mattole Salmon Group employee Drew Barber. These comments on the plan are looking primarily at management that may impact the Mattole estuary and our ability to improve it in the future. These comments are not intended to represent all comments from the Mattole Salmon Group. Nor are these comments to represent comments from any of the other local restoration groups.

Thank you for your support and request of Mattole Salmon Group Comments regarding the KRMP.

In general the BLM plan reflects our preferred management of the estuary that well considers the estuary as essential habitat. This is reflected by the continued designation of the estuary and vicinity as an ACEC (Area of Critical Environmental Concern). BLM does though face mixed pressures from the sensitive ecology of the Mattole Estuary and the fact that Mattole Beach is the north access for departure to the Lost Coast Trail. This intensive recreational use has the potential to negatively impact the biological resources.

Summary of considerations and concerns:

- 1. The plan does not seem to directly consider the impacts of the campground and campground expansion on the Mattole river when it is in its lagoon state: ie visitors bathing in the estuary- there is a need for signage.] **12-1**
- 2. On page 158 restoration is defined incompletely, "In general, watershed restoration involves upgrading, reshaping and/or abandonment of outdated roads." The preferred plan calls for support of estuary enhancement projects through restoration. If the definition of restoration is limited to road removal it fails to include direct habitat enhancement activities, instream habitat improvement, riparian tree planting etc. All of which will likely be essential in the recovery of the estuary as salmonid habitat.] **12-2**
- 3. While the goals are stated to work with local restoration groups what are the specifics of those goals? How will the revised KRMP improve and further the collaborative efforts with BLM and the local restoration groups? Can the MSG and MRC take leadership roles in these efforts to maximize watershed wide benefits from other restoration efforts?] **12-3**

4. This plan does not seem in any way to reflect the potential threats of Global Climate Change on the delicate natural resources in the KRNCA. This is a complex question and the plan would benefit from a look at building resiliency in KRNCA ecological systems.

12-4

Comments on Specific Management plan Alternatives:

While BLM's preferred alternative is in most cases acceptable to our mission of restoring the salmon, specific agreements and disagreements follow.

3.5 No comment

3.6 In agreement with BLM's chosen preferred alternative 3.6.5

3.7 No comment

3.8 No comment

3.9 In agreement with BLM's chosen preferred alternative 3.9.5, Alternative C keeping estuary as ACEC and adding Mill Creek as an ACEC.

3.10 In agreement with BLM's chosen preferred alternative 3.10.5

3.11 In agreement with BLM's chosen alternative 3.11.5

3.12 In agreement with BLM's chosen alternative 3.12.5 with a special restriction on the use of herbicides for native plant removal (only as mentioned) in the watershed basin of the Mattole Estuary especially when it is in its lagoon state. As the lagoon is a mostly closed system and introduction of any chemicals to the lagoon system must be considered a direct threat to the fish over-summering there.

12-5

3.13 Prefer Alternative C 3.13.5. Alternative D is not appropriate (3.13.6) as it permits the construction of new roads and salvage logging. This is counter to the objectives set out in 3.13 and will negatively impact the salmonid rearing and habitat potential of the Mattole.

12-6

3.14 No comment

3.15 In agreement with BLM's chosen alternative 3.15.4 (alternative C)

3.16 In agreement with BLM's chosen alternative 3.16.5 (alternative C)

3.17 No comment

3.18 In agreement with BLM's chosen alternative 3.18.5 (alternative C) with amendment of the Low flying air craft section from alternative A (it will be disallowed).

3.19 No comment

Thank you for considering these comments.

Drew Barber
Mattole Salmon Group

Lynn Ryan
1693 J. Street
Arcata, CA 95521

April 16, 2004

Ms. Lynda J. Roush
Arcata BLM Field Manager
1695 Heindon Road
Arcata, CA 95521

Dear Lynda J. Roush and BLM,

I am commenting on the King Range National Conservation Area Draft Resource Management Plan and Draft Environmental Impact Statement dated January 2004. These are my personal comments and those of the Northcoast Environmental Center in Arcata, CA.

Overall, I appreciate the Arcata Bureau of Land Management doing justice to the King Range, managing it to preserve its natural and primitive values. Local citizens, international visitors, and many people from California have, over the past 20 years, joined public hikes in the King Range lead by me and colleagues of Sierra Club, Ancient Forest International, Northcoast Environmental Center and the California Wild Heritage Campaign. The beauty and grandeur, the wildness and weather of the Lost Coast makes a lasting impression on everyone. Thank you for your dedication.

Generally speaking, we support alternative B with some important changes.

None of the alternatives including Alternative B adequately protect public water in the King Range. No applications for water rights of way that propose to divert surface water from public should be considered. BLM should apply for water rights in all King Range watersheds to protect public resource values such as adequate flow, temperature, riparian and fisheries needs.

13-1

We support the BLM's Wild & Scenic River recommendations for eight streams in the King Range National Conservation Area: Mattole River, Mill Creek, Big Creek, Big Flat Creek, Gitchell Creek, Honeydew Creek, and South Fork Bear Creek. These streams represent slightly more than half of the eligible mileage identified by the BLM. We support the best protection for our public water and waterways as they provide important spawning habitat for the threatened Coho salmon and steelhead, old growth forests for the endangered Northern spotted owl, outstanding and unique opportunities for coastal recreation with unsurpassed scenery, pre-historic and cultural values, and sensitive plant habitat. If wild and scenic status provides the best protection, we support that designation for all King Range streams.

NO salvage logging should be allowed on lands inventoried for wilderness, or anywhere in the King Range for that matter. Fire is part of the natural process. If it burns, let it stand, fall and contribute to the soil bank instead of the mill owner's bank account. We request that in the final RMP/EIS the proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA be designated as backcountry so that their wilderness values can be

13-2

Pg. 2. KRRMP Lynn Ryan

maintained. Senator Boxer and Rep Thompson's proposed King Range wilderness should be managed in its entirety as backcountry. Road construction be prohibited in the proposed wilderness, and prohibited anywhere in the King Range.

BLM's Preferred Alternative manages for MODERATE opportunities for solitude in spite of overwhelming public opinion for HIGH opportunities for solitude. I support Alternative B for Backcountry Zone, which manages for high opportunities for solitude.

13-3

We take issue with Redwoods to the Sea Recreational Corridor reference. Redwoods to the Sea was and is envisioned as a BICLOGICAL Connectivity Linkage, not a RECREATION corridor. Redwoods to the Sea seems to take on more than one manifestation in this Draft, linking the southern King Range with the headwaters of the Mattole River/Sanctuary Forest area, and linking the more northern portion of the King Range with Humboldt Redwoods State Park through BLM's Gilham Butte. We support biological linkages, whatever their name may be.

13-4

This brings us to bicycles in the King Range NCA. Paradise Ridge is an appropriate place for bicycles. Biological connectivity linkage areas are inappropriate for bicycles. Paradise Ridge was not included in the California Wild Heritage Wilderness proposal because the Paradise Ridge area is appropriate for bicycles. Regarding mountain bike use, BLM's 1995 Interim Management Policy for WSA management prohibits mountain bike use on all single-track trails in WSAs and only allows bikes on roads and ways (but not trails) that existed before the WSA was created. This is contrary to the description of mountain bike policy provided in the draft at page 2-145. We hope that the final version of the RMP/EIS will be written with this new understanding in mind and will contain a list of routes in the NCA where bikes are allowed.

13-5

For public hiking safety and serenity, we recommend no designated single-track, single use bike trails in the KRNCAs. There are dirt roads in the KRNCAs that provide a wonderful mountain bike experience and give other users like equestrians and hikers/backpackers a safe escape from the path of a bike. Counting cars on King Range roads is a boring job, especially on weekdays. I know, I spend time there and see very few if any automobiles on main King Range roads. There is actually room for all users in KRNCAs, but the areas that qualify for management for their wilderness characteristics should be protected. Wilderness and wildlife are not competing user groups or special interests. Mountain bike advocates are a special interest. We believe groups speaking for wild nature are acting for the public benefit. The public loves the King Range because it is primitive and wild. Keep it wild and safe for non-human and underrepresented creatures, for humans seeking solace and a place to be with their quiet self, and for the integrity of the place itself.

