

KING RANGE NATIONAL CONSERVATION AREA



Proposed Resource Management Plan and Final Environmental Impact Statement
Volume II

U.S. Department of Interior
Bureau of Land Management
Arcata Field Office, Arcata, California

November 2004



KING RANGE NATIONAL CONSERVATION AREA

Proposed Resource Management Plan

and Final Environmental Impact Statement

Volume II

Prepared by:

U.S. Department of Interior, Bureau of Land Management

Arcata Field Office, Arcata, California



And

EDAW, Inc.

San Francisco, CA



November 2004



CHAPTER FIVE : Environmental Consequences



5.0 ENVIRONMENTAL CONSEQUENCES

5.1 INTRODUCTION

This chapter addresses the likely consequences, both beneficial and adverse, to the natural and human environments in the King Range that could result from implementing the Proposed RMP described in Chapter 4. These include short-term and long-term effects, direct and indirect effects, and cumulative effects. Duration, intensity (or magnitude), and context (local, regional, or national effects) of impacts are interpreted where possible. Mitigation measures designed to avoid or reduce impacts were incorporated into the management proposals, so impacts in this chapter are considered unavoidable and would result from implementing the management actions and mitigation. If impacts are not discussed, analysis has indicated either that none would occur or that their magnitude would be negligible. No impacts or negligible impacts have been identified for geology and soils, prime and unique farmlands, hazardous materials, lands and realty, interpretation and education, public safety, and waste management. Therefore, these resources are not discussed as stand-alone resource topics. No specific projects are proposed that would have negative impacts on floodplains or wetlands, and cumulative impacts are not anticipated for these resources. Individual watershed restoration activities and other projects that affect wetlands/floodplains would undergo a site-specific permitting/NEPA analysis. Because all on-the-ground actions would be subject to a visual resources contrast assessment to ensure that they meet the objectives of the visual resources class where they are located, no impacts are identified for visual resources. It has been determined that the plan would not have a direct or adverse effect on Wild and Scenic River values, and is therefore in compliance with Section 7 of the Wild and Scenic Rivers Act (Public Law 90-542 and amendments thereto). Thus, Wild and Scenic Rivers values would be discussed only in relation to the rivers/streams studied for eligibility and suitability in the plan. This plan would undergo a specific review by the California Coastal Commission to determine consistency with the California Coastal Act.

5.1.1 Methodology

Impact analyses and conclusions are based on interdisciplinary team knowledge of resources and the project area, reviews of existing literature, and information provided by technical experts in the BLM and other agencies. The analyses identify both enhancing and improving effects to a resource from a management action, and actions with potential to degrade a resource. Any impacts described in this section are based on the Proposed RMP goals, objectives, actions, and allowable uses as described in Chapter 4. The baseline used for projecting impacts is the current condition or situation described in Chapter 3. Management actions and allowable uses have been configured to maximize benefits and minimize adverse effects on both ecosystem function and the human environment. Impacts are quantified where possible. Impacts are sometimes described using ranges of potential effects or in qualitative terms, where appropriate. In the absence of quantitative data, effects were described based on the professional judgment of an interdisciplinary team of technical specialists using the best available information.

5.1.2 Impact Terminology

Terms referring to impact intensity, context, and duration are used in the effects analysis. Impacts are not necessarily only negative; many are positive benefits, and are specified as such. Unless otherwise stated, the standard definitions for these terms are as follows:

- **Negligible:** the impact is at the lower level of detection; there would be no measurable change.
- **Minor:** the impact is slight but detectable; there would be a small change.
- **Moderate:** the impact is readily apparent; there would be a measurable change that could result in a small but permanent change.
- **Major:** the impact is large; there would be a highly noticeable, long-term, or permanent measurable change.
- **Localized impact:** the impact would occur in a specific site or area. When comparing changes to existing conditions, the impacts would be detectable only in the localized area.
- **Short-term effect:** the effect would occur only during or immediately after implementation of the Proposed RMP.
- **Long-term effect:** the effect could occur for an extended period after implementation of the Proposed RMP. The effect could last several years or more.

5.1.3 Cumulative Impacts

NEPA requires evaluation of a proposed action's potential to contribute to "cumulative" environmental impacts. A cumulative impact is defined as:

The impact on the environment which results from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Cumulative impacts can result from similar projects or actions, as well as from projects or actions that have similar impacts (40 CFR 1508.7).

In this case, similar actions external to the King Range could include recreation developments in surrounding State Parks, watershed restoration projects conducted by non-profit groups in other parts of the Mattole, or county plans that allow population growth that would increase traffic levels and visitation.

The objective of cumulative impact analysis is to evaluate the significance of the proposed action's contribution to cumulative environmental impacts. It is accomplished in three steps:

- Step 1: Identify the cumulative impacts study area for each resource evaluated. Unless otherwise indicated, the cumulative impacts study area covers the King Range planning area plus the remainder of the Mattole watershed.
- Step 2: Identify and describe past, present, and reasonably foreseeable future actions in the cumulative impact study area that are similar to the proposed action or have substantial impacts to which the proposed action would contribute.

- Step 3: Evaluate the potential for the proposed action to have a substantial contribution to cumulative environmental impacts with the potential to significantly affect the environment.

The timeframe for the cumulative impact analysis begins at the anticipated time that this RMP would first take effect, in 2005, and extends for the twenty-year life of the plan to 2025. It includes existing conditions of the landscape, particularly alterations from past developments and uses of the land.

5.1.4 Chapter Organization

Effects from different management actions are considered by the following resource topics:

- Social and Economic Conditions (includes discussion of Environmental Justice and Native American Traditional Practices)
- Cultural Resources
- Inventory Units and Study Areas (Wild and Scenic Rivers, wilderness characteristic inventory units, Wilderness Study Areas, and Areas of Critical Environmental Concern)
- Aquatic Ecosystems and Fisheries Resources (including water quantity and quality and riparian resources)
- Wildlife (including T&E Species)
- Terrestrial Ecosystems and Vegetation Resources (including noxious weeds and T&E Species)
- Forest Resources
- Grazing Resources
- Fire Management
- Travel Management
- Recreation
- Air Quality

For each resource, the possible effects from other resource management programs are described and analyzed. Within each section of the resource analysis, effects common to all zones are discussed first, then zone-specific effects and cumulative impacts are considered; where no cumulative impacts are stated, they are considered to be negligible or nonexistent.

5.2 IMPACTS TO SOCIAL AND ECONOMIC CONDITIONS

Impacts to social and economic conditions would result from a wide range of management decisions. The range of potentially affected resources and conditions is extensive; however, most of these impacts are minor to moderate, and most are beneficial in nature. Recreation may have moderate to major positive and negative impacts to the planning area (such as potential conflicts between recreationists and local residents, tourism benefits, and open space benefits of public land recreation amenities).

The socioeconomic conditions that are the focus of this evaluation include: potential employment/job and income effects on affected businesses and the local and regional economies; effects on the fiscal resources of local governments; and changes in the demand for local public services (i.e., law enforcement, fire protection, and search and rescue). In addition, many human impacts cannot easily be measured in economic terms, and are considered as social impacts. These include detractions from existing lifestyles, sense of place, community values, and unfair or unjust impacts or burdens on minority and low income populations (environmental justice).

5.2.1 Impacts to Social and Economic Conditions from Visual Resource Management

The Visual Resource Management (VRM) system would include the completion of visual resource contrast ratings for existing roads and facilities and proposed projects, as well as an inventory of existing and potential key scenic vista points. Protection of scenic qualities of the region would be further enhanced by coordinating with local management agencies to ensure that coastal developments do not detract from the scenic integrity of the area. Similarly, all new site developments within the KRNCA would be designed and located so that they do not detract from the coastal bluff viewshed.

By helping preserve the scenic quality of the region through coordinated management efforts and mostly Class I and II Visual Resource Class ratings, the Proposed RMP would provide moderate to major, long-term beneficial impacts to local residents and visitors alike. In particular, locals who personally identify with the rugged landscape are likely to experience a minor to moderate, positive impact from the continued protection of unobstructed views. There would also be beneficial impacts to fiscal resources in the County, associated with minor increases in property tax revenue resulting from amenity values positively influencing local property values. These amenity values are associated with a property's proximity to a significant protected open space resource. Those with view lots or homes would enjoy major positive impacts, as open space vistas on the California coastline continue to become a rarer commodity in the future. Lots in Shelter Cove with vistas of the undeveloped KRNCA coastline generally command higher values than non-view lots. The visual management policies described above are not expected to lead to employment, income, or public service effects.

Protection of the Lost Coast visual resources of a naturally appearing coastline is also central to the identity and sense of place of local and regional residents. Thus increased protection of the visual resources would have a moderate to major positive social impact.

5.2.2 Impacts to Social and Economic Conditions from Cultural Resources Management

The Proposed RMP includes policies to increase monitoring and site patrols for additional protection of cultural and historic resources in all three management zones. Such policies would place additional demand on BLM staff that provide monitoring and patrol services. Since the BLM plans on using its staff to meet future monitoring and site patrol needs at KRNCA, there would be no additional demands placed on local agencies for these services. Preservation of the remaining cultural sites in the KRNCA is an important value to Native American groups associated with the area, so the Proposed RMP would

have moderate to major beneficial impacts to these groups through monitoring and actions to reduce site degradation from human and natural causes.

5.2.3 Impacts to Social and Economic Conditions from Lands and Realty

Under the Proposed RMP, new policies would be implemented that would focus future land acquisitions. The BLM could propose property acquisitions in the Residential Zone, but would work with affected local governments and local community associations regarding such acquisitions. Nevertheless, there is the potential for additional land acquisitions by the BLM over time, which would change the existing balance of public and private lands in the project area. Such acquisitions would be a minor, long-term, and adverse impact to the county property tax base.

Any fiscal impacts would likely be offset by property tax revenue increases as property values near open-space areas generally increase over time. Also, properties acquired by the BLM would mostly be in rural areas where the lands would be otherwise developed for rural residential use. This type of development typically results in a net burden to county fiscal resources due to the difficulty of providing services in remote locations. Some local minor social impacts could occur as less rural private land would be available for home site development in the immediate vicinity of acquisition areas.

In addition, lands and realty practices may affect the quantity, location, and type of rights-of-way (ROW) permitted within the KRNCA. The Proposed RMP would make Backcountry Zone an exclusion area for new rights-of-way and/or permits, and utility rights-of-way would be restricted to underground locations to preserve aesthetic values. This action would cause no associated adverse effects on property values as described above, but there could be indirect costs borne by utility companies that would either have to re-route facilities or implement higher-cost construction techniques for underground installation. This could result in minor, long-term, and adverse impacts to local utilities and indirect impacts to the local economy. Additional ROWs could be located in the Frontcountry and Residential Zones in the future relative to existing conditions. Because these proposed ROWs may include features such as above-ground utility facilities where other alternatives are infeasible, there is the potential for adverse effects to visual resources. However, any above ground developments would require visual resource mitigation measures, so these impacts would be minor. By accommodating such ROWs, the Proposed RMP would continue to provide lower-cost infrastructure options for local utilities that can result in beneficial impacts to local businesses and thus the local economy; however, because this does not represent a change from existing conditions, no impact is anticipated.

5.2.4 Impacts to Social and Economic Conditions from Inventory Units and Study Areas

Socioeconomic impacts associated with inventory units and study areas are related to potential changes in income and employment opportunities and local property values. The Proposed RMP identifies additional lands as having wilderness characteristics, and rivers identified as suitable for Wild and Scenic River designation. In addition, the Mill Creek area would be designated as an ACEC/RNA. However, existing uses such as special forest product harvesting that occurs at the KRNCA would continue to be allowed in the identified areas, except for the Mill Creek and Mattole ACECs. Commercial use is

currently minor to non-existent in these areas. Therefore, potential and negative income and employment effects are not expected.

Formally identifying land and water areas as protected open space would likely generate amenity values to private properties in the local area. If this value is captured during property tax assessments, there is the potential to generate higher property tax revenues that would be realized by the local county. This is considered a minor, long-term, and beneficial impact to the fiscal resources of Humboldt and to a lesser degree Mendocino County.

5.2.5 Impacts to Social and Economic Conditions from Aquatic Ecosystems and Fisheries Management

The Proposed RMP includes a number of restoration actions for aquatic ecosystems, including up-slope sediment reduction, in-stream habitat enhancement, riparian silvicultural work, monitoring measures, and an estuary enhancement program. Many of these activities would be implemented in coordination with local watershed restoration groups. In the past this kind of work has been a major source of funding for these groups; from 1995-1003, roughly \$1.5 million was spent on restoration and monitoring. While there are no assurances that this level of funding would be maintained, the Proposed RMP calls for actions that would continue similar efforts into the future. The funding of such local conservation programs would be a long-term, minor, and beneficial impact to the local economy. Such impacts would include temporary increases in income and employment enjoyed by involved individuals and organizations. Indirectly, this increase in income and associated spending by affected individuals and organizations would in turn result in negligible, but positive, impacts to fiscal resources (i.e., state and local sales tax revenues and state and federal income tax revenues).

The communities that surround the King Range have established a serious commitment to restoring watersheds and salmon habitat, as evidenced by the multitude of local restoration groups in the area and their extensive efforts to improve nearby fisheries since the early 1980s (House 1999). Many personally identify with the health of area streams and take delight in seeing the anadromous fish making their annual migrations inland to spawn. Knowing that their work is supported and encouraged by the BLM would give local participants in these restoration groups an additional moderate, long-term, beneficial social impact.

5.2.6 Impacts to Social and Economic Conditions from Wildlife Management

The Proposed RMP does not include wildlife management prescriptions that involve funding of local conservation groups or otherwise actions that would affect socioeconomic resources. The BLM is responsible for habitat management, not wildlife population management. Therefore, habitat improvement projects (e.g. old-growth forest, coastal prairie restoration) are the focus of wildlife management under this plan and impacts are discussed in those respective sections. Some minor beneficial economic impacts occur from the BLM hiring seasonal employees to conduct wildlife monitoring.

5.2.7 Impacts to Social and Economic Conditions from Terrestrial Ecosystems and Vegetation Management

Under the Proposed RMP, existing programs that utilize the services of local conservation organizations would continue to help control invasive plant species. The funding of such local programs would be an input to the local economy, thus leading to the same type of positive economic impacts summarized above in Section 5.2.5. However, relative to existing conditions (which already include programs to help manage invasive species), there would be no new impact to socioeconomic resources.

5.2.8 Impacts to Social and Economic Conditions from Forest Management

Forest management practices have the potential to positively affect socioeconomic resources by increasing the income of local contractors or conservation groups, and by causing the types of related and beneficial employment and fiscal resource effects described in Section 5.2.5. The Proposed RMP includes silvicultural treatments that would be performed, where possible, by means of cooperative agreements, partnerships, and contracts, with local communities or individuals. Occasional salvage timber harvests also may occur, depending on the future fire regime. If local resources are used in implementing these policies, they would generate direct income and job effects realized by involved individuals, and secondary sales and income tax revenues earned by state and local governments. Because these effects represent enhancements to existing conditions, they are considered a minor, short-term, and beneficial impact to local socioeconomic resources. The regional fiscal impacts would also be positive and short-term, but negligible.

There is a great deal of community interest in development of a restoration-based forest products industry. Sustainable forest management is an important community value in the Mattole valley and Humboldt County. Therefore, the restoration activities proposed in this plan would have moderate positive social impacts.

5.2.9 Impacts to Social and Economic Conditions from Special Forest Products Management

The BLM would continue to issue permits for the collection of mushrooms, beargrass, floral trade species, and fuelwood, thus leading to a continuation of existing and positive economic impacts to harvesters, primarily in the form of income and employment effects that result from the harvest and selling of harvested products in the marketplace. The number of permits issued would vary from year to year, but this would not be related to the Proposed RMP. Areas closed to commercial harvest (Mill Creek and Mattole ACEC, and the proposed Native American Beargrass Unit) represent a small percentage of the planning area acreage (under five percent), and so would have negligible economic impacts. The establishment of the Native American Beargrass Collection Unit would have minor to moderate positive impacts to area Native American groups involved in traditional uses of public lands.

5.2.10 Impacts to Social and Economic Conditions from Grazing Management

The Proposed RMP would continue existing KRNCA grazing policies, and while it would change the Spanish Flat allotment boundary, the number of AUMs/amount of grazing on the allotment would remain unaltered. In addition, four inactive grazing allotments would be administratively changed from

“available” to “unavailable” for grazing. The positive economic impacts associated with cattle ranching in the project area and existing conditions, namely income and job generation accrued to local ranching operations utilizing lands within the KRNCA, and to a lesser extent, secondary job, income and sales/income tax effects, would continue. Continuation of farming and ranching to retain open space lands has been identified as a high priority by Humboldt County residents during development of the county general plan. Retention of the allotments and associated AUMs in the KRNCA would support this goal and provide a minor localized positive benefit by helping these ranches remain viable.

5.2.11 Impacts to Social and Economic Conditions from Fire Management

Under the Proposed RMP, only fires in the Residential and Frontcountry Zones would be fully suppressed. This represents a change from existing conditions and policies where full fire suppression is practiced in all zones. As a result, there would be less long-term demand for state and local fire protection-related services for wildfire suppression relative to existing conditions. This reduced demand would not occur until fuels treatments, prescribed burning, and other actions are completed to allow for safe fire management in the Backcountry Zone. This would be a minor, long-term, beneficial impact to the fiscal resources of affected agencies and departments. However, there would be a partially offsetting need for additional support to conduct prescribed burning. In addition, this plan includes policies to explore opportunities for stewardship contracts with local organizations to meet hazardous fuel reduction goals. By contracting with local interests, this policy would generate minor but positive local income and job effects, and negligible but beneficial secondary sales and income tax effects. Finally, the RMP would result in moderate, long-term, and beneficial economic impacts associated with active fuel-load management techniques.

5.2.12 Impacts to Social and Economic Conditions from Travel Management

Impacts associated with travel management policies would be based primarily on the need for road maintenance services. Road maintenance services are provided primarily by local contractors. Under the Proposed RMP, existing roads would remain open with the same management in place relative to existing conditions. These conditions, combined with increasing use of area roads would generate the need for slightly higher levels of road maintenance, some of which would likely be provided by local contractors, thereby resulting in related positive, minor, and long-term income and employment effects. This in turn would lead to negligible, long-term, and beneficial fiscal resource impacts.

5.2.13 Impacts to Social and Economic Conditions from Recreation

Future KRNCA recreation use has the potential to affect local and regional socioeconomic resources. Socioeconomic impacts would primarily be in the form of income and employment effects in sectors of the local and regional economies that serve recreation users. However, future recreation use could also affect the provision of certain services by government agencies, as well as their fiscal resources.

KRNCA recreation use was projected for the Proposed RMP; detailed information on the methodology and results of the recreation use projections are presented in Section 5.12.13.1. Projected recreation use at KRNCA over the planning period (through 2025) ranges from 162,858 to 211,715 visitor days; the lower estimate represents an increase of 18,042 visitor days from current conditions, or a 12.5 percent increase.

5.2.13.1 Potential Income and Employment Effects

In order to translate projected recreation use levels into potential income and employment effects associated with the Proposed RMP, it was necessary to make several assumptions regarding future recreation use and spending. It is assumed that the same proportion of existing resident (11 percent) versus non-resident visitors (89 percent) would utilize the recreation resources at KRNCA in the future; there is no change in the participation rates across recreation activities relative to existing conditions; and the proportion of recreation spending “captured” by the local economy remains constant.

Based on these assumptions and following the methodology discussed in Section 5.12.13.1, total recreation expenditures were estimated for the Proposed RMP. Table 5-1 summarizes direct recreation expenditures and associated income and job effects of the proposed plan, as well as non-market/consumer surplus value estimates for recreation opportunities at KRNCA. It should be noted that a dollar value can also be placed on other types of environmental benefits associated with the KRNCA; however, doing so requires extensive surveys and other techniques that were not conducted for this analysis. The recreation-related non-market values presented in Table 5-1 are indicative of the value of some of these benefits using readily available study results.

Based on these direct expenditures, and using applicable recreation-based multipliers, recreation use at the KRNCA could generate about \$2.77 million per year in direct labor and proprietor income in the regional economy (i.e., primarily Humboldt County, and to a lesser extent Mendocino County) and could also directly support approximately 162 jobs under the Proposed RMP. The total direct, indirect, and induced effect of these expenditures circulating through the regional economy could amount to approximately \$4.84 million per year in income and 222 jobs under the Proposed RMP. In addition, the estimated “willingness-to-pay” value, the value (or worth) of the experience to the recreationists, is estimated at \$4.19 million (all estimates are in 2000 dollars). Because the estimates of future recreation use at KRNCA represent the lower bound of the potential range of future use levels, the associated economic impacts presented above are conservative and could range higher as shown in Table 5-1.

Table 5-1: Potential Socioeconomic Effects from Projected KRNCA Recreation Use

	DIRECT EXPENDITURES ^{1,2}	RELATED INCOME EFFECTS ^{1,2}		RELATED EMPLOYMENT EFFECTS (JOBS) ²		EXAMPLES OF NON-MARKET EFFECTS (Willingness-To-Pay for Recreation-Related Benefits) ^{1,2}
		DIRECT	TOTAL ³	DIRECT	TOTAL ³	
Proposed RMP	\$8.00 (\$8.00 - \$10.39)	\$2.77 (\$2.77 - \$3.60)	\$4.84 (\$4.84 - \$6.29)	161.6 (161.6 - 210.1)	222.4 (222.4 - 289.1)	\$4.19 (\$4.19 - \$5.44)

¹ Millions of dollars annually

² Numbers in parentheses represent range of results based on the range of recreation use projections.

³ Includes direct, indirect, and induced impacts.

Under existing conditions, it is estimated that recreation use at KRNCA results in about \$2.46 million in direct income and directly supports approximately 144 jobs; the total (i.e., direct, indirect, and induced) income and job effects are estimated to be \$4.30 million and 198, respectively. When analyzing the project’s socioeconomic impacts, it is important to evaluate the relative change between income and job

effects associated with the Proposed RMP and existing conditions. The Proposed RMP would result in an increase in recreation-induced income and jobs at 2025 relative to existing conditions, and thus, would benefit the local and regional economies.

It is also important to consider the magnitude of the income and job effects in the context of the size of the economy which is primarily affected. Under the Proposed RMP, the estimated increase in total KRNCA recreation-induced income relative to existing conditions is \$0.54 million, which represents less than 0.02 percent of Humboldt County's total income base. Similarly, in terms of total jobs, the increase is estimated to be about 17 jobs, which represents only 0.03 percent of Humboldt County's total job base. Therefore, under the Proposed RMP, inputs to the regional economy from recreation spending associated with KRNCA are considered long-term and minor beneficial impacts. Similar beneficial impacts would be enjoyed by local business owners and their employees, and such impacts could be major depending on a number of factors, including their specific location relative to visitor travel routes, how much of their existing business capacity is being utilized now, room for expansion, etc.

5.2.13.2 Potential Public Services and Fiscal Resources Effects

In terms of public services and fiscal resources potentially affected by changes in KRNCA recreation use, public service-related effects would be related to the provision of law enforcement and search and rescue services. Affected agencies would be the county sheriff departments, BLM, the California Department of Forestry, and the U.S. Coast Guard. The future demand for such services, and therefore likelihood of related effects on these agencies, would be directly proportional to the estimated changes in recreation use. The Proposed RMP would likely increase recreation use, and hence lead to an increase in the demand for law enforcement and search and rescue services.

The budgets/fiscal resources of these agencies also would likely be affected as KRNCA recreation use changes over time. The magnitude of these potential public service and fiscal impacts are very difficult to predict, given the wide range of service capacities and financial conditions of each potentially affected agency; however, based on the experience of local BLM staff, such impacts are expected to be minor. Some of the fiscal impacts to local volunteer fire departments have been mitigated by the provision of funding by the BLM for equipment, training, and other local needs. This support is expected to continue contingent on adequate funding appropriations to the BLM.

The fiscal resources of local county governments would also be indirectly affected by future recreation use levels through sales and lodging taxes. Expenditures for recreation-related goods and services are subject to state sales taxes that are collected by the state and distributed to counties. For those recreationists who stay overnight when visiting KRNCA, lodging taxes are also collected at the county level. Because the proportion of total recreation expenditures for goods, services, and lodging is not known, it is not possible to quantify sales and lodging tax effects on the county's fiscal resource base. However, based on the projected recreation use estimates above, it can be concluded that tax revenues would likely increase under the Proposed RMP. These tax revenue impacts would likely be negligible to minor relative to total county tax revenues.

5.2.13.3 Potential Non-Market/Consumer Surplus Effects

Table 5-1 also indicates that the consumer surplus value experienced by recreationists at KRNCA would likely be higher relative to existing conditions, and therefore, minor, long-term, and positive related impacts. Minor negative impacts would occur to the rural isolated character of the communities surrounding the KRNCA, particularly for those residents who moved to the area to get away from mainstream society. However, with projected use increases these impacts are expected to be minor. Also, the increase in trails and other recreation opportunities would improve amenities for local residents to enjoy the outdoor resources in their backyards, by providing additional community green space.

5.2.13.4 Potential Impacts from Recreation Fees

The implementation of a fee program for overnight backcountry use would have negligible impacts on visitors being able to afford to recreate within the King Range backcountry. The fee system is anticipated to initially be in the \$3-10 range (with adjustments for inflation), a modest component of the overall cost of an overnight trip to the KRNCA. Also, visitor surveys conducted in 1990, 1997, and 2003 indicate that most current visitors (80+ percent) are willing to pay for use of the backcountry. The average amount visitors were willing to pay as a direct fee to the BLM was \$5.00 per day per person. Most of those who opposed fees commented that they did so because they felt that they already paid taxes to use the area, rather than feeling unable to afford the fees. This attitude is confirmed by the 1990 study. When asked in a different way (overall trip costs vs. direct fee to the government) how much they would be willing to pay before they would not go to the King Range for backpacking, 90% of visitors would pay up to \$45 more and 60% up to \$150 more. Low income or minority groups would not be disproportionately affected by the fee program. Current use of the area even with no fees is predominately by non-minority groups with incomes/education levels at or above national and state averages.

5.2.14 Impacts to Social and Economic Conditions from Interpretation and Education

The interpretive and education prescriptions would cause minor positive impacts to social and economic resources as existing programs are expanded with growth in use of the area. Community residents, school groups, and area visitors access KRNCA environmental education and interpretive programs, and participants obtain social benefits through learning about the natural and cultural resources of the area.

5.2.15 Potential Cumulative Impacts to Social and Economic Conditions

5.2.15.1 Cumulative Impacts from Land Acquisition Program

BLM has acquired roughly 25,700 acres to date in the KRNCA since it was established in 1970. The present plan is calling for a much smaller BLM acquisition program, since most of the private lands within the KRNCA have already been acquired. Several other acquisition efforts are also ongoing within the Mattole Valley. These programs are in support of the “Redwoods-to-the-Sea” Corridor and Sanctuary Forest efforts, and are led by private conservation organizations. Future acquisitions by these entities are anticipated to be mostly in the form of conservation easements. Thus, the land transferred to public agency management would be minor. However, the acquisitions would still affect county tax

revenues. These reductions in taxable properties would be partially offset by payments in lieu of taxes and increased property values on lands adjoining conservation easements, so the net impact is expected to be minor. Overall, it is anticipated that an additional 5-15,000 acres would be placed under easements or public ownership within the King Range and adjoining Mattole watershed within the next 25 years through the combined efforts of public agencies and land trusts. There are approximately 155,000 acres of private land in the Mattole watershed, so this level of public acquisition would have relatively minor impacts on the amount of private land in the region available for homesites and other private uses.

5.2.15.2 Cumulative Impacts from Increased Visitation and Tourism

Humboldt County has been actively working in recent years to increase tourism, especially ecotourism. Under the Proposed RMP, the King Range would continue to be a destination that attracts visitors to the region and contributes to the natural resource-based tourism economy of the “Lost Coast” and “Redwood Coast.” Communities such as Shelter Cove, Ferndale, and Garberville-Redway are expected to continue to promote the region as a recreation destination. Other recreation attractions in the area, such as Sinkyone Wilderness State Park and Humboldt Redwoods State Park, are not proposing major changes in management or development that would have dramatic cumulative impacts on visitation levels when combined with proposed actions in this plan. Therefore, cumulative changes in visitation levels to the region are expected to involve moderate increases throughout the life of the plan, mostly attributable to population growth and marketing efforts by community and regional tourism promotion organizations. These changes would result in moderate positive economic impacts to the region, and minor to moderate social impacts. The social impacts would be mixed positive and negative depending on a specific individual’s perspectives; for example, additional recreation amenities would be available to area residents enhancing their quality of life. However, increased tourism could detract from community character and cause crowding, reduced privacy, and other negative impacts.

5.3 IMPACTS TO CULTURAL RESOURCES

The basic cultural resource preservation goals express the BLM’s and the local community’s desire to employ outreach, educational and interpretive efforts aimed at the protection and study of prehistoric and historic sites, features, and artifacts situated within the KRNCA. The Proposed RMP consists of policies that place a high priority on the preservation of cultural resources in the Backcountry, Frontcountry, and/or Residential Zones. The need for resource monitoring and cooperation with the local Native American community is also included as a significant element in these efforts.

5.3.1 Impacts to Cultural Resources from Visual Resources Management

Under the Proposed RMP, existing policies would remain in place to maintain or strengthen current management levels of visual resource management (VRM), and the impacts on cultural resources would be negligible. In general, efforts at preserving visual resources can aid in the preservation of cultural resources. In particular, placing new construction away from the coastal bluff viewshed would aid in the protection of prehistoric and historic sites, features, and artifacts, which are frequently situated in coastal settings. Maintenance of historic coastal ranching facilities and the Punta Gorda Lighthouse would be allowed under Class I VRM objectives, as these cultural features are considered to be part of the characteristic landscapes where they are located.

5.3.2 Impacts to Cultural Resources from Cultural Resources Management

The Proposed RMP provides a basic level of protection for prehistoric and historic cultural resources within the KRNCA. In general, the effects of management programs on the resources themselves would result only in positive or “negligible” impacts. Protection of sites through physical means utilizing barriers, fences or erosion control methods and designation of grazing areas away from known sites, etc., would all aid in maintaining resource integrity and significance. Interpretive aids such as educational signs or printed materials for visitor use would enlighten the general public as to the presence of cultural resources and their vulnerability to damage and destruction through man-made or natural processes. Unfortunately, drawing visitor attention to significant cultural sites can raise their visibility and may increase the likelihood of intentional damage or destruction through looting. This has not been an issue in the KRNCA.

The Proposed RMP places equal priority on the preservation of cultural resources in all three zones (Backcountry, Frontcountry, and Residential), and offers proactive actions for documenting and protecting prehistoric and historic resources, including increased levels of resource monitoring, calls for surveys in the inland areas 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 (NRHP). The implementation of the Proposed RMP would provide protection and management of cultural resources within the KRNCA and would contribute greatly towards reducing adverse impacts to a moderate or negligible level.

5.3.3 Impacts to Cultural Resources from Lands and Realty

The acquisition of additional lands for administration by the KRNCA, particularly those located in the Shelter Cove area, could result in generally positive impacts on cultural resources. Under the Proposed RMP, property purchases from willing landowners would serve to prevent residential or commercial development on those parcels. This could protect documented cultural resources by reducing or eliminating development activities in sensitive areas. In addition, land acquisition would contribute to the preservation of any undocumented cultural resources that might exist on future acquired parcels. Only a few acquisitions are expected in Shelter Cove, so these positive impacts would be minor.

5.3.4 Impacts to Cultural Resources from Inventory Units and Study Areas

The Proposed RMP makes provisions for management of parts of the area to protect wilderness characteristics, wild and scenic river values or as Areas of Critical Environmental Concern (ACEC). These areas can and do include significant cultural resources, and the recognition of the unique status of these locations provides for more intensive levels of management. As a result, archaeological materials in these areas would be under greater protection, constituting a minor, positive impact. This is especially true in the Mattole ACEC, identified specifically to provide special management and protection of coastal archaeological sites.

5.3.5 Impacts to Cultural Resources from Aquatic Ecosystems and Fisheries Management

The Proposed RMP stresses the importance of the ecological health of watersheds and watershed restoration efforts in cooperation with private landowners. Prehistoric resources in particular tend to be located close to perennial fresh water sources such as streams, springs, and wetlands. Efforts to preserve such areas could, by association, benefit documented and unrecorded cultural resources located at or near these well-watered areas. However, active restoration efforts could result in adverse impacts to these same cultural resources where restoration plans include heavy vegetation removal and ground disturbing activities. However, Section 106 of the National Historic Preservation Act requires that all ground-disturbing projects be reviewed, with a site visit, by a qualified archeologist. Compliance with this regulation should ensure that no cultural resources or sacred places are disturbed, eliminating the possibility of adverse impacts to cultural resources from aquatic ecosystems and fisheries management.

5.3.6 Impacts to Cultural Resources from Wildlife Management

Impacts to documented or unrecorded cultural resources resulting from the maintenance and enhancement of wildlife populations and habitats in the KRNCA are likely to be negligible under the Proposed RMP. Preservation of amphibian habitats, which would include wetland areas, could have positive impacts for cultural resources by protecting watered areas more sensitive for containing prehistoric archaeological materials.

5.3.7 Impacts to Cultural Resources from Terrestrial Ecosystems and Vegetation Management

Under the Proposed RMP, the maintenance of coastal dune systems and the eradication of invasive floral species are stressed. In general, the utilization of prescribed burns, the replication of historic fire regimes, and native grass enhancement programs would have negligible, localized impacts on cultural resources. Archaeological clearances would be completed prior to any projects to ensure that significant sites are not harmed. Prescribed burns, if not properly controlled, could result in moderate to major impacts to standing historic structures and buildings. This would be of particular concern in areas near historic ranching operations, such as the Chambers Ranch. Prescribed burns would only be done by a qualified “burn boss” working in conjunction with a cultural specialist, and would include construction of defensible space around the structures. Therefore, the probability of impacts would be very low.

5.3.8 Impacts to Cultural Resources from Forest Management

The Proposed RMP would allow the reopening of old logging roads and the construction of temporary access roads for timber salvage operations. Due to the ground disturbance involved in road construction and eventual removal under the Proposed RMP, the possibility exists that archaeological sites and materials would be subjected to impacts. Archaeological clearances performed in compliance with Section 106 of the NHPA should prevent such disturbances from occurring.

5.3.9 Impacts to Cultural Resources from Special Forest Products Management

The Proposed RMP takes a more proactive approach toward expanding beargrass habitat with the establishment of Native American Beargrass Collection Unit(s). Such programs and efforts would have negligible or positive, long term impacts on this particular natural/cultural resource. Use of other special forest products such as the collection of species utilized in the floral trade, fuel wood from firebreak creation, or the personal collection of mushrooms would have negligible impacts on cultural resources.

5.3.10 Impacts to Cultural Resources from Grazing Management

Four active ranching operations currently exist within the KRNCA, some elements of which constitute cultural resources, such as the Chambers Ranch complex. The Proposed RMP redefines the Spanish Flat and Randall Creek grazing allotments to protect documented cultural resources. These restrictions would aid in the minimization or elimination of disturbances to archaeological materials and would reduce impacts to minor or negligible levels.

5.3.11 Impacts to Cultural Resources from Fire Management

The Proposed RMP allows natural wildfires to burn in the Backcountry Zone, but not in the Frontcountry, representing a slight decrease in potential impact on cultural resources. It is aggressive in terms of fuel management and provides for mechanical fuel reduction methods. Where such methods involve the utilization of equipment such as ATVs and other vehicles, there is an increased possibility that cultural resources would be subjected to minor to moderate localized impacts. All projects would require an archaeological clearance, and therefore impacts would be minimized. Suppression of wildfire requires the use of heavy equipment, such as dozers to construct fireline, in cases where life and private property are at risk. The rapid-response nature of suppression greatly increases the potential for archaeological site damage, even with clearance and other requirements. Based on this higher level of impact associated with wildfire response, the Proposed RMP would likely provide a moderate to major long-term benefit to cultural resources by decreasing the risk of catastrophic fires and potential damage from fire suppression operations in the King Range, through fuels management that encourages a more natural role for fire in the ecosystem.

5.3.12 Impacts to Cultural Resources from Travel Management

The Proposed RMP would continue existing travel management policies on the existing road system, with negligible impacts on documented and unrecorded cultural resources. The beach corridor and other locations with sensitive cultural sites would remain closed to vehicle use.

5.3.13 Impacts to Cultural Resources from Recreation

As recreation use can present general levels of adverse impacts to cultural resources, establishment of visitor use limits should result in fewer and less severe impacts to prehistoric and historic sites. Most identified cultural resources are situated within the Backcountry and, as a result, could be subjected to moderate impacts under the Proposed RMP; because most popular camping places in the Backcountry are located where prehistoric people had seasonal encampments, increases in recreation use could have an adverse effect on cultural resources. However, the Proposed RMP makes provisions for the

placement of barriers and fences, the designation of “group avoidance areas,” and additional management of recreation uses in order to protect resources and reduce impacts. Visitor education on low-impact use techniques should also reduce potential impacts. Implementation of recreation management programs discussed in the Proposed RMP would contribute towards reducing impacts from projected increases in the intensity of recreation use of the KRNCA to minor levels.

5.3.14 Impacts to Cultural Resources from Interpretation and Education

The Proposed RMP would continue existing policies and would have minor impact on cultural resources within the KRNCA. By continuing to expand the interpretive program to incorporate cultural resource programs, a positive impact would be realized by increasing public appreciation and protection of the sites.

5.3.15 Potential Cumulative Impacts to Cultural Resources

The cumulative impact study area for cultural resources covers all of Humboldt County. The RMP contributes to area-wide efforts to protect and promote cultural resources. In particular, many areas within the County that lie outside of the KRNCA are privately owned, where cultural resource protections are not legally required, so the King Range contributes a disproportionately large amount to protection of cultural resources in the area. This represents a moderate positive cumulative impact.

5.4 IMPACTS TO INVENTORY UNITS AND STUDY AREAS (WILD AND SCENIC RIVERS, WILDERNESS CHARACTERISTIC INVENTORY UNITS, ACECS)

This section focuses on the affects that management actions would have on the suitability of the lands for a respective designation or protective management, and not on the impacts to the resource values themselves. For example, all of the eligible Wild and Scenic River segments have anadromous fisheries as the Outstandingly Remarkable values that contribute to their eligibility. The impact assessment in this section does not identify impacts from the various programs to the anadromous fisheries themselves (these are discussed in the Aquatic Ecosystem and Fisheries section), but only their impacts on the eligibility/suitability on the river for the designation. The Proposed RMP would have minimal impacts on the inventory units and study areas, and does not include actions that would result in an irreversible or irretrievable impact, i.e., an impact that would make a particular inventory unit or study area unsuitable for consideration for protective management under later land use planning efforts.

5.4.1 Impacts to Inventory Units and Study Areas from Visual Resources Management

Implementation of the visual resources management program would not impact the inventory units and study areas.

5.4.2 Impacts to Inventory Units and Study Areas from Cultural Resources Management

No impacts would occur to the inventory units and study areas from cultural resources management.

5.4.3 Impacts to Inventory Units and Study Areas from Lands and Realty

No impacts would occur to the inventory units or study areas from the lands and realty program.

5.4.4 Impacts to Inventory Units and Study Areas from Inventory Units and Study Areas

Beneficial impacts would occur for those areas identified for management according to their respective Congressional or administrative designations/allocations: two wilderness characteristics subunits, two ACECs, and ten suitable Wild and Scenic stream segments. Areas not proposed for management under these respective designations or land use allocations would not have any long-term impacts under the Proposed RMP that would make them ineligible for future consideration.

5.4.5 Impacts to Inventory Units and Study Areas from Aquatic Ecosystems and Fisheries Management

No impacts would occur, except some minor to moderate positive impacts to the outstandingly remarkable anadromous fishery values of the eligible Wild and Scenic River segments.

5.4.6 Impacts to Inventory Units and Study Areas from Wildlife Management

No impacts would occur.

5.4.7 Impacts to Inventory Units and Study Areas from Terrestrial Ecosystems and Vegetation Management

No impacts would occur.

5.4.8 Impacts to Inventory Units and Study Areas from Forest Management

Minor to moderate short-term negative impacts would occur to wilderness characteristic inventory subunits 1H and 1I under the Proposed RMP. Proposed forest and watershed restoration activities in parts of these units impacted from past timber harvesting would reduce naturalness and opportunities for solitude during and for a time after the operational period. However, these projects would result in long-term beneficial impacts by improving the ecological character of the units, and returning them to a forest structure that more closely approximates natural conditions. Any salvage logging would result in similar short-term negative and long-term positive impacts on naturalness to wilderness characteristic inventory units that are not incorporated into the Backcountry Zone.

5.4.9 Impacts to Inventory Units and Study Areas from Special Forest Products Management

No or negligible impacts would occur.

5.4.10 Impacts to Inventory Units and Study Areas from Grazing Management

No or negligible impacts would occur.

5.4.11 Impacts to Inventory Units and Study Areas from Fire Management

Minor to moderate short-term impacts would occur to the wilderness inventory subunits from fuels management projects that could occur in the Frontcountry Zone in the Proposed RMP. However, in the long-term, these projects would serve to create a landscape that more closely approximates natural conditions and is more resistant to catastrophic wildfire. This would serve to increase the naturalness of the units in the long-term.

5.4.12 Impacts to Inventory Units and Study Areas from Travel Management

No impacts would occur.

5.4.13 Cumulative Impacts from Inventory Units and Study Areas

In terms of cumulative impacts, with a study area identified as the North Coast region, these inventory units and study areas contribute to systems of protected lands already in place. For example, a number of wilderness areas have already been designated within fifty miles of the KRNCA, including the North Fork Wilderness, the Yolla Bolly Middle-Eel Wilderness, and Humboldt Redwoods State Park Wilderness. However, the King Range and adjoining Sinkyone Wilderness State Park are the only coastal lands with wilderness characteristics. A number of BLM Wilderness Study Areas are also within fifty miles of the King Range. There is one other ACEC/RNA in the Mattole Valley (The Gilham Butte ACEC/RNA). This area complements the old growth forest and watershed protection of the Mill Creek area, resulting in a positive cumulative impact. The cumulative impacts of Wild and Scenic River designation (Regional Summary of Rivers) are described in Appendix D.

5.5 IMPACTS TO AQUATIC ECOSYSTEMS AND FISHERIES RESOURCES

The description of potential impacts to fisheries resources described below is based on the assumption that allowable uses that could potentially affect aquatic habitat in the KNRCA would be guided by determining consistency with aquatic and fisheries goals, management objectives and Aquatic Standards and Guidelines (Appendix E), which are specific to ongoing or future proposed land management activities. Riparian Reserves (RRs) include lands along streams and associated areas necessary for maintaining hydrologic, geomorphic, and ecological processes. The fisheries goals and objectives, along with the Aquatic Standards and Guidelines, limit or exclude land use activities so that riparian and aquatic habitat is maintained and restored. The goals, objectives, standards and guidelines, and RRs would be

used to screen all future projects and were designed to operate together to maintain productivity and resiliency of riparian and aquatic ecosystems and the species that depend on them.

The Proposed RMP contains actions that are ongoing within the KRNCA (existing grazing management, fuels reduction actions, road maintenance actions, existing recreation facilities, timber stand improvement actions, etc.) but may be modified by the plan. Ongoing actions have already undergone Endangered Species Act Section 7 consultation with NOAA Fisheries and have been analyzed on a programmatic or project basis. Thus, additional direction relevant to protection of riparian and aquatic habitat in the KRNCA includes, but is not limited to, measures contained in existing biological assessments and ESA consultation documents specific to these ongoing actions. If any of the proposed activities discussed under the Proposed RMP are outside of the scope of existing Section 7 consultations, and/or if an activity could affect a listed species but has not undergone Section 7 consultation, that activity would be subject to Section 7 consultation prior to implementation.

5.5.1 Impacts to Aquatic Ecosystems and Fisheries Resources from Visual Resources Management

All VRM actions and inventory procedures would need to move conditions of riparian and aquatic ecosystems toward attainment of the fisheries goals and objectives. Examples of management actions that would reduce existing visual impacts were given in Section 4.5.4 and included painting of culverts and removing road berms. These types of actions have the potential for adverse impacts to aquatic habitats and fisheries if not conducted properly. However, because all proposed VRM actions would be screened for consistency with the aquatic goals and objectives prior to implementation, and because these were designed to prevent degradation of riparian and aquatic habitat, there would be no impact to fisheries from visual resources.

5.5.2 Impacts to Aquatic Ecosystems and Fisheries Resources from Cultural Resources Management

Under the Proposed RMP, existing policies would remain in place to protect cultural resources from the management actions identified to restore or maintain desired conditions for fisheries resources, so there would be no change in BLM's ability to implement fisheries restoration projects. Policies to maintain or increase monitoring, site patrols and collaboration with Native Americans under the Proposed RMP would have no impact on fisheries resources. Policies encouraging surveying, regional overviews, stabilization of historic structures and development of National Register nominations under the Proposed RMP would have no impact on fisheries resources. Some stream restoration projects may need to be modified to eliminate impacts to cultural resources. However, this should have negligible impacts to the overall restoration program.

5.5.3 Impacts to Aquatic Ecosystems and Fisheries Resources from Lands and Realty

Policies to obtain lands, specifically lands within anadromous watersheds, could facilitate watershed protection, restoration, and recovery of fisheries. Land acquisitions could have major beneficial impacts to fisheries by increasing the extent of watershed area that is specifically managed to maintain and restore

riparian and aquatic habitat. The Aquatic Guideline LH-5 directs BLM to use land acquisition to meet fisheries objectives and to facilitate the restoration of fish stocks and other species at risk.

Policies to consider new rights-of-way in the Frontcountry Zone under the Proposed RMP could have moderate adverse impacts to fisheries due to potential watershed disturbance that could occur on private lands as a result of a change in access (i.e., road construction, timber harvest, water withdrawals). Issuance of rights-of-ways would be screened using the fisheries goals, objectives, and standards and guidelines. Aquatic Guideline LH-4 directs that rights-of-way and other permits must avoid adverse effects that retard or prevent attainment of fisheries objectives. However, because of associated activities on private land, issuance of rights-of-ways could result in moderate adverse impacts to fisheries. Activities on private lands would be consistent with State and County regulations.

BLM's assertion of water rights under the Proposed RMP would not have any immediate impact on the watershed or other water users. The beneficial effects of these actions would only occur if the watershed becomes more developed in the future and water rights are adjudicated or if the watershed is determined to be "fully-allocated" by the state. Parties with a proven senior water right would be unaffected by BLM assertion of water rights.

5.5.4 Impacts to Aquatic Ecosystems and Fisheries Resources from Inventory Units and Study Areas

5.5.4.1 Wild and Scenic Rivers

The Proposed RMP would continue existing policies that protect RRs and aquatic habitat along rivers and streams within the KRNCA, and thus would have no impact to fisheries. In addition to these policies, it would recommend ten river segments for inclusion in the National Wild and Scenic River System (NWSRS). Future management prescriptions for suitable river segments would protect the free-flowing values of river segments, thereby precluding stream impoundments, diversions, channelization, and/or rip-rapping. River segments would also be managed to protect identified "outstandingly remarkable values."

Fisheries goals, objectives, and standards and guidelines were designed to protect free-flowing values of rivers including instream flows, channel conditions, and RRs. Thus, beneficial impacts of the designations are expected to be minimal on most stream segments relative to most of the fisheries management actions. Designation under the Wild and Scenic Rivers Act would require the Federal Government to protect the "outstandingly remarkable" values of each stream segment. Since the anadromous fishery is identified as the outstandingly remarkable value in all of the segments, designation would provide beneficial impacts.

5.5.4.2 Wilderness Characteristic Inventory Units

The Proposed RMP would continue current policies for existing WSAs until congressional designation or release occurs. Lands outside of the King Range and Chemise Mountain areas that have identified wilderness characteristics would be managed to protect these values. Lands within WSAs are subject to special management constraints and are managed to not impair their suitability for designation as

wilderness. The only permissible activities are temporary uses that avoid surface disturbance, do not require reclamation, nor involve permanent placement of structures. Exceptions are granted for emergencies or existing activities that enhance wilderness values. The Proposed RMP would incorporate portions of the Bear Creek and Squaw Creek watersheds into the Backcountry Zone to be managed for wilderness characteristics, and would protect an additional 200 acres of acquired lands within the existing WSAs. This would have mixed minor impacts to fisheries. Protection of naturalness and other wilderness characteristics would have a minor beneficial impact, while some limitations may be required regarding restoration actions resulting in a minor negative impact.

5.5.4.3 ACECs

Designation of the Mill Creek ACEC would provide positive impacts to the Mill Creek Watershed. The relevant and important values identified for protection under this designation are the cold water, fishery and old-growth forest values.

5.5.5 Impacts to Aquatic Ecosystems and Fisheries Resources from Aquatic Ecosystems and Fisheries Management

Management actions identified in the Proposed RMP include upslope sediment reduction, instream habitat enhancement, riparian silviculture, monitoring, and estuary enhancement. All of these actions would have major, long term, and beneficial impacts to fisheries through improved habitat quantity and quality. Upslope sediment reduction would reduce the amount of fine sediment that deposits in pools and spawning habitat, which decreases suitability of Pacific salmonid habitat and may adversely affect survival of fish. Instream habitat enhancement would provide more rearing, holding, and spawning habitat. Riparian silviculture would enhance the function of riparian zones to provide increased filtering capacity, increased nutrient input to streams, and increased stream cover and large wood recruitment potential. Silviculture treatments would be screened to ensure that they benefit riparian dependent species, and methods would be constrained so that treatments do not retard or prevent attainment of fisheries goals and objectives. Estuary enhancement would benefit salmonids by increasing cover from predators and causing scour around structures, and would particularly benefit juvenile salmonids rearing in the estuary.

There could be minor short-term adverse impacts to fisheries as well as the beneficial impacts due to localized disturbance that may occur when restoration projects are implemented. For example, during road decommissioning, stream crossings are pulled out and soils are disturbed making them vulnerable to settling and erosion, especially the first winter following restoration. Sediment could be washed downstream and impact fisheries habitat. However, the minor short-term disturbances that may be associated with the management actions proposed are expected to be minimized through project-level design, and it is expected that potential impacts would be outweighed by the substantial beneficial impacts of restoration.

The Proposed RMP would allow implementation of estuary enhancement. Estuary habitat is crucial to the life cycle of Pacific salmonids, and estuary residence time may be an important determinant of ocean survival of young salmonids. There is little documentation of the historical condition of the Mattole River estuary and lagoon, but currently this area is aggraded and shallow, and frequently changes in

response to environmental factors, such as flood events. Studies in the Mattole Estuary have indicated that the summer carrying capacity of the estuary is low, and that the estuary may be a significant bottleneck with respect to the life cycle of Chinook salmon. Limiting factors are not clear, but are likely related to water temperatures, food and predation, which are related primarily to patterns of sediment deposition in the watershed and estuary and secondarily to the quality of riparian and large wood elements within and along the estuary. Erosion control work in the watershed, as proposed under the Proposed RMP, which reduces the input of sediment in the Mattole basin, would benefit estuary habitat and fisheries especially if coupled with estuarine enhancement work that increases the summer carrying capacity of the estuary. Estuary enhancement would include placement of large wood structures. These structures would benefit fisheries by providing cover from predators and by causing scour that would increase water depths around the structures and act as refuge for migrating or rearing salmonids. Thus, the Proposed RMP would have major beneficial impacts to fisheries through enhancement of estuary habitat.

The Proposed RMP allows for the full complement of restoration actions (upslope sediment reduction, instream habitat enhancement, riparian silviculture) but only in fish bearing watersheds in the Mattole basin. It would benefit fisheries in the Mattole basin through enhancing watershed condition and fish habitat but streams in the backcountry would not benefit.

Monitoring is not a restoration activity but provides crucial information to managers regarding the effectiveness of restoration activities and aids in prioritizing future restoration projects. Monitoring in the Proposed RMP would be focused in fish bearing streams in the Mattole basin, and thus habitat, water quality condition and trends, and fisheries data would be tracked and appropriate responses may be formulated and implemented. Limited monitoring would also occur on west slope streams to ensure that grazing, recreation, and other uses do not impact fishery values. This would have a positive impact on fisheries.

5.5.6 Impacts to Aquatic Ecosystems and Fisheries Resources from Wildlife Management

Under the Proposed RMP, existing policies would remain in place to maintain and enhance natural wildlife populations. Also, existing policies would remain in place to reduce or eliminate the need for listing of additional wildlife species under the ESA and to contribute to the recovery of listed species. Limited operating periods to protect owls and/or murrelets from noise generated by watershed restoration projects could, if implemented, constrain the amount of restoration work that can be implemented in a given year and thus would indirectly result in adverse impacts to fisheries. (However, disturbance distances can be minimized with topographic or vegetative screening around projects, which could reduce or eliminate any adverse impacts. Also, these operating requirements are required under the Endangered Species Act Recovery Plan, and are beyond the scope of this planning effort.) Actions specific to various listed species identified under the Proposed RMP would not impact fisheries, and in general wildlife species protection benefits fisheries as well. Policies enacted under the Proposed RMP to facilitate research and monitoring of wildlife would have no impact on fisheries resources.

5.5.7 Impacts to Aquatic Ecosystems and Fisheries Resources from Terrestrial Ecosystems and Vegetation Management

Under the Proposed RMP, existing programs would be continued to eradicate invasive plant species. Site surveys have shown that invasive species have only colonized isolated locations in RRs. Thus, the potential benefits to riparian plant species associated with removal of invasive species would be minor. Similarly, any ground disturbance associated with removal of invasive plants would be very localized and minor.

The impact of limited grazing outside of allotments under the Proposed RMP is anticipated to be minor, localized, and short-term. Any grazing projects would be limited in size with a primary goal of improving vegetation structure and wildlife habitat. All ongoing grazing-related activities in the KRNCA have undergone Section 7 consultation and adverse effects have been minimized. Thus, any changes to the ongoing grazing management would cause reinitiation of consultation to ensure that effects of modifications are minimized. Thus, if limited grazing outside of allotments is proposed in the future, it is expected that streams and RRs would be protected from impacts, and upslope impacts would be minimized through project design.

Specific types of vegetation may be burned under the Proposed RMP, which could temporarily decrease soil cover and cause erosion in areas burned. However, prescribed burns and their potential effects to fisheries in the KRNCA have been analyzed and mitigated through the ongoing program and through Section 7 consultation, such that adverse impacts to fisheries are not expected.

5.5.8 Impacts to Aquatic Ecosystems and Fisheries Resources from Forest Management

Under the Proposed RMP, existing policies would remain in place to maintain and enhance old growth forests. RRs would be protected from timber harvest and projects would be screened to ensure that they don't retard or prevent attainment of fisheries goals and objectives prior to implementation. The Aquatic Standards and Guidelines prohibit silvicultural activities in RRs except where catastrophic events have degraded riparian conditions and forest health treatments would help attain desired riparian conditions. RR widths in the KRNCA would be consistent with RR widths in the NWFPA ROD, designed to protect riparian ecosystems, potentially unstable areas, inner gorges, and floodplains from management activities.

Potential impacts of silvicultural treatments under the Proposed RMP are expected to be minor to moderate and temporary in nature, based on the areas proposed for treatment. Silvicultural treatments may increase erosion in harvest units, roads, and landings. The risk of impacts to fisheries would be primarily related to the potential for sediment delivery to streams. Activities associated with the Proposed RMP would allow increases in watershed disturbances, which may result in temporary impacts to fisheries depending on the extent, location, and characteristics of the landscape treated. The highest potential for adverse impacts to fisheries is represented by the opening and use of old logging roads and construction of new temporary roads. However, these projects would only be completed if they serve to meet the primary goals of restoring forest and watershed health, and so would provide long-term positive impacts. Similarly, all other silvicultural treatments would only be completed with a long-term goal of restoring previously harvested stands to more natural forest characteristics that are less subject to stand

replacing fires. This would reduce sediment impacts associated with large-scale intense wildfires in the long-term.

Timber Stand Improvement (TSI) projects could occur under the Proposed RMP and methods have been analyzed and mitigated through the ongoing TSI program and through Section 7 consultation. Thus, TSI activities would have no impact on fisheries. All projects allowed would be designed by an interdisciplinary team and land management activities would be guided by determining consistency with fisheries goals and objectives and standards and guidelines designed to protect RRs and aquatic habitat.

5.5.9 Impacts to Aquatic Ecosystems and Fisheries Resources from Special Forest Products Management

Issuance of permits to collect mushrooms, beargrass, floral trade species, and fuelwood proposed under the Proposed RMP would not impact fisheries. Fuelwood cutting would be prohibited in RRs unless it could be used as a tool to attain fisheries objectives. The Proposed RMP would prohibit fuelwood cutting in the Mattole Estuary area, which would result in significant beneficial impacts. Large wood may be recruited to the estuary during high flows, if fuelwood cutters do not remove it.

The Proposed RMP could impact fisheries if road use occurs or increases during the wet season for purposes of collecting special forest products. Winter road use accelerates erosion on unsurfaced roads, and winter rains carry the fines from road surfaces to streams. All BLM roads open to winter use in the King Range are located on ridgetops and upper slopes, so this impact would be minor.

Policies to monitor mushroom collection methods, coordinate with local tribes regarding use of beargrass, and manage beargrass resources proposed in the Proposed RMP would have no impact on fisheries.

5.5.10 Impacts to Aquatic Ecosystems and Fisheries Resources from Grazing Management

Under the Proposed RMP, existing policies and allotments would remain in place, which have been analyzed and mitigated through the ongoing program and through Section 7 consultation. Aquatic Guidelines GM-1 through GM-3 would be used to guide grazing practices and placement of grazing facilities to protect aquatic habitat. Thus, the Proposed RMP would have no adverse impacts to fisheries. Under the Proposed RMP, the Spanish Flat allotment boundary would be adjusted to exclude 500 acres of a terraced prairie between Spanish and Randall Creeks to protect significant cultural sites, but the number of Animal Unit Months (1,105 AUMs) would remain unaltered. This represents roughly a five percent decrease in size of this allotment, and would not impact fisheries. Under the Proposed RMP, four expired grazing leases would be administratively changed from available to unavailable for grazing. This action would result in beneficial impacts to fisheries, as it would ensure protection of streams in the lease areas from future grazing impacts. However, these leases are inactive and have not been used for grazing for several years, thus relative to existing on-the-ground impacts, this action would have no impact on fisheries.

5.5.11 Impacts to Aquatic Ecosystems and Fisheries Resources from Fire Management

Managing fuels to create a landscape resistant to damaging high intensity wildfires would have beneficial impact to fisheries in treated areas. However, due to the extent of overstocked stands and high levels of fuels, treatments would likely be limited in the watershed context and would be concentrated along roads. Therefore, the beneficial impact would be minor to moderate, at least during the life of the plan, as effective fuels reduction would take many decades and retreatments. The relative potential impacts of wildfires that are allowed to burn versus suppression activities that could also impact fisheries must be considered in the context of existing watershed conditions. The Frontcountry is roaded and provides existing roads from which to stage pre-suppression and suppression activities. Thus, the effects of suppression would be lower than in the Backcountry Zone. The Backcountry Zone is essentially unroaded and suppression activities along the west slope of the KRNCA could have significant adverse impacts to fisheries in the small coastal drainages in this area if emergency suppression requires dozer lines or roads. The Honeydew Fire of 2003 illustrated that dozer lines might be necessary to protect life and property. The Backcountry Zone also has a different vegetation mosaic than much of the Frontcountry Zone, and fires may burn at different intensities. Thus, the proposed plan would likely be beneficial from a fisheries impact perspective since suppression activities may cause more adverse impacts than allowing a wildfire to burn. The use of prescribed fire and mechanical methods for fuels reduction in the Frontcountry Zone would likely be targeted on woody vegetation outside of RRs, so riparian function would be maintained and streams would be protected from disturbance.

5.5.12 Impacts to Aquatic Ecosystems and Fisheries Resources from Travel Management

The Proposed RMP would continue existing policies to provide a network of roads that complement the rural character of the KRNCA. Aquatic Guidelines RF-1 through RF-7 would be used to guide road management activities in the KRNCA. These actions would provide benefits to fisheries. By directing use in the Mattole Estuary onto a main access road and other routes that do not impact riparian vegetation, existing impacts to the estuary would be reduced to minor levels. It is unknown whether poaching of adult salmonids occurs in the Mattole Estuary. If so, continued vehicle access into the estuary could indirectly impact fisheries. This impact is expected to be improbable and minimal, as the estuary receives a great deal of oversight by area residents.

5.5.13 Impacts to Aquatic Ecosystems and Fisheries Resources from Recreation

The Proposed RMP would continue existing policies regarding visitor information, road and trail maintenance, resource protection, visitor safety, special recreation permits, cooperative management, exclusionary fence and barrier construction, enforcement, and Universal Accessibility Standards, so there would be no impact to fisheries. The Proposed RMP calls for development of additional trails, and specifically a mountain bike trail network in the Bear Creek watershed. Trail construction standards contained in the RMP would be followed to minimize any watershed/fisheries impacts. Long-term impacts from this trail system are expected to be negligible to minor, and site-specific consultation would occur with NOAA Fisheries for specific projects. Development of a parking area and trailhead along Bear Creek from Shelter Cove Road could cause minor to major negative impacts to fisheries depending

on the specific design/feasibility of low impact construction. Further site specific analysis would be required to determine the level of impact. The project would not be implemented if impacts were determined to be significant.

The ongoing recreation program in the KRNCA has undergone Section 7 consultation and adverse effects have been mitigated. The Proposed RMP would allow moderate use numbers in the Backcountry Zone. This would increase the potential for adverse effects to fisheries in the small coastal drainages on the western slope, such as impacts related to human waste in the floodplains and trampling of habitat. The Proposed RMP would also allow for increases in visitor use in the Frontcountry Zone. However, existing recreation facilities in the Frontcountry Zone have been mitigated through the ongoing programs and Section 7 consultation, and new facilities would be screened to ensure that they do not retard or prevent attainment of fisheries goals and objectives, so this would have no impact on fisheries.

5.5.14 Impacts to Aquatic Ecosystems and Fisheries Resources from Interpretation and Education

The Proposed RMP would continue existing policies to provide information to visitors. This information includes posting of fishing regulations and recommended methods to avoid surface water contamination (from human waste), so the Proposed RMP would have beneficial impacts to fisheries.

5.5.15 Potential Cumulative Impacts to Aquatic Ecosystems and Fisheries Resources

Within the Mattole watershed, there are numerous agencies and organizations—the Mattole Restoration Council, Mattole Salmon Group, Sanctuary Forest, Middle Mattole Conservancy, CDFG, and others—performing watershed restoration activities on both public and private lands. BLM actions proposed in this plan contribute to this coordinated effort, constituting a major beneficial cumulative impact.

In addition, watershed restoration groups are promoting and subsidizing the use of large water storage facilities to reduce the level of summertime diversions in the Mattole basin. BLM's exercise of water rights under this RMP would complement this effort and reduce future water diversions from the Mattole watershed, which otherwise could contribute to higher summertime temperatures and its drying out seasonally. This also represents a major beneficial cumulative impact to aquatic resources.

5.6 IMPACTS TO WILDLIFE

Under the Proposed RMP, existing policies would remain in place to maintain and enhance natural wildlife populations, minimize or eliminate the need for listing of additional species under the Endangered Species Act, and contribute to the recovery of listed species. These continued policies would cause a negligible or no negative impact on wildlife species.

5.6.1 Impacts to Wildlife from Visual Resources Management

Under the Proposed RMP, impacts from management of visual resources would have a negligible long-term impact on wildlife populations. The Proposed RMP would make the Frontcountry Zone Class II and III Visual Resource Management designation in the north and south, respectively. No wildlife habitat improvements that would conflict with these designations are proposed, so this would have no impact on wildlife. It would also change the VRM designation in the Backcountry Zone to Class I. This could result in minor negative impacts to wildlife if habitat improvement projects require the placement of structures that would not conform with the strict Class I requirements.

5.6.2 Impacts to Wildlife from Cultural Resources Management

Under the Proposed RMP, existing policies would remain in place to protect cultural resources, so there would be negligible impact on wildlife. Policies to maintain or increase monitoring, site patrols, and collaboration with Native Americans would have negligible impact on wildlife.

5.6.3 Impacts to Wildlife from Lands and Realty

Policies to obtain lands and interests determined to be desirable for consolidation so as to facilitate management in Backcountry and Frontcountry Zones under the Proposed RMP could have a minor to moderate, long-term, and beneficial impact on wildlife by increasing the land base and providing greater protection to some habitats types (e.g., riparian zones would be managed to protect anadromous fish, thereby benefiting wildlife species within these habitats). Lands acquired in the Residential Zone would have minimal impacts on wildlife. Under the Proposed RMP, policies to make the Backcountry Zone an exclusion area for new rights-of-way and/or permits would have minor to moderate, long-term benefits to wildlife by limiting habitat fragmentation and frequency of human disturbance.

5.6.4 Impacts to Wildlife from Inventory Units and Study Areas

5.6.4.1 Wild and Scenic Rivers

Protective management of various rivers under the Proposed RMP would have minor beneficial impacts on wildlife populations by affording an added level of protection of water quantity and quality and riparian habitat to meet wildlife needs.

5.6.4.2 Wilderness Characteristic Inventory Units

The Proposed RMP would continue existing policies for management of lands currently designated as WSAs 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.

Wilderness characteristics would be protected on additional lands adjacent to the existing King Range and Chemise Mountain WSAs, most notably old-growth forest habitat in the Squaw Creek drainage. This would have a minor to moderate positive impact on wildlife in these areas.

5.6.4.3 ACECs

The Proposed RMP would designate the Mill Creek Watershed as an ACEC to protect the water quality of this important anadromous fish stream/cold water tributary to the Mattole River, and the low-elevation old-growth Douglas-fir forest. This policy would have a major beneficial impact on wildlife.

5.6.5 Impacts to Wildlife from Aquatic Ecosystems and Fisheries Management

Under the Proposed RMP, existing policies would remain in place to restore and maintain ecological health of watersheds and aquatic habitats and implement up-slope sediment reduction resulting in a minor to moderate long-term positive impact to wildlife species that occupy riparian habitats (e.g., riparian birds, aquatic amphibians). Implementation of estuary enhancement program in the Mattole Estuary would have a moderate long-term benefit to wildlife species, including marine mammals and numerous species of birds.

5.6.6 Impacts to Wildlife from Wildlife Management

Under the Proposed RMP, existing policies would remain in place to maintain and enhance natural wildlife populations, protect habitat, prevent damage, and increase public education. The plan would encourage habitat for federally threatened western snowy plovers at the Mattole River mouth. The localized impacts could result in long term, moderate positive effects.

The Proposed RMP would have a major positive impact on spotted owls as it would provide sufficient habitat to attract and maintain 20 breeding pairs. It would also have minor positive impact for Steller's sea lions by protecting haul-out sites through cooperative management with the California Coastal National Monument.

In addition, the Proposed RMP would design and implement a long-term "all bird" monitoring plan that would provide managers data necessary to responsibly manage wildlife. This plan would be implemented opportunistically, resulting in a moderate beneficial effect. The Proposed RMP would facilitate research and monitoring of wildlife populations within the KRNCA to increase the knowledge base. This would provide managers with species and local population data necessary to responsibly manage wildlife species within the KRNCA; the short term minor effect on wildlife would be positive; the long term effect could result in a major positive impact to some wildlife species.

Additionally, in the Proposed RMP, BLM would work cooperatively with CDFG to maintain a natural diversity of intertidal organisms and educate visitors to intertidal habitat resulting in a long term major beneficial impact to wildlife using intertidal habitats.

5.6.7 Impacts to Wildlife from Terrestrial Ecosystems and Vegetation Management

Under the Proposed RMP, existing programs would be continued to eradicate invasive plant species and manage vegetation composition to represent more naturally occurring conditions. This would maintain a mosaic of compositionally and structurally diverse habitat types which would have a minor to moderate beneficial impact on a wide range of wildlife species.

5.6.8 Impacts to Wildlife from Forest Management

Under the Proposed RMP, existing policies would remain in place to maintain and enhance old growth forests, resulting in a positive impact on old-growth dependant wildlife. Goals to conduct silvicultural treatments and promote forest restoration (tree planting) under the Proposed RMP could have a minor, short-term negative impact on some wildlife, but would have a moderate to major long-term positive impact. It would also allow silvicultural treatments and selected post-fire salvage operations, which could temporarily reopen old logging roads and/or build new temporary roads; this could have a moderate, short-term negative, and localized impact to wildlife species by causing habitat fragmentation. A component of downed woody debris and snags would be retained; this would minimize impacts of removal of important components of forest ecosystems and wildlife habitat. The primary long-term goal and criteria used to determine whether to conduct salvage operations would be the improvement of a more natural forest structure and associated wildlife habitat. Therefore, long-term benefits to wildlife would be positive.

5.6.9 Impacts to Wildlife from Special Forest Products Management

Issuance of permits to collect mushrooms, beargrass, floral trade species, and fuelwood proposed under the Proposed RMP would have a negligible effect on wildlife.

5.6.10 Impacts to Wildlife from Grazing Management

Under the Proposed RMP, existing policies would remain in place to preclude loss or reductions in grazing allotments or AUMs, resulting in no changes to current rangeland management and negligible impact to wildlife.

5.6.11 Impacts to Wildlife from Fire Management

The Proposed RMP would have minor positive long term effects on wildlife, due to reduction in the risk of fire. The geographic extent of this effect would depend on the number and extent of future fires and the associated rehabilitation.

Under the Proposed RMP, effects to wildlife in the Backcountry would be positive, but Frontcountry activities could lead to minor, long-term negative effects on wildlife in that zone, negatively impacting wildlife that depends on snags and downed woody debris. The Proposed RMP would utilize prescribed fire and mechanical methods in the Frontcountry Zone to manage fuels, which could have a moderate, long-term, and beneficial impact on wildlife.

5.6.12 Impacts to Wildlife from Travel Management

The Proposed RMP would continue existing policies to provide a network of roads that complement the rural character of the King Range, so there would be negligible impact on wildlife.

5.6.13 Impacts to Wildlife from Recreation

The Proposed RMP would continue existing policies regarding visitor information, road and trail maintenance, resource protection, visitor safety, special recreation permits, cooperative management, exclusionary fence and barrier construction, enforcement, and Universal Accessibility Standards, so there would be negligible impact on wildlife. However, it would establish a visitor use allocation system to allow moderate use numbers in the Backcountry and Frontcountry Zones. Allowance of increased use could have a minor to moderate negative impact on sensitive wildlife species, especially during the spring/summer breeding season. The requirement that Backcountry Zone visitors obtain a permit would have moderate positive impacts to wildlife with the inclusion of outdoor ethics information in the permit program.

The Proposed RMP would prohibit motorized watercraft landings, with the exception of emergencies and work cooperatively to establish parameters for commercial touring flights over the KRNCA, and to discourage low-flying aircraft. Both policies would greatly benefit marine wildlife such as seabirds and marine mammals roosting or breeding within the King Range.

5.6.14 Impacts to Wildlife from Interpretation and Education

The Proposed RMP would continue existing policies to provide information to visitors, including wildlife and tidepool related ethics information. This could have a minor to major beneficial impact on sensitive wildlife.

5.6.15 Potential Cumulative Impacts to Wildlife

The KRNCA, in conjunction with the nearby Sinkyone Wilderness State Park, Gilham Butte Public Lands, and Humboldt Redwoods State Park, provides a protected corridor for the movement of wide-ranging, dispersing, and migratory animals, which is a moderate and positive cumulative impact. For the northern spotted owl in particular, the study area for cumulative impacts is the entire California Coastal Province. The KRNCA is one of several public land areas with designated critical habitat. Managed in a coordinated fashion with these other areas, the King Range contributes to a solid chunk of habitat for this species, as well as other species associated with the same ecosystem type. In contrast, private lands in the province are generally managed intensively for timber production, which provide very limited suitable habitat. This represents a major beneficial cumulative impact.

5.7 IMPACTS TO TERRESTRIAL ECOSYSTEMS AND VEGETATION RESOURCES

Impacts on the vegetation resources of the King Range are variable, as these resources are present in one form or another throughout all of the study area except for the beach wave-slope and landslide areas. The BLM is responsible for assessing the effects of any proposed activities associated with the various resource management activities and to insure that any effects from these activities do not result in significant adverse effects to these species under current and proposed management regimes.

5.7.1 Impacts to Terrestrial Ecosystems and Vegetation Resources from Visual Resource Management

The impacts from the visual resources would likely not impact the vegetation under the Proposed RMP, as the conditions imposed respect the integrity of the vegetation as a fundamental element of the viewshed.