Much of the Spanish Flat Grazing Allotment, by far the largest allotment in the King Range, has been "rested" since 1998. It looks much better than when cattle were present. Only if one understands it is 5 years into recovery and temporarily resting can one recognize that what they see is a recovering ecosystem, not an actively grazed area. Spanish Flat is a rare coastal prairie. The amount of income generated from grazing does not warrant the damage. I recognize only a small part of Cooskie Creek watershed is managed by BLM, but BLM land suffers greatly from the upstream effects of private land grazing in Cooskie Creek watershed. From the looks of the steeply cut slopes and banks, Total Maximum Daily Load of sediment into Cooskie Creek and onward into the marine environment must be huge. This grazing allotment should be permanently retired to protect native grasses, steelhead habitat, and archeology, and to heal the steep erosive slopes.

13-6

Pg.3. KRRMP Lynn Ryan

The areas listed below are contiguous to King Range WSA's, were inventoried and found to possess substantial wilderness character, and should be managed to protect that character for future generations:

1A	Mattole River Flat	115 acres	gravel river bar
1B	Collins Gulch	224 acres	beach at Mattole estuary
1C	Moore Hill South	9 acres	includes Mattole river bar
1D	Prosper Ridge	80 acres	Windy Pt
1E	4Mile Cr	3377 acres	includes 4Mile, Indian and Mill creeks
1F	Gorda	669 acres	Johnny Jack Ridge
1G	Lake Ridge	108 acres	Cooskie Cr
1H	Moorhead Ridge	3094 acres	HW Squaw, Woods Cr
1I	Bear Wallow Ridge	2092 acres	HW E Fk Honeydew, N Fk Bear Cr,
		Smith-Etter Rd	
1J	Kaluna	423 acres	Shelter Cove, Black Sands Beach

13-7

Marine Sanctuary is not addressed in the Plan because it is apparently beyond the scope of this planning effort. However, a healthy aquatic environment is integral to the Lost Coast from at least a biological and visual perspective. Motorized boats landing on the King Range beach, especially at Big Flat, is becoming a problem from an aquatic and wilderness perspective. Unfortunately, many boaters bring garbage in and do not take garbage out. Motorized boat traffic and trash pose a danger for aquatic life. BLM spends time and resources picking up trash brought in by boats. This issue needs to be dealt with from a marine and primitive recreation perspective.

13-8

Sincerely,

Lynn Ryan
Northcoast Environmental Center

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APR 19 2004

BLM ARCATA FIELD OFFICE

April 16, 2004

Lynda Roush
Bureau of Land Management
1695 Heindon Road
Arcata, CA 95521

Dear Lynda,

I am writing on behalf of the Mattole Restoration Council (MRC) with our comments on the King Range National Conservation Area (KRNCA) Resource Management Plan (RMP). We reserved our comments to the resources that directly affected restoration and/or overall land management.

NEW ZONES:

We had one problem with the zoning changes; the parcel recently acquired in the Squaw Creek drainage should be zoned as backcountry for two reasons.

- 1) This parcel contains several acres of late successional forest which needs backcountry protection
- 2) The rest of the Squaw Creek headwaters that the BLM owns is in the backcountry zone

CULTURAL and HISTORIC RESOURCES:

We advocate for more thorough protection, increased monitoring and additional surveying of cultural and historic sites throughout the King Range and therefore we support the preferred alternative D.

LANDS and REALTY:

There was some discrepancy between the alternatives mentioned in the summary and those outlined in the third chapter. From the alternatives in the chapter we support alternative B that states for properties adjacent to/or outside the KRNCA boundary: Only acquire lands and interests that have been proposed by County governments, affected local governments, and/or local community associations. For the residential zone we want to make clear that we support acquisition of property in the Shelter Cove area ONLY if it is inappropriate for a residence.

14-1

14-2

14-3

AREA of CRITICAL ENVIRONMENTAL CONCERN (ACEC): (Changed)

We wholeheartedly support Alternative C as it would designate the BLM-owned Mill Creek watershed parcels as an ACEC. Mill Creek is biologically one of the most important tributaries to the Mattole in the lower river. It contributes cold, clear water to the Mattole and supports both coho and steelhead habitat as well as tailed frogs and torrent salamanders. The 220 acre old-growth forest has been home to Northern Spotted Owls, Golden Eagles, red tree voles and a diversity of native plant and animal species. However, we also are aware that Mill Creek has been nominated as a Research and Natural Area (RNA). Please ensure that both designations are given to Mill Creek watershed in the final management plan.

14-4

AQUATIC ECOSYSTEMS and FISHERIES:

We support the preferred alternative C as this choice affords the most opportunities for restoration in the Mattole watershed.

WILDLIFE MANAGEMENT:

Again, we support the preferred alternative C for the most affordable wildlife protections. We applaud the BLM for their steps to ensure protection and recovery of many rare, threatened, endangered species.

TERRESTRIAL/VEGETATIVE ECOSYSTEMS:

For vegetative issues we support Alternative C with one caveat. We are opposed to the use of herbicides within the KRNCA. Herbicide use is incompatible with the goal of conserving one of America's last wild and coastal landscapes. Let's keep it as wild as we can without the introduction of synthetic chemicals. Although manual release is a more expensive method of weed/invasive control, it does have the positive impact of employment opportunities.

14-5

An important side note: Please implement a management action to rid the prairies of the rusting vegetation pyramids that I believe were originally set up to study grazing impacts. Many of them are broken and dangerous for wildlife and people. They are definitely an eyesore and are not being monitored and haven't been for years.

14-6

FOREST MANAGEMENT:

We support the preferred alternative D with some important exceptions. There needs to be more specific guidelines regarding salvage logging. There should never be an opportunity, for instance, to harvest any tree over 18" in diameter. We are also against the re-opening of old haul and skid roads for the purpose of stand treatment projects.

I have a specific suggestion for Noonung Creek as it was mentioned in the silvicultural treatments for alternative C. We recently surveyed Noonung Creek for riparian conifer planting potential and found that the riparian area was well stocked with the exception of the area before and after the culvert under Noonung Creek Road. Before the culvert is a small landslide that could be planted. After the culvert the banks on both side should be planted with redwood. The rest of the riparian area was well stocked with Douglas-fir and ponderosa pine of all things. The pine tends to be dying out, but it is a shame that more redwoods are not present. The main suggestion here is however, that due

14-7

to successive plantings, there is an extreme amount of planting waste in the form of vexars and black plastic tubing that should be removed. We began collecting them but were not equipped to carry out 1/10 of what was there.

GRAZING MANAGEMENT:

We support the preferred alternative C with one exception. We cannot unconditionally agree with making unavailable the expired grazing allotments until we have discussed the matter with all parties. We strongly agree in the protection of cultural sites in the Spanish Flat grazing allotment. And we understand that a lack of grazing will potentially lead to a decrease in prairie or grassland that is an extremely important ecosystem that is already disappearing.

14-8

FIRE MANAGEMENT:

Again we support the preferred alternative C. We applaud the ideas in alternative C that explore stewardship contracts with the local contractors and organizations to meet the goals of hazardous fuels reduction and vegetative management.

TRANSPORTATION and ACCESS:

For this issue, we have chosen Alternative B with the exception of the necessity to leave Telegraph Road open for emergency fire access. For instance, you could close the first ½ mile of road so the public couldn't see it. Alternative B also benefits fisheries by keeping the Mattole estuary road closed. To open it further as Alternative D suggests would degrade the estuarine system. This area was designated as an ACEC and we can't imagine why alternatives C and D were suggested in light of this designation.