5.7.2 Impacts to Terrestrial Ecosystems and Vegetation Resources from Cultural Resources Management

Under the Proposed RMP, impacts to the vegetative resources from cultural resources management would be localized (site-specific). The impact would be negative, from negligible to minor, and most likely as a result of efforts to stabilize or prevent environmental degradation to important sites. The impact would come both as a result of the efforts to stabilize, and possibly also as an indirect result of the alteration of the natural vegetation successional processes due to such stabilization efforts.

5.7.3 Impacts to Terrestrial Ecosystems and Vegetation Resources from Lands and Realty

The only foreseen impact on the vegetation of the King Range from the management of Lands/Realty Resources would be an increased level of habitat management requirements, particularly if new acquisitions include populations of sensitive species, or suitable habitat contiguous with known occurrences of such species. These impacts would be minor to moderate and positive as vegetation stands are managed over a larger area and in a more comprehensive manner.

5.7.4 Impacts to Terrestrial Ecosystems and Vegetation Resources from Inventory Units and Study Areas

The Proposed RMP provides for protective management of Wild and Scenic Rivers, wilderness characteristics, and ACEC values and would likely have long-term moderate positive effects.

5.7.5 Impacts to Terrestrial Ecosystems and Vegetation Resources from Aquatic Ecosystems and Fisheries Management

All proposed watershed enhancement projects relative to aquatic and fisheries resources should have a similar level of impact to the vegetation resources of the King Range, and are likely to result in long-term moderate beneficial impacts to all affected habitats.

Upslope sediment reduction (road decommissioning, landslide rehabilitation, and road drainage maintenance and upgrades) activities could have short-term adverse impacts to sensitive botanical species associated with these elements, but would likely be outweighed by the overall moderate, long-term, beneficial impacts that would result, contributing to the overall watershed integrity. Instream habitat enhancement improvement projects would likely only pose negligible, localized adverse impacts to sensitive botanical species and habitats, if any.

Riparian silviculture activities could have long-term localized minor to moderate adverse impacts to sensitive botanical species that might occur in these habitats, but would also result in moderate long-term benefits to habitat quality. Botanical clearances would ensure that impacts to sensitive species are minimized during these projects.

5.7.6 Impacts to Terrestrial Ecosystems and Vegetation Resources from Wildlife Resource Management

Under the Proposed RMP, management of wildlife should have a negligible effect on the vegetative resources, aside from those addressed in the vegetation management section.

5.7.7 Impacts to Terrestrial Ecosystems and Vegetation Resources from Terrestrial Ecosystems and Vegetation Resource Management

5.7.7.1 Impacts to Habitats

The impacts to the different dominant habitats in the King Range would be beneficial, as the Proposed RMP specifies various levels of management activities to maintain and encourage a return of the area to a diversity of native habitats. The Proposed RMP would have a minor to moderate positive impact to the coastal dunes, scrub, and grassland habitats because it would implement some level of monitoring and allow for a wider diversity of management activities (prescribed burning, manual means, and limited grazing) to be utilized to contribute to “within-habitat diversity.” With respect to management of invasive plant species and sudden oak death, the Proposed RMP should have a minor to moderate beneficial impact on all habitat types.

5.7.7.2 Special-Status Plant Species

The Proposed RMP has the goal of maintaining viable and healthy populations of special status species, a management program that would undoubtedly benefit these species. These management prescriptions have the potential to cause short-term adverse effects on these species, but would result in long-term benefits, by increasing the quality of the associated habitats. The Proposed RMP could potentially have moderate adverse effects as a result of the “habitat-degrading” trends discussed above. With respect to management of invasive plant species and sudden oak death, the Proposed RMP should have a long-term beneficial impact on special status species, although the extent of the short-term negative impact would vary with the mechanism utilized in the removal of invasive plant species.

5.7.8 Impacts to Terrestrial Ecosystems and Vegetation Resources from Forest Management

Forest improvement projects designed to accelerate the development of late-seral forest stand characteristics that are in the Proposed RMP could cause short-term minor to moderate adverse impacts to special status plant species, but would result in moderate long-term beneficial effects to both these habitats and any associated special status species. The Proposed RMP could have moderate, short-term adverse impacts on special status plant species as a result of timber salvage activities, with the larger impacts due to the level of road construction and maintenance. However, botany clearances would be

conducted prior to operations, and salvage would only be conducted for benefits to ecosystem management objectives. Therefore, long-term impacts would need to be determined to be beneficial through site specific analysis or the projects would not be implemented.

5.7.9 Impacts to Terrestrial Ecosystems and Vegetation Resources from Special Forest Products Management

The Proposed RMP could have minor adverse impacts on special status plant species (particularly fungi) and habitats if habitat-destructive mushroom harvest methods are used illegally, particularly as a result of commercial collection. Ongoing monitoring and law enforcement would help to minimize this activity. All other aspects of special forest products management would likely have a negligible impact on the vegetation resources.

5.7.10 Impacts to Terrestrial Ecosystems and Vegetation Resources from Grazing Management

Impacts related to grazing management would be localized to the grassland and scrub habitats that occur in the specific allotments. The effects of grazing on the native species diversity and abundance of grasslands vegetation has been shown to be quite variable (Harrison et al. 2003, Jutila 1999, etc.). The level of grazing identified in the Proposed RMP allows for an appropriate level of disturbance necessary to maintain these habitats and therefore represent a moderate positive long term impact on grassland habitats. The Proposed RMP also excludes grazing from specific areas where this activity compromises the integrity of the unstable substrates, which would minimize adverse impacts to this habitat, and allow for recovery. It is anticipated that the proposed level of grazing would have only negligible impacts to the scrub habitats.

Some special status plant species occur or have the potential to occur in these habitats. The relative contribution of grazing towards maintaining these early successional habitats is believed to mitigate any lesser adverse impacts to special status species as a result of grazing, and is therefore considered a beneficial impact on these species.

5.7.11 Impacts to Terrestrial Ecosystems and Vegetation Resources from Fire Management

The use of fire as a management tool is well documented, although the effects can be quite variable. For the most part, fire would help to maintain a diversity of naturally occurring habitat types and also any associated special status species. Although some short-term minor to moderate negative impacts could occur as a result of wildfire and prescribed burns, the long-term positive effect they have on habitat maintenance would likely be moderately beneficial both to these habitats, and any associated sensitive flora. The Proposed RMP prescribes the completion and maintenance of shaded fuel breaks, which could pose localized negative impacts to sensitive botanical species, particularly those species with unique dispersal limitations.

The Proposed RMP allows for wildfires to occur only in the Backcountry Zone, but does allow for the use of prescribed burns to manage specific habitats in all zones. This would result in positive impacts to

all habitats and associated sensitive species, particularly in the level of precision allowed for the use of fire as a vegetation management tool. The suppression of naturally occurring fires in the Frontcountry does detract from the positive impacts (variation in burn area, intensity, etc.) to the diversity of habitats in this management zone as a result of such an event.

5.7.12 Impacts to Terrestrial Ecosystems and Vegetation Resources from Travel Management

The Proposed RMP would reduce existing impacts to habitat quality and special status plant species known to occur in the vicinity of the Mattole River Estuary, by reducing off-road access in this area. The entire King Range would be designated as “limited” with vehicle use only allowed on designated roads and trails. This would serve to minimize impacts from off-road vehicle travel.

5.7.13 Impacts to Terrestrial Ecosystems and Vegetation Resources from Recreation

Recreation management actions in the Proposed RMP would likely result in a variety of impacts. Some would have a minor beneficial effect, such as the restrictions in group size. Others could have along term localized and/or non-localized minor negative adverse impacts: for example, localized impacts would result from the construction of new trails and associated facilities, while non-localized adverse impacts would result from overall increased recreation use, in addition to the particular types of uses (i.e., mountain bikes).

5.7.14 Impacts to Terrestrial Ecosystems and Vegetation Resources from Interpretation and Education

As long as interpretive signs and structures are appropriately located, interpretive and educational resource management is likely to have negligible effect on the vegetation under the Proposed RMP, other than a positive effect as a result of increased appreciation for the vegetative resources.

5.7.15 Potential Cumulative Impacts to Terrestrial Ecosystems and Vegetation Resources

Under the Proposed RMP, through management done in the KRNCA in concert with a County-wide noxious weed management strategy and associated private efforts, invasive weed rates of spread would be reduced. This represents a moderate beneficial cumulative impact. Similarly, coordinated efforts to reduce the spread of sudden oak death would result in positive cumulative impacts.

5.8 IMPACTS TO FOREST RESOURCES

Under the Proposed RMP, policies described under the Northwest Forest Plan would remain in place to maintain and enhance the late successional characteristics of KRNCA forests. In addition it would increase the amount of active management designed to hasten the return of late successional attributes to forest stands and have a moderate to major positive long-term impact on KRNCA forests.

5.8.1 Impacts to Forest Resources from Visual Resources Management

Impacts from management of visual resources under the Proposed RMP could have a minor short-term negative impact on forest ecosystem restoration, in so far as certain forest management activities are not visually pleasing. The Proposed RMP would allow for short-term silvicultural treatments to cause impacts that meet Class III visual contrasts, with long-term requirements to meet Class II objectives. These requirements would have a minor impact on forest management by requiring some changes in technique and location of treatments. The Proposed RMP would change the VRM designation in the Backcountry Zone to Class I, which would result in negligible impacts since no silvicultural activities are proposed here.

5.8.2 Impacts to Forest Resources from Cultural Resources Management

Under the Proposed RMP, existing policies would remain in place to protect cultural resources, so there would be negligible impact on forest management. Policies to maintain or increase monitoring, site patrols and collaboration with Native Americans could have minor negative short-term impacts on forest restoration activities, if management options were restricted. Policies encouraging surveying, regional overviews, stabilization of historic structures and development of National Register nominations would have negligible impact on forest ecosystems.

5.8.3 Impacts to Forest Resources from Lands and Realty

Policies to obtain lands and interests determined to be desirable for consolidation to facilitate management in Backcountry and Frontcountry Zones under the Proposed RMP could have a minor to moderate long-term positive impact on forest management activities by increasing the land base and providing greater opportunities for forest rehabilitation. Lands acquired in the Residential Zone would have minimal impacts on forest management activities.

5.8.4 Impacts to Forest Resources from Inventory Units and Study Areas

5.8.4.1 Wild and Scenic Rivers

Designation of various rivers under the Proposed RMP would have minor impacts on forest management activities, since existing policies already provide similar direction for forest management activities in and around watercourses.

5.8.4.2 Wilderness Characteristic Inventory Units

The Proposed RMP would continue existing policies for management of lands currently designated as WSAs 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. Wilderness characteristics would be protected on an additional 1,465 acres adjacent to the existing King Range and Chemise Mountain WSAs. This would have a negligible impact on forest management, since this acreage is outside of proposed silvicultural treatment areas.

5.8.4.3 ACECs

The Proposed RMP would designate the Mill Creek Watershed as an ACEC to protect the water quality of this important anadromous fish stream/cold water tributary to the Mattole River, and the low-elevation old-growth Douglas-fir forest. This policy could have a positive impact on forest resources, and would not preclude BLM from proposing low-impact forest management projects in the future.

5.8.5 Impacts to Forest Resources from Aquatic and Fisheries Management

Under the Proposed RMP, existing policies would remain in place to restore and maintain ecological health of watersheds and aquatic habitats and implement up-slope sediment reduction resulting in a potential minor negative impact to forest resources, by restricting the location and extent of forest management/restoration opportunities.

5.8.6 Impacts to Forest Resources from Wildlife Management

Under the Proposed RMP, existing programs would continue to protect wildlife during forest management activities, resulting in negligible impact to forest management.

5.8.7 Impacts to Forest Resources from Terrestrial Ecosystems/Vegetation Management

Under the Proposed RMP, existing programs would be continued to eradicate invasive plant species, maintaining a mosaic of compositionally and structurally diverse habitat types; this would have a negligible impact on forest management activities.

5.8.8 Impacts to Forest Resources from Forest Management

Under the Proposed RMP, existing policies would remain in place to maintain and enhance old growth forests, resulting in a major positive impact on forest ecosystem management and restoration. Goals to conduct silvicultural treatments and promote forest restoration (tree planting) would have a long-term positive impact. The Proposed RMP would allow silvicultural treatments and selected post-fire salvage operations, which could reopen old logging roads and/or build new temporary short spur roads; these actions would only be conducted if they were anticipated to have a moderate to major positive impact to forest health and ecosystem restoration. Based on fire history for the KRNCA, it is anticipated that salvage logging would be a relatively minor component of forest management. During the 23-year period ending in December 2003, only seven fires occurred that were larger than 100 acres. Of these fires, five occurred in the proposed Backcountry Zone which would be closed to salvage in this plan. The other two fires included acreage in the proposed Frontcountry Zone. One fire (the 2003 two-hundred-acre "10" fire) was a moderate intensity burn in a mixture of old-growth and second-growth forest. Since the fire was not stand replacing, it has benefited forest structure, and salvage would not meet the objectives of the Northwest Forest Plan or this plan as it would not improve late successional characteristics. The other fire (1988 Saddle Fire) burned mostly in the Backcountry, but also roughly 500 acres in the Frontcountry Zone. Of this, only five acres was salvaged along the King Peak Road for safety reasons.

In summary, salvage is foreseen to be a minor but positive tool for forest ecosystem management in the area over the life of this plan.

5.8.9 Impacts to Forest Resources from Special Forest Products Management

Issuance of permits to collect mushrooms, beargrass, floral trade species, and fuelwood proposed under the Proposed RMP would have a negligible effect on forest resources and management activities, and a minor to moderate positive effect on special forest products.

5.8.10 Impacts to Forest Resources from Grazing Management

Under the Proposed RMP, existing policies would remain in place to preclude loss or reductions in grazing allotments or AUMs, resulting in no changes to current rangeland management and negligible impact to forest resources.

5.8.11 Impacts to Forest Resources from Fire Management

Fire management activities in the Proposed RMP would have moderate to major positive long term effects on forest management activities, due to reduction in the risk of fire. The geographic extent of this effect would depend on the number and extent of future fires and the associated rehabilitation.

Suppression of fires within the Residential Zone would have negligible impact on forest ecosystems. Aggressive suppression activities in the Frontcountry Zone could have a moderate localized negative impact on forest management, depending on the nature and extent of a fire and its suppression activities. Some of these effects could have a long-term negative effect on forest management. However, utilization of prescribed fire and mechanical methods in the Frontcountry Zone to manage fuels could have a moderate long-term beneficial impact on forest resources.

Managing for low intensity fires in the Backcountry Zone would likely have a long-term moderate to major positive impact on forest resources, depending on the size and extent of future fires. It is possible that long-term negative impacts could occur locally as a result of the loss of valuable forests to a fire, but re-establishing the natural role of fire would have moderate to major positive long-term effects on forest management as a result of creating a landscape resistant to intense and/or stand-replacing type fires.

5.8.12 Impacts to Forest Resources from Travel Management

The Proposed RMP would continue existing policies to provide a network of roads that complement the rural character of the King Range, so there would be negligible impact on forest management.

5.8.13 Impacts to Forest Resources from Recreation

The Proposed RMP would continue existing policies regarding visitor information, road and trail maintenance, resource protection, visitor safety, special recreation permits, cooperative management, exclusionary fence and barrier construction, enforcement, and Universal Accessibility Standards, so there would be negligible impact on forest management activities. It would also increase the visitor use

allocation system to allow moderate use numbers in the Backcountry and Frontcountry Zones, which could have a minor negative impact on forest resources.

5.8.14 Impacts to Forest Resources from Interpretation and Education

The Proposed RMP would continue existing policies that provide information to visitors, which would have a minor beneficial impact on forest management activities.

5.8.15 Potential Cumulative Impacts to Forest Resources

Efforts to maintain and increase old-growth forest habitat in the KRNCA, as well as linking this habitat to other old-growth forest areas in the region (Humboldt Redwoods State Park, Gilham Butte, Sanctuary Forest), would result in a moderate beneficial cumulative impact to late successional forest management. Removal of certain tracts of timber from the regional forest harvest base through combined efforts of land conservancies, the BLM, and other public agencies would result in minor negative cumulative impacts to the forest products production (see Lands and Realty section for anticipated land/easement acquisition acreage in the area, and social/economic section for economic impacts of area management).

5.9 IMPACTS TO GRAZING RESOURCES

Under the Proposed RMP, decisions relating to grazing management are within parameters defined by current BLM grazing regulations and the California Standards for Rangeland Health and Guidelines for Livestock Management.

5.9.1 Impacts to Grazing Resources from Visual Resources Management

The Proposed RMP would classify the northern part of the Frontcountry Zone (which contains all of the allotment acreage in the Frontcountry Zone) in the Class II designation. This would have minor impacts on grazing by requiring any improvements (fencing, water troughs, etc.) to have minimal impacts to the existing landscape. Existing historic ranch improvements (fencing, barns, etc.) make up the cultural landscape that contributes to the pastoral scenic quality of the area, so improvements that mimic these qualities would be permitted. This would not affect the function of grazing operations, but could add costs to the improvements. The Proposed RMP would classify the Backcountry Zone as Class I. This would also result in minor impacts to grazing management as improvements would follow similar, but more stringent requirements than Class II.

5.9.2 Impacts to Grazing Resources from Cultural Resources Management

Under the Proposed RMP, existing policies would remain in place to protect cultural resources from grazing impacts; therefore there would be no impact on grazing management. Policies to maintain or increase monitoring, site patrols and collaboration with Native Americans under the Proposed RMP would have no impact on grazing resources. Policies encouraging surveying, regional overviews, stabilization of historic structures, and development of National Register nominations would have negligible impacts on grazing resources, unless they required fencing off some site areas, which could have a minor negative impact.

5.9.3 Impacts to Grazing Resources from Lands and Realty

Policies to obtain lands and interests determined to be desirable for consolidation so as to facilitate management in Backcountry and Frontcountry Zones under the Proposed RMP could have a minor beneficial impact on grazing resources by increasing grazing operator flexibility. Policies to consider new rights-of-way for roads in the Frontcountry Zone could have a minor beneficial impact on grazing resources by increasing grazing operator flexibility.

5.9.4 Impacts to Grazing Resources from Inventory Units and Study Areas

Under the Proposed RMP, there would be no impact on grazing resources from Wild and Scenic River designations because authorized livestock grazing use is compatible with that designation and protection of wild and scenic river values under that designation is subject to valid existing rights. The Proposed RMP would cause no impact on grazing resources from protective management for wilderness characteristics because grazing is a valid use in Wilderness Study Areas and under the Backcountry Zone land allocation. In addition, no impact on grazing resources would occur from Areas of Critical Environmental Concern (ACEC) designations because no active grazing allotments are located in the proposed Mill Creek Watershed ACEC, and cattle are already excluded from the Mattole ACEC.

5.9.5 Impacts to Grazing Resources from Aquatic Ecosystems and Fisheries Management

Under the Proposed RMP, existing policies would remain in place to restore and maintain ecological health of watersheds and aquatic habitats and implement up-slope sediment reduction. Permitted grazing operations have already been excluded from creek bottoms, and changed to seasonal use to improve the conditions of rangelands and improve water quality. Additional changes are possible based on results from rangeland condition assessments and water quality monitoring, but are likely to be small in scale and result in minor impacts to operations.

5.9.6 Impacts to Grazing Resources from Terrestrial Ecosystems and Vegetation Management

Under the Proposed RMP, existing programs which eradicate invasive plant species would be continued, thereby potentially leading to slight improvements in forage quality. This could result in a minor beneficial impact on grazing resources. Prescribed fire, limited conservation grazing outside of existing grazing allotments, and native grass enhancement projects would be used to maintain healthy and productive grasslands; this could result in moderate beneficial impacts to grazing resources.

5.9.7 Impacts to Grazing Resources from Wildlife Management

Under the Proposed RMP, existing policies would remain in place to maintain and enhance natural wildlife populations, minimize or eliminate the need for listing of additional species under the ESA, and contribute to the recovery of listed species. Because the plan would continue existing policies, there would be no impact on grazing resources. Actions specific to various listed species identified would not affect grasslands within active grazing allotments, so would result in no impact on grazing resources.

Policies enacted under the Proposed RMP to facilitate research and monitoring of wildlife would have no impact on grazing resources.

5.9.8 Impacts to Grazing Resources from Forest Management

Under the Proposed RMP, existing policies would remain in place to maintain and enhance old growth forests; as this would not affect grazing allotments, there would be no impact on grazing resources. Goals to conduct silvicultural treatments and promote forest restoration (tree planting) would not affect the grasslands within the active grazing allotments, so there would be no impact on grazing resources from forest management.

5.9.9 Impacts to Grazing Resources from Special Forest Products Management

Issuance of permits to collect mushrooms, beargrass, floral trade species, and fuelwood proposed under the Proposed RMP would not affect the grasslands within the active grazing allotments, so there would be no impact on grazing resources from special forest products. Policies to monitor mushroom collection methods, coordinate with local tribes regarding use of beargrass, and active management of beargrass resources would also have no impact on grazing resources.

5.9.10 Impacts to Grazing Resources from Grazing Management

Under the Proposed RMP, existing policies would remain in place to preclude loss or reductions in grazing allotments or AUMs, resulting in no impact on grazing resources. The Spanish Flat allotment boundary would be adjusted to exclude 500 acres of a terraced prairie between Spanish and Randall Creeks to protect significant cultural sites, but the number of Animal Unit Months (1,105 AUMs) would remain unaltered. Because this only represents about a five percent decrease in size of this allotment, and the Residual Dry Matter (RDM) target levels have been consistently exceeded on this allotment (implying more than adequate levels of forage), the adverse impact on grazing resources would be negligible. Under the Proposed RMP, four expired grazing leases would be administratively changed from available to unavailable for grazing. Because these leases are inactive and are unsuitable for livestock grazing because of forest regrowth or sensitive soil conditions, this would have a negligible impact on grazing resources.

5.9.11 Impacts to Grazing Resources from Fire Management

The Proposed RMP would suppress all fires in the Frontcountry, a continuation of existing policies in that zone with no impact on grazing resources. It would also utilize prescribed fire in the Frontcountry and Backcountry Zones for unique habitat improvement such as maintaining coastal prairies in an early successional stage. This would have a significant beneficial impact on grazing resources.

5.9.12 Impacts to Grazing Resources from Travel Management

The Proposed RMP would continue existing policies to provide a network of roads that complement the rural character of the King Range. Use of some unimproved roads not maintained under the travel management plan would continue by authorized grazing permittees. Several of these routes are in

landslide-prone areas and subject to failure. If routes fail, permittee access opportunities would need to be reevaluated and alternative access means considered (such as horseback, etc.). This could result in moderate impacts to these permittees.

5.9.13 Impacts to Grazing Resources from Recreation

The Proposed RMP would continue existing policies regarding visitor information, road and trail maintenance, resource protection, visitor safety, special recreation permits, cooperative management, exclusionary fence and barrier construction, enforcement, and Universal Accessibility Standards, so there would be no impact on grazing resources. It would also establish a visitor use allocation system to allow moderate use numbers in the Backcountry Zone. As use levels increase, there would be a corresponding increase in the potential for vandalism of grazing management facilities (fences, water developments etc.) from recreational visitors, but the allotments in this zone are not located near heavily used trails, so this would only cause a minor adverse impact. The Proposed RMP would also allow heavier visitor use in the Frontcountry Zone, but allotments in this zone are also not located in proximity to heavily used trails, so the impact to grazing resources from potential vandalism would be minor in that zone also, except for continued moderate localized impacts in the Prosper Ridge Road area.

5.9.14 Impacts to Grazing Resources from Interpretation and Education

The Proposed RMP would continue existing policies to provide information to visitors, including information on historic and existing grazing programs, so there would be a minor positive impact on grazing resources.

5.9.15 Potential Cumulative Impacts to Grazing Resources

Cumulative impacts to grazing resources are expected to be negligible or nonexistent.

5.10 IMPACTS TO FIRE MANAGEMENT

Under the Proposed RMP, the Fire Management program and activities are guided by existing fire management policies that are contained in BLM national regulation, state directives, unit management plans and supplemented by cooperative agreements for fire protection.

5.10.1 Impacts to Fire Management from Visual Resources Management

Under the Proposed RMP, the Visual Resources Management program would have minor impacts on the Fire Management program, based on requirements for fuels treatment and suppression rehabilitation activities to meet VRM class objectives.

5.10.2 Impacts to Fire Management from Cultural Resources Management

Under the Proposed RMP, the Cultural and Historic Resources management program with its existing and proposed policies would have negligible impacts on the Fire Management program. Some minor modifications to pre-suppression and suppression activities may be required to avoid impacts to sensitive

cultural sites. However, these sites encompass a very small percentage of the overall acreage of the planning area.

5.10.3 Impacts to Fire Management from Lands and Realty

Under the Proposed RMP, the Lands and Realty management program would have minimal impacts on the Fire Management program. Acquisition of additional lands surrounding the KRNCA could have minor beneficial impacts by increasing the opportunities for implementing the fuels management/fuel break program.

5.10.4 Impacts to Fire Management from Inventory Units and Study Areas

Under the Proposed RMP, the Wild and Scenic River protective management and ACEC designations would have no impact on the Fire Management program. Protective management of lands with wilderness characteristics (Backcountry Zone) would not preclude fire and fuels management activities in situations where private land protection, public safety and other priority issues arise, so negligible impacts would occur.

5.10.5 Impacts to Fire Management from Aquatic Ecosystems and Fisheries Management

Under the Proposed RMP, the existing policies for the Aquatic Ecosystems and Fisheries Management programs would remain in place for restoring and maintaining the ecological health of watersheds, aquatic habitats, and up-slope sedimentation reductions. The constraints found in these policies are considered in the current suppression and fuels management programs, and would be continued under implementation of the Proposed RMP, thereby creating negligible impacts on the Fire Management program.

5.10.6 Impacts on Fire Management from Terrestrial Ecosystems and Vegetation Management

Under the Proposed RMP, the Terrestrial/Vegetative Ecosystems Management programs would have minor positive impacts on the Fire Management, as fire would be used as a tool to manage certain ecosystems.

5.10.7 Impacts to Fire Management from Wildlife Management

Under the Proposed RMP, the Wildlife Management program requirements in habitat protection for marbled murrelets and northern spotted owls potentially conflicts with wildfire suppression actions and would have a minor impact on the Fire Management program. The fuels management program activities would provide beneficial long-term effects that enhance vegetative conditions favorable for wildlife species, so the goals would be complementary resulting in a positive impact.

5.10.8 Impacts to Fire Management from Forest Management

Under the Proposed RMP, there are some beneficial effects to Fire Management as the development of mosaic and old growth patterns expand. These vegetative changes enhance the capability for the use of natural ignitions thereby allowing for the more natural role of fire to occur across the landscape.

5.10.9 Impacts on Fire Management from Special Forest Products Management

Under the Proposed RMP, the Special Forest Products program would have no impacts on Fire Management.

5.10.10 Impacts to Fire Management from Grazing Management

Under the Proposed RMP, the Grazing Management program would have no impacts on Fire Management.

5.10.11 Impacts to Fire Management from Fire Management

Under the Proposed RMP, re-establishing the natural role of fire in the Backcountry Zone by allowing natural caused fires to burn within defined suppression actions and constraints provides a long-term beneficial effect to Fire Management. Prescribed burning (broadcast and pile burning) could be used to reduce fuels and create mosaic vegetative patterns in the Frontcountry Zone. Wildfires would burn with variable fire intensities across the landscape thereby minimizing damage associated with large high intensity fires and results in major long-term beneficial effects for fire management, especially suppression. The use of broadcast burning to expand the width of fuelbreaks could provide a larger suppression structure and therefore an improved capability in suppression actions. This would provide a major long-term beneficial effect to the Fire Management program.

5.10.12 Impacts to Fire Management from Travel Management

Under the Proposed RMP, the Travel Management program would have no impacts on the fire management, as existing roads would remain open to provide access.

5.10.13 Impacts to Fire Management from Recreation

Under the Proposed RMP, minor impacts would occur because of the projected increase in use of recreation trails, camping, and developed campgrounds. With increasing numbers of users there is a commensurate increase in wildfire occurrence and risk. The corresponding management focus on backcountry patrols and visitor education/permit requirements would provide a beneficial impact that should offset this potential risk.

5.10.14 Impacts to Fire Management from Interpretation and Education

Under the Proposed RMP, the Interpretation and Education programs would have minor to moderate beneficial impact on the Fire Management program as fire safety is a key message in KRNCA interpretive/educational programs.

5.10.15 Potential Cumulative Impacts to Fire Management

A number of organizations and agencies in Humboldt County—including local Fire Safe councils, State Parks, etc.—have recently been developing fuels management reduction plans. Improved and complementary management of fuels in the King Range would contribute to a moderate cumulative impact in the context of these regional efforts.

5.11 IMPACTS TO TRAVEL MANAGEMENT

Under the Proposed RMP, County roads within the KRNCA are public routes and are managed by Humboldt County, with the exception of a short segment of Chemise Mountain Road at the southern tip of the KRNCA, which is managed by Mendocino County. All other roads are managed under the jurisdiction of the BLM.

5.11.1 Impacts to Travel Management from Visual Resources Management

Under the Proposed RMP, visual contrast ratings for existing roads and facilities would be conducted and opportunities for reducing existing visual impacts through modifications (e.g., painting culverts, removing road berms, etc.) identified. Modifications would serve to blend roads and facilities into the landscape, minimizing their visual impact and resulting in a minor, beneficial, and localized impact. A complete inventory of existing and potential key scenic vistas along road and trail corridors would be undertaken, and opportunities would be identified for enhancing these locations. Construction of scenic pullouts would result in moderate, beneficial, and localized impacts to roads and facilities by increasing opportunities for viewing scenic vistas. Impacts to roads and facilities, including through modifications and construction of scenic pull-outs would be considered long-term.

The Proposed RMP would change the Frontcountry Zone north of King Range Road and west of the King Peak Road to the Class II VRM designation. This would have a minor to moderate impact on transportation facilities by requiring that any changes/improvements meet VRM Class II standards. Continued designation of the Residential Zone as Class IV would allow for transportation improvements needed for vehicular safety and operations, as are currently allowed.

5.11.2 Impacts of Travel Management from Cultural Resources Management

Under the Proposed RMP, policies proposed to protect cultural resources would have minor impacts to road maintenance activities by limiting road grading and facility construction near cultural and historic resources. Proposed policies to protect the character of historic resources, such as Chambers Ranch and hunting cabins located on King Peak Road, would have impacts on transportation by limiting the extent of improvements allowed on those roads. This impact would be minor, localized, and long-term (no major road improvements are foreseen). In addition, policies to protect subsurface cultural resources would have a minor, localized, and long-term impact to road grading and roadway improvements construction (culverts, crossings, etc.) activities by requiring avoidance of cultural resources.

5.11.3 Impacts to Travel Management from Lands and Realty

There would be minor to moderate beneficial impacts on travel management from the Lands and Realty Program, depending on the extent of access improvements to public lands realized through future land acquisitions. All private land inholders are assured reasonable access to their properties through existing laws and statutes.

5.11.4 Impacts to Travel Management from Inventory Units and Study Areas

The Wild and Scenic Rivers or ACEC designations would have minor impacts on travel management, as roads that pass through or near those proposed areas are compatible with their management. The only exception is vehicle use in the Mattole Estuary (Mattole Beach ACEC) which would be limited to a designated route. This would cause only minor negative impacts to current vehicle users as access to much of the estuary would continue. Wilderness characteristic inventory units would also not impact transportation, as there are no roads in the proposed areas.

5.11.5 Impacts to Travel Management from Aquatic Ecosystems and Fisheries Management

Under the Proposed RMP, existing policies for restoring and maintaining ecological health of watersheds and aquatic habitats and implementing up-slope sediment reduction would remain in place and would not create impacts to travel management. New standards and guidelines could have minor, localized, long-term beneficial impacts to roadways by requiring out-sloping, and improving culverts at stream crossings.

5.11.6 Impacts to Travel Management from Terrestrial Ecosystems and Vegetation Management

No impacts identified.

5.11.7 Impacts to Travel Management from Wildlife Management

Under the Proposed RMP, existing policies would remain in place regarding road maintenance to avoid disturbance of special status species. There would be no impact to travel management from continuation of these policies.

5.11.8 Impacts to Travel Management from Forest Management

Under the Proposed RMP, decommissioned roads would be subject to reforestation through tree planting. Reforestation would eliminate decommissioned roads and simplify the road network. Since none of the routes are currently open to public access, there would be no impact. Old logging roads could be reopened and new temporary roads built to remove burned or fire-killed lumber. This would temporarily expand the road network without affecting public access.

5.11.9 Impacts to Travel Management from Special Forest Products Management

Permits are currently issued to collect special forest products in the KRNCA. There could be minor impacts to travel management from increased use of road system by special forest products gatherers. This impact is anticipated to be negligible.

5.11.10 Impacts to Travel Management from Grazing Management

None of the proposed grazing management actions would impact travel management.

5.11.11 Impacts to Travel Management from Fire Management

The Proposed RMP includes completion and maintenance of a planned fuel break system. Some roads in the KRNCA are considered fuel breaks (King Range Road, Smith-Etter Road, Paradise Ridge Road, and Saddle Mountain Road) and would be maintained as part of the system. Inclusion of roads as part of the fuel break system would require consideration of impacts to fuel breaks in any discussion of modifications to road alignments. No major realignments are proposed at this time, so the impact would be negligible, unless landslides or other weather or seismic events occur.

5.11.12 Impacts to Travel Management from Travel Management

Under the Proposed RMP, all roads with the exception of Etter Road, and Mattole Estuary Roads would operate under existing conditions. Etter Road would be opened to 4-WD vehicles from April 1 through October 31, and Mattole Estuary Road would be opened. These changes would represent a minor, localized, and long-term positive transportation impact by increasing access on these roads. The elimination of non-emergency boat landings would cause moderate localized negative impacts to a small group of visitors who currently land boats on Big Flat and other parts of the coast.

5.11.13 Impacts to Travel Management from Recreation

The Proposed RMP would continue existing policies regarding visitor information, road and trail maintenance, Universal Accessibility Standards, and monitoring of visitor use so there would be no impact on transportation. It would also provide barriers such as gates and fences, as needed, to block vehicular access to designated closed areas, and trailhead facilities, including parking, which would create a moderate beneficial impact by keeping vehicles on routes designed for their use.

The Proposed RMP could create a new trailhead at Bear Creek, requiring reopening/hardening of the existing road. This road work would be a minor beneficial impact by providing additional parking/vehicle access. It would also possibly upgrade the parking lot at Mal Coombs Park to make more efficient use of space. Expansion of the parking lot would involve construction and would be considered a moderate, localized, and long-term positive impact by improving the vehicle capacity and flow at this often congested site. Parking spaces would be added at Black Sands Beach when opportunities arise; this expansion would involve construction and would be considered a moderate, localized, and long-term impact.

5.11.14 Impacts to Travel Management from Interpretation and Education

The Proposed RMP would continue existing policies to provide information to visitors, including detailed information on road conditions and safety. This would be a beneficial impact on travel management.

5.11.15 Potential Cumulative Impacts to Travel Management

Population growth in southern Humboldt County over the life of this plan could result in minor cumulative traffic impacts by adding use to the BLM King Range transportation network. Also, increased visitor use in the King Range along with population growth would cause moderate impacts by adding to vehicle traffic on the county road system. Although existing vehicle use data is available for several area county roads, no future use projections are available.

5.12 IMPACTS TO RECREATION

The Proposed RMP would continue policies regarding visitor information and adequate maps, road and trail maintenance, resource protection, visitor safety, special recreation permits, cooperative management, exclusionary fence and barrier construction, enforcement, Universal Accessibility Standards, and stressing compliance with coastal “leave no trace” principles. These policies would have a long-term minor beneficial impact on recreation.

Policies would remain in place to provide supplementary rules and regulations that protect resources, visitor safety, and the surrounding community. Examples of such rules include campfire prohibitions during extreme fire conditions, requiring bear proof food containers in the backcountry, and not allowing camping on BLM lands within Shelter Cove. Rules such as these would have minor impacts on recreation because visitor behavior or equipment usage would only have to change slightly to comply with the new rules.

Policies regarding special recreation permits would have a negligible beneficial impact on recreation by maintaining consistent use within the management zones, and prohibiting incompatible use which could create conflicts with other recreational users in that zone.