Alternative B also benefits marine fisheries by making it harder to access the abalone off of Windy Point. We have seen the numbers of vehicles escalate in the past 5 years during abalone season dramatically. Deep ruts have formed in the meadow. Closing Windy Point Road will improve the area by allowing the meadow to grow back over the horribly eroded road scars. Closing these roads supports the mission of the KRNCA by keeping the coast wild.

14-9

RECREATION

We understand that this issue is perhaps the largest as visitor use has increased dramatically over the last 30 years. Alternative D is overkill. We do not need more kiosks, a backcountry ranger station, a playground, or an additional bunch of campspots on the Mattole River bar for overflow camping. The river bar is an ACEC and should be protected for the fragile systems that it nurtures. The KRNCA is something to be experienced in the wild.

- We support alternative C for the following reasons:
- Sensitive ecological and cultural areas should be avoided and protected
- Competitive events should not be allowed in the backcountry
- Certain, appropriate trails should be developed for horse use.
- Drinking water in campgrounds should be developed where possible
- Some campgrounds should be accessible to the disabled
- A visitor use allocation system should be established that puts limits on both trail use and campground use.

However, we take exception to the following in alternative C:

- There should be no fee system for individual backcountry use
- Mountain bikes should not be allowed in the backcountry with the exception of ridgetop trails that could be surveyed in order to determine that use will not cause erosion. Wilderness study areas should remain free from use.
- There should be no development of campsites for overflow at the Mattole beach.

14-10
14-11
14-12

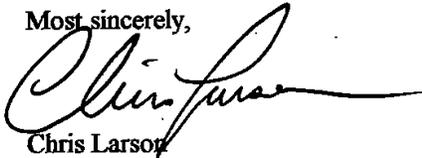
It does seem imperative to include a visitor registration system at the Mattole Beach for both the trails and the campground. We do agree that visitor numbers are a problem and suggest a tighter control, one that puts a cap on the amount of visitors on each trail, each day, as well as the campground. This is a difficult proposition as we want to avoid any fee associated with the backcountry. Within 5 years, it should be known that one must pre-register during peak months before hiking the Lost Coast. This could be done by phone or web. And then a place to actually put registration materials in at either end is necessary. This could then be checked daily with a posting of closed trails due to numbers.

14-13

INTERPRETATION and EDUCATION:

The BLM has been doing an excellent job on this front and we support the preferred alternative A.

Most sincerely,



Chris Larson

Mattole Restoration Council
P.O. Box 160
Petrolia, CA 95558-0160



King Range NCA ~~State~~ RMP Comm'n
Attn: Lynda Roush
Bureau of Land Management
1695 Heindon Rd.
Arcata, CA 95521

95521#4573



BCHC

Backcountry Horsemen of California, Inc.



April 13, 2004

Ms. Lynda Rousch
Bureau of Land Management
Arcata Field Manager
1695 Heindon Road
Arcata, CA 95521

Dear Ms Rousch:

This letter is from the Redwood Unit, Back Country Horsemen of California, comprised of approximately 200 members. We wish to express our views on the King Range Draft Management Plan. We have enclosed a copy of a chart we developed which lists the BLM Proposed Alternatives in the left hand column of the pages. The Redwood Unit preferences are in the right hand column.

Redwood Unit agrees with most of the BLM Proposed Alternatives. Alternatives which Redwood Unit does not agree with are in the right hand column of the chart and are as follows:

- 1. Redwood Unit does not agree that BLM should acquire more property.] **15-1**
- 2. Redwood Unit is opposed to any changes to the river and/or stream designations already in place. Designations already in place are adequate.] **15-2**
- 3. Landowners with legal access should be provided with written documentation stating that they have the right to use, maintain and repair their existing access road(s). In addition, they should allowed to realign their access road(s) if a large slide or slip-out occurs, in order to return it to a usable state.] **15-1 cont.**
- 4. Permits should not be required. A self-registration system is acceptable to document use.] **15-3**
- 5. Counting animals in the 15 "heartbeats" context should be limited people. If animals are to be counted the number should be raised to 25 "heartbeats." The maximum number of 45 visitors should be allowed to leave any trailhead per day.] **15-4**
- 6. Back Country Horsemen of California has previously submitted written letters regarding their opposition to "user" fees. A copy of this letter is enclosed. Back Country Horsemen of California have donated \$325 million dollars in hours, supplies, and animals on volunteer efforts on public lands from 1998-2002.

A good working relationship has been established with BLM and we look forward to working together to make the King Range Management Plan better the future of the Lost Coast.

Sincerely,

Carole Polasek
Public Lands Chairperson
Redwood Unit, Back Country Horsemen of California
PO Box 792, Ferndale, California 95536

cc: Toby Horst, California Equestrian Trails & Lands Coalition
Barbara Ferguson, Public Lands Chairperson, Back Country Horsemen of California

On March 8, 2002 the Backcountry Horsemen of California Board of Directors approved the following wilderness policy.

The BCHC will not support any new wilderness designations until the following is adopted for all existing and proposed wilderness areas.

1. There shall be no curtailment in the amount and distribution of recreational saddle and pack stock use, and grazing incidental to that use, in existing wilderness. Nor should social values, norms and preferences of other wilderness users be used as a reason by administrators to restrict, phase out, or eliminate recreational stock use, grazing by recreational stock or trails and associated trailhead facilities of a sufficient standard to accommodate that use.
2. The numbers of recreational stock use days in wilderness will not be reduced below approximate levels existing at the time an area was designated as wilderness. If total use is allowed to increase beyond that which existed at the time of classification, recreational stock use will be allowed to increase at a rate proportionate to that which existed at the time of classification. If, through monitoring for a period of not less than five years, administrators determine that the capacity of a wilderness area has been exceeded, differing classes of uses will be reduced proportionately to that which existed at the time of classification.
3. It is recognized that there may be limited areas where the terrain is so fragile that recreational stock use may have to be restricted or prohibited. These will be the exception and will be determined by site specific analysis based on biological and physical criteria rather than subjective social preferences of other wilderness users.

Redwood Unit
 Back Country Horsemen of California
 Comparison of the King Range National Conservation Area
 Draft Resource Management Plan and
 Draft Environmental Impact Statement

Compiled by Carole Polasek
 February 19, 2004, edited February 25, 2004, and March 19, 2004

BLM PROPOSED ALTERNATIVES	REDWOOD UNIT, BCHC PREFERENCES
<p>THEME OF ALTERNATIVE Alternative A: No Action - Continue current Management</p>	<p>Agree</p>
<p>GENERAL OBJECTIVE OF ALTERNATIVE Alternative A: Maintain current level of multiple uses and resource management in accordance with existing guidance, laws, plans, and policies, and that comply with the King Range National Conservation Area Act ("the Act"), while meeting land health standards.</p>	<p>Redwood Unit, BCHC agrees.</p>
<p>VISUAL RESOURCE MANAGEMENT - Alternative C Same as Alternative B, except portion of Backcountry Zone north of Cooskie Creek will be managed as VRM Class II. Alternative B: Backcountry Zone Class I. Same as Alternative A: Complete visual contrast ratings for existing roads and facilities and identify opportunities to reduce existing visual impacts through modifications (e.g. painting culverts, removing road berms etc.). Same as Alternative A: Complete visual contrast ratings for all proposed roads and facilities and identify opportunities to reduce existing visual impacts through modifications (e.g. painting culverts, removing road berms etc.).</p>	<p>Agree Agree Agree Agree</p>

Redwood Unit
 Back Country Horsemen of California
 Comparison of the King Range National Conservation Area
 Draft Resource Management Plan and
 Draft Environmental Impact Statement

Compiled by Carole Polasek
 February 19, 2004, edited February 25, 2004

BLM PROPOSED ALTERNATIVES	REDWOOD UNIT, BCHC PREFERENCES
<p>THEME OF ALTERNATIVE Alternative A: No Action - Continue current Management</p>	<p>Agree</p>
<p>GENERAL OBJECTIVE OF ALTERNATIVE Alternative A: Maintain current level of multiple uses and resource management in accordance with existing guidance, laws, plans, and policies, and that comply with the King Range National Conservation Area Act ("the Act"), while meeting land health standards.</p>	<p>Redwood Unit, BCHC agrees.</p>
<p>VISUAL RESOURCE MANAGEMENT - Alternative C Same as Alternative B, except portion of Backcountry Zone north of Cooskie Creek will be managed as VRM Class II. Alternative B: Backcountry Zone Class I. Same as Alternative A: Complete visual contrast ratings for existing roads and facilities and identify opportunities to reduce existing visual impacts through modifications (e.g. painting culverts, removing road berms etc.). Same as Alternative A: Complete visual contrast ratings for all proposed roads and facilities and identify opportunities to reduce existing visual impacts through modifications (e.g. painting culverts, removing road berms etc.).</p>	<p>Agree Agree Agree Agree</p>

<p>Same as Alternative A: Complete an inventory of existing and potential key scenic vista points along road and trail corridors within the KRNCA and identify opportunities to enhance these locations so that they are available to the public.</p> <p>Ensure that coastal developments do not detract from the scenic integrity of the area by working with Humboldt County, the California Coastal Commission and other agencies with management jurisdiction.</p> <p>Same as Alternative A: BLM managed lands in Shelter Cove provide the primary public open space in the Residential Zone. Any site developments on public lands will be located and designed so that they do not detract from the coastal vistas. New facilities will be constructed away from the coastal bluff viewshed.</p> <p>Same as Alternative A. Preserve, protect, and study cultural resources through outreach, educational, and interpretive efforts; and to reduce imminent threats from natural or Human-caused deterioration or other potential conflict with other resources.</p> <p>Same as Alternative C: Priority for protection placed on cultural resources in all three Zones.</p> <p>Same as Alternative C: Increased monitoring, site patrols, and collaboration with local Native American Tribes and Individuals.</p> <p>Take a proactive approach to surveying the Frontcountry Zone for cultural resources.</p> <p>Conduct a Regional Overview for the entire King Range and surrounding areas.</p> <p>Develop stabilization projects for historic properties.</p> <p>Develop National Register nominations for King Range Historic and Prehistoric Archeological Districts.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
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<p>LANDS AND REALTY</p> <p>Land Acquisition: Alternative C</p> <p>In the Backcountry and Frontcountry Zones, acquire lands and interests in lands from willing sellers to reduce fragmentation, and/or enhance management. In the Residential Zone and outside the KRNCA boundary, BLM will acquire lands only after working with affected local governments and community associations.</p> <p>Rights-of-Way: Alternative C</p> <p>Make Backcountry Zone an exclusion area for new rights-of-way and/or permits; rights-of-way and permits will be considered in Frontcountry and Residential Zones on a case-by-case basis. Utility rights-of-way will be restricted as much as possible to existing and/or underground locations.</p> <p>Water Rights-of-Way: Alternative C</p> <p>New water rights-of-way that propose to divert surface water on public lands will be considered on a case-by-case basis and in all cases stipulate that surface water can only be diverted on public lands during the winter and spring months, when base flows are adequate.</p> <p>Water Rights: Same as Alternative C.</p> <p>Alternative C: BLM will apply for water rights only after completing an inventory and assessing surface water sources within the KRNCA and adjacent public lands.</p>	<p>Agree, with the following preferences:</p> <p>Redwood Unit, BCHC, does not agree that BLM should acquire more property from private owners. Too many times when agencies purchase private property for public use it is closed to all public access.</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>INVENTORY UNITS & STUDY AREAS-WILDERNESS CHARACTERISTICS - Alternative D:</p>	<p>Agree, with the following preferences</p>

<p>Agree</p> <p>Agree</p> <p>Redwood Unit, BCHC is opposed to any changes to the river and/or stream designations already in place.</p> <p>Do not agree. Designations already in place are adequate.</p> <p>Do not agree. Designations already in place are adequate.</p>	<p>Same as Alternative A: Manage the 37,975 acres of existing WSAs identified in the 1988 Wilderness EIS under the BLM's "Interim Management Policy (IMP) For Lands Under Wilderness Review" (H-8550-1) until Congressional designation as Wilderness or release from WSA status.</p> <p>Alternative D: Protect Wilderness Characteristics on five parcels (approximately 200 acres within the King Range WSA that have been acquired since the Wilderness EIS was published in 1988.</p> <p>Alternative D: Recommend eight eligible river segments on seven different streams as Suitable for inclusion in the NWSRS: South Fork Bear Creek (Segments A and B), Big Creek, Big Flat Creek, Honeydew Creek, Gitchell Creek, Mattole River, and Mill Creek. The BLM would place all suitable river segments under protective management until a final decision is made by Congress.</p> <p>Preliminary classifications for all river segments would be the same as Alternative B:</p> <p>Alternative B: The mouth of the Mattole River and estuary would receive preliminary classifications as a scenic river area, as well as Mill Creek and South Fork Bear Creek north of Shelter Cove Road. The remaining portion of South Fork Bear Creek, south of Shelter Cove Road, would be preliminarily classified as a recreational river area; the remainder of the eligible streams in the King Range would all receive preliminary classification as wild river areas.</p>
<p>Agree</p> <p>Agree</p> <p>Agree</p>	<p>INVENTORY UNITS AND STUDY AREAS - ACECs - Alternative C</p> <p>Same as Alternative A: Continue management of the 655 Acre Mattole Estuary ACEC.</p> <p>Designate the Mill Creek Watershed as an ACEC, including all BLM managed lands within the Mill Creek Watershed.</p>

<p>AQUATIC ECOSYSTEMS AND FISHERIES - Alternative C</p> <p>Same as Alternative B - Alternative B: Restore and maintain the ecological health of watersheds and aquatic ecosystems on public lands, and, to the extent possible, partner with other landowners to coordinate restoration efforts across watersheds, with new standards and guidelines included in the plan.</p> <p>Implement up-slope sediment reduction, in-stream habitat enhancement, riparian silviculture, research, and monitoring measures only in fish-bearing streams within the Mattole Basin.</p> <p>Same as Alternative A: Implement estuary enhancement program in the Mattole Estuary, in coordination with local watershed restoration groups.</p> <p>Same as Alternative A: Work with federal, state, and local partners to minimize or eliminate the need for additional listing of species under the ESA and to contribute to the recovery of listed species in the King Range.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>WILDLIFE - Alternative C</p> <p>Cooperative Management: Alternative C:</p> <p>Cooperative management with the CDFG and FWS to achieve, maintain and enhance natural wildlife populations, protect habitat, prevent damage, and increase public education; also facilitate research and monitoring to increase knowledge.</p> <p>Threatened and Endangered Species: Alternative C</p> <p>Same as Alternative A: Work with federal, state and local partners to minimize or eliminate the need for additional listing of species under the ESA and to contribute to the recovery of listed species in the King Range. Initiate Consultation with appropriate agencies if new T&E species colonize area.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>