Policies to control unauthorized visitation from public land onto private land and to restrict vehicle use within designated areas would have a long-term, minor, and beneficial impact on recreation. Enforcing existing regulations and applying other regulations for visitor safety or resource protection would have a long-term, moderate, and beneficial impact, because the regulations would help to reduce visitor safety incidents, conflicts with other users, and would ensure additional protection of sensitive resource areas.

Policies ensuring that Universal Accessibility Standards under the Americans with Disabilities Act are met would have a long-term, moderate, and beneficial impact on recreation. Visitors with disabilities would have an improved recreational experience at KRNCA because of improved access to recreational areas, trails, campgrounds and other facilities.

Use allocation measures would have a long-term beneficial impact on the quality of the recreation experience by reducing noticeable resource impacts and user encounters. However, implementation of such a system would displace users geographically and temporally.

5.12.1 Impacts to Recreation from Visual Resources Management

Policies included in the Proposed RMP would require visual contrast ratings, inventory existing and proposed scenic vista points, and ensure non-detracting coastal development. These would have a positive impact on recreation by ensuring that the scenic quality of the King Range is maintained—a primary feature that attracts visitors to the area.

The Proposed RMP would manage the Backcountry Zone as VRM Class I, which could require some facilities or structures, including fences and dilapidated buildings, to be removed in order to maintain the Class I rating. This would result in a minor positive impact to recreation by removing unnatural features. Visitors and local residents who recreate in the Backcountry Zone because of its primitive qualities, relative solitude, and natural scenic character, would continue this experience resulting in a moderate beneficial and long-term impact on recreation. Maintaining the Frontcountry Zone as VRM Class II and III and the Residential Zone as VRM Class IV would result in no impacts on recreation.

5.12.2 Impacts to Recreation from Cultural Resources Management

Under the Proposed RMP, existing policies involving the issuance of permits, field evaluations, use allocations, safeguards against incompatible uses, and archaeological inventories would have no impact on recreation. Policies encouraging appropriate educational and interpretive outreach would have a long-term, minor, and beneficial impact on recreation by providing additional cultural information and opportunities that would enhance visitors' recreational experiences at the KRNCA. All three management zones (Backcountry, Frontcountry, and Residential) would have priority for protection, which would result in minor to moderate beneficial impacts on recreation, due to visitors and local users who are interested in viewing and learning about historic resources and their preservation. These impacts would be long-term. If cultural resource monitoring indicated that recreation use is impacting archaeological sites, some fencing/closure of specific sites may be necessary. This would be a minor and localized impact.

The Proposed RMP provides for additional actions encouraging further surveying of the Frontcountry Zone, regional overviews, stabilization of historic properties, and development of National Register nominations for historic and prehistoric districts. These policies and actions would result in long-term, moderate, and beneficial impacts on recreation, because of the positive interest expressed by visitors and local users who visit KRCNA towards the preservation of cultural and historic resources, opportunities for volunteer outreach, and the opportunities for education and interpretation of these resources.

5.12.3 Impacts to Recreation from Lands and Realty

Policies to acquire lands and interests determined to be desirable for consolidation to facilitate management would have minor to major positive impacts to recreation depending upon whether acquisition opportunities facilitate public access, or provide new linkages to adjacent recreation areas.

Impacts would be considered beneficial and long-term with respect to providing additional land for recreational use.

Policies to consider new rights-of-way and/or permits for roads/utilities in the Frontcountry and Residential Zones under the Proposed RMP could impact recreation positively (for those visitors wanting roaded opportunities) if access is improved by the new roads. However, since the majority of the recreation areas in the Frontcountry and Residential Zones are currently accessible by road, additional road rights-of-way would have only long-term negligible negative impacts. The level of impact would depend on each individual case and location relative to the KRNCA; however, it is possible that additional road rights-of-way would open some areas to increased vehicle access where none exists currently.

Excluding the Backcountry Zone from consideration of new rights-of-way under the Proposed RMP would have minor positive impacts to recreation by protecting the primitive qualities of the area. Utilities rights-of-way under the Proposed RMP would result in negligible or minor impacts to recreation, as rights-of-way would be restricted to existing and/or underground locations to maintain aesthetic values.

5.12.4 Impacts of Recreation from Inventory Units and Study Areas

Recreation impacts associated with inventory units and study areas would be related to potential changes in access and allowable uses, existing and proposed trail routes, and location of existing or proposed facilities.

5.12.4.1 Wild and Scenic Rivers

Under the Proposed RMP, there would be ten additional river segments found suitable for designation under the National Wild and Scenic Rivers System (NWSRS). This would be a positive impact on recreation by protecting the outstandingly remarkable values of the watersheds, as the clear, free-flowing streams are a major visitor attraction in the KRNCA.

5.12.4.2 Wilderness Study Areas and Wilderness Characteristic Inventory Units

Under the Proposed RMP, lands currently designated as WSAs would be managed 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. Under the Proposed RMP, there would be no impact on recreation within the Backcountry Zone, which is mostly within the WSA. This is because the Proposed RMP suggests minimal to no new recreational facilities or development within the Backcountry Zone and WSA, other than those compatible with WSA management or wilderness designation. Impacts would occur to mountain biking and are discussed in the "Impacts from Recreation Management" section (5.12.13).

5.12.4.3 ACECs

Under the Proposed RMP, an additional ACEC designation would be proposed for Mill Creek Watershed (approximately 680 acres) including all BLM managed lands within the watershed in order to protect water quality important to anadromous fish stream/cold water tributary; and the low-elevation

old-growth Douglas-fir forest. There would be minor impacts on recreation as ACEC designation would not preclude most recreational uses and primitive recreation would still be allowed. Some restrictions to visitor use to protect ACEC values such as a ban on campfires and no overnight camping may cause minor localized impacts to recreation.

5.12.5 Impacts to Recreation from Aquatic and Fisheries Management

Under the Proposed RMP, existing policies would remain in place to restore and maintain the ecological health of watersheds and aquatic habitats on public lands, so there would be no impact on recreation. The riparian standards and guidelines are already in place so would not create additional impacts on recreation.

Implementing projects pertaining to in-stream habitat enhancement, riparian silviculture and monitoring measures as outlined under the Proposed RMP would not impact recreation. However, recreation could be affected by road decommissioning related to several of the up-slope sediment reduction projects. However, roads selected for decommissioning are not open to vehicle travel, and only used by a small number of off-trail hikers or hunters, so impacts are negligible. For other recreational users, decommissioning of some roads for habitat enhancement provides opportunities for experiencing a healthier and naturally functioning ecosystem, which would enhance their own recreational experience. In this regard, impacts on recreation from habitat enhancement could also be minor, beneficial, and long-term.

Implementing the estuary enhancement program would result in long-term, negligible, and beneficial impacts on recreation, related to the value placed on visitors being able to view enhanced estuarine ecosystems.

5.12.6 Impacts to Recreation from Wildlife Management

Under the Proposed RMP, policies would remain in place to maintain and enhance natural wildlife populations, minimize or eliminate the need for listing of additional species under the ESA, and contribute to the recovery of listed species. These policies could have minor localized impacts on recreation visitors; for instance, because of limiting operating periods and equipment use for trail maintenance, some trails damaged by winter storms may not be accessible until later in the season. Actions specific to bald eagles, snowy plovers, marbled murrelets, spotted owls, and Steller's sea lions would not impact recreation. Additional policies on facilitating research and monitoring of wildlife, special-status amphibians and reptiles, game species, would not impact recreation. Support of wildlife reintroductions could benefit recreation by providing additional viewing opportunities. Intertidal habitat policies to educate visitors would have long-term minor beneficial impacts on the recreational experience from learning new information and helping to reduce visitor impacts on intertidal species. Other intertidal habitat policies would not impact recreation.

5.12.7 Impacts to Recreation from Terrestrial Ecosystems and Vegetation Management

The Proposed RMP has specific management actions for different habitat types. Policies to maintain coastal dunes would not impact recreation, unless increased public use negatively impacts dune

vegetation. This would result in restrictions to cross-country dune hiking which would have minor impacts to recreation access. Prescribed burning policies for coastal scrub, grassland, and chaparral may have very localized short-term impacts on recreation if recreational use was temporarily suspended in areas where burns were taking place, or access to other recreation areas was prohibited due to prescribed burning. Visually, the burned area could have a short-term minor adverse impact on the recreational experience if it is very close to a trail or campground. If prescribed burns are done so they are sensitive to location, timing and frequency, impacts on recreation would be short-term and minor to moderate. Additionally, there could be minor beneficial impacts following a prescribed burn, depending on location, due to the effects of revitalized vegetation and the appearance of wildflowers within the burned area. These impacts could be long or short-term.

Limited grazing for coastal scrub and grassland management could have minor localized negative impacts on recreation depending on where it took place. If grazing were to take place in the Backcountry Zone near a trail or campground, the impact to recreation would be short-term and minor adverse due to the sight and smell of domestic animals in a wilderness environment, and having to avoid cow feces. There would be no impacts to recreation if grazing were done so that it was not detectable to recreational users on trails and in campsites.

Other policies for habitat management of coastal scrub, grasslands, and chaparral would not impact recreation. Policies regarding efforts to map, monitor, and eradicate invasive plant species would not impact recreation. Policies regarding sudden oak death would impact recreation from negligible to moderate levels, depending on the use requirements/limitations that need to be imposed to slow the spread of the pathogen. The level of visitor impacts cannot be estimated at this time as methods for slowing the spread of this disease are not fully understood.

5.12.8 Impacts to Recreation from Forest Management

Under the Proposed RMP, policies to maintain forest stand characteristics and late-successional/old growth forest habitat would not affect existing recreational facilities or trails, so there would be no impact on recreation. Policies on salvaging timber in the Frontcountry and Residential Zones could impact the recreation experience if access were affected or closed, recreational use temporarily suspended in some areas, or if operations were visually distracting or disturbing to the traditional landscape scene. Short-term negligible impacts would occur if access roads were temporarily closed or restricted; no impact would occur if timber salvaging was carried out away from recreation areas and the salvaging operations were not visible to recreational users. Management goals of promoting a natural mosaic of forest vegetation with a large component of old-growth forest would be a major beneficial impact, as the large forests of Northwest California are a major visitor attraction.

As for specific areas requiring treatments, thinning, or pile burning in Nooning Creek and Finley Ridge, Bear Trap Creek, and Kaluna Cliff could potentially cause negligible impacts to recreation, as these projects are not close to popular use areas.

5.12.9 Impacts to Recreation from Special Forest Products Management

Many non-commercial special forest products gatherers pursue collecting as a recreation activity, and continuation of the program in the Proposed RMP would provide beneficial impacts to these collectors.

Issuance of permits to collect mushrooms, beargrass, floral trade species, and fuelwood under the Proposed RMP would not impact recreation, as these are continuations of existing policies. Most policies regarding beargrass would not impact recreation, except the policy to coordinate with local tribes to increase awareness and education regarding cultural use of beargrass and implementation of active management efforts. Increased awareness and education could have a long-term, negligible, and beneficial impact on the visitor experience at KRNCA. Implementation of active management efforts, such as prescribed burns in a designated “Native American Beargrass Collection Unit,” could have a localized minor to moderate, short-term, and adverse impact on recreation. This could occur if the prescribed burns were carried out in close proximity to trails or campground areas, resulting in temporary closure of the recreation area.

5.12.10 Impacts to Recreation from Grazing Management

Under the Proposed RMP, existing policies would remain in place to preclude loss or reductions in grazing allotments or AUMs, resulting in no impact on recreation with one exception. The reconfiguration of the Spanish Flat allotment to remove cattle from the beach would provide a minor beneficial impact to Lost Coast Trail users.

5.12.11 Impacts to Recreation from Fire Management

Under the Proposed RMP, policies regarding campfire permits would remain the same and therefore would not impact recreation. Wildfire prevention and education programs would have a long-term negligible beneficial impact on visitor experience by increasing the awareness and knowledge of visitors and local recreational users. They would also have a positive impact by reducing the incidence of fire damage and associated visual impacts at popular campsites. This is a recurring problem along the Lost Coast Trail where unattended campfires become wildfires. Policies regarding utilization of prescribed fire and mechanical fuel reduction methods to manage fuels for low intensity wildfires; reduction of fire spread within the Frontcountry and Residential Zones; and completion and maintenance of planned fuel break systems would not impact recreation. Prescribed burning activities could impact recreational use, based on their location, timing, and frequency. As with prescribed burning to maintain habitat, burning may have very localized, short-term, minor adverse impacts on recreation if recreational use was temporarily suspended in areas where burns were taking place, effects of smoke and reduced visibility were present in adjacent areas, or if access were restricted/prohibited due to burning (see Section 4.12.7, Impacts from Terrestrial Ecosystems and Vegetative Management).

Visually, the prescribed burn areas could have an impact on the recreational experience if it is very close to a trail or campground. Broadcast burning would have these impacts more than pile burning would since pile burning is typically localized. If prescribed burns are carried out close to high use trails, campgrounds, or access roads, impacts could be short-term and moderately adverse. If burns are planned and announced in advance to the public and are sensitive to location, timing and frequency, potential impacts on recreation would be negligible.

Mechanized fuel reduction may result in impacts to recreation depending on the timing and location of projects. If the projects are close to recreation areas, especially during periods of high use, the noise and visibility of the projects could result in short-term minor adverse impacts. If projects were carried out to

avoid popular recreation areas and peak use times of the year, impacts would be short-term and negligible.

In the Proposed RMP, naturally occurring fires in the Backcountry Zone would be allowed to burn. This policy may impact recreation due to temporary trail, campground, or access closure; damage to recreational facilities; and alteration of the visual landscape setting. If a fire is allowed to burn along a trail or around a recreation area, the visual setting could potentially be altered, as well as recreational facilities damaged. Depending upon the extent of the fire, the burned area could negatively affect the recreational experience of visitors and local users at KRNCA. The level of impact could range from no impact to major adverse. Management activities that reduce the likelihood of a catastrophic fire decrease the likelihood that impacts from fires would be severe. Therefore, in the long-term, the overall impact from the fire management program on recreation would be positive.

5.12.12 Impacts to Recreation from Travel Management

The Proposed RMP would continue existing policies to provide a network of roads that complement the rural character of the King Range. All roads with the exception of Etter Road and Mattole Estuary Roads would operate under existing conditions. Etter Road would be opened to 4-WD vehicles and Mattole Estuary Road would be opened. These changes would have a minor beneficial impact on recreation.

Not allowing motorized boat landings along the Lost Coast within the Backcountry Zone or the Mattole Estuary would have a minor adverse impact based on the small number (estimate less than 100 visitors annually) of visitors who presently use this access mode. However, the action would have minor immediate positive impacts by reducing the sights and sounds of motorized watercraft in keeping with the management goals of the Backcountry Zone. Based on anticipated growth in motorized beach access without management controls, this action would have a moderate to major long-term positive impact on visitors accessing the coast for a wilderness experience. Eliminating these landings would also help decrease trash left behind, thus improving the appearance and maintenance of the Backcountry.

5.12.13 Impacts to Recreation from Recreation Management

The Proposed RMP would continue policies regarding visitor information and adequate maps, road and trail maintenance, resource protection, visitor safety, special recreation permits, cooperative management, exclusionary fence and barrier construction, enforcement, Universal Accessibility Standards, and stressing compliance with coastal “leave no trace” principles. These policies would have a long-term, moderate, and beneficial impact on recreation. By providing improved visitor information and maps, visitors would leave recreational areas and trails in better condition and fewer visitors would get lost in the rugged terrain. Adequate and timely maintenance of roads, facilities, trails and signs would also have a long-term, moderate, and beneficial impact on recreation by providing opportunities for visitors to easily obtain directional information and avoid access constraints which could detract from the visitor overall experience.

Policies would remain in place to provide supplementary rules and regulations to protect resources, visitor safety, and the surrounding community. Examples of such rules could include campfire prohibitions during extreme fire conditions, requiring bear proof food containers in the Backcountry, and

not allowing camping within the Shelter Cove subdivision. Rules such as these would have minor impacts on recreation because visitor behavior or equipment usage would only have to change slightly to comply with the new rules.

Policies regarding special recreation permits would have a negligible beneficial impact on recreation by maintaining consistent use within the management zones, and prohibiting incompatible use which could create conflicts with other recreational users in that zone.

Encouraging and promoting cooperative management effort policies would result in positive impacts on recreation.

Policies to control unauthorized visitation from public land onto private land and to restrict vehicle use within designated areas would have a long-term, minor, and beneficial impact on recreation. These policies would maintain recreational use within the appropriate BLM boundaries and reduce boundary conflicts due to unauthorized recreational use, as well as reduce conflicts between unauthorized vehicle use and other allowable uses.

Enforcing existing regulations and applying other regulations for visitor safety or resource protection would have a long-term moderate beneficial impact, because the regulations would help to reduce visitor safety incidents, conflicts with other users, and would ensure additional protection of sensitive resource areas. These benefits would allow visitors to have an improved recreational experience.

Policies ensuring that Universal Accessibility Standards under the Americans with Disabilities Act are met would have a long-term moderate beneficial impact on recreation. Visitors with disabilities would have an improved recreational experience at KRNCA, because of improved access to recreational areas, trails, campgrounds and other facilities.

Any visitor use allocation system would redistribute and modify visitor use patterns. These measures would result in a long-term beneficial impact by increasing the quality of the recreational experience for those visitors. Encounters with other visitors, competition for prime camping locations, and noticeable resource impacts would be diminished. However, some visitors would be displaced by applying use allocation measures, both geographically and temporally.

5.12.13.1 Methodology for Impact Assessment

In determining impacts on recreation, the following visitor use allocation assumptions were prepared to support the Proposed RMP theme and objective for management, along with a corresponding projection for baseline and proposed visitor use growth. Projected recreation visitor days were estimated as follows:

- Determination, by survey data, of popular recreational activities (e.g. backpacking, hiking, and camping)
- Determination of use projections for these activities, based on visitor trends
- Adjust the percentage of increase for a weighted average population increase based on top ten counties that contribute to KRCNA visitation
- Adjust what activities are contributing to growth based on assumptions for the Proposed RMP

- Adjust based on the “uniqueness” of the KRNCA as a backcountry coastal recreation destination with few substitute areas available

Assumptions

- Use allocation system starts in 2010 when backpacking numbers would be restricted to maintain moderate to high opportunities for solitude so backpacking no longer contributes to growth
- Developed campgrounds hit carrying capacity in 2020; no new campgrounds are built, so primitive camping no longer contributes to increased growth
- Continued opportunities for growth of day-use visitors to Shelter Cove and other sites
- Continued opportunities for growth in upland trail use, as these routes are just getting discovered by the public

Table 5-2: Recreation Projections

YEAR	% GROWTH	RANGE OF VISITOR DAYS
2002	Base	144,816
2005	3.77%	150,279 – 165,307
2010	2.30%	153,731 – 176,791
2015	3.05%	158,424 – 190,109
2020	1.32%	160,521 – 200,651
2025	1.46%	162,858 – 211,715

5.12.13.2 Backcountry Zone

Visitor Use Management

Under the Proposed RMP, a visitor use allocation system would be implemented within five years. This would restrict visitor use to a level to provide for high opportunities for solitude, except for holidays and peak weekends when it would provide for moderate opportunities for solitude. Although there would be a slight loss in the quality of the backcountry experience over present levels, overall impacts on backcountry recreation would be long-term moderate and beneficial when compared to current trends of use growth without an allocation system. The system would also restrict freedom of access for some visitors until they receive permits for backcountry travel.

Under the Proposed RMP, group size would increase to 15 people on all trails; the number of people that can leave from a trailhead in one day increases from 25 to 30. Increasing these numbers would have a minor adverse impact on recreation, due to the increased numbers of visitors allowed on the trails in one day, resulting in less opportunity for solitude. Stock use groups could have up to 25 “heartbeats” (people/stock combination), with a maximum of 15 people. This would accommodate historic levels of stock use, and provide opportunities for growth, so should have no impact. These totals would be

reassessed during development of the long-term visitor allocation plan to ensure that impacts to solitude are not greater than anticipated.

The Proposed RMP identifies specific group camping locations within the Backcountry Zone. This would direct group camping opportunities in the Backcountry resulting in a long-term moderate beneficial impact on recreation. Group avoidance areas would also be identified that would be managed for lower visitor levels and limited to specific areas, but would retain other areas at high opportunities for solitude, reducing conflicts between larger groups and people looking for solitude and quiet.

In regard to commercial groups (businesses who charge fees for organized activities), the Proposed RMP would not allow commercial group usage on Memorial Day or July 4th weekends, which would limit opportunities for commercial groups, but enhance the recreational experiences of the general public.

The Proposed RMP calls for charging a nominal fee for overnight use, for reinvestment in management of resources and visitor services. Although some people may not be able to afford to recreate overnight if fees were required, the benefit from reinvesting this money to maintain the visitor experience in the KRNCA would result in this policy having a long-term moderate beneficial impact on recreation.

The Proposed RMP calls for assessing opportunities to move the hunting season to after Labor Day. If this action were implemented it would result in long-term minor beneficial impacts on recreation by removing conflicts and safety concerns, as many of the conflicts between hunters, recreational users, and adjacent landowners occur during the Labor Day holiday weekend. This would have a moderate, adverse impact on hunting enthusiasts who enjoy the start of the hunting season at KRCNA in the late summer months instead of the fall. It would also shorten the hunting season, since the dates could not be extended later due to biological (deer rutting season) considerations.

The Proposed RMP would phase out mountain biking within the Backcountry Zone. Current use of the Backcountry Zone trail system is limited to routes determined to be “ways” in the BLM wilderness inventory. In the King Range, almost all of these inventoried ways are two-track routes that traverse the steep coastal slope. (Note that under the BLM’s *Interim Management Policy for Lands Under Wilderness Review*, the King Crest and Chemise Mountain Trails are closed to mountain bike use. Therefore, mountain bike use on these trails is beyond the scope of this plan.) The routes receive limited use due to the extremely rough terrain and vertical relief. The allowance for continued use of the Cooskie Creek, Spanish Ridge, Buck Creek, and Kinsey Ridge trails under special permit would minimize short-term negative impacts to mountain bikers. Eventual phasing-out of mountain biking would negatively impact the users who currently access the trails (due to the rugged nature of the area, use is low and estimated at approximately 100 visitor days annually). This impact would be partially mitigated by developing a trail system in the Paradise Ridge area. A long-term beneficial impact would be seen by recreation users who are impacted by mountain bikes on trails. The elimination of mountain bikes in the Backcountry Zone would also provide for a higher quality visitor experience of wilderness characteristics as called for under this land use allocation.

The Proposed RMP would have policies regarding overhead flights. These policies would help improve the Backcountry experience by reducing the sight and sound of humans by discouraging low-flying aircraft, resulting in a long-term minor beneficial impact on recreation.

Facility Development

The Proposed RMP would allow development of minimal facilities for visitor safety and resource protection, but not for visitor convenience. Facilities that could be added include Backcountry campsites, a bear proof food storage system, and Backcountry toilets, but only if alternative solutions have proved unsuccessful. Additional facilities would help with issues such as sanitation and could balance use among other sites, however, this could also change the look and feel of areas which did not have development previously. Impacts on recreation would be long-term minor adverse if only a few facilities were added, or long-term moderate adverse if more facilities were added. Construction or maintenance of fences and barriers would be allowed only if alternative means of protection have proved unsuccessful. This could result in long-term minor impacts on recreation due to the visual effect on primitive areas in the backcountry.

Trails

The Proposed RMP would develop new trails as needed, including trails for a wider range of visitors, development of potable water sources near upland trails, and improving horse trails, and creating a horse camp at Miller Flat. An “easy-grade” interpretive trail would be developed at Hidden Valley. These policies would result in long-term moderate beneficial impacts on recreation due to new opportunities for recreation, an increase in the range of users that could access trails, and more increased visitor comfort on trails (water available, more horse facilities).

Signage and Interpretation

The Proposed RMP would maintain the existing signs and interpretive information, as required, to provide for visitor safety and resource protection. Efforts to install way-finding signage at campsites, water sources or other important features would result in long-term moderate beneficial impacts, since these actions would enhance way-finding for visitors, prevent trespassing onto private land, or suffering health risks (such as drinking untreated water from developed water sources). However, unless properly designed to blend into the surrounding landscape, additional signage could also detract from a natural primitive experience present in the Backcountry Zone.

Monitoring

The plan would continue ongoing monitoring programs with some minor which would have no impacts on recreation.

5.12.13.3 Frontcountry Zone

Visitor Use Management

Under the proposed plan, a maximum of eight people would be allowed per campsite at developed campgrounds, as currently managed. Group size at Nadelos group camp could range from 20 to 60 people. This would have no impact on recreation use.

Facility Development

The Proposed RMP would provide and maintain existing facilities, including trailheads, parking, and information kiosks. A proposed trailhead at Bear Creek would provide for additional hiking opportunities for visitors to the Frontcountry Zone if development is feasible. Impacts on recreation would be long-term minor beneficial.

In regard to campgrounds in the Frontcountry Zone, the focus would be to maintain facilities at Nadelos, Wailaki, Tolkan, and Mattole, and to provide potable water at all four of these sites if feasible. Existing facilities would be retrofitted to meet Universal Accessibility Standards. Dispersed camping would be prohibited within a certain distance of all campgrounds. This would result in a long-term moderate beneficial impact on recreation, since the quality of the camping experience would be improved at the existing campgrounds.

Trails

The Proposed RMP would establish and maintain a network of trails, including expanding and improving the interpretive trail between Wailaki and Nadelos as a loop trail with wheelchair accessibility. Also a mountain bike trail system would be developed linking Paradise Ridge to the King Peak Road corridor and Tolkan and Horse Mountain. This would result in a long-term moderate beneficial impact on recreation since the network of trails would be expanded to accommodate visitors who cannot access the Backcountry Zone.

Signage and Interpretation

The plan would maintain and install signs as needed for visitor safety, orientation, education, and resource protection. This would result in a beneficial impact on recreation.

Monitoring

The Proposed RMP would continue ongoing monitoring of use levels and consider special uses on a site-by-site basis, which would have no impact on recreation.

5.12.13.4 Residential Zone

Visitor Use Management

Non-traditional and newly emerging recreational uses would be allowed as long as they are consistent with zone management objectives. This would result in minimal impacts on recreation. Specific areas and sites may be identified as special use areas to accommodate specific visitor needs, including development of a group use area in Mal Coombs Park. This would be a positive impact on recreation.

Facility Development

The Proposed RMP would improve existing recreational and interpretive facilities at Mal Coombs Park, including parking, picnic sites, the relocated Cape Mendocino lighthouse, monuments, interpretive panels, barriers, and steps down to the beach and tidepools; maintain existing Black Sands Beach

parking, restroom, informational kiosks and other facilities, and ensure visitor safety along the cliff; maintain Seal Rock and Abalone Point areas for individual and small group day use, providing opportunities for picnicking, wildlife viewing, interpretation, and other compatible recreational and educational activities. The restroom at Mal Coombs Park would be upgraded to meet provisions for persons with disabilities and to accommodate heavy seasonal use, with possible upgrade to the parking lot. Cooperative efforts would be proposed with local groups to maintain the Cape Mendocino lighthouse, memorials, and joint projects.

The plan would propose development of a group use area at Mal Coombs Park, and would consider opportunities for additional vehicle parking and parking for horse trailers. The plan would also require commercial groups to camp at least ¼ mile from Black Sands Beach trailhead, and individuals and non-commercial groups to camp north of Telegraph Creek. The RMP would also allow group use events on a case-by case basis at Seal Rock and Abalone Point. These upgrades and expansions would help to mitigate parking and overcrowding problems at these popular day-use and overnight destinations, and would also further increase opportunities for improving the visitor experience within the Residential Zone without impacting local residents. This would result in long-term moderate beneficial impacts on recreation only if limited day-use parking was expanded. If expansion increased beyond the existing carrying capacity of these facilities, it is possible that some long-term minor adverse impacts could occur due to the increased level of use.

Trails

Under the Proposed RMP, the wheelchair accessible trail in Mal Coombs Park would be maintained to provide access between facilities, along with maintaining a safe and adequate beach access trail at Black Sands Beach trailhead. This would result in no impact on recreation.

Signage and Interpretation

The Proposed RMP would install and maintain adequate signs and interpretive information, to provide for visitor orientation, safety, education, and to promote resource protection. This would result in a long-term moderate beneficial impact on recreation, because improved signage would assist visitors and local users with better information with which to plan their activities at the KRNCA.

Monitoring

The plan would continue monitoring of use levels, vehicle parking, and lighthouse visitation, which would have no impact on recreation.

5.12.14 Impacts of Recreation from Interpretation and Education

Policies under the Proposed RMP to provide information through a variety of formats and venues would have a long-term major beneficial impact on recreation. By providing visitors with enhanced interpretive background and up-to-date site information, visitors would be better able to plan their recreational trip to the KRNCA. Visitors would also be better prepared for the weather and the remote rugged nature of the area, thus allowing them to have a better recreational experience.

Policies to provide improved safety and orientation information to visitors before they enter the Backcountry would have a moderate beneficial impact on recreation. If visitors were provided improved trip planning information, there would potentially be fewer problems and accidents, resulting in a much improved visitor experience.

Policies to provide support for BLM King Range programs utilizing a variety of outreach approaches would have a long-term, minor, and beneficial impact on recreation, due to enhancement of the recreation experience and exposure to the significant resources of the KRCNA. More interpretation projects that increase the information and opportunities available to visitors would help them become more knowledgeable about the KRNCA, and would enhance the recreation experience.

Policies to engage children in learning about the King Range by developing curriculum based education opportunities would have a long-term, moderate, and beneficial impact on recreation. These policies would offer children new information and opportunities to experience King Range, thus improving their visitor experience, and perhaps secondarily enhancing their family's visitor experience to the KRNCA.

5.12.15 Potential Cumulative Impacts to Recreation

This RMP complements the Sinkyone Wilderness plan, currently in progress, by linking the two areas to form a unique coastal experience. It also contributes to a range and "critical mass" of recreation opportunities in the Humboldt County region, creating a beneficial cumulative impact for recreational visitors who travel to the area as a destination.

5.13 IMPACTS TO AIR QUALITY

Only a few management programs would have impacts on air quality; all others not described can be assumed to have negligible or nonexistent impacts.

5.13.1 Impacts to Air Quality from Fire Management

Under the Proposed RMP, pile burning along fuel breaks and all prescribed fire activities would be completed under permit from the California Air Resource Board, the North Coast Unified Air Quality Management District, and the County of Mendocino Air Quality Management District (California Health and Safety Code Section 41855). Specific smoke management concerns/impacts would be addressed in prescribed fire plans. Although use of prescribed fires would result in short-term negative air quality impacts, these impacts would be minor, as burns would be conducted during periods with high smoke dispersion potential (due to requirements of the burn permit). The long-term net effect on air quality would be positive because management activities would reduce the risk of catastrophic high-intensity wildfires and their associated impacts on air quality.

5.13.2 Impacts to Air Quality from Recreation Management

Air quality impacts from recreation management would be minor under the Proposed RMP and associated with increases in vehicle traffic on the area road system. Impacts from increased dust along

unpaved road corridors would be mitigated in sensitive locations such as near residences and recreation sites, through the application of dust abatement materials.

5.13.3 Impacts to Air Quality from Travel Management

Minor impacts would occur under the Proposed RMP from travel management, associated with temporary increases in dust associated with road maintenance activities. Dust abatement would occur in association with heavy traffic use periods such as during fire suppression operations, or permitted timber hauling etc., so impacts would be minor. No soils with serpentine origins or containing other hazardous materials are known to exist in the KRNCA.

5.13.4 Impacts to Air Quality from Grazing Management

Under the Proposed RMP, there would be no negative impacts on air quality from grazing management. The Proposed RMP would not affect the ozone air quality standard, as methane production from livestock production is not a criterion for non-attainment (not meeting a given standard). Methane levels are inventoried regularly from a Eureka monitoring site in Humboldt County because it is an organic gas that contributes to ozone formation. All other grazing management activities would have negligible or no impacts on air quality, and so are not discussed further.

5.13.5 Cumulative Impacts to Air Quality

Prescribed fire has the potential to cause cumulative impacts to air quality, as other public agencies and private timber companies also conduct burns during optimal conditions. However, impacts are kept to minor levels through the permit program/requirements of the North Coast Unified Air Quality Management District.

This page intentionally left blank.



CHAPTER SIX : Consultation + Coordination



6.0 CONSULTATION AND COORDINATION

6.1 INTRODUCTION

This document has been prepared with input from and coordination with interested agencies, organizations, and individuals. Public involvement is a vital component of the Resource Management Planning (RMP) process and Environmental Impact Statement (EIS) preparation for vesting the public in the effort and allowing for full environmental disclosure. Guidance for implementing public involvement is codified in 40 CFR 1506.6, thereby ensuring that federal agencies make a diligent effort to involve the public in the National Environmental Policy Act (NEPA) process through preparation of the EIS.

Public involvement for the King Range RMP is being conducted in two phases, as follows:

- Public scoping prior to NEPA analysis to obtain public input on issues, the scope of the analysis, and to develop the proposed alternatives, and
- Public review and comment on the Draft RMP/EIS, which includes analyzing possible environmental impacts and identifying the final preferred alternative for the Proposed Plan and Final EIS.

A summary of the earlier public scoping process is available in Chapter 5 of the Draft RMP/EIS and is not reproduced here. This chapter summarizes and responds to public comments submitted on the Draft RMP/EIS.

6.2 DISTRIBUTION AND AVAILABILITY OF THE DRAFT RMP/EIS

6.2.1 Notice of Intent

The public comment period for the King Range RMP/EIS opened with publication of the notice of availability (NOA) in the *Federal Register* on January 16, 2004 (Volume 69, Number 11). This NOA notified the public of the BLM's publication of the Draft RMP and associated Draft Environmental Impact Statement for those lands within the KRNCA planning area boundary (Appendix I). The NOA also solicited public comments and participation.

6.2.2 Advertisements and Announcements

Newspaper advertisements, a press release, and informal flyers were issued or posted to notify the public of the project, to announce the five public scoping meetings, to request public comments, and to provide contact information. Press releases were sent to local and major northern California news media, and meeting announcements were published in several local and regional newspapers including the *Eureka Times Standard*, the *Southern Humboldt Life and Times* (Garberville), and the *Independent* (Garberville). Press releases were not carried by San Francisco Bay Area newspapers, so a display advertisement was published in the *San Francisco Bay Guardian* on February 18, 2004. Flyers announcing the public scoping meetings were posted in numerous locations, including KRNCA campgrounds, and shops and organizations in Shelter Cove, Whitethorn, Petrolia, Honeydew, Redway, Garberville, Eureka, Arcata,

Berkeley, and San Francisco. In addition, BLM staff conducted an on-air interview at KMUD radio station (Garberville) to publicize the scoping meetings and discuss various topics relating to the plan update.

6.2.3 Project Website

An informational website, www.ca.blm.gov/arcata/kingrange/King_Range_Plan.html, was updated and made available to the public on November 4, 2002. It provided background information on the King Range, downloadable version of the Draft RMP/EIS, an outline of the planning process, a schedule of upcoming meetings, plus an opportunity for people to e-mail comments directly to the BLM offices. It had received 498 hits between January and March 2004.

6.2.4 Planning Update Mailers

The BLM produced three special Planning Update mailers: one prior to scoping, one to highlight the draft alternatives, and one announcing the publication of the Draft RMP. These were sent via direct mail to the KRNCA mailing list and were also distributed at public meetings. The Planning Updates included background information on the King Range, a description and timeline for the upcoming planning process, dates and locations of the public scoping meetings, and contact information for getting public comments to the BLM.

6.2.5 Public Comment Meetings

Five public comment meetings were held in February and March 2004, with four in local communities close to the King Range and one in the San Francisco Bay Area: Petrolia, CA on February 23; Eureka, CA on February 24; San Francisco, CA on February 26; Garberville, CA on March 3; and Shelter Cove, CA on March 4. All five meetings were held in the evening on weekdays, from 6-8pm. Attendance totaled 77 individuals, with the breakdown per meeting as follows:

- Petrolia: 20 people
- Eureka: 28 people
- San Francisco: 9 people
- Garberville: 7 people
- Shelter Cove: 13 people

The meetings were held to summarize the Draft RMP/EIS for the public, via a PowerPoint presentation given by BLM staff on the plan, the alternatives considered, and the preferred alternative. Participants were then invited to ask questions or offer formal comment on the plan, which was recorded as accurately as possible on flip-charts by EDAW staff. Commentors were asked to sign in when entering the meeting and to indicate whether they wanted to speak (although comments were accepted from everyone, not only those who had indicated their interest on the sign-in sheet). At the beginning of their oral comments, each individual was asked to provide their full name, and after making their comments, were asked to ensure their meaning was captured correctly by the recorder. Public comment forms were also distributed that people could hand them in at the meeting or mail them in later, if they preferred to

write their comments rather than speak publicly. Everyone was told that they could submit written comments in any format (i.e., using the form provided was not required), even if they already made oral comments at the meeting, so as to elaborate on previously-made points or to raise new issues or concerns.

6.2.6 Other Outreach and Consultation

Humboldt County was approached by the BLM regarding “cooperating agency” status at the beginning of the RMP process. Although the County has not become a formal cooperator, efforts have been ongoing with County staff to coordinate the RMP and the Humboldt County General Plan Update. The BLM met with Humboldt County Planning Department staff on 7/2/04 and provided a briefing on the Draft RMP. The following state agencies have been provided with information on the RMP process and consultation is ongoing with: the State Historic Preservation Officer (SHPO), California Department of Fish and Game, California State Parks and California Coastal Commission. The Draft RMP was also submitted to the California Governor’s Clearing House for review by appropriate agencies. Consultation is ongoing with, and Biological Assessments are under preparation and will be submitted to the Fish and Wildlife Service and NOAA Fisheries with the Proposed RMP. The Bear River Band of the Rohnerville Reservation was provided with a copy of the Draft RMP and contacted as the Federal Recognized Tribal Entity for consultation purposes. The BLM has an ongoing relationship with this tribe regarding management of the KRNCA, and they had no specific comments on the RMP.¹

6.3 PUBLIC REVIEW AND COMMENT ON THE DRAFT RMP/EIS

Public comment forms were distributed to participants at all meetings, and oral comments were recorded. By the end of the public comment period, 862 agency, individual, or organization comments were received. The breakdown of respondents and number of comments is as follows:

- 5 comment letters from public agencies—see Section 6.3.1 below
- 11 comment letters from organizations—see Section 6.3.2 below
- 33 verbal comments by individual at public meetings—see Section 6.3.3 below
- 813 written messages from individuals (emails and postal messages), of which 39 were individualized and 774 were form messages—see Section 6.3.4 below

6.3.1 Commenting Public Agencies (5)

1. Mendocino County Air Quality Management District (Christopher Brown)
2. U.S. Geological Survey (Trish Riley)
3. California Office of Historic Preservation (Knox Mellon)
4. State of California, Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit (Terry Roberts)

¹ Call from Robert Wick to Edwin Smith, Tribal Council Member and Tribal Environmental Coordinator on 8/30/04 --- Mr. Smith commented that: “We’re fine with it.”

5. United States Environmental Protection Agency, Region IX, San Francisco, CA (Lisa Hanf)

Letters from these agencies are shown in Attachment 6-1 at the end of this chapter. Individual comments are identified by number in the right-hand margin. A summary of each letter is provided below, followed by BLM's response to each identified comment. For this purpose a two-part reference number is used: the first number refers to the number assigned to each letter above and marked in the upper-right corner of the letter in Attachment 6-1; the second number refers to the individual comment number assigned in the right-hand margin of each letter. The summary before each letter is intended to provide a short overview for readers' convenience, and not as a BLM interpretation of the comment's meaning. The BLM responses are based on the comments in the letters themselves.

6.3.1.1 Mendocino County Air Quality Management District

Summary of Comments

The District suggested that the RMP should identify the portion of study area that falls within the Mendocino County Air Quality Management District, and work with District to follow air quality guidelines.

Responses

- 1-1. The plan is amended to address the comment.

6.3.1.2 U.S. Geological Survey

Summary of Comments

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.

6.3.1.3 California Office of Historic Preservation

Summary of Comments

The Office agrees that Alternative D is most desirable for cultural resources, and notes that some specific actions will be subject to provisions of the BLM State Protocol Agreement.

Responses

- 3-1. Comment noted. Alternative D has been carried forward as the Proposed RMP.

6.3.1.4 State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

Summary of Comments

No state agencies commented via the Clearinghouse by the deadline of April 16, 2004. BLM has complied with the state environmental review process.

6.3.1.5 U.S. Environmental Protection Agency

Summary of Comments

The Agency classifies the DEIS as LO, “Lack of Objections.” Commend proposal to designate Mill Creek as an ACEC, and suggest working with the CRWQCB to ensure consistency with their action plans for the Mattole River.

Responses

5-1. Document rating by EPA of “LO” noted.

6.3.2 Commenting Organizations (11)

6. California Wilderness Coalition (Ryan Henson)
7. International Mountain Bicycling Association (Jim Haagen-Smit)
8. Sierra Club, North Group, Redwood Chapter (Bob Wunner and Emelia Berol)
9. Community Wilderness Alliance (Rich Polley)
10. Mill Creek Watershed Conservancy (Jim Groeling)
11. Environmental Protection Information Center (Scott Greacen)
12. Mattole Salmon Group (Drew Barber)
13. Northcoast Environmental Center (Lynn Ryan)
14. Mattole Restoration Council (Chris Larson)
15. Backcountry Horsemen of California (Carole Polasek)
16. Middle Mattole Conservancy (Richard McGuiness)

Similar to the agency comment section above, letters from these organizations are shown in Attachment 6-1 at the end of this chapter. Individual comments are identified by number in the right-hand margin. A summary of each letter is provided below, followed by BLM’s response to each identified comment. For this purpose a two-part reference number is used: the first number refers to the number assigned to each letter above and marked in the upper-right corner of the letter in Attachment 6-1; the second number refers to the individual comment number assigned in the right-hand margin of each letter. The summary before each letter is intended to provide a short overview for readers’ convenience, and not as a BLM interpretation of the comment’s meaning. The BLM responses are based on the comments in the letters themselves.

6.3.2.1 California Wilderness Coalition (CWC)

Summary of Comments

The CWC objects that the Preferred Alternative does not propose any areas be managed for wilderness characteristics outside of the existing King Range WSA and suggest designating proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA as backcountry. They express concern that the impact of salvage logging on proposed wilderness areas in the frontcountry is not discussed. In addition, they feel the description of mountain bike policy in the Draft RMP (p. 2-145) is not consistent with the BLM's 1995 *Interim Management Policy* for bicycle use in WSAs.

Responses

6-1. **Management of areas outside WSAs for wilderness characteristics.** The Proposed RMP adds unit 2A and the Squaw Creek portion of 1H to the Backcountry Zone, to be managed to protect their wilderness characteristics. The remaining units are proposed for management as part of the Frontcountry Zone to allow for forest and fuels treatments on previously harvested stands. However, these management actions would serve to increase naturalness on the inventory units over the long-term by returning them to a historic forest structure. The Proposed RMP states that actions would not affect future consideration of any units for wilderness characteristic protection.

6-2. **Impacts of salvage logging.** This issue has been clarified in the Proposed RMP in Section 5.4.8. Salvage logging would only be implemented where it would improve natural stand characteristics, and therefore wilderness characteristics, in the long-term.

6-3. **Designate Inventory Units 1EA, 1E, 1F, 1G, 1H and 1HA as Backcountry.** See response 6-1 above. Also, parcels 1EA, 1E, 1F, 1G, the portion of 1H other than Squaw Creek section, and 1HA, although naturally appearing, have areas of extremely high fuel loads and are in close proximity to private rural subdivisions. They therefore do not fit within this plan's definition of Backcountry. The Frontcountry Zone allocation also reflects a reality that much of the King Range is surrounded by rural subdivisions in a region with extreme fire danger, as evidenced by the fall 2003 lightning fires. Fuels management in the Frontcountry Zone would allow for "lighter-hand" suppression tactics to be employed when future wildfires occur, allowing the BLM to better protect the natural values of both the Front and Backcountry Zones.

6-4. **Mountain bikes in WSAs.** The text has been updated to reflect proper interpretation of BLM's *Interim Management Policy for Lands Under Wilderness Review* (H-8550-1). The proposed RMP also identifies routes where mountain bikes would be allowed as a temporary use.

6-5. **Support for RMP allocations and actions regarding management zones, ACECs, watershed restoration, grazing, and fire.** Comment noted; these management prescriptions are all carried forward in the Proposed RMP.

6.3.2.2 *International Mountain Bicycling Association (IMBA)*

Summary of Comments

IMBA encourages provisions for multi-use trails that allow mountain biking in the Backcountry Zone. The group questions the categorization of mountain bicycling as a “special” and “emerging” use and suggests they are long-time trail users and advocates. In addition, they assert that exclusion of mountain bikers from the backcountry is a significant adverse impact. IMBA also expresses concern that the Draft RMP does not embrace mountain biking as called for in the BLM’s *National Mountain Biking Strategic Action Plan*.

Responses

7-1. **Opportunities for mountain biking in KRNCA, including Backcountry Zone.** Comment noted. The Proposed Plan seeks to provide opportunities for mountain biking in the Frontcountry Zone where it is compatible with national BLM policies and the Proposed RMP land use allocations.

7-2. **Add mountain biking to list of activities.** Mountain biking was discussed on page 2-145 of the Draft RMP. Mountain biking was not listed as a major activity in the Draft Plan because historically use levels have been very limited relative to many other activities in the KRNCA. Due to the mountain biking community’s interest in working with the BLM to expand opportunities in the KRNCA, the lack of suitable trails in the area, and the level of demand for additional riding areas, this activity has been added as a major focus on management in the Frontcountry Zone.

7-3. **Mountain biking as an appropriate low-impact “non-motorized” use in the Backcountry Zone.** Based on the current low levels of use, resource impacts of mountain bikes to trail treads, watersheds etc. are not considered an issue in the KRNCA and are not addressed as an impact in the Proposed RMP. Compatibility with management for wilderness characteristics is the rationale for limiting mountain bike use in the Backcountry Zone and for transitioning this use into the Frontcountry Zone. The Proposed RMP text has been updated to replace “non-motorized” with “non-mechanized” to more clearly reflect the land use allocation of the Backcountry Zone to be managed for wilderness characteristics. The Plan seeks to develop a mountain bike suitable trail system in the Frontcountry Zone that would mitigate the long-term impact of not allowing mountain bikes in the Backcountry Zone.

7-4. **Mountain bikes in WSAs.** The Draft RMP contained a statement regarding BLM’s *Interim Management Policy for Lands Under Wilderness Review* (IMP) that indicated mountain bikes are allowed on existing trails within WSAs. Under the national IMP, mountain biking is only allowed on routes inventoried as vehicle ways in the initial wilderness inventory. All existing trails in the King Range are contained within or adjoining the WSAs. The Proposed RMP text has been updated to reflect the correct interpretation of the policy. The Proposed RMP calls for managing the Backcountry Zone for wilderness characteristics as a land use allocation during the life of the plan, whether or not Congress formally designates the area as Wilderness. Mechanized uses, including mountain bikes are not considered to be compatible with management for wilderness characteristics. The Proposed RMP allows mountain biking as a temporary use under permit on approximately 23 miles of routes that were inventoried as ways. These routes include the Cooskie Creek, Buck Creek, Spanish Ridge, and Kinsey Ridge Trails. Mountain bike use would be discontinued in the Backcountry upon Congressional wilderness designation or development of a Frontcountry Zone trail network.

7-5. **Relative impacts of different user groups to resources.** Impacts to the trail tread or other resources are considered to be minor among all existing user groups, including hikers, mountain bikers, and equestrian users.

7-6. **Working with BLM to expand trails in Frontcountry Zone.** Comment noted. The Proposed RMP includes specific language to expand non-motorized use trails in the Frontcountry Zone, with design and management accommodating mountain biking as a primary use.

7-7. **Mountain biking as a “special,” “non-traditional,” or “emerging” use.** Comment noted. The references to mountain biking among emerging uses have been changed, and the Proposed RMP has been clarified. The Proposed RMP has identified mountain biking as a temporary use within the Backcountry Zone as it is not considered to be compatible with long-term management goals for this part of the KRNCA.

7-8. **Implementation of BLM’s *National Mountain Bicycling Strategic Action Plan*.** The Proposed RMP is consistent with the *National Mountain Bicycling Strategic Action Plan*. Under the Proposed RMP, the BLM would proactively work with the mountain bike community to implement mountain biking opportunities where they are compatible with the management zone goals and objectives and national policy relating to WSAs. A reference to the strategic plan has been added to the mountain biking discussion in Chapter 3.

7-9. **Impacts to mountain bicyclists from trail closures.** The impact description has been revised to reflect the Proposed RMP. However, the impact is still considered to be minor based on the low levels of use on the existing trail system and the proposal to develop similar opportunities in the Frontcountry Zone prior to any closures of existing trails. Closure of certain trails to mountain bikes through the BLM’s *Interim Management Policy for Lands Under Wilderness Review*, or Congressional wilderness designation, is outside the scope of this plan and therefore is not included in the impact analysis. Trails such as Chemise Mountain, King Crest, Lightning, and Rattlesnake Ridge were not inventoried as vehicle ways, so are closed by the IMP and are not under the discretion of this plan.

7-10. **User conflicts.** No major conflicts have been observed or reported in the KRNCA between mountain bikers and other trail users based on the current low levels of mountain bike use.

7-11. **Relationship with other plans.** The BLM is coordinating with California Department of Parks and Recreation to ensure that the King Range RMP and Sinkyone Wilderness State Park Management Plan have complementary objectives. A discussion of BLM’s *Mountain Bike Strategic Action Plan* has been added to the Proposed RMP.

6.3.2.3 *Sierra Club, North Group, Redwood Chapter*

Summary of Comments

The Sierra Club recommends that the Final RMP/EIS designate the proposed wilderness portions of area 1A, 1B, 1Ea, 1E, 1F, 1G, 1H, and 1Ha as backcountry to maintain their wilderness values, and recommends high opportunities for solitude. Sierra Club proposes several management measures to

reduce impacts in the Big Flat and Spanish Flat areas. Sierra Club expresses support for the Wild and Scenic Rivers designation and water rights protection. The group opposes salvage logging and suggests BLM take a more active role in local community growth concerns.

Responses

8-1. **More of wilderness story should be told.** The Affected Environment Chapter gives a brief overview of resources affected by planning actions and is not intended to be a comprehensive history and overview of the area's values. Section 4.19 discusses interpretation and education goals for the KRNCA. The BLM agrees that, particularly in the King Range, wilderness values are important to interpret and will be an integral part of the management program.

8-2. **Incorporate archeological sites between Windy Point and mouth of Mattole into Backcountry Zone.** The archaeological resources of the Mattole Beach corridor are given special recognition and management protection through designation as an Area of Critical Environmental Concern. The Backcountry Zone has been extended in the Proposed RMP along the coastal strand from Windy Point northward to just south of the Mattole Campground primarily for recreation management purposes.

8-3. **Add Mill Creek ACEC to King Range wilderness.** The Proposed RMP includes special management protection for the Mill Creek Area of Critical Environmental Concern (ACEC)/Research Natural Area (RNA)'s watershed and old-growth forest values. Some of the lands within this area were logged prior to public acquisition and require silvicultural treatments to assist the area's effective ecological recovery and return to naturalness. The Proposed RMP states that no actions will cause long-term impacts to the area's wilderness characteristics.

8-4. **Designate proposed wilderness parcels as Backcountry Zone.** See response 6-3 above.

8-5. **Manage for high opportunities for solitude.** The Proposed RMP would manage the Backcountry Zone for levels of use that allow for high opportunities for solitude and low levels of encounters between visitors at most locations and times of the year. Levels of use during holiday periods and summer weekends and at popular campsites would allow moderate levels of encounters between visitors and moderate levels of solitude. Visitor surveys conducted in 1997 and 2003 indicate that crowding is not currently a major issue in the King Range backcountry, and the modest growth in use allowed under the Proposed RMP will still allow for quality wilderness experience.

8-6. **More information that areas lacking plant cover and/or erosive features are natural.** Information is currently not available to further determine whether or not the degree of past ridgetop vegetation reduction is natural. These past impacts are discussed in detail in the Rangeland Health Assessments, which were developed based on the best available information. Section 3.12.3.2 of this document contains a summary of the Rangeland Health Assessment information on resource conditions and trends of all allotments affected by this plan. The allotments have been comprehensively assessed to ensure that they are meeting California's *Standards and Guidelines for Rangeland Health* and that trends in resource quality are improving. Under the grasslands habitat objectives and standards (Section 4.13.3.5), ongoing monitoring is required as part of the Proposed RMP. If monitoring indicates soil conditions, water quality, or vegetation health are in downward trends and attributed to livestock grazing, the BLM

would be required under the *California Rangeland Health Standards* to immediately change grazing practices to reverse these trends.

8-7. **Relative cost of grazing vs. erosion control and vegetation management projects.** No major erosion control or vegetation management projects related to impacts from current cattle grazing have been undertaken in the KRNCA to date, and so no costs are attributed to this management. Some impacts exist due to historic sheep grazing, but sheep are not currently grazed on any of the allotments.

8-8. **Big Flat management.** BLM has been increasing backcountry patrols of the Big Flat area and plans to continue. Composting toilets are listed as a management action in the Proposed RMP if monitoring shows that they are necessary. The Proposed RMP would not allow for boat landings on the beach except in emergencies.

8-9. **Big Flat air strips.** As stated in Section 1.7.6 of the Proposed RMP, access provisions to private inholdings, including the Big Flat airstrips, are based on legal rights associated with each parcel and, therefore, are addressed individually with each landowner, and not at the planning level.

8-10. **Spanish Flat grazing allotment.** The Proposed RMP would change the allotment boundary to exclude the marine terraces along the coastal strip and eliminate archeological impacts. The plan would allow for continued grazing while protecting water and vegetation quality on the remaining portions of the allotment. If monitoring indicates soil conditions, water quality, or vegetation health are in downward trends and attributed to livestock grazing, the BLM would be required under the *California Rangeland Health Standards* to immediately change grazing practices to reverse these trends.

8-11. **Water rights and rights-of-way.** The Proposed RMP would require BLM to secure water rights with all new acquisitions. Any water rights applications (allowable only in Frontcountry and Residential Zones) would require an Environmental Assessment under NEPA and would only allow for diversions during the wet season, not the critical dry summer months.

8-12. **Management of vegetation.** The plan does not impose silvicultural treatments in old growth stands or within the Backcountry Zone. However, the 1970 King Range Act called for return of cut-over forest lands to ecologically sound conditions, and based on the fire history of the tanoak-Douglas-fir vegetation type, cut-over, previously entered and burned stands located in the Frontcountry Zone will not return to historic characteristics without careful silvicultural modifications. Any silvicultural treatments would have the primary purpose of restoring natural stand characteristics (see Section 4.14.4).

8-13. **No salvage logging.** The BLM recognizes concerns about the potential impacts of salvage logging and the importance of fire-killed trees and snags to ecosystem values. However, because of the harvest activities on these lands in the 1950s-60s (prior to BLM acquisition), many of the stands within the Frontcountry Zone have been altered to the point that entering them after a stand-replacing fire will, in specific instances, provide an opportunity to correct existing problems and lead to development of more natural stand conditions. Any salvage efforts would be part of a comprehensive effort that would include replanting, erosion control etc., and would require that a snag component be left in place. Timber would only be removed after site-specific environmental analysis and within specified standards and guidelines adopted from the Northwest Forest Plan as shown in Section 4.14.4. No salvage operations would occur in the Backcountry Zone. Based on the fire history of the King Range in the

Frontcountry Zone, it is anticipated that salvage would be a relatively small component of area forest management activities and is included as a tool for use in these specific instances (see Chapter 5 for estimates).

Any road re-opening would be temporary in nature and followed by restoration within 12-18 months, and would only occur in very limited circumstances where environmental analysis shows direct benefit to improving late-successional forest characteristics and no major watershed impacts; see Section 4.14.5 for details. In some cases these actions may serve the dual purpose of removal and restoration of old logging roads.

8-14. **BLM should take an active role in responding to Shelter Cove development.** The 1970 King Range Act intended that the primary use of the Shelter Cove subdivision be for private development and residential use (*House Report on HR 12870*, 1970). The BLM will continue to take an active role in working with Humboldt County, the California Coastal Commission, and the Shelter Cove Resort Improvement District to ensure that development in Shelter Cove is compatible with KRNCA management objectives.

8-15. **Socioeconomic impacts of area management.** Comment noted; see response 8-7 above. Congress provided management direction for the area to the BLM under the King Range Act (Public Law 91-476), which called for managing the area for a number of primary and compatible secondary uses, including recreation, forest management, and grazing.

8-16. **Links to regional landscapes.** Comment noted. The King Range Proposed RMP and the Arcata Field Office RMPs allow the BLM to work with local community governments and organizations to acquire lands and work cooperatively to provide conservation of regional resource values.

8-17. **King Range marine sanctuary.** The Pacific Ocean is outside the BLM's jurisdiction; however, the Proposed RMP recognizes the importance and interdependence of marine resources (e.g., tidepools, marine mammals, anadromous fisheries, etc.) with lands within the KRNCA planning area. The BLM would continue to work with agencies such as California Department of Fish and Game, NOAA Fisheries, the California Coastal Commission, managers of the BLM's California Coastal National Monument, and others to protect marine resources adjacent to the King Range.

6.3.2.4 *Community Wilderness Alliance*

Summary of Comments

The Alliance contends that none of the alternatives adequately protect public water in the King Range and supports Wild and Scenic River status for all waterways in the King Range. The Alliance comments that the grazing allotment at Spanish Flat should be permanently retired. The Alliance recommends the proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA be designated as backcountry and objects to bicycles on all King Range trails, boats dropping people on the beach, and the overuse of the Big Flat airstrip.

Responses

- 9-1. **Support inclusion of King Range lands in Federal Wilderness Preservation System.** Only Congress has the authority to designate lands as federally-protected wilderness; therefore this is outside the scope of the Proposed RMP.
- 9-2. **Support for Alternative B for recreation, due to high opportunities for solitude.** Comment noted; see response 8-5 above.
- 9-3. **Protection of public water in the KRNCA.** See response 8-11 above with regard to water rights and rights-of-way. The Proposed RMP contains direction to assert water rights and protect resource values of area streams regardless of their suitability for Wild and Scenic Rivers designation. The determination of suitability for Wild and Scenic River designation is based on specific criteria as shown in Appendix D.
- 9-4. **Grazing allotment at Spanish Flat.** See response 8-10 above.
- 9-5. **Designate proposed wilderness parcels as Backcountry Zone.** See response 6-3 above.
- 9-6. **No bikes on King Range trails.** See response 7-4 above.
- 9-7. **No boat landings on the beach.** The plan would not allow for boat landings on the beach except in emergencies.
- 9-8. **Airstrip and buildings at Big Flat.** See response 8-9 above regarding airstrips; all buildings at Big Flat are located on private lands. The 1970 King Range Act allows and establishes criteria for continued use and occupancy of private property within the KRNCA boundary.

6.3.2.5 Mill Creek Watershed Conservancy

Summary of Comments

The Conservancy disagrees with the Draft RMP designations of zones for the Mill Creek and Squaw Creek lands and recommends the majority of the lands be designated as backcountry. The Conservancy objects to the preferred alternative in terms of Recreation, stating that it is too invasive and instead proposes a blend of all of the Alternatives and offers other suggestions. Other recommendations include not allowing herbicide use, leaving Telegraph Road open for emergency fire access, not allowing commercial permits to non-tribal uses of special forest products, and changing Mill Creek to Backcountry Zone status. The Conservancy did not make a recommendation for Grazing Management due to various sentiments.

Responses

- 10-1. **Include Mill Creek watershed and Squaw Creek parcels in the Backcountry Zone.** The Proposed RMP has been revised to include the Squaw Creek section of unit 1H in the Backcountry Zone. However, the parcels in the Mill Creek watershed will require silvicultural treatments to assist with ecological recovery and restoration goals; see response 8-3 above. This parcel is also separated from the main body of the Backcountry Zone by several road segments in the upper Mill Creek drainage, and so is

not a logical addition to the zone. As stated in Section 4.3.2 of the Proposed RMP, no additional major public use facilities are proposed for the northern part of the Frontcountry Zone in the Proposed RMP. Also, ACEC/RNA status affords a similar level of protection to the Backcountry Zone, but is geared to the specific values of the ACEC. The ACEC status also provides for area-specific rules and public use requirements that are beyond those proposed for the Backcountry Zone.

10-2. **Designate Mill Creek as an RNA as well as an ACEC.** The Proposed RMP has been revised to include the RNA designation.

10-3. **Support protection of all units for wilderness characteristics, with an allowance for interim restoration measures.** The Proposed RMP determined that Mill Creek and other northern units, although they have wilderness characteristics, will require multiple silvicultural treatments over the life of the plan to restore previously harvested stands (which cover a majority of the acreage) to more natural forest conditions. The proposed treatments would not only reduce fire danger and improve habitat, but would serve to increase naturalness and other wilderness characteristics in the long-term. Based on the present condition of forest stands, a short-term treatment plan would be infeasible and ineffective. No permanent roads or other developments are proposed in the RMP that would preclude Congress from considering these units for wilderness designation.

10-4. **Wild and Scenic Rivers.** Comment noted; Mill Creek remains in the plan as suitable for Wild and Scenic River designation.

10-5. **Salvage logging should never be permitted.** See response 8-13 above.

10-6. **Broadcast burning unsafe.** Broadcast burning would not be used in situations where there is risk of escape onto private lands. In these situations, mechanical fuel reduction would be used.

10-7. **Control camping at Mattole beach area.** The Proposed RMP contains additional limits on camping surrounding the Mattole beach campground to address concerns regarding large gatherings in the area. The proposal for overflow camping on the Mattole River bar that appeared in the Draft RMP has been removed.

10-8. **No fee system for individual backcountry use.** Comment noted. The BLM is committed to maintaining the area with the level of fees consistent with policy and budget requirements.

10-9. **Publicize and enforce a cap on visitor numbers.** The Proposed RMP carries forward a proposed system to develop a carrying capacity program for King Range visitation. Limits are also in place for use of developed campgrounds, including the Mattole Campground.

10-10. **No herbicide use.** The Proposed RMP only allows for herbicide use in limited situations where manual removal of invasive plant species is not feasible, and the spread of these plants would cause extensive ecological damage. Any proposal to use herbicides would require additional environmental analysis prior to implementation.

10-11. **Remove rusting vegetation pyramids.** Comment noted; removal of these structures, old fencing, and other materials is an on-going effort with BLM personnel and volunteers.

10-12. **Transportation and access.** The Proposed RMP keeps Telegraph Ridge and Windy Point Roads open to seasonal use to allow for recreation access to popular trailheads and use areas. Vehicles are required to stay on existing roads to protect coastal prairies and watershed values. Vehicle use in the Mattole Estuary area would be limited to routes that do not impact the estuary values. Signing and driftwood barriers would be placed along allowable travel routes to ensure vehicles do not access the estuary. This will allow for continued community and public use of the area while eliminating resource impacts.

10-13. **Do not acquire land in Residential Zone.** The BLM has very limited landholdings in the Residential Zone, which encompass only the Shelter Cove subdivision. These lands make up the majority of coastal greenspace within the subdivision. In some cases, additional parcels could be needed to provide additional public access, parking etc., which are supported by the local community. The Proposed RMP would allow acquisition in this Zone only after working with the Humboldt County government and local community organizations.

10-14. **No commercial special forest product permits.** Existing special forest product permits are issued to small family collectors for modest levels of harvest, and mostly to people belonging to low-income and/or minority populations. A theme identified during the public scoping process for the Draft RMP was to allow for economic opportunities for local communities. Allowance for continued harvesting of these products provides both local economic opportunities and addresses environmental justice concerns for the area. The Proposed RMP would include monitoring of harvest levels to ensure resource values are protected. No commercial collecting would be permitted within the Mill Creek or Mattole ACECs. The Proposed RMP also carries forward a Native American beargrass area where commercial beargrass harvesting would not be permitted.

10-15. **Visual Resource Management classifications.** The Proposed RMP would classify the Mill Creek area in VRM Class II. This class requires the BLM to retain the existing character of the landscape. It allows for management activities, such as the proposed silvicultural treatments in the Mill Creek watershed, which would not be allowed under Class I objectives. These treatments would still have minimal and temporary visual impacts on the natural landscape.

10-16. **Grazing management.** Comment noted.

6.3.2.6 Environmental Protection Information Center (EPIC)

Summary of Comments

EPIC expresses support for the wilderness boundaries proposed by the California Wild Heritage Campaign and recommends more of the northern sections of the King Range be designated as backcountry, as well as the inclusion of the subunits 1A through 1J in the King Range WSA. EPIC is opposed to all logging in the King Range, and expresses support for the maximum feasible protection of all the 28 stream segments in the King Range. The group opposes opening any areas to bicycles in the WSAs, and generally supports Alternative B for Recreation, suggesting that all recreation in the King Range be low-impact. EPIC recommends the FEIS to document and analyze the ongoing effects of

existing roads and potential impacts of the development of roads as well as the effects of fire suppression and fire-fighting.

Responses

11-1. **Wilderness designation and WSA management.** The settlement of *Utah v. Norton Regarding Wilderness Study* clarified that the BLM's authority to expand Wilderness Study Areas or designate additional areas through the RMP process expired in 1993. However, the BLM can make land use allocations through the RMP to manage areas to protect their wilderness characteristics. Within the King Range RMP, the Backcountry Zone represents this allocation. Parcels 1B, 1EA, 1E, 1F, 1G, the portion of 1H other than Squaw Creek section (see response 6-1 above), and 1HA all have previously harvested forest stands that require management such as long-term silvicultural treatments to encourage old growth values or fuels management in areas adjoining private rural subdivisions. These actions would not be allowed within the Backcountry Zone, and so the above parcels are included in the Frontcountry Zone. A primary goal of all silvicultural treatments is to restore stands to a historic ecological state. This would serve to enhance wilderness characteristics of these lands. The Proposed RMP also states that no actions will cause irreversible impacts to wilderness characteristics that would affect future consideration for Congressional wilderness designation. The BLM is aware of the pending wilderness legislation S-738, "Northern California Coastal Wild Heritage Wilderness Act." Nothing in the Proposed RMP would preclude management of the lands proposed in S-738 as wilderness, should this bill be passed into law.

In addition, parcels 1A, 1C, and 2C were not included in Alternative B in the Draft RMP because they did not meet the minimum criteria for wilderness characteristics; hence Alternative B proposed to protect the maximum lands with wilderness characteristics and met the intent of NEPA to provide a full range of reasonable alternatives.

11-2. **No salvage logging.** See response 8-13 above.

11-3. **Maximize Wild and Scenic River protection.** Appendix D of the Proposed RMP outlines the criteria used by all agencies, including the BLM, to study streams for Wild and Scenic River suitability. One of these criteria is to consider stream segments in a regional context. Although many of the streams in the King Range exhibit significant values that meet eligibility criteria, the study team has determined that the values are not at a level that would make these segments worthy additions to the NWSRS when viewed in the context of the California Coastal Range Physiographic Province. The Proposed RMP would protect resource values of area streams regardless of their suitability for Wild and Scenic River designation.

11-4. **No mountain bicycles in areas suitable for wilderness.** The Proposed RMP would phase out mountain biking use in the Backcountry Zone. The plan would allow mountain biking as a temporary use under permit within the Backcountry Zone (Section 4.19.6.1) on approximately 23 miles of routes that were inventoried as "ways" in the original 1988 Wilderness Study. All existing trails in the King Range are contained within the WSA, and mechanized uses are not considered compatible with management of Backcountry Zone for wilderness characteristics. The plan proposes development of a Frontcountry Zone trail network, focused in the Paradise Ridge area. Upon completion of this network, or designation of King Range wilderness, mountain biking would not be allowed in the Backcountry.

11-5. **Airstrip at Big Flat.** See response 8-9 above.

11-6. **Frontcountry Zone management.** The 1970 King Range Act calls for a plan which zones the area for a variety of uses. The proposed zones in this plan reflect a strong emphasis on conservation and restoration of the area's resource values while meeting the intent of the Act to provide a mix of primary and secondary uses (Public Law 91-476). The Proposed RMP does not call for any major new developments, such as permanent roads or facilities (except trails) in the Frontcountry Zone. This zone is not intended to provide only a diminished level of protection; rather, it calls for a more intensively managed restoration effort on those lands adversely impacted by timber harvesting prior to BLM acquisition. The zone also reflects a reality that much of the King Range is surrounded by rural subdivisions in a region with extreme fire danger, as evidenced by the Fall 2003 lightning fires. Fuels management in the Frontcountry Zone would allow for "lighter-hand" suppression tactics to be employed when future wildfires occur, allowing the BLM to better protect the natural values of both the Front and Backcountry Zones.

11-7. **Expansion of the King Range in future land acquisition.** The Proposed RMP would allow the goals identified in this comment to be met. BLM land acquisitions are identified based on local and national management priorities, and the availability of matching non-federal government and private funding opportunities. Therefore, this plan would not result in an overshadowing of "acquisition priority 1 and 2 private lands" identified in the Arcata Field Office RMP.

11-8. **Native plant species restoration.** Comment noted; the BLM will continue to work to protect and expand the range of native plant species.

11-9. **Research and actions to protect wildlife and aquatic species.** The Proposed RMP does not identify specific research and restoration projects, as these will be identified in later project-level implementation plans and NEPA documents. However, the BLM actively works with Humboldt State University and other researchers, as well as community restoration groups, to improve understanding and ecological conditions of species within the region.

11-10. **Existing roads in the King Range should be fully removed and restored.** All roads not included in the Travel Management section (Section 4.18) of the Proposed RMP, or used for administrative or private land access, will continue to be assessed for potential removal. Roads will be removed when it can be demonstrated that the result will be a net reduction in sediment load to streams. Specific roads would be identified in the context of project-level activity plans.

11-11. **Reintroduction of native wildlife.** While only CDFG and FWS have direct authority over wildlife population management (i.e., relocation, removal, or introduction), the BLM remains open to recommendations or options for future actions that are consistent with the goals of the Proposed RMP. The costs and benefits of any species reintroduction proposals are outside the scope of this planning effort and would need to be analyzed separately at that time.

11-12. **Impacts of cross-country vehicle use to Roosevelt elk.** Public lands in the vicinity of the Chemise Mountain and Shelter Cove Road intersection are currently closed to vehicle use, and would remain so under the Proposed RMP. Present cross-country vehicle use in this area is illegal and enforcement and education efforts are on-going.

11-13. **Grazing allotments.** The King Range Act requires the BLM to consider all legitimate uses of resources on public lands, including grazing, in planning and management of the area (PL 91-476). The Proposed RMP would change the Spanish Flat allotment boundary to exclude grazing from the coastal terraces and therefore would eliminate any impacts to cultural resources. Similarly, the coastal dune habitat surrounding Mattole Campground is closed and fenced so that cattle do not graze on the dunes. The plan would allow for continued grazing while protecting water and vegetation quality on the remaining grazing allotments. If monitoring indicates soil conditions, water quality, or vegetation health are in downward trends and attributed to livestock grazing, the BLM would be required under the *California Rangeland Health Standards* to immediately change grazing practices to reverse these trends.

11-14. **Manage for recreation experiences/qualities unique to the area with focus on muscle-powered activities, and allow for low-medium use levels.** See comment 8-5. The BLM recognizes the unique values of the KRNCA's undeveloped coastal slope, and the Proposed RMP limits recreation use to non-mechanized activities in the Backcountry Zone. Other parts of the KRNCA are managed for additional uses to meet the intent of the King Range Act to provide for a balanced range of compatible uses.

11-15. **Where recreation and wildlife values conflict, curtail recreation use.** The Proposed RMP includes a number of objectives and actions to ensure that recreation use does not impact wildlife values. For example, the RMP calls for continued visitor education which includes topics such as low impact use, and wildlife viewing ethics. Any proposed recreation developments (trails, etc.) would undergo a site specific environmental analysis to ensure impacts to wildlife and other resources are minimized. The BLM has consulted with the Fish and Wildlife Service and NOAA Fisheries on impacts to Threatened and Endangered Species to ensure that management actions and uses proposed in the RMP do not impact the conservation of these species. Also, the Proposed RMP calls for development of carrying capacities to limit growth of recreation use.

11-16. **Off-highway vehicle management.** Section 4.18 contains specific mileage and map of road segments open to vehicle use. Section 5.11.12 assesses the impacts from this use. Vehicle use off of the open transportation system is an enforcement issue. Impacts from use off of designated routes are assessed on an ongoing basis by field personnel and enforcement efforts adjusted accordingly.

11-17. **Redwoods to Sea corridor.** The Draft RMP makes no reference to the Redwoods to Sea Corridor as a recreational corridor. This area is outside the KRNCA planning area boundary and the Proposed RMP provides no direction for its management. A separate activity level plan will be developed for lands in this area and will include public involvement.