<p>Alternative C: Protect roost sites for brown pelicans through cooperative management with the Coastal Monument.</p> <p>Same as Alternative A: Encourage habitat for bald eagles.</p> <p>Same as Alternative A: Monitor for nesting western snowy plovers.</p> <p>Same as Alternative A: Preserve potential nesting habitat for marbled murrelets, and conduct project-level protocol surveys in appropriate habitat prior to project implementation.</p> <p>Protect and increase suitable habitat for nesting and roosting of northern spotted owl, with sufficient habitat to attract and maintain 20 breeding pairs within the KRNCA. Monitor known owl sites and conduct periodic surveys in suitable habitat.</p> <p>Protect haul-out sites for Steller's sea lions through cooperative management with the Coastal Monument, and educate boaters on appropriate conduct.</p> <p>Other Wildlife</p> <p>Design management actions to minimize disturbance to nesting species of migratory birds. Design and implement a long-term "all bird" monitoring plan.</p> <p>Same as Alternative A: Disturbance of special-status amphibians and reptiles will be avoided to the extent practicable.</p> <p>Work cooperatively with CDFG to maintain a natural diversity of intertidal organisms; also educate visitors to intertidal habitat.</p> <p>Same as Alternative A: Provide a mix of habitats to support wildlife game species.</p> <p>Same as Alternative A: Native wildlife re-introductions will not be a stated objective of this plan; however BLM will work cooperatively to assess suitability of re-introduction proposed by CDFG and other entities.</p>	<p>Agree</p>
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Participate in casual monitoring of recently introduced Roosevelt elk populations.	Agree
TERRESTRIAL/VEGETATIVE ECOSYSTEMS -Alternative C	
Habitat	Agree
Implement habitat-specific management actions, as described below:	Agree
Maintain a semi-stable coastal dune system near mouth of Mattole River by eradicating invasive plant species and assessing habitat trends with qualitative monitoring.	Agree
Maintain a healthy and productive coastal scrub community that will produce forage for game species; also allow the establishment of decadent scrub communities as habitat for other species.	Agree
Utilize prescribed burns to maintain scrub; allow limited grazing on project-by-project basis.	Agree
Maintain healthy, productive grasslands, and encourage native species abundance and diversity as needed, utilizing prescribed burns and manual means to mimic historic fire regimes; also pursue native grass enhancement projects, and allow limited grazing on project-by-project basis.	Agree
Same as Alternative B: Maintain current levels of chaparral by allowing natural disturbances such as wildfire to maintain chaparral habitats; implement prescribed burns as needed in specific areas.	Agree
Special-Status Plant Species - Alternative C - Same as Alternative A:	Agree
Maintain and encourage viable populations of T&E and Special Status species known to occur in the King Range across all Zones.	Agree

<p>Invasive Plant Species - Alternative C - Same as Alternative A, plus apply an Integrated Pest Management approach to all invasive infestations, utilizing manual means wherever possible.</p> <p>Alternative A: Continue on-going efforts to map, monitor, and eradicate invasive plant species. Work with various local organizations, agencies, and landowners to promote education and assist in preventing establishment of invasive. Remove invasive by manual means whenever possible.</p> <p>Sudden Oak Death - Alternative C - Same as Alternative A:</p> <p>Work cooperatively with other agencies, provide appropriate information to the public, and monitor species known to be vulnerable to this pathogen.</p> <p>Same as Alternative B: Implement preventative measures consistent with USDA and Humboldt County guidelines.</p> <p>Implement additional control measures, such as vehicle "dip" stations, if found necessary to manage an infestation.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>FOREST MANAGEMENT - Alternative D</p> <p>Same as Alternative B: Maintain and develop forest stand characteristics that are reflective of natural processes in forest ecology, based on a historical perspective prior to the onset of logging with mechanical means.</p> <p>Same as Alternative A: Maintain undisturbed late-successional/old growth forest habitat, keeping such stands intact and allowing natural processes to prevail.</p> <p>Same as Alternative C: Utilize silvicultural treatments to restore structural diversity and enriched species composition to second-growth, previously harvested stands, encouraging or accelerating late-successional characteristics where possible.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>

<p>Same as Alternative C: Design silvicultural treatments to reduce fuel loading.</p> <p>Following a stand replacement fire in the Frontcountry or Residential Zones, burned timber may be removed, after careful analysis and with particular stipulations, as part of a salvage effort. Old logging roads may be reopened and new temporary roads may be built to remove burned or fire-killed timber. All temporary roads will be removed upon completion of the salvage operation.</p> <p>Same as Alternative C: Perform silvicultural treatments where possible via cooperative agreements, partnerships, and contracts, particularly with local communities or individuals.</p> <p>Same as Alternative C: Tree planting will be done as part of forest restoration following a fire or road decommissioning. Only trees grown from native seed will be planted.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>SPECIAL FOREST PRODUCTS - Alternative C</p> <p>Mushrooms - Issue permits for commercial (during a limited season) and personal collection of mushrooms. The number of permits issued will depend on availability of the resource and maintenance of sustainable populations.</p> <p>Monitor mushroom collection methods to prohibit destructive techniques.</p> <p>Encourage cooperative studies and monitoring programs.</p> <p>Beargrass - Same as Alternative A: Issue cultural use permits for collection of beargrass.</p> <p>Coordinate with local tribes to increase awareness and education regarding cultural</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>

<p>use of beargrass</p> <p>Implement active management efforts, such as localized prescribed burns, in a designated "Native American Beargrass Collection Unit."</p> <p>Floral Trade Species - Same as Alternative A: Issue Special Use Permits for collection of plants used in floral trade, such as huckleberry and salal.</p> <p>Fuelwood - Alternative C: Issue permits for fuelwood collection resulting from creation of fuelbreaks or other forest improvement activities.</p> <p>No fuelwood permits would be issued for the Backcountry Zone or Mattole Estuary.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>GRAZING MANAGEMENT - Alternative C</p> <p>Same as Alternative A: Maintain existing four active grazing leases and associated grazing allotments, representing a total of 2,050 AUMs.</p> <p>Administratively redefine Spanish Flat grazing boundary to exclude the terraced prairie between and including Spanish and Randall Creeks in order to protect significant cultural sites.</p> <p>Administratively change land use allocations for four expired leases from available to unavailable to livestock grazing.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>FIRE MANAGEMENT - Alternative C</p> <p>Full suppression of all fires, regardless of cause, within the Frontcountry and Residential Zones to protect human life and property and natural/cultural resources both within and adjacent to agency administered lands.</p> <p>Utilize prescribed fire and mechanical fuel reduction methods to manage fuels for</p>	<p>Agree</p> <p>Agree</p>

<p>low intensity wildfires and reduce fire spread potential within the Frontcountry and Residential Zones.</p> <p>Same as Alternative A: Perform burned area rehabilitation to mitigate damages associated with wildfires.</p> <p>Same as Alternative A: Assist CDF in wildfire prevention and education.</p> <p>Use prescribed fire in Frontcountry and Backcountry Zones for fuels reduction, forest health, and unique habitat improvement.</p> <p>Explore opportunities for stewardship contracts with local interests to meet goals of hazardous fuels reduction.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>TRANSPORTATION AND ACCESS - Alternative C</p> <p>General Management - Same as Alternative A: Provide a network of roads for public and administrative access that complement the rural character of the King Range NCA and surrounding Lost Coast region, and have minimal impacts on resource conditions.</p> <p>Same as Alternative A: Fulfill legal access requirements for private landowners and other rights-of-way holders and land use permittees.</p> <p>Same as Alternative A: All vehicle use is limited to designated roads and trails.</p> <p>Specific Road Designations -</p> <p>Prosper Ridge Road - Same as Alternative A: Accessible year round to all vehicles.</p> <p>Nooning Creek Road - Same as Alternative A: Accessible year round to all vehicles.</p> <p>King Range Road - Same as Alternative A: Accessible year round to all vehicles.</p>	<p>Agree, with the following preferences:</p> <p>Agree</p> <p>Redwood Unit, BCHC prefers that private landowners with legal access should be provided with written documentation stating that they have the right to use, maintain and repair their existing access road(s). In addition, they should be allowed to realign their access road(s) if a large slide or slip-out occurs, in order to return it to a usable state.</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>

<p>Finley Ridge Road - Same as Alternative A: Accessible year round to 4-WD vehicles.</p> <p>Smith-Etter Road - Same as Alternative A: Accessible seasonally from 4/1-10/31 to 4-WD vehicles.</p> <p>Johanny Jack Ridge Road - Same as Alternative A: Closed (no legal access).</p> <p>Windy Point Road - Same as Alternative A: Accessible seasonally from 4/1-10/31 to 4-WD vehicles.</p> <p>Telegraph Ridge Road - Same as Alternative A: Accessible seasonally from 4/1-10/31 to 4-WD vehicles.</p> <p>Etter Road - Alternative C: Accessible seasonally from 4/1-10/31 to 4-WD vehicles.</p> <p>Paradise Ridge Road - Same as Alternative A: Accessible year round to 4-WD vehicles.</p> <p>Saddle Mountain Road - Same as Alternative A: Accessible year round to 4-WD vehicles.</p> <p>Mattole Estuary Road - Alternative C: Open the main access road plus two designated routes totaling approximately two miles.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>RECREATION - Alternative C</p> <p>Actions Common Across Zones - Same as Alternative A: Provide adequate maps and visitor information. Stress compliance with coastal "Leave No Trace" principles.</p> <p>Same as Alternative A: Provide adequate and timely maintenance of all facilities, roads, trails, and signs to identified standards.</p> <p>Same as Alternative A: Provide supplementary rules and regulations, where required, to protect resources, visitor safety, and the community surrounding</p>	<p>Agree, with the following exceptions:</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>

<p>the King Range.</p> <p>Same as Alternative A: Evaluate all applications for special recreation permits on a case by case basis. Approve only those requests that are consistent with the goals of the different KRNCA use zones.</p> <p>Same as Alternative A: Encourage and promote cooperative management efforts with local groups, communities, and interested individuals.</p> <p>Same as Alternative A: Promote volunteerism.</p> <p>Same as Alternative A: Construct fences or barriers where needed to control unauthorized visitation or use from public land onto private land. Install effective barriers to preclude vehicle use within designated closed areas.</p> <p>Same as Alternative A: Enforce existing regulations and apply other regulations, if necessary, to address visitor safety or resource protection issues as they arise.</p> <p>Same as Alternative A: Ensure that Universal Accessibility Standards are met for all new developed facilities and, where feasible, the retrofitting of existing facilities.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
<p>Backcountry Zone - Alternative C</p> <p>Within 5 years, design and implement a comprehensive visitor use allocation system designed to allow moderate use numbers and provide moderate opportunities for solitude. This will be an adaptive allocation system, progressing from limits on commercial groups during popular holiday weekends, to requiring permits for all users within established limits on popular holiday weekends, to high-use season permits, as future increases in visitation necessitate.</p> <p>In the interim - same as Alternative B: Implement a self-registration permit system to better count users and aid in disseminating information to the public.</p> <p>Maximum group size of 15 "heartbeats" (people and livestock) on all trails. No</p>	<p>Agree, with the following exceptions:</p> <p>Redwood Unit, BCHC opposes requiring permits.</p> <p>Agree with a self-registration system, without permits.</p> <p>Redwood Unit, BCHC opposes counting animals in the "heartbeats" context. II</p>

<p>more than 30 people maximum may depart from a given trailhead in one day.</p> <p>Designate specific camping locations to accommodate larger groups without overwhelming site or visitor experience, such as Big Flat/ Miller Flat & Spanish Flat.</p> <p>Also designate "group avoidance areas" to be managed for lower visitation levels. On an interim basis, limit and discourage group camping at Cooskie, Buck and Shipman Creeks.</p> <p>Disallow competitive recreation permits.</p> <p>Same as Alternative A: no commercial groups allowed on Memorial Day and Fourth of July weekends.</p> <p>Charge a nominal fee for overnight use, to be reinvested in management of resources and visitor services.</p> <p>Use information, education and increased presence of visitor services and law enforcement personnel during hunting season to minimize conflicts between deer hunters and other KRNCA visitors/neighbors/private landowners.</p> <p>Allow mountain bikes on existing trails, but not on any new trails within WSAs, as per stated BLM policy.</p> <p>Same as Alternative B: Prohibit motorized watercraft landings, with the exception of emergencies.</p> <p>Same as Alternative B: Work cooperatively to establish parameters for commercial flights over the KRNCA, and to discourage low-flying aircraft.</p> <p>Develop minimal facilities as required to provide for visitor safety and resource protection, but not visitor convenience. This could include additional campsites or springs for potable water. Possibly install unobtrusive bear-proof food storage systems and/or rustic, low-maintenance backcountry toilets at popular sites, but only if</p>	<p>"heartbeats" are to be counted, the number should be higher. Redwood Unit suggests 25 would be an acceptable number. Also, the maximum number of visitors leaving any given trailhead in one day should be raised to 45.</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Back Country Horsemen of California have stated they are opposed to fees. The BCHC has donated \$325 million in hours, supplies, and animals on volunteer efforts on public lands from 1998-2002. A copy of the letter regarding this position is included.</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p> <p>Agree</p>
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<p>alternative solutions to these problems have proved unsuccessful.</p> <p>Construct or maintain fences or barriers to protect sensitive natural and cultural resources, but only if alternative means of protection have proved unsuccessful.</p> <p>Maintain existing network of trails; develop new trails as needed, particularly to provide some easier trails for a wider range of users.</p> <p>Develop springs for potable water where feasible on upland trails, including side trails to provide access if needed.</p> <p>Identify and prioritize "horse friendly" trails.</p> <p>Develop an easy-grade interpretative trail at Hidden Valley.</p> <p>Maintain the existing minimal signs and interpretive information, as required, to provide for visitor safety and resource protection. These include signs at trail junctions and marking private property boundaries, as well as identifying campsites, water sources, or other important features.</p> <p>Same as Alternative A: Continue ongoing monitoring program to determine impacts of recreation use on natural and cultural resources, and to assess social impacts of changing visitor use.</p> <p>Frontcountry Zone - Alternative C</p> <p>Same as Alternative B: Determine maximum use levels at facilities on a site-by-site basis.</p> <p>Same as Alternative B: Incorporate the Lost Coast Trail segment from Mattole trailhead to the Punta Gorda lighthouse into the backcountry visitor use allocation system.</p> <p>Provide and maintain trailhead facilities, including parking and information kiosks.</p>	<p>Agree</p>
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<p>Develop new trailhead at Bear Creek.</p> <p>Maintain all campgrounds, and provide drinking water where possible. Retrofit facilities where possible to meet Universal Accessibility standards.</p> <p>Upgrade Horse Mountain campground to meet Universal Accessibility standards, and tie in to expanded mountain bike road/trail system.</p> <p>Upgrade Mattole campground and manage camping in undeveloped areas nearby.</p> <p>Provide adequate trail maintenance and horse passes for equestrian use.</p> <p>Improve linkage between north and south segments of Lost Coast Trail; reestablish trail from Tolkan to Bear Creek.</p> <p>Same as Alternative A: Continue to install signs as needed for visitor safety, orientation, and education, and to promote resource protection.</p> <p>Same as Alternative A: Continue monitoring of use levels, and consider special uses on a site-by-site basis.</p> <p>Residential Zone: Alternative C</p> <p>Same as Alternative B: Upgrade restroom at Mal Coombs Park to ensure adequate provisions for persons with disabilities and accommodate for heavy seasonal use.</p> <p>Same as Alternative B: Possibly upgrade parking lot to make for efficient use of space.</p> <p>Same as Alternative B: Work cooperatively with local groups to maintain the Cape Mendocino Lighthouse, memorials, and other approved joint community projects.</p> <p>Same as Alternative B: Maintain existing pedestrian access to tidepools. Provide information and interpretation for tidepool ecology and diversity.</p>	<p>Agree</p>
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<p>Evaluate possibility of group/overflow camping near river.</p> <p>Develop additional trails as needed.</p> <p>Expand and improve interpretive trail between Waitaki and Nadelos; make a loop if feasible; make entire trail wheelchair accessible.</p> <p>Maintain existing Black Sands Beach parking facility. Improve landscaping, views from overlook, and visitor safety along cliff. Locate additional sites, if feasible and as opportunities arise, to include additional vehicle parking and parking for horse trailers.</p> <p>Maintain extensive visitor information kiosks. Require commercial groups to camp at least 1/4 mile from Black Sands Beach trailhead and individuals and non-commercial groups to camp north of Telegraph Creek.</p> <p>Maintain Seal Rock and Abalone Point areas for individual and small group day use. Provide opportunities for picnicking, wildlife viewing, interpretation, and other compatible recreational and educational activities. Permit group use events on a case-by-case basis.</p> <p>Same as Alternative A. Maintain wheelchair accessible trail in Mal Coombs Park to provide designated access between facilities. Maintain safe and adequate beach access trail at Black Sands Beach trailhead.</p> <p>Same as Alternative B: Adequate signs and interpretive information will be installed and maintained to provide for visitor orientation, safety, and education, and to promote resource protection.</p> <p>Same as Alternative A: Monitoring of visitor use will continue to be conducted by use of Same as Alternative B: Adequate signs and interpretive information will be installed and traffic counters, counting vehicles parked at Black Sands Beach trailhead, Lighthouse visitation data, observation sheets and patrol logs, and direct visitor contact.</p> <p>Specific areas and site may be identified as special use areas to accommodate specific visitor needs. Development of a group day use area in Mal Coombs Park will</p>	<p>Agree</p>
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<p>accommodate desired group events not available or as desirable as other BLM locations.</p> <p>Same as Alternative B: Non-traditional and newly emerging recreational uses will be allowed as long as they are consistent with the zone management objectives. Such uses will be monitored to assess potential conflicts, impacts to sensitive resources, or visitor safety issues.</p>	<p>Agree</p>
<p>INTERPRETATION AND EDUCATION - Alternative A.</p> <p>Provide current, accurate, and descriptive information to visitors that facilitates a safe and enjoyable trip to the King Range while minimizing negative impacts on resources and surrounding communities.</p> <p>Same as Alternative A: Engage children and adults in learning about cultural and natural history and encourage stewardship of these lands.</p>	<p>Agree</p> <p>Agree</p> <p>Agree</p>