11-18. **Use of private land at Big Flat.** See response 8-9 above; in addition, private land owners within the King Range are subject to the same use limitations on public lands adjacent to their inholdings as any member of the general public using the area.

11-19. **Additional campground development.** The Proposed RMP would include some minor changes to existing facilities but no major expansions or new campgrounds.

11-20. **Recreation user fees.** See response 10-8 above. Also, the initiation of fees would not result in changing allowable uses in any of the management zones.

11-21. **Road closure and removal.** Section 4.10 (Fisheries and Aquatic Ecosystems) of the Proposed RMP identifies the need to remove existing closed roads and improve drainage and maintenance on existing open roads. Impacts from road decommissioning and management of existing open roads are discussed in Sections 5.10 (Fisheries and Aquatic Ecosystems) and 5.11 (Travel Management). No new permanent roads would be constructed under the Proposed RMP. Also see response 11-10 above.

11-22. **Fire management.** Comment noted; no pesticides or herbicides are proposed for use in the fuels management program. Fuels management is only proposed in cut-over and burned areas which contain thick stands of small-diameter trees. The BLM's policy is to not allow use of heavy equipment for fire-fighting within WSAs unless there are immediate threats to life and/or private property.

11-23. **Invasive species.** See response 10-10 above.

11-24. **Protection of cultural sites.** All cultural resources are protected by the National Historic Preservation Act of 1966. Management and protection of cultural resource is an important priority of this planning effort. Also see response 11-13 above.

11-25. **Coordination with the Resort Improvement District, California Coastal Commission, and Humboldt County.** Commented noted. Coordination is on-going with these entities to ensure that King Range resource values are protected.

11-26. **Water quality and quantity and Wild and Scenic Rivers.** Section 4.7 (Lands and Realty) addresses water quality and quantity issues. Also see response 11-3 above.

11-27. **Marine and coastal resources.** See response 8-17 above; BLM will comment on respective plans and their impacts on the King Range as appropriate.

6.3.2.7 Mattole Salmon Group

Summary of Comments

The Group states that the Draft RMP generally reflects their preferred management of the Mattole Estuary; however, they are concerned with the sensitive ecology of the estuary and the fact that Mattole Beach is the north access for departure to the Lost Coast Trail. The Group suggests that this recreational use has the potential to negatively impact biological resources. The Group expresses concern with the following issues; the Draft RMP does not seem to directly consider campground impacts on the Mattole River, restoration is not defined completely, the goals stated to work with local restoration groups are not specific enough and the Draft RMP does not seem to reflect potential threats of global climate change. The Group comments on specific management plan alternatives that they both agree and disagree with.

Responses

12-1. **Impacts of campground expansion on Mattole River, bathing in estuary.** See 10-7 above; the Mattole Campground has been upgraded and a potable water system added. All interpretive/orientation information for visitors to the KRNCA describes proper sanitation practices including carrying water and bathing away from streams.

12-2. **Definition of restoration should not be limited to road removal.** Section 2.7.2.4 of the Draft RMP defined watershed restoration as involving proper road maintenance and/or removal specifically in the context of water quality concerns; it did not intend to imply that there are not other types of actions for ecological restoration that are important. The text has been revised to clarify the issue.

12-3. **Specific goals for collaboration with local restoration groups; can MSG and MRC take leadership roles?** The Proposed RMP is an overall guide for KRNCA management for the next twenty years, and does not contain detailed strategic direction on how the plan will be implemented. Details of partnerships with specific groups and respective roles of the BLM and cooperators will be determined in a subsequent implementation strategy, and on an individual basis as outlined in agreements with respective groups/agencies.

12-4. **Plan should address potential threats from global climate change and build resiliency into King Range ecological systems.** The potential threats from global climate change are not fully understood to the level that the RMP can directly address reasonably foreseeable impacts specific to King Range ecosystems. However, many of the decisions in the RMP will serve to improve the resiliency of resources, such as the reduction of fuel loads in previously harvested stands and continued watershed restoration efforts and storm-proofing of roads. In addition, the Proposed RMP calls for monitoring of resource conditions of the KRNCA to determine effectiveness of management actions and ongoing trends. This will allow for a level of adaptability in the plan to address unforeseen impacts from changing climate conditions.

12-5. **Herbicide use in Mattole watershed when estuary is in lagoon state.** See response 10-10 above; herbicides would only be used in specific instances on non-native invasive weeds, and not for native plant removal.

12-6. **Impacts of salvage logging and road construction on salmonid habitat.** See response 8-13 above.

6.3.2.8 Northcoast Environmental Center

Summary of Comments

The Center supports Alternative B with some suggested changes involving protecting public water. The Center objects to salvage logging in the King Range. The Center requests that the Final RMP/EIS designate the proposed wilderness portions of areas 1EA, 1E, 1F, 1G, 1H, and 1HA as backcountry as well as Alternative B for backcountry zones. The Center takes issue with the Redwoods to the Sea Recreational Corridor reference in that they prefer it referred to as a biological connectivity linkage. The Center suggests the Final RMP/EIS include a list of routes in the NCA where bicycles are allowed and recommend no designated single-track, single use bicycle trails in the KRNCA. The Center recommends the Spanish Flat grazing allotment be permanently retired. The Center requests that the area 1A through 1J be managed to protect their character for future generations. The Center expresses concern that marine sanctuary is not addressed in the Draft RMP.

Responses

- 13-1. **Protection of public water in the KRNCA.** See response 9-3 above.
- 13-2. **No salvage logging.** See response 8-13 above.
- 13-3. **Manage for high opportunities for solitude.** See response 8-5 above.
- 13-4. **Redwoods to Sea corridor.** See response 11-17 above.
- 13-5. **Mountain bicycle use in KRNCA.** See responses 6-4 and 11-4 above.
- 13-6. **Spanish Flat grazing allotment.** See response 8-10 above.
- 13-7. **Protect inventory units with wilderness characteristics.** See responses 6-3, 10-3, and 11-1 above.
- 13-8. **Motorized boat landings.** The Proposed RMP does not allow for motorized boat landings on the beach except in emergencies.

6.3.2.9 Mattole Restoration Council

Summary of Comments

The MRC expresses concern about the zoning changes and suggests the Squaw Creek drainage be zoned as backcountry, advocates more protection for Cultural and Historic Resources, supports Alternative B for the alternatives for Lands and Realty, and supports acquisition of property in the Shelter Cove area only if it is inappropriate for a residence. MRC supports Alternative C for the ACEC and requests Mill Creek also be given the RNA designation. The Council supports the Preferred Alternative C for Aquatic Ecosystems and for Fisheries and Wildlife Management. The Council recommends Alternative C for vegetative issues (with the exceptions of herbicide use and suggests ridding prairies of rusting vegetation pyramids). The Council supports the Preferred Alternative D for Forest Management; however, suggests more specific guidelines for salvage logging. The Council supports Preferred Alternative C for Grazing Management except for making unavailable the expired grazing allotments and also supports Preferred Alternative C for Fire Management. The Council endorses Alternative B for Transportation and Access (with the exception of the necessity to leave Telegraph Road open for emergency fire access). The Council supports Alternative C for Recreation with several exceptions and agrees with including a visitor registration system at Mattole Beach.

Responses

- 14-1. **Re-zone Squaw Creek parcel as Backcountry.** The Squaw Creek portion of unit 1H has been added to the Backcountry Zone in the Proposed RMP.
- 14-2. **Support Preferred Alternative for Cultural Resources.** This alternative has been carried forward in the Proposed RMP.

- 14-3. **Land acquisition for properties adjacent to or outside the KRNCA boundary and in Shelter Cove.** Comment Noted. The proposed RMP calls for continued coordination with county government and community & conservation groups in acquisition of properties outside the KRNCA boundary. See also response 10-13.
- 14-4. **Designate Mill Creek as an RNA as well as an ACEC.** See response 10-2 above.
- 14-5. **Oppose use of herbicides in KRNCA.** See response 10-10 above.
- 14-6. **Remove rusting vegetation pyramids.** See response 10-11 above.
- 14-7. **Need for more specific guidelines regarding salvage logging and road re-opening.** See response 8-13 above. The text of the Proposed RMP has been updated to clarify the guidelines.
- 14-8. **Retirement of expired grazing allotments.** Comment noted.
- 14-9. **Transportation and access.** See response 10-12 above.
- 14-10. **No fee system for individual backcountry use.** See response 10-8 above.
- 14-11. **No mountain bicycles in Backcountry/wilderness.** See response 7-4 above.
- 14-12. **No overflow campsites at Mattole beach.** See response 10-7 above.
- 14-13. **Visitor caps needed on backcountry and Mattole Campground use.** Comment noted. The Proposed RMP includes objectives for developing capacities for the Backcountry and Frontcountry Zone trails and facilities.

6.3.2.10 Backcountry Horsemen of California, Redwood Unit

Summary of Comments

The commenter agrees with most of the BLM proposed alternatives; alternatives which Redwood Unit does not agree with are as follows:

- BLM should not acquire more property
- Opposed to changes to the river/stream designations already in place
- Landowners with legal access should be provided with written documentation stating that they have the right to use, maintain and repair their existing road(s) and 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.
- Permits should not be required, a self-registration system is acceptable to document use.
- Counting animals in the 15 “heartbeats” context should be limited to people. If animals are to be counted the number should be raised to 25 “heartbeats.” The maximum number of visitors should be allowed to leave any trail head per day.
- Oppose user fees.

Responses

15-1. **Recommendations regarding property acquisition, Wild and Scenic River designations, and visitor permit system.** Comments noted.

15-2. **Private landowner access.** As stated in Section 1.7.6 of the Proposed RMP, access provisions to private inholdings are based on legal rights associated with each parcel and, therefore, are addressed individually with each landowner, and not at a planning level. Therefore these actions are beyond the scope of this RMP.

15-3. **Counting animals as “heartbeats” on trails.** The Proposed RMP text has been revised to accommodate this concern, raising the total number of “heartbeats” allowed per group on Backcountry Zone trails to 25; the maximum number of people per group remains at 15. There is no limit on the number of visitors allowed to leave a given trailhead each day unless they are part of an organized and/or commercial group. All of these provisions would be interim measures to be updated through development of a final carrying capacity plan for the KRCNA.

15-4. **Opposition to user fees.** See response 10-8 above.

15-5. **Adoption of stipulations for wilderness designation.** Comment noted; only Congress has authority over wilderness designations. The BLM will also consider these concerns long-term carrying capacity and use allocations are developed for the King Range Backcountry Zone.

6.3.2.11 Middle Mattole Conservancy

Summary of Comments

The Conservancy supports the Preferred Alternatives for KRNCA and offers suggestions for long-term forest management. The Conservancy recommends BLM continue to make protective purchases of industrial timberlands and other properties in the Mattole Valley and discourages roads in the area. The Conservancy notes that there is no mention of corvids in the Draft RMP and encourages the reintroduction of the species. The Conservancy expresses concern with both the restrictive classifications placed on impacted rivers and streams and the threat of global warming.

Responses

16-1. **Protect wilderness from unnecessary noise; use VRM designations to prohibit offshore drilling.** Comment noted. Management of the WSAs and Backcountry Zone for wilderness characteristics, by definition, means limiting human intrusions including noise. The BLM’s Visual Resource Management program only applies to public lands under the agency’s jurisdiction. The BLM would comment on any offshore drilling operations with the potential to impact public land resources at the time any developments are proposed.

16-2. **Land acquisition in the Mattole Valley.** Comment noted; see response 14-3 above.

16-3. **Watershed impacts from road construction and maintenance; plan did not address restoration of wet areas like Headwaters Plan.** Comment noted. All existing roads are being

outsloped where possible to minimize impacts to natural drainage patterns. Also road removal will include restoration of natural drainage patterns. The King Range RMP encompasses a larger area and is at a more general level of detail than the Headwaters plan, and so includes less details regarding restoration.

16-4. **Redwoods to Sea corridor.** See response 11-17 above.

16-5. **Plan lacks discussion of corvids.** Corvids are not considered to be a threat to conservation of the northern spotted owl and other species of special concern known to occupy the KRNCA. Extensive surveys for marbled murrelets in the King Range have failed to detect occupancy. Should future murrelet (a species subject to corvid predation) surveys indicate occupancy, additional protective measures would be implemented. The Proposed RMP calls for continuation of the environmental education program, which includes informing visitors on proper food storage/disposal that will minimize corvid attraction on trails and in recreation sites.

16-6. **Species reintroductions.** See response 11-11 above.

16-7. **Wild and Scenic River designation could restrict restoration opportunities.** The BLM is required to study streams for eligibility and suitability for designation under the Wild and Scenic Rivers Act during the RMP process. Restoration actions are permitted on streams found suitable for designation under the Act, as long as they do not impact the free-flowing or outstandingly remarkable values of the segments.

16-8. **Watershed restoration techniques and materials.** Comment noted. The Proposed RMP provides general direction for watershed restoration, and does not detail site specific implementation actions. These techniques will be considered during implementation planning.

16-9. **Glomalin carbon storage.** Comment noted. The reduction of risk of catastrophic fire is a major goal of forest restoration in the Frontcountry Zone. The Proposed RMP and BLM policy allow for and encourage research regarding natural processes and resource conditions on public lands.

16-10. **Watershed impacts of salvage.** Comment noted. See comment 8-13.

16-11. **Research.** See comment 16.9 above

16-12. **Information and interpretation.** Comment noted. The BLM will continue working with the community to improve environmental education and interpretive programs, including web-based information.

6.3.3 Persons Commenting at Public Meetings (33)

Petrolia – February 23, 2004:

Otter Anderson

Mary Etter

Ali Freedland

Bobby Goforth

Tracking Number

PM01

PM02

PM03

PM04

Robin Lozito	PM05
John McAbery	PM06
Peggy Morrison-Fox	PM07
Peter Nash	PM08
Rex Rathbun	PM09
Maureen Roche	PM10
Melvin Rodriguez	PM11

Eureka Meeting – February 24, 2004:

Zach Coffman	PM12
Ryan Coltrin	PM13
Timothy Crlenjak	PM14
Greg Gaser	PM15
Tracy Katelman	PM16
Patrick McDaniel	PM17
Carole Polasek/Backcountry Horsemen of California	PM18
Darrel Polasek	PM19
Wendell Schautz	PM20

San Francisco Meeting – February 26, 2004:

[no comments recorded]

Garberville Meeting – March 3, 2004:

Fred Green	PM21
Ryan Henson/CA Wilderness Coalition	PM22
Robert Sutherland	PM23

Shelter Cove Meeting – March 4, 2004:

Cheryl Antony/Shelter Cove Fire	PM24
Jeane Elder	PM25
Leah Fanucchi-Bettis	PM26
Eric Goldsmith/Sanctuary Forest	PM27
John Jennings	PM28
Myra Johnson	PM29
Janet Lopes	PM30
Joe Lopes	PM31
Mel Lynn	PM32
Steve Mobley	PM33
Melvin Rodriguez [attended two meetings]	PM11

Comments from these individuals are summarized by BLM below and are organized by topic. BLM responses are given. Persons commenting are listed above in the order that they spoke. A tracking number is used so that individual comment summaries can be correlated with the commenter. At the beginning of their oral comments, each individual was asked to provide their full name, and after making their comments, were asked to ensure their meaning was captured correctly by the recorder. Copies of the meeting notes are available from the BLM Arcata Field Office upon request.

6.3.3.1 Management Zones

Comment Summary

- Concern regarding standards for salvage of old growth in Frontcountry, favor change following to Backcountry status: 1EA, 1E, 1F, 1G, 1H, and 1HA. (PM22)

Responses

The Proposed RMP adds unit 2A and the Squaw Creek portion of 1H to the Backcountry Zone, to be managed to protect their wilderness characteristics. Parcels 1EA, 1E, 1F, 1G, the portion of 1H other than the Squaw Creek section, and 1HA, although naturally appearing, have areas of extremely high fuel loads and are in close proximity to private rural subdivisions. They therefore do not fit within this plan's definition of Backcountry. They are proposed for management as part of the Frontcountry Zone to allow for forest and fuels treatments on previously harvested stands. However, these management actions would serve to increase naturalness on the inventory units over the long-term by returning them to a historic forest structure. The Proposed RMP states that actions would not affect future consideration of any units for wilderness characteristic protection.

6.3.3.2 Lands and Realty – Water

Comment Summary

- Riparian Section, Appendix D – County water draft – Is it really happening? Check it. (PM10)

Responses

Appendix D was incorporated into the Draft RMP from the *Northwest Forest Plan Aquatic Conservation Strategy Standards and Guidelines*. The section regarding roads management RF-2 (h) states: “Water drafting will be conducted only at sites approved by the BLM and will follow National Marine Fisheries Service (NMFS) guidelines.” During road reconstruction, wildland fire events, and other situations, water may be needed by a variety of agencies for dust abatement, fire suppression, and other purposes. The BLM does not regulate water drafting itself (the State of California regulates water use), but has included this stipulation to prevent damage from occurring to streambanks and riparian areas on public lands by ensuring that equipment only accesses suitable locations.

6.3.3.3 Lands and Realty – Acquisition

Comment Summary

- RMP should do what it can to maintain and encourage wildlife/biodiversity corridors, i.e., connect to USFS areas. Suggest acquiring lands between Headwaters and Six Rivers National Forest to provide eventual biological corridor. (PM23)
- Acquire additional access lot between Seal Rock and Abalone Point on Ocean Drive [in Shelter Cove]. (PM28)

Responses

The Proposed RMP directs the BLM to acquire lands outside the KRNCA boundary after coordination with county governments and local community associations, and only from willing sellers. If lands become available that meet these criteria and form biological corridors to USFS lands, particularly if they support citizen-based conservation initiatives, Humboldt County open space goals, watershed protection for the Mattole River and tributaries, and/or provide habitat continuity for threatened, endangered, or other special status species, the BLM would pursue the possibility of acquisition. Much of the region identified by this comment would also fall outside of the scope of the Proposed RMP, which has a planning area focused in the Mattole Valley and Lost Coast. These lands would be covered under the direction of the Arcata RMP (and amendments) which provide similar direction for acquisitions.

Within the Residential Zone that encompasses Shelter Cove, the BLM may also acquire lands after working with affected local governments and community associations, to provide enhanced visitor services or facilities, or to facilitate protection of greenspace, riparian values, and water sources. In all cases, if these criteria are met, acquisitions will be considered on a case-by-case basis.

6.3.3.4 Lands and Realty – Private Lands/Inholders

Comment Summary

- As a hiker, very troubled by presence of air traffic at Big Flat – strongly encourage BLM to close the air strip, interferes with wilderness values. (PM23)
- Take responsibility for source of the environmental damage taking place at Shelter Cove (ex., break in sewage collection system). Be more proactive in addressing these kinds of problems. (PM23)

Responses

BLM does not have the authority to close the air strip at Big Flat. As stated in Section 1.7.6 of the Proposed RMP, access provisions to private inholdings, including the Big Flat air strip, are based on legal deeded rights associated with each parcel and, therefore, are addressed individually with each landowner, and not at a planning level.

The 1970 King Range Act intended that the primary use of the Shelter Cove subdivision be for private ownership and residential use (*House Report on HR 12870, 1970*). The BLM has and will continue to take an active role in working with Humboldt County the California Coastal Commission, and the Shelter Cove Resort Improvement District who have primary planning authority over the private land in the subdivision.

6.3.3.5 Wilderness Characteristics

Comment Summary

- More awareness and education needed for wilderness users re: how to behave in the wilderness. (PM05)

- Survey of wilderness character – good job taking inventory. Section 4.4.8 – impacts to areas with wilderness characteristics – mentions thinning but not salvage. Add assessment of that to the final plan and/or clarification of what is meant by “salvage.” (PM22)

Responses

The Proposed RMP would continue and expand upon the BLM’s existing visitor education programs to encourage appropriate behavior in line with a “Leave No Trace” philosophy, particularly in the Backcountry Zone. In addition, development of the visitor carrying capacity program and a permit system for Backcountry use would facilitate these educational efforts by requiring all visitors to obtain information before accessing the area.

Section 5.4.8 in the Proposed RMP describes impacts to inventory units and study areas from Forest Management, and has been amended to include possible impacts from limited salvage projects.

6.3.3.6 Wild and Scenic Rivers

Comment Summary

- Less river segments designated Wild & Scenic. (PM02)
- More river segments designated Wild & Scenic. (PM06)

Responses

Comments noted. The determination of suitability for Wild and Scenic River designation is based on specific criteria as shown in Appendix D. The BLM Wild and Scenic River study team considered these criteria along with input from commentors to make the final suitability recommendation. As a result, two segments were added to the streams recommended suitable (the main stem and south fork of Bear Creek). The suitability study serves as background information and a recommendation to Congress; only Congress can designate a stream as a component of the Wild and Scenic River system.

6.3.3.7 Wildlife

Comment Summary

- Opposed to reintroduction of species without further discussion/consideration. (PM07)
- Look into marten introduction? Favor seeing them here again. (PM09)
- Consider adding surplus elk from neighboring herds to King Range. Also, eastern wild turkeys introduced to King Range. Survey/inventory species in King Range (perhaps tie into SOD efforts). (PM14)
- Check presence of tailed frog in Big Finley Creek along the coast in summer. (PM23)
- Occasional sightings of bald eagles along the coast in summers. (PM23)
- Plan should do what it can to maintain and encourage wildlife/biodiversity corridors, i.e., connect to USFS areas. Acquire lands between Headwaters and Six Rivers NF to provide eventual biological corridor. (PM23)

Responses

Only CDFG and FWS have direct authority over wildlife population management (i.e., relocation, removal, or introduction), so reintroductions were not considered as actions or goals under this planning effort. However, the BLM remains open to opportunities for future wildlife management changes, including reintroductions, as long as they are consistent with the goals of the Proposed RMP. The costs and benefits of any species reintroduction proposals would need to be analyzed at the time of the proposal.

Regarding the presence of tailed frogs and bald eagles in the KRNCA: The RMP does not contain a detailed list of all species sightings, or management prescriptions for all species present in the area. Chapter 3 includes a chart of all special status species (Section 3.9.1). The Proposed RMP addresses specific goals, objectives, and actions associated with federally-listed Threatened or Endangered species known to occur in the KRNCA (including bald eagles), as determined through a formal list provided by the FWS as required by Section 7 of the Endangered Species Act.. Non-listed wildlife species are addressed only where there is a specific issue associated with their management (e.g. black bears because of potential conflicts with visitors; game species because of hunting regulations). Other wildlife species are named with their associated habitat in the terrestrial ecosystems section. If a species is not named specifically, it does not mean that management actions will not address habitat improvements that will benefit populations. For example, the management actions to protect and enhance late successional forests and riparian corridors will directly benefit tailed frogs.

Regarding wildlife corridor acquisition, see response 6.3.3.3 above.

6.3.3.8 Terrestrial Ecosystems and Vegetation

Comment Summary

- Cooperative burn restoration at Big Flat on exchange for educational values. Make sure any salvage language is tied to ecological criteria. (PM16)
- Help from BLM Botanist, contact Jan Lopes. (PM25)
- Wants more info on how and where to get native plants specific to Shelter Cove/S. King Range. Could BLM sell them? (PM26)
- Need educational process to encourage new Shelter Cove residents not to bring in invasive plants – put info in “welcome basket” for new residents. (PM30)

Responses

The Proposed RMP contains general criteria guiding fire management in the KRNCA, including restoration after burns. Restoration activities relating to the Honeydew Fire are outside of the scope of this plan, but are ongoing with assistance from a variety of partners. The environmental education program will include information on the fire and its rehabilitation.

Regarding native/invasive plants: Comment noted. The BLM coordinates with Humboldt County and other cooperators in developing weed education materials and will make them available to local residents.

6.3.3.9 Forest Management

Comment Summary

- Concern regarding changes in the King Range from the original 1974 Plan, especially regarding timber production on the East side. Feels like the government has not lived up to its original goals and direction for the King Range. (PM21)
- If not reclassified to backcountry, do not allow salvage logging of late seral stages in those zones previously listed. (PM22)
- Also analyze Douglas-fir distribution re: causing possible future risk if global warming heats and dries the climate. (PM23)

Responses

The 1970 King Range Act, along with the 1974 Management Plan, directed that the KRNCA be managed for a variety of primary and secondary uses, including commercial timber production on portions of the eastern side of the ridgeline. However, a number of legislative and administrative changes have updated this original direction, including the 1973 Endangered Species Act, the 1976 Federal Land Policy and Management Act and associated wilderness study process, and the 1994 Northwest Forest Plan. The Northwest Forest Plan was completed as an interagency effort throughout the northwestern U.S. to conserve old-growth dependent species including the northern spotted owl on federal lands managed by the BLM and Forest Service. Under this plan, the KRNCA was designated as a Late Successional Reserve, a land use allocation intended to conserve a network of old-growth forests, while allowing timber production on certain other lands. This allocation only permits the sale of forest products as a realized from silvicultural treatments implemented to restore late-successional stand character. Yields from these treatments would primarily consist of such products as poles and firewood. The current planning process must be consistent with the Northwest Forest Plan.

The BLM recognizes concerns about the potential impacts of salvage logging and the importance of fire-killed trees/snags to ecosystem values. However, because of the harvest activities on these lands in the 1950s-60s (prior to BLM acquisition), many of the stands within the Frontcountry Zone have been altered to the point that entering them after a stand-replacing fire will, in specific instances, provide an opportunity to correct existing problems and lead to development of more natural stand conditions. Any salvage efforts would be part of a comprehensive effort that would include replanting, erosion control etc., and would require that a snag component be left in place. Timber would only be removed after site-specific environmental analysis and within specified standards and guidelines adopted from the Northwest Forest Plan as shown in Section 4.14.4. No salvage operations would occur in the Backcountry Zone. Based on the fire history of the King Range in the Frontcountry Zone, it is anticipated that salvage would be a relatively small component of area forest management activities and is included as a tool for use in these specific instances (see Chapter 5 for estimates).

The potential threats from global climate change are not fully understood to the level that the RMP can directly address reasonably foreseeable impacts specific to King Range ecosystems. However, many of the decisions in the RMP will serve to improve the resiliency of resources, such as the reduction of fuel loads in previously harvested stands and continued watershed restoration efforts and storm-proofing of roads. In addition, the Proposed RMP calls for monitoring of resource conditions of the KRNCA to

determine effectiveness of management actions and ongoing trends. This will allow for a level of adaptability in the plan to address unforeseen impacts from changing climate conditions.

6.3.3.10 Grazing

Comment Summary

- Metal pyramids (exclosures) along grazing leases – coming apart, dangerous, should be checked. (PM01)
- Favors the retirement of unused grazing leases. (PM22)

Responses

Comments noted; removal of the metal structures, old fencing, and other materials is an on-going effort with BLM personnel and volunteers. The Proposed RMP would administratively change the land use allocations for four expired leases from “available” to “unavailable” to livestock grazing.

6.3.3.11 Fire Management

Comment Summary

- Does plan address replanting/reforestation after fires? Concerns that open areas could be planted, prefers they open. (PM02)
- Include water canisters at any designated fire pits. (PM19)
- Favors innovative ideas for prescribed fire, more natural fire cycle, and science opportunity for HSU. (PM22)
- Concerned with fire hazards in this area and feels it warrants greater attention re: changing conditions (global warming). Would like to see an analysis of historical ecology and pattern of fire-dependent species on tops of hills/ridges/mountains, but not lower down. (PM23)

Responses

The Proposed RMP outlines vegetation management goals and fire management goals that would result in a return to historic ecological conditions over the long-term. Under the plan goals, “open” areas that were historically coastal prairies would be managed to encourage retention of prairie vegetation, while forested areas may be replanted or otherwise managed to encourage reforestation.

Fire rings in designated upland campsites include a fuel-free perimeter to minimize the potential for wildfire. Water canisters, while they would provide further fire protection, would also serve as breeding locations for mosquitoes and result in associated health concerns. There are no designated campsites along the Lost Coast Trail, making placement of water canisters impractical. The KRNCA has never recorded a wildfire start from a developed campsite.

The Proposed RMP includes management prescriptions to allow for a more natural fire cycle. Although research opportunities are not specifically identified in the Proposed RMP, the BLM encourages and supports university/partnership studies of public land ecosystems, including fire and fuels.

6.3.3.12 Travel Management

Comment Summary

- Prosper Ridge Road – first stretch (250 feet) too narrow and unsafe, needs to be widened, additional drainage or pullout. (PM04, PM09)
- Maintain existing roads but no more of them. Present roads should not erode sediment into streams. (PM08)
- More extensive and maintained road network – at least for BLM and local users use/access (3 or 4 of ridges). (PM11)
- Promote partnerships with county on road improvements – reflectors to separate lanes. (PM33)

Responses

The Proposed RMP would maintain the existing road network with minimal changes. It includes measures to reduce or eliminate sediment loading into area streams. Specific maintenance concerns, such as widening Prosper Ridge Road, while not specifically addressed in this broad-scale planning effort, will be considered when developing road maintenance or upgrade needs.

The BLM cooperates and assists Humboldt County with road improvements in the King Range as funding permits, and will continue to work with the county.

6.3.3.13 Recreation Resources

Comment Summary

- Add designated fire pits (perhaps constructed with rocks/fire ring) at backcountry camping sites, or designate specific locations for fires – Spanish Flat, Big Flat. (PM15)
- Accommodate higher total group sizes. (PM18)
- Supports permit system to give out information – safety concerns. (PM25)
- Tolkan and Horse Mountain campgrounds – keep rustic, drive in developed, no campgrounds in Shelter Cove. (PM26)
- Don't advertise to promote use – strain on roads, etc. (PM11)

Responses

The Proposed RMP prescribes an adaptive management approach that would require visitors to use designated fire rings and/or campsites in the Backcountry Zone if less restrictive management actions are not effective in preventing wildfire (e.g., backcountry ranger presence, education on campfire site selection and extinguishing, promoting voluntary use of existing user-built fire rings).

The Proposed RMP raises the total number of people in organized groups that may leave from a given trailhead per day from 25 to 30. However, the maximum number of people permitted per group remains at 15 based on the limited size of campsites and the impacts of larger groups on wilderness experiences of the Backcountry Zone.

An interim permit system, and any permit system implemented later as part of a carrying capacity program, will include information for visitors on safety issues while using the Backcountry.

The plan does not include any major changes to Tolkan or Horse Mountain Campgrounds, other than maintenance and basic facility upgrades to meet universal accessibility standards, and to link to a proposed mountain bike trail network.

The BLM is responsible for providing accurate information to the public regarding resources and use opportunities on public lands. In the KRNCA this information is presented via a website and printed visitor guide. The KRNCA and Lost Coast region is a very popular travel destination and is the subject of numerous articles annually in travel and outdoor magazines and newspapers. The BLM has no authority to limit these privately published articles, but provides information to their authors upon request, to help ensure that readers are provided with an accurate depiction of area recreation opportunities, visitor preparation needs, and safety concerns.

6.3.3.14 Recreation – Mountain Biking

Comment Summary

- Mountain bikes don't belong on the trails here. (PM07)
- Allow no new accommodations for mountain bikers. (PM08)
- Support for new mountain bike trails. (PM12)
- Encourage BLM to keep multi-use trails for mountain bikers, possibly build more. Chemise Mountain and King Crest Trail – keep open to mountain bikes. (PM17)
- Favor prohibition of mountain bike use in the backcountry. (PM22)
- Have had 2-3 instances of mountain bikes straying onto private land – nowhere to go South on Chemise Mountain. (PM32)
- No bikes on trails so won't break down and abandon bikes. (PM11)

Responses

The Proposed RMP would provide opportunities for mountain biking where it is compatible with land use allocations, and includes an objective to expand mountain biking opportunities in the Frontcountry Zone. The plan would allow mountain biking on a permitted basis as a temporary use within the Backcountry Zone (Section 4.19.6.1) on approximately 23 miles of routes that were inventoried as “ways” in the original 1988 Wilderness Study. All existing trails in the King Range are contained within the WSA, (except for a portion of the Cooskie Creek Trail which follows the boundary) and mechanized uses are not considered compatible with long-term management of the Backcountry Zone for wilderness characteristics. The plan proposes development of a mountain bike trail network in the Paradise Ridge

area. Upon completion of this network, or designation of the King Range as wilderness, mountain biking would not be allowed in the Backcountry Zone.

6.3.3.15 Recreation – Trails

Comment Summary

- Develop trails to water sources along LCT/other trails. (PM13)

Responses

The Proposed RMP would develop springs for potable water sources where feasible at appropriate intervals near upland trails, and allows for construction of side trails to provide access to such water sources.

6.3.3.16 Recreation – Fees

Comment Summary

- Possibly have backcountry use fees to support increased BLM presence on beach, enforcing fire rules, etc. (PM15)
- Opposed to any fees for use of public lands (representing Unit Backcountry Horsemen of CA). (PM18)
- Have out of state visitors pay two times the fee of California residents. (PM24)

Responses

The BLM is committed to maintaining the KRNCA with the level of fees consistent with policy and budget requirements. If fees are charged, federal policy requires the BLM to treat all visitors equally, regardless of their state of residence.

6.3.3.17 Recreation – Equestrian Uses

Comment Summary

- Horse trailer parking at Woods Gulch – horse pass trailers at gate. (PM25, PM29)

Responses

The Proposed RMP calls for developing additional parking for horse trailers, where feasible, in the Shelter Cove subdivision. Thank you for the suggestion of Woods Gulch as a potential site.

6.3.3.18 Interpretation and Education

Comment Summary

- Create more programs and partnerships w/ schools to restore and teach about local habitat. (PM26)
- Better publicity for interpretive walks/programs - contact Pioneers for docents/volunteers. (PM30)
- Interpretation panels for lighthouse. Get with Carol, work with Lighthouse Society on panels to spruce up lighthouse. (PM31)

Responses

Comments noted. Thank you for the recommendation for additional docent volunteers. The lighthouse panels have been installed.

6.3.3.19 Public Safety and Emergency Services

Comment Summary

- Address Lyme Disease, public safety and awareness, avoidance of ticks, etc. (PM03)
- Would like helispot at wide area near King Peak Road and Shelter Cove Road, allow for emergency helicopter landing, BSB for emergency helicopter use. (PM29)

Responses

Lyme disease concerns and tick information will continue to be emphasized in BLM public information.

The King Peak-Shelter Cove Road intersection is located on private lands. A helispot is located on public lands near the intersection of Paradise Ridge Road and Shelter Cove Road, and would be available for emergency use. Other public lands, including Black Sands Beach, are available for use in emergencies where suitable alternatives (i.e. Shelter Cove Airport) are not available or feasible for use in the specific emergency situation.

6.3.3.20 Cost/General Management and Administration

Comment Summary

- Concern regarding staffing levels required to implement the new plan – will cost too much? (PM11)
- Concern that BLM not adequately managing the areas now (grazing, roads, timber) so why take on more? (PM11)
- Also concern that new plan is too large and complex. (PM21)
- Would like to see more/better coordination with the Sinkyone State Park Plan (ex., common standards for use of LCT). (PM23)

- All of these issues represent writing a comprehensive plan. (PM23)
- Will need more staff to implement plan. (PM11)

Responses

The Proposed RMP represents a continuation of existing management of the KRNCA with changes proposed to manage growing public use demands and additional actions to restore resource conditions. Objectives and actions within the plan will be implemented as staffing and budget levels allow. The plan is intended to guide management of the area for the next twenty years and provide comprehensive and consistent management direction. The RMP is written at a level that matches the complexity of resources, uses, and trends that are anticipated to affect the planning area within this timeframe. The BLM is coordinating with California Department of Parks and Recreation to ensure that the King Range RMP and Sinkyone Wilderness State Park Management Plan have complementary objectives where feasible, and to provide information regarding differences in use requirements.

6.3.3.21 Community Collaboration/Partnerships/Relations and Economics

Comment Summary

- Favors work for local contractors. (PM21)
- Need sign at Black Sands Beach directing people to Shelter Cove, Deli, and Main road – Backpackers before getting to parking lot – to business area. (PM24)
- Create more programs and partnerships with schools to restore and teach about local habitat. (PM26)

Responses

The BLM must follow federal laws when soliciting bids for contracts to allow equal participation in the process. However, the BLM routinely uses local contractors for King Range projects, and will continue to do so as allowed by law.

Thank you for the recommendation for improved visitor information/directions.

As staffing levels allow, the BLM will continue to provide local school programs, and increase the delivery of these programs in partnership with local schools where possible.