Richard McGuiness
637 Humboldt Street
Eureka, CA 95501

RECEIVED

APR 19 2004

Lynda Roush, Arcata Field Manager
Bureau of Land Management
1695 Heindon Road
Arcata, CA 95521

BLM ARCATA FIELD OFFICE

April 15, 2004

Dear Linda,

BLM has done an excellent job creating and describing conditions and alternatives for KRNCA. I support the preferred alternatives, particularly in cases where restoration is still needed. I believe it will become standing policy for public lands to partake in carbon dioxide reduction through timber and land management as the understanding of soil stored carbon becomes widespread knowledge and becomes government policy. This will also positively affect available water in the region- better for people, forests and wildlife.

As more people interact with natural environments it will become clear that preservation of wilderness is a timeless value, and that wilderness characteristics are often recreated by the simple process of protection during regrowth, as in Shenandoah National Park. The biological activity of old growth forest is not completely known. It is possible that trees begin certain operations, such as carbon exudation in the roots or chemicals in the heartwood or the quantity of stored carbon rising rapidly after wood production slows, only after reaching milestones. What is actually needed is the long range outlook, economic incentive and political will necessary to reestablish functioning late seral forestlands across large portions of the landscape. Wilderness will eventually give way to agroforestry simply by the fact that unrestricted growth creates problems easily managed by routine forestry practices such as thinning and accelerated canopy programs. Managing the forest for carbon storage and rainfall retention can meet the criteria for wilderness recreation. Until that time we need old growth biological reserves to be sure we can create new functioning forests complete with fungi, bacteria and invertebrate and wildlife populations necessary for those systems.

Visual Resources receives special treatment but noise is only mentioned in passing in describing wilderness characteristics. We hope BLM will preserve wilderness silence as one of its objectives, including land use issues in the surrounding areas that might impact on those values for extended periods, and the impact of roads near wilderness areas. We hope BLM can use its Visual Resources goals to prevent offshore operations like oil-drilling or wind power plants offshore.

Acquisition and Designation of Lands

BLM should continue to make protective purchases of industrial timberlands and other properties in the Mattole Valley to help insure the quality of the estuary in particular. BLM should be interested in holding property anywhere in the Valley in the public interest if asked to do so. BLM has been a good neighbor in the watershed and their management goals match restoration agendas. The small relative size of the watershed makes it a good model of cooperative restoration. This must happen in a private land environment to be exportable to larger watersheds. BLM can begin to manage for carbon storage in a viable manner that would demonstrate opening forest land to the carbon

16-1

16-2

markets. This would amount to technology transfer from USDA Sustainable Agriculture Lab's discovery of glomalin. Conservation easements and carbon storage payments together with aggressive thinning can propel forestry into the new century. Wilderness land would be able to receive income under the undisturbed carbon storage model. This is much better than fee-demo programs.

Mill Creek is an ACEC and should be so designated.

Roads

Roads destroy the natural landscape drainages worked out over thousands of years. The landscapes ability to handle large rain events has been impaired by destruction of the water holding zone in the soils and by disruption of drainage patterns on the surface. Any disruption in the drainage results in runoff. Sediment surveys on Middle Creek demonstrate 100% inner gorge failures for the entire three plus mile creek, all below the neighborhood road, which concentrates runoff. It is inevitable once runoff gets moving it will destroy the ability of vegetation to restrain it and soil will move downhill.

"Maintenance" roadwork often just changes the area the runoff impacts, extending legacy damage to new land and far into the future. No new roads. IF old roads must be preserved engineer them so no runoff is created during peak events, or use retention ponds and sumps to allow for longer percolation times. Faster drainage is not acceptable under local conditions. I see no mention of identification and restoration of historic and critical wet areas along old roads as reported in Headwaters Plan. It is obvious that maintenance of the forest floor as a functioning organism precludes activities that impair its integrity.

16-3

Wildlife

Redwoods to the Sea is a Wildlife Corridor and should not be regarded as anything but a rugged area under various private ownerships between two conservation centered chunks of public land dedicated to wildlife values. We do not think acquisition of all the intervening lands is likely or desirable. Please do not advertise the Redwood to the Sea Corridor as a future or potential hiking trail, as it makes cooperative restoration and management projects more problematic. This can be reviewed at the next plan in twenty years.

16-4

There is no discussion about corvids in this plan, again as in Headwaters, but their dependence on human activity and exclusion by canopy management would seem a proper goal consistent with established wilderness characteristics.

16-5

I feel the federal government has a responsibility to reintroduce those species extirpated by past actions. I do not think the time is right for reintroductions yet but these future possibilities should be planned for:

Fur bearers like otter and mink exist either in the area or in the redwoods to the sea wildlife corridor. Riparian vegetation and enough fish are their primary habitat considerations.

Other midsize forest carnivores likely for reintroduction such as marten and fisher clash with marbled murrelet goals.

16-6

Beaver might be found to be a good way to restore damaged Mattole tributaries in the future.

BLM reports two condor sightings in historical times, yet it was the sacred bird of the Lolangkok Sinkyone. BLM should consult with Fish and Wildlife about eventually becoming a home for reintroduction or as a resting place for other populations, as KRNCA is within one days flight of the Big Sur colony.

In Stream Projects

BLM should not put restrictive classifications on impacted rivers and streams as it complicates restoration. BLM might consult with Scott Downey of DFG and State Parks about the Bull Creek restoration plan. Digging out the pools in the tributaries creates usable habitat in a short time, retains moisture and contains sediment from the main channel at least temporarily. Retaining moisture in the watershed must be a high priority in management decisions. This should be a high priority project if the situation is suitable.

16-7

BLM may want to use artificial “debris” such as tough water bags for LWD in small streams for pool building. Larger bags (like those used for ocean transport) or dolmans can be used to channel the area just above the estuary to force water to a higher rate of speed in order to encourage scouring the lagoon. Built in overflow of reduced nature can be channeled to allow fine sediment to fill in between larger cobbles in the riverbar away from the mainstem, reducing sediment in the estuary and providing suitable conditions for vegetation to get established closer to the river

16-8

Vegetation management

One of the known quantities of global warming is CO2 rising at rates that will double atmospheric CO2 in the next fifty years. Science is examining this issue and is sending a steady stream of findings indicating large changes are underway in the global environment. Land managers with long term outlooks need to take this information into account in their planning so we are not surprised by changing conditions when the next general plan comes up. We can act now in knowledge for everybody’s benefit or wait and see what happens.

Plants are the interface between atmospheric carbon and water. In a perfect world they are in balance with other nutrients creating the stable biosphere we are familiar with. The back and forth interaction goes on in the air, in the plants and in the soil around the roots, and further in the earth as fossil fuel. Since the last plan was visited in 1974, mycologists have discovered the important relationships between certain fungi and plants. These fungi, known collectively as mycorrhizia, infect root systems of plants, then spread across the landscape looking for nutrients and water, exchanging them with the plants roots for carbon products produced in the photosynthetic parts of the plants. Individual plant species may associate with hundreds or thousands of fungi species, which connect them with other plants in the landscape in a mutual assistance network. Local plant association by hyphae is still an unknown, although plant communities are well known and are probable indicators.

Hyphae are the very fine extensions of fungi spreading through the soil in search of nutrients to exchange with the host plant in return for photosynthetic products produced by green plants. Potassium and water are two key elements, nitrogen and trace minerals are also important. One cubic centimeter of soil may contain over a kilometer of these threads, which absorb water and harbor beneficial bacteria from larger bacteriophages. Hyphae spread through the soil, depositing globules of the glycoprotein glomalin in the soil.

Glomalin was discovered in 1996 by USDA’s Sustainable Agriculture researcher Sara Wright. The nature of glomalin and its critical importance in natural systems is coming to light. Glomalin has several known useful properties, including “gluing” soil together as aggregates, holding water, creating pores in the soil, and remaining in the soil as a

16-9

durable working molecule for decades. Its role as a mitigator of rising CO₂ levels insures us it will be at the forefront of science in the 21st century. Glomalin, previously unknown, accounts for more than a quarter of a plants output annually. This fact has not been applied to carbon storage models I am aware of and begs the little bit of research it requires to document. Quantification of stored carbon, as opposed to carbon sequestered only in wood, changes the Kyoto landscape and puts many current practices at odds with accepted theories. One such example is the destruction of glomalin and re-release of stored carbon from the enemies of glomalin- running water, sunlight (UV) and ambient air. Recent figures of carbon release from forest fires burning into peat in Indonesia are estimated in the billions of tons, much greater than expected. I believe carbon release from soils will be found to be a great source of atmospheric carbon and the perception of industrial emissions as the major cause will slowly erode into an understanding that our land use practices are responsible as much as our technology. This is born out in the soil improvement of cropland using no-till methods, despite using GMO crops and herbicides. However, atmospheric changes mean vegetative changes, especially in that CO₂ is seen as atmospheric fertilization. BLM's proposed aggressive vegetation management is properly called for as increased growth will lead to fuel buildup. Focusing the growing ability of the land into fewer stems reduces fire danger, raises the canopy and will be of more importance as time goes by, as plants increase their growth rate and the rate of fuel buildup increases. This concept can be used in the front country zones to quickly establish areas of maximum growth and the fire safety of large trees through manual release Destruction of the forest floor releases carbon dioxide and destroys glomalin and carbon storage capacity, which may change management options for certain operations. Destruction of the soil zones in which glomalin is stored reduces the lands ability to gather, store and use precipitation, effectively shrinking the watershed, increasing runoff and causing all the attendant damages to the landscape runoff creates, including the general drying of the landscape and especially during late summer and early fall, devastating to salmonid fisheries.

Glomalin allows plants to tailor the landscape to their own needs. Increased growth will mean increased use of water and may result in drier conditions until the storage is redeveloped. There is reason to believe younger and older trees would allocate differing percentages of carbon products to plant growth and soil conditioning. There is much to study although the methods are relatively easy. Glomalin testing methods are posted on the Internet. Baseline data from old-growth (virgin), late seral, early seral, seedling, and after traumatic events like fire and slides, and across various species such as Doug fir, redwood, tanoak, perennial and annual grasses and would provide a usable baseline for maximum glomalin production and by extension discover soil water storage rates, help quantify carbon storage for potential sale of stored carbon or the ability to store carbon and may affect management decisions that favor one species over another, for example perennial grass instead of annual grass because the latter does nothing to condition the soil to accept precipitation. Humboldt County has great resources for this work with many agencies and public institutions focused on environmental issues. This knowledge in hand leads us into the challenges of the 21st century. Most all of the legacy destruction in the area is simply destroying the properties of the soil zone and the consequences of that ignorance.

Trees also create aerosol molecules that have recently been found to cause cloud formation by acting as nuclei for water droplets to condense around. It is possible to see this in the King Range, according to old-timers who say the treed ridge tops make their own clouds. Fog drip is a well-known form of precipitation in which trees' needles comb the fog accumulating drips of water from the air and moistening the tree and ground around it. Bigger exposed trees get more fog and pull more moisture into the environment in the dry season. It seems reasonable a successful species would be able to extract moisture from air in the dry season and develop a storage method for it belowground.

In addition to water, increased growth also strains the depleted nitrogen cycle. Depleted because it (and other trace minerals) is no longer annually supplemented by salmon carcasses, nor spread around the watershed by bears and eagles. Enough nitrogen exists to ensure continued plant growth, but recent studies are finding diminishing numbers of soil organisms and microbes and much longer decomposition rates for plant material. Less food is available to fewer insects and thus birds, fish and generally reducing food supplies even as habitat improves and other studies indicate that more vegetation has generally poorer protein ratios which may have an impact on grazers, whether wildlife or cattle. Nutrient turnover slows and diversity is diminished, and food chains degrade. Fuel buildup increases as litter accumulates instead of breaking down. Studies indicate insect species adapted to today's environment may not do well in an enriched environment, causing unforeseeable changes in forest etymology and higher food chains. It has also been shown that higher CO2 levels increase nitrogen fixation by legumes and other nitrogen fixers, complicating the picture even more, but encouraging in that there are plenty of those here.

Fear of depleting the soils because of removal of organic matter is answered by glomalin, which will condition the soil without woody debris if the canopy and forest floor remain relatively undisturbed. This type of management allows continuous extraction without habitat destruction or degradation of the forests ability to provide growth and water, as PL proved in their first hundred years. Douglas firs replenishment densities assure us of a proliferation of small wood in the immediate future, diminishing as managed area increases and the canopy closes. Removal of smallwood and firewood by wheeled vehicles less than two tons in some front country areas is a consideration. Salvage operations will create more drainage problems. It should be noted that surface disruption has caused most of the watersheds many problems.

Meadows

Meadows are a cultural legacy of Natives and ranchers. It is no secret fire must be used to maintain them, so they are not a natural component. Rainfall is too high for trees not to grow, and Douglas firs adaptability pretty much preclude areas of soil deficiency. The working wilderness demands full canopy and maximum rooting depth in high precipitation areas for landscape stability.

Please do not see yourself as a park. BLM should take the lead in carbon storage study and release of soil carbon through surface disruption as part of information gathering for policy change for all federal land mangement, as it affects land use in myriad ways and may affect mitigations from other projects, especially when ground disruption is found to release large amounts of CO2. Quantification and demonstration of glomalin may well answer many of our needs.

16-10

16-11

We thank BLM for your cooperation in restoration efforts and in recognizing local goals and needs. We would like to see a coordinated website that was daily or weekly updated with current conditions but also carrying such Mattole news as: opening of the lagoon, size and timing of fish runs, locations of wildflower displays, river conditions for fishing and boating, astronomical events, rare bird sightings, fire danger, regulations, announcements, wildlife behavior, like the elk rut or lion attacks or bird or whale migrations.

16-12

Thank you for allowing the public to have a say in these decisions.

Sincerely,



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