6.3.4 Individuals Commenting via Mail (813)

Individualized messages: 39 (email or postal):

Last Name	First Name	City	State	Zip Code	Tracking Number
Alderson	George & Frances	Baltimore	MD	21228	L01

Antonson-Solo	Sandra	Petrolia	CA	95558	L02
Brown	Richard	Petrolia	CA	95558	L03
Campbell	Bruce	Los Angeles	CA	90049	L04
Cardella	Sylvia	Hydesville	CA	95547	L05
Carroll	Chris	Fortuna	CA	95540	L06
Chandler	Ginevra & David Morrow	Ukiah	CA	95482	L07
Coltrin	Ryan	Arcata	CA	95521	L08
Cousins	Robert	Bainbridge Island	WA	98110	L09
Covey	Mr. & Mrs. Elwin	San Diego	CA	92106	L10
Crockett	Kate	Redway	CA	95560	L11
Franzoia	Bob	Sacramento	CA	95822	L12
Green	Fred	Redway	CA	95560	L13
Hall	Thomas	Bakersfield	CA	93308	L14
Heaton	Emily	Ukiah	CA	95482	L15
Huber	Patrick	Davis	CA	95616	L16
Kirkpatrick	William	Santa Clara	CA	95050	L17
Kozarsky	Daniel	Mountain View	CA	94043	L18
Krivanek	Alan	Davis	CA	95617	L19
LaFramboise	Greg	Concord	CA	94521	L20
Madrone	S.	?	CA	?	L21
May	Dottie & Cyril	Long Beach	CA	90803	L22
McAbery	John	Petrolia	CA	95558	L23
Meral	Gerald	Inverness	CA	94937	L24
nagiecki@cox.net		Eureka	CA	?	L25
Nash	Peter & Judy	Petrolia	CA	95558	L26
Nolan	Susan	Bayside	CA	95524	L27
Palmer	Liana	Los Gatos	CA	95032	L28
Rilla	Michael	Eureka	CA	95501	L29
Roche	Maureen	Petrolia	CA	95558	L30
Ryan	Eddy	Piercy	CA	95587	L31
Sardina	George	Valley Center	CA	92082	L32
Sutherland	Robert	Redway	CA	95560	L33
Sweet	Francis	Petrolia	CA	95558	L34
Tillman	Shawn	Redding	CA	?	L35
Wallace	Douglas	Redway	CA	95560	L36
Waxman	Jonas	Oakland	CA	94611	L37
Wengert	Greta	Bayside	CA	95524	L38
Yates	Gus	Berkeley	CA	94703	L39

Comments in each of the individual letters are summarized by resource area, followed by BLM responses. Persons commenting are listed in alphabetical order. A tracking number is used so that individual comment summaries can be correlated with the commenter. Copies of the comment letters are not

included in this document (as permitted under NEPA requirements) since their volume would add considerably to publication size and cost. However, the comments are available for review at the BLM Arcata Field Office upon request.

6.3.4.1 Management Zones

Comment Summary

- Concerned with multiple use zone for areas proposed for wilderness designation. (L01)
- Manage the entire proposed King Range Wilderness [Boxer/Thompson bill] as backcountry/wilderness. (L01, L05, L12, L15, L16, L17, L20, L28, L39)
- Distinction between backcountry & frontcountry is unsupported, concerns for ecological fragmentation. (L04)
- Backcountry/Frontcountry distinction arbitrary in larger context of motorized access. (L11)
- Management zones are not consistent from north to south. (L27)
- Against all new development. (L32)

Responses

The Proposed RMP adds units 2A and the Squaw Creek portion of 1H to the Backcountry Zone, to protect their wilderness characteristics. The remaining units are proposed for management as part of the Frontcountry Zone, but management actions and uses would not affect future consideration of any units for wilderness characteristic protection or Congressional wilderness designation. The BLM is aware of the pending wilderness legislation S-738, “Northern California Coastal Wild Heritage Wilderness Act.” Nothing in the Proposed RMP would preclude management of the lands proposed in S-738 as wilderness, should this bill be passed into law.

The management focus for the units included in the Frontcountry Zone would be ecological restoration, recreation, and private land interface protection from wildland fire. The management objectives and actions for the management zones (and specifically the Frontcountry Zone) will not contribute to ecological fragmentation; restoration actions proposed for the Frontcountry Zone would reduce existing fragmentation and contribute to the return of more natural conditions. The Frontcountry Zone also reflects a reality that much of the King Range is surrounded by rural subdivisions in a region with extreme fire danger, as evidenced by the Fall 2003 lightning fires. Fuels management in the Frontcountry Zone would allow for “lighter-hand” suppression tactics to be employed when future wildfires occur, allowing the BLM to better protect the natural values of both the Front and Backcountry Zones. Section 4.3 of the Proposed RMP describes the rationale behind the inclusion of lands in a particular zone. The Proposed RMP changed the zoning on lands north of Shelter Cove from Residential to Frontcountry to better depict management actions associated with that area.

The Proposed RMP proposes very little new development, other than trails, within the King Range. Facility improvements would be concentrated at existing developed sites.

6.3.4.2 *Visual Resources*

Comment Summary

- Supports Alternative C. (L02)
- Supports Alternative B. (L26, L30)
- The section of backcountry north of Cooskie Creek should be VRM I status as in Alternative B. (L27)

Responses

Comments noted. The Proposed RMP has been revised to include the coastal strip north of Cooskie Creek in the Backcountry Zone with VRM Class I status. The Proposed RMP would classify the northern part of the Frontcountry Zone as VRM Class II. This class requires the BLM to retain the existing character of the landscape, allowing for some limited management activities, such as the proposed silvicultural treatments and watershed restoration activities, which would not be allowed under Class I objectives. These treatments would still have minimal and temporary visual impacts on the natural landscape.

6.3.4.3 *Cultural Resources*

Comment Summary

- Supports Alternative C. (L02)
- Supports Alternative A. (L26, L30)
- Suggests fences on cultural sites. (L30)

Responses

Comments noted. Cultural sites would be fenced where necessary for resource protection.

6.3.4.4 *Realty*

Comment Summary

- Supports Alternative B. (L02, L30)
- Supports Alternative A. (L26)

Responses

Comments noted.

6.3.4.5 Realty – Water

Comment Summary

- Supports Wild & Scenic River designation which would establish a federal water right over such segments. (L04)
- Cumulative impacts for population increase and water rights are not adequately developed. (L09)
- Supports seeking to control and maintain water rights to all waters originating in the KRNCA. (L23)
- BLM should apply for water rights in all fish bearing streams and should not grant private water rights-of-way. (L27)

Responses

The final decision regarding Wild and Scenic River designation and the establishment of a federal reserved water right rests with Congress.

The Proposed RMP addresses and mitigates impacts, including cumulative impacts associated with population growth, under the discussions of specific resource program and use impacts (Chapters 4 and 5). For example, the plan addresses growth issues relating to recreation use by establishing an objective to develop carrying capacities to limit use. The allocation of water and establishment of water rights is outside of the BLM's jurisdiction and is managed by the State of California. Therefore, this issue is beyond the scope of the plan.

The Proposed RMP would require BLM to secure water rights with all new acquisitions, and to apply for water rights necessary to protect resource values on public lands.

Any water right-of-way applications (allowable only in Frontcountry and Residential Zones) would require an Environmental Assessment under NEPA, and would only allow for diversions during the wet season, not the critical dry summer months resulting in no or negligible impacts to fish bearing streams.

6.3.4.6 Realty – Private Lands/Inholders

Comment Summary

- The Draft RMP has an inadequate discussion of impacts (re: NEPA) from air access at Big Flat, which should not be allowed and ownership should be consolidated to public land and from development in Shelter Cove. (L33)

Responses

As stated in Section 1.7.6 of the Proposed RMP, access provisions to private inholdings, including the Big Flat air strip, are based on legal rights associated with each parcel and, therefore, are addressed individually with each landowner, and not at a planning level, and therefore are beyond the scope of this RMP and associated EIS.

6.3.4.7 *Wilderness Characteristics*

Comment Summary

- Encourages the protection of wilderness values. (L01, L30)
- Supports Alternative B. (L02, L15, L30)
- Supports Alternative A. (L26)
- All identifiable units with wilderness characteristics should be managed for those characteristics. (L04)
- The King Range should be managed like a wilderness area, in hopes that Congress will designate as such. (L08)
- Protect areas with wilderness characteristics for potential wilderness designation. (L09)
- Protect all 10,191 acres of land in 11 subunits for wilderness character, believes having none of the alternatives is a failure of NEPA (providing a full range of management alternatives). (L11)
- Supports formalized wilderness. (L21)
- Protect all 10,260 acres of areas with wilderness characteristics adjacent to King Range & Chemise Mountain WSAs. (L23)
- Include more discussion explaining why preferred alternative keeps new acquisitions out of wilderness. (L27)
- The Draft RMP fails to discuss impact of pending Wilderness designation. (L33)

Responses

The settlement of *Utah v. Norton Regarding Wilderness Study* clarified that the BLM's authority to expand Wilderness Study Areas or designate additional areas through the RMP process expired in 1993. However, the BLM can make land use allocations through the RMP to manage areas to protect their wilderness characteristics. Within the King Range RMP, the Backcountry Zone represents this allocation. Parcels 1B, 1EA, 1E, 1F, 1G, the portion of 1H other than Squaw Creek section (see response 6-1 above), 1HA, and 2B were not included in the Backcountry Zone. These parcels require silvicultural treatments in previously harvested forest stands to improve stand naturalness and reduce fuel loads. These prescriptions would protect the Backcountry Zone from fires originating on private rural subdivisions adjoining the King Range, and protect private lands and structures from fires originating in the KRNCA. Since a primary goal of all silvicultural treatments is to restore previously harvested stands to a late-successional ecological state, the treatments would serve to enhance wilderness characteristics of these lands over the long-term. The Proposed RMP also states that no actions will cause impacts to wilderness characteristics that would affect future consideration for Congressional wilderness designation or BLM management for these characteristics.

Parcels 1A, 1C, and 2C were not included in Alternative B in the Draft RMP because they did not meet the minimum criteria used in the assessment for wilderness characteristics; hence Alternative B proposed

to protect the maximum lands with wilderness characteristics and met the intent of NEPA to provide a full range of reasonable alternatives.

The Proposed RMP (and the preferred alternative in the Draft RMP) calls for protection of acquired parcels for wilderness characteristics; see Section 4.8.3.1.

The BLM completed an Environmental Impact Statement (EIS) which studied the impacts of several wilderness designation alternatives for the KRNCA in 1988. The final determination of wilderness designation and boundaries is a Congressional action, and so is outside of the scope of this plan and EIS. The BLM is aware of the pending wilderness legislation S-738, “Northern California Coastal Wild Heritage Wilderness Act.” Nothing in the Proposed RMP would preclude management of the lands proposed in S-738 as wilderness, should this bill be passed into law.

6.3.4.8 Wild and Scenic Rivers

Comment Summary

- Supports Alternative B. (L02, L26, L30)
- Recommends adding eligible segments of Mattole River - headwaters to Honeydew Creek, Squaw Creek, upper and lower North Fork to Alternative C for Wild and Scenic Rivers. (L03)
- Supports more extensive Wild & Scenic River designations and better watershed protection. (L04)
- Recommends that as many segments as possible should be protected as Wild and Scenic Rivers. (L09)
- Recommends maximum protection to every stream and river in KRNCA with a viable salmonid population via Wild & Scenic designation. (L23)
- Suggests Main Stem Bear Creek and North Fork Bear Creek river segments be included in Wild and Scenic River system. (L36)

Responses

The Proposed RMP has been revised to recommend a total of ten stream segments as suitable for inclusion in the National Wild and Scenic River System, including both the Main Stem and North Fork of Bear Creek. Appendix D of the Proposed RMP outlines the criteria used by the BLM to study streams for Wild and Scenic River suitability. One of these criteria is to consider stream segments in a regional context. Although many of the streams in the King Range exhibit significant values that meet eligibility criteria, the study team has determined that the values are not at a level that would make these segments worthy additions to the NWSRS when viewed in the context of the KRNCA as a whole, or within the California Coastal Range Physiographic Province (which serves as the regional context). The Proposed RMP would protect resource values of area streams where they cross public lands regardless of their suitability for Wild and Scenic River designation. The Mattole River upstream from Honeydew Creek and the lower North Fork of the Mattole are bordered by private lands, and so are outside of the BLM’s management jurisdiction. The Proposed RMP contains suitability recommendations, and only Congress can designate a stream segment as part of the National Wild and Scenic Rivers System.

6.3.4.9 ACECs

Comment Summary

- Supports Alternative C. (L02, L26, L30)
- Lower part of Mill Creek must especially be managed to protect wilderness characteristics, designate as ACEC/RNA. (L04)

Responses

The Proposed RMP includes special management protections for the Mill Creek ACEC's watershed and old-growth forest values. Some of the lands within this area were logged prior to public acquisition and require silvicultural treatments to assist the area's ecological recovery. The Proposed RMP states that no actions would cause long-term impacts to wilderness characteristics. By improving natural forest conditions, the treatments would enhance wilderness characteristics in the long-term.

6.3.4.10 Aquatic Systems and Fisheries

Comment Summary

- Supports Alternative C with a 5 year cap on restoration. (L02)
- Figure 2-11 does not indicate coho present in Squaw creek while a CDFG survey on 6/24/03 found coho present. (L03)
- The preferred alternatives for forest and fire management as well as transportation will have detrimental effects of threatened species habitat, particularly on aquatic species habitat. (L09)
- Supports Alternative B. (L26, L30)

Responses

Forest restoration actions in the existing stand types and age classes require successive stand treatments to be effective. These treatments would likely extend beyond the life of this plan. Therefore a five-year timeframe limit would not allow for meeting the plan objectives for restoring forests to a more natural condition. Likewise, watershed restoration activities are completed over multiple years, contingent on funding availability, and to minimize the risk of significant sediment/fisheries impacts from extensive treatments.

The Draft RMP map 2-11 has been updated for the Proposed RMP to correct any fisheries data errors.

The RMP/EIS process includes consultation with the Fish and Wildlife Service and NOAA Fisheries to ensure that management actions do not harm threatened or endangered species. The RMP includes a Biological Assessment which outlines actions that would be taken to protect aquatic and terrestrial species. Specific on-the-ground projects such as fuels treatments and road improvements would require site-specific Biological Assessments and additional consultation prior to implementation.

6.3.4.11 Wildlife

Comment Summary

- Recommends Alternative C. (L02, L26, L30)
- There is little discussion of marbled murrelet, suggest considering current and potential nesting and social activity habitat to encourage species. (L04)
- Against establishing camping corridors (50 yards to each side) at mouths of all creeks and streams along LCT to protect wildlife. (L23)
- Include consideration of fishers which are no longer considered old-growth dependent; and is against the introduction of turkeys. (L27)
- There is no discussion of impacts of introduced species such as turkeys and pigs. (L33)
- There is an inadequate discussion of long-term viability of wildlife populations; missing tailed frog, marten, and goshawk; as well as insufficient coverage of bald eagles, marbled murrelets, brown pelican, California condor, elephant seal and northern fur seal. (L33)
- Against the introduction of wolves and supports the control of mountain lions, concern predators will roam outside public lands. (L34)
- Eradicate all Texas turkeys from KRNCA; establish eradication as a management goal. (L36)
- Cites report of Sinkyone herd of Roosevelt elk expanding into KRNCA. (L38)
- The Draft RMP overlooks management of mountain lion (influence on visitors, also deer and elk populations). (L38)
- Several listed species are overlooked in the Draft RMP. (L30, L38)

Responses

Only CDFG and FWS have direct authority over wildlife population management (i.e., relocation, removal, or introduction), so reintroductions and other population management actions were not considered under this planning effort. However, the BLM remains open to opportunities for future wildlife management changes, including reintroductions, as long as they are consistent with the goals of the Proposed RMP. The costs and benefits of any species reintroduction proposals would need to be analyzed at the time of the proposal.

Pigs have not historically been an issue in the KRNCA, as the habitat they use is mostly found on private lands in the region. A small population of turkeys inhabits a minor part of the KRNCA. However, suitable turkey habitat is limited, so they are not expected to increase substantially during the life of this plan. There are no known impacts from turkeys on native species in the KRNCA. If wildlife monitoring indicates that impacts are occurring, the BLM will work with CDFG to address the issue.

With regard to marbled murrelets, surveys have not detected occupancy and only one “fly-over” was documented which is presumed to be associated with nearby Humboldt Redwoods State Park. Although critical habitat for murrelets has been designated within the boundaries of the King Range, the offshore winds maintain a warm, dry climate that mimics inland conditions that are generally considered

unsuitable, rather than the coastal fog-dominated habitat with which murrelets are ordinarily associated. Similarly, surveys for marten and fishers have not found any occurrence of these species.

Regarding the presence of tailed frogs, marten, goshawk, as well as insufficient discussion of bald eagles, marbled murrelets, brown pelican, California condor, elephant seal and northern fur seal in the Draft RMP: The RMP does not contain a detailed list of all species sightings, or management prescriptions for all species present in the area. Chapter 3 includes a chart of all special status species (Section 3.9.1). The Proposed RMP addresses specific goals, objectives, and actions associated with federally-listed Threatened or Endangered species known to occur in the KRNCA (including bald eagles), as determined through a formal list provided by the FWS as required by Section 7 of the Endangered Species Act. Non-listed wildlife species are addressed only where there is a specific issue associated with their management (e.g. black bears because of potential conflicts with visitors; game species because of hunting regulations). Other wildlife species are named with their associated habitat in the terrestrial ecosystems section. If a species is not named specifically, it does not mean that management actions will not address habitat improvements that will benefit populations. For example, the management actions to protect and enhance late successional forests and riparian corridors will directly benefit tailed frogs.

6.3.4.12 Terrestrial Ecosystems and Vegetation

Comment Summary

- Supports Alternative B. (L02)
- Supports Alternative A. (L26, L30)
- The Redwoods to Sea Corridor as a biological linkage, not recreational. (L04, L11)
- The impact of global warming is not considered. (L09)
- Expresses support for the attention in the plan to coastal prairies as endangered habitat. (L27)
- The discussion of rare plant species is inadequate. (L33)
- There is no discussion of impacts of introduced species such as pampas grass. (L33)
- Is against the use of pesticides and herbicides. (L30)

Responses

Comments noted.

The Draft RMP makes no reference to the Redwoods to Sea Corridor as a recreational corridor. This area is outside the planning area boundary and thus is outside the scope of this RMP.

The potential threats from global climate change are not fully understood to the level that the RMP can directly address reasonably foreseeable impacts specific to King Range ecosystems. However, many of the decisions in the RMP will serve to improve the resiliency of resources, such as the reduction of fuel loads in previously harvested stands and continued watershed restoration efforts and storm-proofing of roads. In addition, the Proposed RMP calls for monitoring of resource conditions of the KRNCA to determine effectiveness of management actions and ongoing trends. This will allow for a level of adaptability in the plan to address unforeseen impacts from changing climate conditions.

Section 4.13.3.1 contains management objectives associated with the protection of all special status species in the KRNCA.

Pampas grass is considered a non-native invasive species, and so is addressed in section 4.13.4.7. The Proposed RMP only allows for herbicide use in limited situations where manual removal of invasive plant species is not feasible, and the spread of these plants would cause extensive ecological damage. Any proposal to use herbicides would require additional environmental analysis.

6.3.4.13 Forest Management

Comment Summary

- Expresses sentiments against logging and road building (L01, L10, L16, L17, L18, L19, L20, L22, L24, L28, L29, L30, L32, L37, L39)
- Recommends against salvage logging. (L04, L23, L30, L36)
- Recommends against all logging. (L14, L30)
- Supports Alternative C with a 5 year cap on restoration. (L02)
- Prohibit salvage logging at the Lower park of Mill Creek. (L04)
- Suggests intensive pursuit of salvage logging will not achieve goal of encouraging old-growth and late-successional forests. (L11)
- Opposed to opening of old logging roads or building new ones. (L11)
- Supports Alternative B. (L11, L26, L30, L36)
- Suggests timber harvesting was promised by original KRNCA Act, small yearly volume and well-regulated contracts should be included in forest management. (L13)
- Supports the Draft RMP silvicultural proposals. (L27)
- Suggest that Alternative B for salvage logging, as the function of large expanses of dead trees is not well enough understood. (L27)
- Opposed to tree-planting in backcountry. (L27)

Responses

The 1970 King Range Act, along with the 1974 King Range Management Program, directed that the KRNCA be managed for a variety of primary and secondary uses, including commercial timber production on inland portions of the area. However, a number of legislative and administrative changes have updated this original direction, including the 1973 Endangered Species Act, the 1976 Federal Land Policy and Management Act and associated wilderness study process, and the 1994 Northwest Forest Plan. The Northwest Forest Plan was completed as an interagency effort throughout the northwestern U.S. to conserve old-growth dependent species including the northern spotted owl on federal lands managed by the BLM and Forest Service. Under this plan, the KRNCA was designated as a Late Successional Reserve (LSR), a land use allocation intended to conserve a network of old-growth forests,

while allowing timber production on certain other lands. This allocation only permits the sale of forest products as a realized from silvicultural treatments implemented to restore late-successional stand character. Yields from these treatments would primarily consist of such products as poles and firewood. The current planning process must be consistent with the Northwest Forest Plan.

Forest restoration actions in the existing stand types-age classes require successive stand treatments to be effective. These treatments would likely extend beyond the life of this plan. Therefore a five-year timeframe limit would not allow for meeting the plan objectives for restoring forests to a more natural condition.

The BLM recognizes concerns about the potential impacts of salvage logging and the importance of fire-killed trees/snags to ecosystem values. However, because of the harvest activities on these lands in the 1950s-60s (prior to BLM acquisition), many of the stands within the Frontcountry Zone have been altered to the point that entering them after a stand-replacing fire will, in specific instances, provide an opportunity to correct existing problems and lead to development of more natural stand conditions. Any salvage efforts would be part of a comprehensive effort that would include replanting, erosion control etc., and would require that a snag component be left in place. Timber would only be removed after site-specific environmental analysis and within specified standards and guidelines adopted from the Northwest Forest Plan as shown in Section 4.14.4. No salvage operations would occur in the Backcountry Zone. Based on the fire history of the King Range in the Frontcountry Zone, it is anticipated that salvage would be a relatively small component of area forest management activities and is included as a tool for use in these specific instances (see Chapter 5 for estimates).

Any road re-opening would be temporary in nature and followed by restoration within 12-18 months, and would only occur in very limited circumstances where environmental analysis shows direct benefit to improving late-successional forest characteristics and no major watershed impacts; see Section 4.14.5 for details. In some cases these actions may serve the dual purpose of removal and restoration of old logging roads.

Regarding the planting of trees in the Backcountry Zone, the Proposed RMP does not call for any treatments (including tree plantings) except for very limited instances; for example, some limited planting is being conducted to rehabilitate fire lines constructed during the Honeydew Fire.

6.3.4.14 Special Forest Products

Comment Summary

- Supports Alternative B. (L02, L26, L30)
- Recommends permits to harvest mushrooms for private non-commercial collectors only. (L23)
- Comments that the Draft RMP does not mention commercial seed-tree harvest. (L27)

Responses

Existing special forest products permits are issued to small family collectors for modest levels of harvest, and mostly to people belonging to low-income and/or minority populations. A theme identified during the public scoping process for the Draft RMP was to allow for economic opportunities for local

communities. Allowance for continued harvesting of these products provides both local economic opportunities and addresses environmental justice concerns for the area. The Proposed RMP would include monitoring of harvest levels to ensure resource values are protected. It also carries forward a Native American beargrass area where commercial beargrass harvesting would not be permitted.

Regarding commercial seed tree harvest, it is assumed that the commentor was referring to the harvest of cones and other vegetative seeds, and not to “seed tree harvesting,” a silvicultural technique that would not be used in the KRNCA because of its status as a Late Successional Reserve. The harvest of cones and other vegetative seeds would be permitted under a Special Forest Products permit.

6.3.4.15 Grazing

Comment Summary

- Supports Alternative B. (L02, L26, L30, L36)
- Suggest eventually eliminating all grazing from KRNCA, negative impacts outweigh the benefits when current permit holders retire or give up leases, those allotments should be terminated. (L23)
- Supports grazing section but questions how cattle will be kept out of redefined portion of Spanish Flat. Also questions whether Howe 1999, studying midwestern tallgrass prairie, applies here. (L27)
- Recommends against commercial grazing. (L29, L30)
- Asserts Draft RMP is incorrect in saying that Big Flat allotment was never grazed, cites sheep grazing there. (L33)
- Asserts the Draft RMP fails to discuss problem of livestock trespass and associated environmental impacts. (L33)

Responses

The King Range Act directs the BLM to consider all legitimate uses of resources on public lands, including grazing, in planning and management of the area (PL 91-476). The Proposed RMP would change the Spanish Flat allotment boundary to exclude grazing from the coastal terraces and therefore would eliminate any impacts to cultural resources. Cattle have already been excluded from this area with upland fencing. The plan would allow for continued grazing while protecting water and vegetation quality on the remaining grazing allotments. If monitoring indicates soil conditions, water quality, or vegetation health are in downward trends and attributed to livestock grazing, the BLM would be required under the *California Rangeland Health Standards* to immediately change grazing practices to reverse these trends. Grazing is also considered to be an important part of management of the coastal prairie ecosystems, to keep them open from forest encroachment (see Section 3.12).

The RMP statement that the Big Flat area was never grazed was intended to indicate that the land was not grazed as an allotment under BLM ownership. The land was grazed prior to BLM acquisition.

There have been past instances of cattle trespass in the KRNCA. However, the BLM has worked extensively with existing permit holders to construct and maintain fences, and limit seasons of use, and will continue to do so to prevent future trespass..

6.3.4.16 Fire Management

Comment Summary

- Supports Alternative C with no broadcast burning. (L02)
- Supports Alternative B. (L26, L30)
- BLM should not to manage for 20 percent seral stage, fire danger. (L04)
- Fuels reduction work should only occur in real interface areas, rather than wild backcountry (even if zoned frontcountry) -- need more study to show that these efforts actually reduce (rather than promote) fire danger. (L04)
- Clarify the meaning of "limit the use of mechanized equipment" in WSA for firefighting, as heavy equipment should not belong in wilderness. (L27)
- Shaded fuel breaks are incompatible with wilderness. (L27)
- Provide proper oversight when involving residents in fuels reduction to avoid highgrading larger trees. (L27)
- Against broadcast burns. (L30)
- Favors more fire protection. (L34)

Responses

A 20 percent early seral stage forest is an estimate of the natural conditions in the King Range forest ecosystem prior to human intervention. This estimate is based on existing conditions in undisturbed forests remaining in the area. Management for a lower percentage of early seral stage forest would be difficult or impossible as the historic stand structure developed based on natural site limitations. The Proposed RMP would accelerate the establishment of late seral stage forests in cutover stands through silvicultural treatments and fuels reductions. This will serve to reduce the current level of early seral forest which is currently much higher than 20 percent. This would also reduce the danger of a stand replacing fire.

Fuels reduction projects would be prioritized in cutover stands with high fuel loads located adjacent to private residential lands.

BLM national level policy provides specific direction and restrictions on allowable uses of mechanized equipment in Wilderness Study Areas. These limitations are outlined in H-8550-1, *Interim Management Policy for Lands Under Wilderness Review*.

Shaded fuel breaks, although they cause some modest impacts to naturalness, would reduce impacts to the area's wilderness characteristics in the long-term by providing defensible containment perimeters for fire, thus reducing the need for dozer line construction during wildfire events that threaten private

property or public safety. Having several defensible fuel breaks would also increase the BLM's capability for reestablishment of the natural role of fire in the Backcountry Zone.

Any permits issued to private landowners allowing fuels treatments on adjoining BLM land would contain specific stipulations on the types and sizes of vegetation to be removed, including restrictions on cutting old-growth or other large-diameter trees.

Broadcast burning would not be used in situations where there is risk of escape onto private lands. In these situations, mechanical fuel reduction would be used.

6.3.4.17 Travel Management

Comment Summary

- Supports Alternative B. (L02, L26, L30)
- The vehicle count for Mattole Road (p. 2-131, Table 2-20) is too high. (L03)
- Close cherrystemmed roads and decommission old/failing/collapsing roads. (L04)
- Close the Smith-Etter road. (L04)
- All year-round roads should be kept open and properly maintained for runoff; seasonal roads open May 1st. (L23)
- Short spur roads less than 2 miles long should be converted to trails. (L23)
- Last 0.6 miles of Windy Point Road should be closed to all vehicle traffic due to steepness of road & poor soil quality. (L23)
- Recommends a complete Environmental Assessment of all roads before finalizing transportation plan. (L23)
- There is confusion with King Peak Road and King Range Road -- consider renaming one. (L27).
- Against the creation of new roads. (L30)
- Against opening Johnny Jack Road. (L30)
- Supports the need for more roads. (L34)

Responses

The vehicle count for Mattole Road was obtained from the Humboldt County Regional Transportation Plan. Although the vehicle count may have increased, this plan represents the best available data at this time.

The Proposed RMP would provide for continued decommissioning of unused roads.

The Smith-Etter Road provides for public access to three trailheads, as well as for legally required landowner access to private inholdings. Therefore, the Proposed RMP would leave this route open to seasonal use.

The Proposed RMP calls for converting several rehabilitated roads into trails including the Queen Peak Mine Road. Development of specific spur routes as trails would be permitted if they meet the recreation management objectives of the RMP. Other roads, including spurs, would be available for non-motorized use, even if not developed specifically as trails.

The Proposed RMP would keep the Windy Point Road open to public access. Closure during the winter season (November 1-March 31) and allowance for extended closure during longer wet seasons, as well as continued maintenance, would serve to minimize impacts to the road bed from public use.

The Proposed RMP includes an Environmental Impact Statement that assesses impacts from the proposed Travel Management plan (Section 5.11.12).

Thank you for the recommendation to change confusing road names. Comment noted.

No new permanent or public use roads would be created under the Proposed RMP.

The Johnny Jack Ridge Road would remain closed under the Proposed RMP.

6.3.4.18 Recreation Resources

Comment Summary

- Supports Alternative A. (L30)
- Supports Alternative A with no fees, just a usage cap. (L02)
- Supports Alternative B. (L26, L27)
- Suggest developing more water sources for public safety along trails (such as King Peak). (L08)
- Recommends not establishing camping corridors (50 yards to each side) at mouths of all creeks and streams along LCT to protect wildlife. (L23)
- Suggests there is no need for a permit system in northern portion of King Range. (L23)
- Disagrees with changing deer season to exclude Labor Day -- supports Preferred Alternative of managing to prevent conflicts. (L27)
- Supports fences of natural material for wildlife & aesthetic reasons. (L27)
- Emphasizes clarification is necessary in defining "developing springs" and "potable water." (L27)
- Supports Alternative B with bear-proof locker storage in backcountry. (L27)
- Recommends signage to be kept to a minimum in backcountry. (L27)
- Supports limiting use of low-flying aircraft. (L27)
- Suggests KRNCA should be closed to loose/off-leash dogs, and that the Draft RMP fails to discuss this. (L33)

- Supports reserving King Range beaches for highest and best uses only, which as judged by numbers of users is individual hiking -- other uses should be excluded. (L33)
- Favors more campgrounds and easier accessibility by older population. (L34)
- Favors allowances for minimum levels of recreation use. (L36)

Responses

The Proposed RMP includes management actions to provide upland water sources.

There is no evidence to indicate that camping at the mouths of Lost Coast streams has had more than negligible impacts on wildlife habitat. Public use is concentrated at the mouths of streams, while the majority of stream mileage receives almost no visitation. This provides extensive areas for terrestrial wildlife use. Public use during winter steelhead and salmon migration is minimal, so again impacts are negligible.

Use impacts and visitor conflicts, while lower on the northern Lost Coast Trail, still occur. Also, administration of a permit system for only a portion of the trail would be difficult to administer and enforce. Therefore the proposed plan provides for a permit system for the entire trail.

The provision to move the deer hunting season to after Labor Day has been removed from the Proposed RMP.

Spring developments typically involve concentration and delivery of water at existing springs that otherwise would not be useable for obtaining water. Development includes small excavations with hand tools, and placement of filter fabric, gravel, and an outlet pipe. Site-specific designs and environmental analysis would occur prior to any developments.

The Proposed RMP calls for limiting signing in the Backcountry Zone to directional and safety signs.

Although the BLM does not have authority to regulate aircraft, the Proposed RMP includes a goal of working with Humboldt County and the FAA to minimize low-flying aircraft use over the King Range Backcountry Zone.

BLM regulations require dogs to be kept on a leash in developed sites such as campgrounds, and under control in all other locations.

The Proposed RMP would manage the Backcountry Zone for a variety of non-mechanized uses in keeping with the goals of managing the area for wilderness characteristics.

The BLM is retrofitting or reconstructing all facilities, including campgrounds, to provide for universal accessibility. All campgrounds in the King Range except for Horse Mountain have been reconstructed for easier access. In addition, the Proposed RMP allows for development of easier access trails in the Shelter Cove/Hidden Valley area.

The Proposed RMP's management objectives call for establishing carrying capacities for recreation use levels to ensure that the area does not become overcrowded.

6.3.4.19 Recreation – Mountain Bicycling

Comment Summary

- No designated single-track, single use bike trails (allow on old roads if holding up ok). (L04)
- Supports continued use of existing trails by mountain bikers. (L06)
- The plan should be more inclusive of mountain bikers on King Range trails. (L07)
- Against describing mountain biking as a “non-traditional,” “special,” or “emerging” activity but rather as an established use. (L07)
- Requests acknowledgement of BLM’s *National Mountain Bicycling Strategic Action Plan* (2002), specifically to identify and implement diverse mountain biking opportunities. (L07)
- Creation of mountain bike trails would be pointless if area is designated wilderness. (L08)
- Supports Alternative C, opposed Alternative B for plan as it is imperative that bicyclists not be excluded from the region. (L25)
- Encouraging mountain bike use in frontcountry will draw them to the backcountry; also comments that the bikeway on shoulder of Shelter Cove Road is needed for safety. (L27)
- Against mountain bikes on trails, especially concerned with its role in causing erosion. (L29)
- Bicycles and hang-gliders should not be in backcountry, represent visual pollution. (L33)
- Supports Alternative C, especially allowing mountain bike access while limiting non-motorized use/access. (L35)

Responses

The Proposed RMP would provide opportunities for mountain biking where it is compatible with land use allocations, and includes an objective to expand mountain biking opportunities in the Frontcountry Zone. The plan would allow mountain biking on a permitted basis as a temporary use within the Backcountry Zone (Section 4.19.6.1) on approximately 23 miles of routes that were inventoried as “ways” in the original 1988 Wilderness Study. All existing trails in the King Range are contained within the WSA, except a portion of the Cooskie Creek Trail which borders the WSA. Mechanized uses are not considered compatible with long-term management of the WSA and overlapping Backcountry Zone for wilderness characteristics. The plan proposes development of a mountain bike trail network in the Paradise Ridge area. Upon completion of this network, or designation of King Range wilderness, mountain biking would not be allowed in the Backcountry Zone.

Mountain biking was discussed on page 2-145 of the Draft RMP. Mountain biking was not listed as a major activity in the Draft Plan because historically use levels have been very limited relative to many other activities in the KRNCA. Due to the mountain biking community’s interest in working with the BLM to expand opportunities in the KRNCA, the lack of suitable trails in the area, and the level of demand for additional riding areas, this activity has been added as a major focus on management in the Frontcountry Zone.

Comment noted. The references to mountain biking among emerging uses have been changed, and the Proposed RMP has been clarified. The Proposed RMP has identified mountain biking as a temporary use within the Backcountry Zone as it is not considered to be compatible with long-term management goals for this part of the KRNCA.

Based on currently low levels of use, resource impacts of mountain bikes to trail treads, watersheds, etc., are not considered an issue in the KRNCA and are not addressed as an impact in the Proposed RMP.

The Proposed RMP is consistent with the *National Mountain Bicycling Strategic Action Plan*. Under the Proposed RMP, the BLM would proactively work with the mountain bike community to implement mountain biking opportunities where they are compatible with the management zone goals and objectives and national policy relating to WSAs. A reference to the strategic plan has been added to the mountain biking discussion in Chapter 3.

Regarding a Shelter Cove Road bike lane: Comment noted. The Shelter Cove Road is under the jurisdiction of Humboldt County. The BLM works with the County to accommodate projects on county roads that cross public lands.

Hang gliding is not currently a known use in the King Range Backcountry Zone. The only hang gliding site on public lands is in the Frontcountry Zone (Strawberry Rock). The Proposed RMP would not allow for mechanized transport in the Backcountry Zone. Hang gliders are considered to be mechanized transport devices, and so would not be permitted.

6.3.4.20 Recreation – Trails

Comment Summary

- Encourage development of trails with gentler grades and loops. (L06)
- Supports responsible use of trails by everyone. (L06)
- Encourage greater coordination with Sinkyone Wilderness State Park’s RMP, specifically linking trails. (L07)
- Suggest a failure to coordinate plan adequately with Sinkyone Wilderness State Park; should not have conflicting sets of regulations on trails. (L33)

Responses

The Proposed RMP includes an objective for developing easier access trails within the Frontcountry Zone. The BLM is coordinating the King Range RMP process with Sinkyone Wilderness State Park planning process to ensure compatible/complementary management. Where regulations vary between the areas, they will be clearly posted at trailheads.

6.3.4.21 Recreation – Motorized Watercraft

Comment Summary

- Emphasizes that motorized watercraft incompatible with wilderness. (L27)
- Suggests outlawing jet skis at Mattole Estuary. (L30)

Responses

The Proposed RMP would not allow motorized watercraft to land on the coast within the Backcountry Zone (except in emergencies), or to be used in the Mattole Estuary.

6.3.4.22 Recreation – Fees

Comment Summary

- Opposes user fees. (L11, L30)
- Opposes fee for overnight use of backcountry. (L27)

Responses

Comments noted. The BLM is committed to maintaining the area with the level of fees consistent with policy and budget requirements.

6.3.4.23 Recreation – Horse / Equestrian Use

Comment Summary

- Supports continued use of existing trails by equestrians. (L06)

Responses

Comment noted. The Proposed RMP allows continued use of all trails by equestrians, with limits on group size that are commensurate with those applied to other user groups.

6.3.4.24 Interpretation and Education

Comment Summary

- Supports Alternative A. (L02, L26, L30)
- Suggests adding informative sign at beach trailheads up to ridges regarding water availability. (L08)

Responses

Comments noted.

6.3.4.25 Public Safety and Emergency Services

Comment Summary

- Suggest developing more water sources for public safety along trails (such as King Peak). (L08)
- Recommends warning visitors about dangers of ticks, Lyme disease and stream crossings on LCT in winter. (L23)
- Favors more police protection. (L34)

Responses

Comments noted. The Proposed RMP calls for development of additional water sources where feasible. The BLM would continue to provide and improve comprehensive safety information and law enforcement ranger patrols to protect visitors. Current BLM visitor information materials include safety as a major topic. This emphasis will continue and be improved where possible.

6.3.4.26 Cost/General Management and Administration

Comment Summary

- Petrolia "inholder" wants King Range to stay as natural and wild as possible. (L02)
- Prefers Alternative B, with some exceptions (some areas are environmentally inferior to other alternatives). (L04)
- The set of policies drawn from alternatives could be presented more clearly as a single section of text. (L11)
- If there are future budget cuts for King Range management, first make cuts in areas that do not promote long term goal of keeping King Range as wild and primitive as possible (such as grazing, closing roads, or limiting length of driving season). (L23)
- Hire locals for any improvements. (L26)
- Draft RMP does not appear to comply with CEQA in terms of adopting the least environmentally damaging feasible alternative, also discussion of cumulative impacts inadequate for compliance with CEQA. (L33)

Responses

Regarding the wild and natural character of the King Range: This is a primary purpose of the legislation and policies guiding KRNCA management, and is reflected in the goals, objectives, and actions of this RMP process.

The plans and policies in the Proposed RMP have been reformatted from the Draft RMP version in an effort to make the text clearer and easier to understand.

The BLM is required to follow federal laws when soliciting bids for contracts to allow equal participation in the process. However, the BLM routinely uses local contractors for King Range projects, and will continue to encourage use of local contractors as allowed by law.

Because this is a federal project, the RMP is subject to the requirements of the National Environmental Policy Act (NEPA), and not CEQA. Under NEPA, the BLM is not required to adopt the environmentally preferable alternative. However, the Proposed RMP includes a balance of actions that will allow for continued public uses of the KRNCA as mandated by the 1970 King Range Act, while protecting and enhancing the quality of the environment through forest and watershed restoration activities. Many actions in the plan will result in beneficial environmental impacts when compared to baseline conditions, while others result in only negligible to minor negative impacts. No significant negative impacts have been identified. Where cumulative impacts would occur, they are analyzed as required under NEPA (see Chapter 5).

6.3.4.27 Community Collaboration/Partnerships/Relations and Economics

Comment Summary

- Concerned that economic portion of document suggests that locals want logging to support local economy. (L04)
- Requests an extension to the comment deadline. (L33)

Responses

The Draft RMP was not intended to create an impression of strong local support (or opposition) for logging. The Economic Context (Section 2.3.6 in the Draft RMP) discusses regional trends in lumber-related jobs within Humboldt County to provide an overview of the regions economy and the impacts of management of the King Range.

The BLM provided for a 90-day comment period on the Draft RMP, from January 16, 2004, to April 16, 2004. This is longer than the 60-day comment period required by NEPA.

6.3.5 Form Messages

Comments in both of the form letters are summarized by the BLM below, followed by BLM responses. Persons commenting are listed in alphabetical order. Copies of actual comment letters are available from the BLM Arcata Field Office upon request.

6.3.5.1 Form Message 1: letters regarding mountain bicycles (4):

Last Name	First Name	City	State	Zip Code
Dobrowolski	Christine	Arcata	CA	95521
Gratz-Weiser	Rowan	Arcata	CA	95521
McDaniel	Patrick	Arcata	CA	95521
Swaffer	Wes	Arcata	CA	95521

Comment Summary

- Supports mission statement developed for management of the area and that mountain bicyclists can be a part of this commitment to the preservation of the KRNCA.
- Indicates 1974 Management Program was developed prior to the invention of mountain bicycles.
- States that studies have shown mountain bicycles as having about the same impact on trails as do hikers and backpackers, and less impact on trails than horses and pack animals.
- Expresses desire to continue using the KRNCA for mountain bicycling.

Responses

Comments noted. The Proposed RMP would provide opportunities for mountain biking where it is compatible with land use allocations, and includes an objective to expand mountain biking opportunities in the Frontcountry Zone. The plan would allow mountain biking on a permitted basis as a temporary use within the Backcountry Zone (Section 4.19.6.1) on approximately 23 miles of routes that were inventoried as “ways” in the original 1988 Wilderness Study. All existing trails in the King Range are contained within the WSA, except a portion of the Cooskie Creek Trail which borders the WSA. Mechanized uses are not considered compatible with long-term management of the WSA and overlapping Backcountry Zone for wilderness characteristics. The plan proposes development of a mountain bike trail network in the Paradise Ridge area. Upon completion of this network, or designation of King Range wilderness, mountain biking would not be allowed in the Backcountry Zone.

Based on the current low levels of use, resource impacts of mountain bikes to trail treads, watersheds etc. are not considered an issue in the KRNCA and are not addressed as an impact in the Proposed RMP. Compatibility with management for wilderness characteristics is the rationale for limiting mountain bike use in the Backcountry Zone and for transitioning this use into the Frontcountry Zone. The Proposed RMP text has been updated to replace “non-motorized” with “non-mechanized” to more clearly reflect the land use allocation of the Backcountry Zone to be managed for wilderness characteristics. The Plan seeks to develop a mountain bike trail system in the Frontcountry Zone that would mitigate the long-term impact of not allowing mountain bikes in the Backcountry Zone.

6.3.5.2 Form Message 2: form letters regarding wilderness (769):

Last Name	First Name	City	State	Zip Code
a'Becket	Suzanne	Cupertino	CA	95014
Adams	Evelyn	McKinney	TX	75071
Adams	Marsha	Sunnyvale	CA	94087
Afzal	Kenneth	Santa Monica	CA	90401
Agredzno	Rene	Eureka	CA	95503
Aguilar	Felix	Long Beach	CA	90804
Aguilar	Toni	Annapolis	MD	21401
Aguirre	Patricia	Los Angeles	CA	90042
Ali	Hana	San Francisco	CA	94117
Allen	Peter	Charlottesville	VA	22903

Alosi	Jeanette	Chico	CA	95928
Alosi	Jeanette	Chico	CA	95928
Althoff	Eric	Los Angeles	CA	90026
Amelang	Loren	Philo	CA	95466
Amelotte	Patti	Gardena	CA	90249
Amon	Rachel	Rochester	NY	14624
Anderson	Colin	Arcata	CA	95521
Anderson	Neal	Altadena	CA	91001
Anderson	Connie	American Canyon	CA	94503
Ankney	Jennie	San Diego	CA	92115
Arblaster	Jacqui	Los Angeles	CA	90066
Archer	Donald	Cambria	CA	93428
Armin-Hoiland	Joel	Bayside	CA	95524
Armstrong	Thomas	Oreland	PA	19075
Aulakh	Arjan	Venice	CA	90291
Ayag	Sarah	Santa Rosa	CA	95407
Ayag	Sarah	Santa Rosa	CA	98407
Badoza	Mariamelia	Sacramento	CA	95824
Bagatelle-Black	Forbes	Saugus	CA	91350
Bailey	Diane	Oakland	CA	94610
Baker	Nicholas	Glendale	CA	91205
Baldomero	Beau	West Hills	CA	91307
Baldwin	Val	Capitola	CA	95010
Balfour	Peter	Key West	FL	33040
Ballentine	Eusebius	Honesdale	PA	18431
Barfield	John	Atlanta	GA	30329
Barnett	Cheryl	Santa Monica	CA	90405
Barrett	Frances	Oregon House	CA	95962
Bartel	E	Anaheim	CA	92805
Barth	Teresa	Cardiff By The Sea	CA	92007
Bartholomaus	Derek	Los Angeles	CA	90066
Bauman	Shawn	Krum	TX	76249
Baumann	Shawn	Krum	TX	76249
Bedolla	Felix	Napa	CA	94558
Bell	Norton & Ann	Palo Alto	CA	94301
Bellomo	Adrian	Palo Alto	CA	94301
Bennett	Paul	Lake Forest	CA	92630
Benschoter	John	Oceanside	CA	92057
Bentz	Susan	San Diego	CA	92127
Berger	Mike	Chico	CA	95973
Bergman	Werner	Pleasanton	CA	94588
Bernard	Bruce	San Jose	CA	95123
Binsfeld	Mindy	Maple City	CA	49664
Birkland	Veronica	Santa Barbara	CA	93111

Bishop	Debra	Sacramento	CA	95819
Blackbum	Sandra	La Puente	CA	91744
Bocchetti	Ralph	Santa Ana	CA	92706
Boe	Amanda	Oakland	CA	94610
Bolsky	Debbie	Santa Monica	CA	90403
Bondy	Coleen	Woodland Hills	CA	91367
Boraby	Ali	Toledo	OH	43609
Bortz	Sarah	Irvine	CA	92612
Boysen	Ruth	San Pedro	CA	90731
Brady	Clare	Danbury	CT	06811
Brandon	Victoria	Lower Lake	CA	95457
Brandstetter	Chuck & Diane	Indianapolis	IN	46220
Branscombe	Debira	Cameron Park	CA	95682
Braus	Joseph	Burbank	CA	91505
Brittenbach	Dennis	Vallejo	CA	94591
Brodslley	William	Carmel	CA	93921
Brown	Karminder	Las Vegas	NV	89146
Brown	Myrna	Rosemead	CA	91770
Brown	Steven	Moorpark	CA	93021
Brown	Karminda	Las Vegas	NV	89146
Brunson	Robert	Seaside	CA	93955
Bruskotter	Eric	Santa Monica	CA	90405
Bryan	Melissa	Belmont	CA	94002
Budnick	Brooke	Eureka	CA	95503
Bukovec	Drazen	Zagreb		10000
Burnett	Nona	Robeline	CA	71469
Butler	Darrol	Redding	CA	96003
Bynum	Joshua	Folsom	CA	95630
Calabria	Antonio	San Antonio	TX	78249
Cambron	Vicki	Penn Valley	CA	95946
Campbell	Christopher	Fort Lauderdale	FL	33311
Cannon	Mike	Long Beach	CA	90803
Cape	Christa	Rohnert Park	CA	94928
Carlson	Janice T	Cocoa Beach	FL	32931
Carlson	Ravin	San Clemente	CA	92672
Carpenter	Bryan	San Jose	CA	95119
Carrington	Martha	Oakland	CA	94602
Carson	Chris	Burbank	CA	91501
Carter	Brenda	San Diego	CA	92103
Carter	Marian	West Covina	CA	91791
Cartolano	Lisa	Oakland	CA	94618
Carver	Gwenn	Riverside	CA	92504
Catapano	Lisa	San Francisco	CA	94105
Caton	Roy	Studio City	CA	91604

Caton	Barbara	Studio City	CA	91604
Catone-Huber	Adrienne	Harbor City	CA	90710
Cejnar	Jessica	Arcata	CA	95521
Chadwick	Patricia	New York	NY	10025
Chadwick	Kate	Irvine	CA	92612
Chadwick	Melani	New York	NY	10025
Chapman	LaRita	Las Vegas	NV	89119
Charette	Jane	Issaquah	WA	98027
Charlton	Dawn	Solana Beach	CA	92075
Chase	Everett	Los Angeles	CA	90039
Chazin	Julian	San Diego	CA	92131
Cheng	W.	Manhattan Beach	CA	90266
Chertov	Barry	Sebastopol	CA	95472
Cheshire	Rena	Tampa	FL	33611
Chess	Katie	Ventura	CA	93001
Chittenden	David	Mill Valley	CA	94941
Christy	Michael	Desert Hot Springs	CA	92240
Clark	James	Coarsegold	CA	93614
Cleveland	Paula	San Diego	CA	92103
Clymo	Jerry	Union City	CA	94587
Coe	Michael	Crete	NE	68333
Colburn	Kathleen	Mont Vernon	NH	3057
Cole	Stormbrenjer	Long Beach	CA	90803
Collins	Merl & Judy	Riverside	CA	92503
Collins	Steven	Redwood City	CA	94065
Conlogue	Robert	Dublin	CA	94568
Consbruck	Barbara	Sylmar	CA	91342
Constenbader	Kari	Wilton	CA	95693
Cook	Craig	Santa Rosa	CA	95401
Correnti	Matt	Altadena	CA	91001
Cosetto	Deborah	San Lorenzo	CA	94580
Costa	Leonard	Empire	CA	95319
Coulson-Schlossnagel	Irena	El Cajon	CA	92020
Covalt	Wendell	Redondo Beach	CA	90277
Covington	Teresa M.	Oceanside	CA	92057
Cox	Midi	San Diego	CA	92122
Craig	Wendi	San Luis Obispo	CA	93401
Cromwick	William	Somerville	CA	02144
Crosby	Lorna	Santa Monica	CA	90405
Croskery	JoBee	Los Angeles	CA	90024
Crupl	Kevin	Marquette	MI	49855
Crusha	Connie	El Cajon	CA	92019
Culhane	Lesley	Camarillo	CA	93010
Cunningham	L.K.	Santa Clara	CA	95050

Cunningham	Dan	Pasadena	CA	91103
Currin	Mary	Petaluma	CA	94952
Cutter	Celeste	Santa Cruz	CA	95062
Cutter	Sandra	Martinez	CA	94553
Da Rocha	Camille	San Jose	CA	95127
Dakak	Alan	Yorba Linda	CA	92886
Daniels	Elizabeth	Melbourne	FL	32901
Davenport	Robert L.	Lakewood	CA	90712
David	Rebecca	Astoria	NY	11102
Davies	Merrily	Porterville	CA	93257
De Leon	Pedro Luis	Santa Cruz	CA	95064
DeBin	Joey	Nicholasville	KY	40356
Deeming	Robin	Canyon	CA	94516
Deferrante	Robert	Pasadena	CA	91104
Delair	Linda	San Rafael	CA	94901
Dengel	Patricia	Hummelstown	PA	17036
Denne	Joyce R	Monterey	CA	93940
Denton	John	Springfield	OR	97478
Denzler	Maria	Reno	NV	89521
Derr	Gideon	Dallas	TX	75231
DeWitt	Shana	El Sobrante	CA	94803
Diasio	Donna	Seattle	WA	98105
Dickens	Bart	Santa Barbara	CA	93109
Dollyhigh	Adrienne	Pilot Mountain	NC	27041
Dolney	R Renee	Pittsburgh	PA	15235
Donlin	John	La Canada Flintridge	CA	91012
Dore	Sandra	Kenosha	WI	53144
Dorer	Jeffery	Los Angeles	CA	90034
Dorinson	David	North Fork	CA	93643
Drescher	Linda	Golden	CO	80401
Dubno	Danielle	Rockville Centre	NY	11570
Dusine	Cindy	San Mateo	CA	94403
Dwoskin	Lauren	Fresno	CA	93720
Early	Eric	Cleveland	OH	44134
Eckhouse	Betty	Escondido	CA	92027
Eco	Esmee	Petaluma	CA	94952
Eco	Esmee	Petaluma	CA	94952
Eddy	Dara	Seattle	WA	98107
Eiser	Elyse	Pasadena	CA	91107
Embree	Tina	Mercer Island	WA	98040
Erhardt	Mona	Santa Barbara	CA	93121
Erickson	Karen	San Jose	CA	95125
Errea	Mack	Laguna Niguel	CA	92677
Eshaghpour	David	Pacific Palisades	CA	90272

Estes	Douglas	San Francisco	CA	94118
Esteve	Gregory	Lake Wales	FL	33898
Etta	Moose Mary	San Francisco	CA	94133
Evans	Dan	Los Angeles	CA	90068
Evans	Bethany	Carlock	IL	61725
Evans	Dinda	San Diego	CA	92177
Evans	James	Clearlake Oaks	CA	95423
Evoy	Cherryl	Burlington	NJ	08016
Fairfield	John	San Francisco	CA	94131
Fanos	Nancy	San Jose	CA	95120
Farnham	Elizabeth	Belmont	CA	94002
Filipelli	Deborah	The Sea Ranch	CA	95497
Fischer	Leonard	San Lorenzo	CA	94580
Flanagan	Paula	Bethel Island	CA	94511
Flaum	Elisabeth	Pasadena	CA	91105
Fletcher	Sonia	San Rafael	CA	94901
Fletcher	Richard	San Diego	CA	92131
Flowers	Bobbie Dee	New York	NY	10011
Folnagy	Attila	Harrison	ID	83833
Forcier	Parry	San Francisco	CA	94102
Ford	Richard	Toluca Lake	CA	91602
Ford	Tom	Venice	CA	90291
Fortier	Rollin	Santa Barbara	CA	93103
Franco	Paige	Grand Junction	CO	81503
Frayne	Joseph	Long Beach	CA	90802
Frazer	Mark	Arlington	VA	22207
Frecon	Suzan	New York	NY	10013
Friscia	Anthony	Los Angeles	CA	90024
Fritz	Paul	Sebastopol	CA	95472
Frommer	James	San Diego	CA	92105
Fulton	Phil	Bend	OR	97707
Gaffney	Kathryn	Albany	CA	94706
Gale	Jennifer	Sea Ranch	CA	95445
Galimitakis	Marguerite Joan	Clinton	CT	06413
Gall	Erin	Wilton	CA	95693
Galston	Mamie	Bellingham	WA	98225
Galvin	Paul	Los Angeles	CA	90007
Gambino	Jennifer	Bloomfield	NJ	07003
Garcia	Paula R.	Blythe	CA	92255
Garcia	Michael J.	Huntington Beach	CA	92648
Garcia	Marco	Buena Park	CA	90621
Gardiner	Shayna	Grass Valley	CA	95945
Garman	Jason	Los Angeles	CA	90026
Garner	Scott	Los Angeles	CA	90027

Garrett	Susan	Green Valley	AZ	85622
Gartin	Courtney	San Jose	CA	95138
Gase	Michelle	Fairfield	OH	45014
Geise	Wendy	Fairfield	CA	94534
Geller	Gloria	Los Altos	CA	94022
Gentry	Louis	Mountain View	CA	94040
Gerdes	Heather Lea	Studio City	CA	91604
Gerstein	Michael	San Rafael	CA	94901
Gessay	Glenda	Black Creek	WI	54106
Glardina	Bonny	Los Angeles	CA	90039
Glavina	Sonja	Beachwood	OH	44122
Glavina	Vesna	Beachwood	OH	44122
Gomez	Maria	Des Plaines	IL	60018
Goodrich	Charlie	San Francisco	CA	94107
Goodson	Alan H.	Los Angeles	CA	90026
Goodwin	Diana	Los Angeles	CA	93313
Goolsby	Matt	Placerville	CA	95667
Goraly	Nitzan	Granada Hills	CA	91344
Gray	Jim	Hemet	CA	92544
Griffis	David	Mill Valley	CA	94941
Grindle	Russell	Fairfield	CA	94533
Groff	Robert	Campbell	CA	95008
Groome	Malcolm	Topanga	CA	90290
Grossman	Bonnie	Walnut Creek	CA	94597
Grozaj	Suzana	Zagreb	NO	10000
Gutierrez	Xavienne	Ojai	CA	93023
Haas	Victoria Bacigalupi	Los Angeles	CA	90025
Haines	Lynn	Agoura	CA	91301
Hall	Carol	Boulder	CO	80305
Hall	Linda	Fontana	CA	92335
Hallacy	Lynn	Sacramento	CA	95828
Hammond	Marcella	Spring Valley	CA	91977
Hampson	Doug	San Francisco	CA	94117
Handley	Vance	Los Angeles	CA	90034
Hanna	Mark	Alpine	CA	91901
Hansen	Joanna	Hayward	CA	94542
Hansen	MJ	Los Angeles	CA	90064
Harbeson	Charlotte	Mammoth Lake	CA	93546
Hargleroad	Jewell	Hayward	CA	94542
Harris	Alex	Independence	MO	64055
Harris	Laura	Ontario	CA	91762
Harrison	Diane	Walnut Creek	CA	94596
Harrod	Florence	Encinitas	CA	92024
Hartland	Karen	Burbank	CA	91504

Hawkins	Sharon	Saginaw	TX	76179
Hawkins	Derrell	Washington DC	VA	20032
Hayo	Katie	Paramus	NJ	07652
Hebert	Joan	Menlo Park	CA	94025
Heidemann	Jakki	Fontana	CA	92336
Henriksen	Heather	New York	NY	10014
Henry	Lyle	Los Angeles	CA	90039
Henry	Steve	Santa Monica	CA	90403
Herath-Velby	Gail	Westborough	MA	01581
Herndon	Laura	Burbank	CA	91505
Hessel	Laura	San Diego	CA	92115
Hicks	Aaron	Chandler	AZ	85246
Higgs	John	San Diego	CA	92123
High	Carole	Frostburg	MD	21532
Hill	Rhonda	San Diego	CA	92117
Hill	Barbara	Loyalton	CA	96118
Hiner	Sam & Allegra	Pennngrove	CA	94951
Hoekenga	Christine	Boulder City	NV	89005
Hogerhuis	Kris	Fullerton	CA	92833
Hohlfeld	Eric	Oxford	CT	06478
Holcomb	Susan	Santa Monica	CA	90403
Holley	Nita	Harriman	TN	37748
Holley	William	Redding	CA	96002
Holt	Raissa	North Hills	CA	91343
Holzberg	Steve	Rodeo	CA	94572
Hopkins	Daniel	Covina	CA	91722
Hoppe	Paula	Santa Monica	CA	90403
Horn	Fred	Coronado	CA	92118
Hubbell	Jodi	Truckee	CA	96160
Huff	Chris	Austin	TX	78748
Hughes	Chuck	Mountain View	AR	72560
Hughes	Michael	San Diego	CA	92123
Humphries	Jane	Yucca Valley	CA	92286
Hunter	Keith	Laguna Beach	CA	92651
Hunter	Ruth Anne	Santa Cruz	CA	95062
Hurwitz	Judith	Centerport	NY	11721
Hutchinson	Terrance	California City	CA	93505
Hutchinson	Terrance	California City	CA	93505
Idol	Kim	Reseda	CA	91335
Jackson	Kathleen	Tiburon	CA	94920
Jacquet	Colette	Greenwich	CT	06831
Jacus	Anna	Linden	NJ	07036
Jacus	Anna	Linden	NJ	07036
Jacus	Anna	Linden	NJ	07036

Jarboe	Mike	Reseda	CA	91335
Jasoni	Marilyn	Penngrove	CA	94951
Jensen	Alex	Berkeley	CA	94705
Jensen	Kristen	Scotts Valley	CA	95066
Jessler	Darynne	Valley Village	CA	91607
Johnson	Bill	Tulsa	OK	74107
Johnson	Darrel	Fairfax	CA	94930
Johnson	Douglas	Burbank	CA	91504
Johnson	Laine	Pleasant Hill	CA	94523
Johnson	Gregg	San Jose	CA	95113
Johnston	Timothy	Marina	CA	93933
Jones	Christine	Rosamond	CA	93560
Jones	Michael	San Diego	CA	92117
Jones	Tanya	Costa Mesa	CA	92627
Jones	Laurel	Los Angeles	CA	90025
Kajtaniak	Dave	San Bernardino	CA	92405
Kavanaugh	Michael	San Francisco	CA	94108
Kay	Melanie	Miami	FL	33193
Kaye	Valerie	San Diego	CA	92110
Keating	Joseph	Los Angeles	CA	90016
Keezer	Geoffrey	San Leandro	CA	94578
Kehoe	Kim	Davis	CA	95616
Keller	Arthur	Palo Alto	CA	94303
Kelner	Anna	Pacific Palisades	CA	90272
Kern	Alicia	Rolling Hills Estates	CA	90274
Kerr	Andrew	Long Beach	CA	90807
Kessler	Keith	Kihei, Maui	HI	96753
Kind	Kathryn	Venice	CA	90291
King	Cassie	Jersey City	NJ	07302
King	Kathleen A.	Stone Mountain	GA	30087
Kingsbury	Marcy	San Diego	CA	92115
Kinsey	Graeme	Concord	CA	94521
Kirby	Ruth	Palo Alto	CA	94306
Kirschbaum	Norton & Sarah	Los Angeles	CA	90035
Kirschling	Karen	San Francisco	CA	94117
Kitman	Lorraine	Arroyo Grande	CA	93420
Kittredge	Nancy	Del Mar	CA	92014
Klein	Laura	Berkeley	CA	94703
Klein	William	Walnut Creek	CA	94596
Knapp	Peggy	Escondido	CA	92029
Koenig	Jesse	Palo Alto	CA	94304
Kohler	John	Daly City	CA	94015
Kohlmetz	Phil	Vallejo	CA	94590
Koivisto	Ellen	San Francisco	CA	94122

Kramer	David	Santa Barbara	CA	93105
Krasenics	Kathleen	Marina del Ray	CA	90292
Krausz	Lisa	Tiburon	CA	94920
Krey	Chantal	San Anselmo	CA	94960
Kriss	Nancy	Fremont	CA	94536
Kroehler	Corbett M.	Orlando	FL	32839
Krupnick	Wendy	Santa Rosa	CA	95401
Kupsaw	Wendy	Oakland	CA	94611
Kyle	Luana	Indio	CA	92201
Labadie	Quinn	San Diego	CA	92117
Lamb	Alexandra	Sherman Oaks	CA	91401
Lambert	Bettina	Long Beach	CA	90814
Lambrix	Teresa	San Diego	CA	92103
Landskroner	Ron	Oakland	CA	94611
Lane	Earl	Hannibal	MO	63401
Langlois	Robert J.	Bay Point	CA	94565
Lansdale	Nolan	Hollywood	CA	90028
Larson	Theresa M.	Orinda	CA	94563
Lasahn	Jacqueline	Richmond	CA	94805
Laverne	Tim	Isla Vista	CA	93117
Le Vanda	Stephanie	Los Angeles	CA	90049
Leahy	Martha	Winchester	MA	01890
Lechuga	Erika	Kihei	HI	96753
Lee	Annie	San Francisco	CA	94116
Leeuwen	Natasha Van	Torrance	CA	90503
Lemoin	Lisa	Campbell	CA	95008
Lent	Chad	San Francisco	CA	94115
Lenz	Dawn	Duluth	MN	55805
Lerner	Lora	Santa Cruz	CA	95062
Leshin	Constance	Llano	CA	93544
Levine	Arielle	Berkeley	CA	94703
Levine	Deborah	San Geronimo	CA	94963
Levstik	Patty	Lakewood	OH	44107
Lew	Crystal	San Jose	CA	95124
Lewis	Rebecca	Cleves	OH	45002
Lewis	Nerida	Pasadena	CA	91105
Lewy	Julien	Studio City	CA	91604
Lifson	Robert	Chicago	CA	60640
Lightner	Scott	Beverly Hills	CA	90210
Lila	Trinity	Goleta	CA	93117
Lisle	David	Willits	CA	95490
Livingston	Nicole	Los Angeles	CA	90027
Lloyd	J.D.	Venice	CA	90291
Loeff	Peter	Mountain View	CA	94039

Logan	Ed	Eugene	OR	97404
Loken	Deborah	Rainier	WA	98576
Long	Carol	Santa Cruz	CA	95060
Looby	Judith	North Fork	CA	93643
Lorusso	Nichole	Branchville	NJ	07826
Lotz	Jonathan	Herndon	VA	20170
Loucks	Robert	Corona	CA	92879
Lubinsky	Jennifer	Merrick	NY	11566
Lyerly	Linda	Cardiff	CA	92007
Lynn	David	San Diego	CA	92103
Lyons	Larry & Diane	Burbank	CA	91505
MacArthur	June	Santa Rosa	CA	95401
MacGinitie	Andrew	Roxbury	CT	06783
Mack	Ryan	Ukiah	CA	95482
Macker	Bonnie	North Hollywood	CA	91602
Mackey	Robin	San Francisco	CA	94110
Magoffin	Patricia	La Canada	CA	91011
Malley	Karen	Anaheim	CA	92804
Mallory	Stephen	Carlsbad	CA	92009
Malone	Michael	Calabasas	CA	91302
Mann	Gloria Darlene	San Francisco	CA	94102
Manning-Brown	Helen	Long Beach	CA	90807
Marino	Regina	Hamden	CT	06514
Marks	Patrick	Stockton	CA	95210
Marr	Patrick	Santa Barbara	CA	93101
Marrs	Cynthia	Fall River Mills	CA	96028
Marsh	Nora	Auburn	CA	95603
Marshall	Lisa	Houston	TX	77070
Mathews	Jen	Burbank	CA	91501
Maufer	Thomas	Menlo Park	CA	94025
Maxwell	Adrienne	Los Angeles	CA	90066
Mazor	Raphael	Oakland	CA	94608
Mc Credie	Brian	Thousand Oaks	CA	91360
McBride	Mary	Alpine	CA	91903
McClellan	Linda	Capitola	CA	95010
McCloskey	R	Kelseyville	CA	95451
McCombs	Richard	Northridge	CA	91343
McDonald	Mary Ann	Sacramento	CA	95818
McFarland	Michael	Fresno	CA	93720
McIntyre	J	Laguna Beach	CA	92651
McKnight	Shoshanah	Santa Cruz	CA	95052
McMurdie	Janine	Thousand Oaks	CA	91360
McRight	Blue	Venice	CA	90291
McRoberts	Kevin	Redondo Beach	CA	90278

McVarish	Linda	Laytonville	CA	95454
Meadmore	Stella	Roseville	CA	95661
Meersand	Kenneth	Hermosa Beach	CA	90254
Mein	Joenie	Dallas	TX	75218
Mellander	Mark	Freestone	CA	95472
Meyerhofer	Jill	Oceanside	CA	92054
Mielke	Katja	Hamburg	OH	22297
Mihok	Michael	Bayville	NJ	08721
Miles	Chris	Los Angeles	CA	90041
Miller	Leslie	Northridge	CA	91324
Miller	Dianne	San Diego	CA	92103
Miller	Susan	Graton	CA	95444
Millner	Susan Emge	Cedar Park	TX	78613
Miluck	Alyse	San Francisco	CA	94112
Minnes	Christopher	Los Angeles	CA	90068
Mitchell	Rev Clair E.	Los Angeles	CA	90016
Mitchell	Ina	Woodland Hills	CA	91364
Mitchell	Zephyr	Ben Lomond	CA	95005
Mitchell	Brittney	Fort Collins	CO	80521
Mo	Donna	Los Angeles	CA	90024
Molina	Jessika	Los Angeles	CA	90026
Moneypenny	Mary	Palmdale	CA	93550
Mongan	James	Mount Vernon	NY	10552
Monks	Dennen	San Luis Obispo	CA	93401
Moore	Tina	Grover Beach	CA	93433
Moose	Emory	Mount Pleasant	NC	28124
Mora	John	Richmond	CA	94803
Moreno	RD	Manhattan Beach	CA	90267
Morris	J. Charles	Milligan	FL	32537
Moss	Bryan	Venice	CA	90291
Mott	Marcie	Doraville	GA	30340
Muelken	Walter	Sebastopol	CA	95472
Mulkins	Mary	Los Altos	CA	94022
Mullane	Ananya	Long Beach	CA	90815
Mullane	Sharon	Los Angeles	CA	90066
Murphy	Sherline	Bella Vista	CA	72714
Murray	Noel	Santa Cruz	CA	95065
Mutter	Melissa	Dayton	OH	45420
Myers	Marc	San Diego	CA	92115
Myhre	Jon	Ojai	CA	93023
Nanic	Mladen	Zagreb		
Nazari	Bezhan	Edmond	OK	73034
Nelsen-Maher	Devon	Camrillo	CA	93010
Nelson	Valerie	Arcata	VA	95521

Newman	Jeanne	Gilroy	CA	95020
Newman	Donna	Merced	CA	95348
Nichele	Alexis	Marina Del Rey	CA	90292
Nicholas	Dafydd	Altamonte Springs	FL	32714
Nicholas	Dafydd	Las Vegas	NV	89128
Nichols	Angela	Garland	TX	75044
Nicoll	Susan	Frazier Park	CA	93225
Niswander	Ruth	Davis	CA	95616
Noble	Craig	El Cerrito	CA	94530
Odonnell	Gerard	Los Angeles	CA	90019
O'Hare	Brian	New York	NY	10025
Okamura	Kim	Los Angeles	CA	90066
Orchoiski	Gerald	Pasadena	CA	91104
O'Rear	Reta	Centennial	CO	80122
Orlando	Lillian	Downers Grove	IL	60515
Osborn	Wren	El Cajon	CA	92020
P	M	Greeley	CO	80634
Paddock	Kathryn	Hidden Hills	CA	91302
Page	Linda	Escondido	CA	92027
Pann	Cheri	Venice	CA	90291
Parades	Victoria	Austin	TX	78709
Parker	Vivian	Kelsey	CA	95667
Parker	Eric	El Sobrante	CA	94803
Parrott	Ian	San Francisco	CA	94107
Pasichnyk	Richard	Tempe	AZ	85281
Pasko	Margery A.	Hammond	NY	13646
Patel	Roshan	Macon	GA	31206
Patrick	John	Phillips	WI	54555
Paulie	Carl	Saint Paul	KS	66771
Peasley	C	La Mesa	CA	91941
Perenne	Luise	Fountain Valley	CA	92708
Perkins	Pamela	Los Angeles	CA	90032
Perkins	Randi	Atascadero	CA	93422
Perley	Susan	Santa Fe	NM	87501
Peterson	Sandy	Belton	MO	64012
Peterson	Kimberly	Cloverdale	CA	95425
Pettee	Pam	San Diego	CA	92112
Philips	Mark	Sunnyvale	CA	94087
Pierce	Alison	Burke	VA	22015
Pinkerton	Ann	Oakland	CA	94618
Pino	Dolores	Morton Grove	IL	60053
Placone	Richard	Palo Alto	CA	94306
Plummer	John	Beverly Hills	CA	90212
Pollack	Sharon	San Francisco	CA	94114

Pollock	Jeri	Tujunga	CA	91042
Pomies	Jackie	San Francisco	CA	94122
Ponce	Carlena	Yakima	WA	98902
Porter	Kathleen	Fairfax Station	VA	22039
Potter	Jacquelyn	Lansing	MI	48915
Potter	Cheryl	Santa Cruz	CA	95065
Poverchuck	Susan	Medford	MA	02155
Poxon	Judith	Sacramento	CA	95864
Prado	Janina	San Leandro	CA	94579
Pratt	Debbi	Seattle	WA	98199
Pretzer	C.	Sacramento	CA	95864
Proffitt	Dennis	Ann Arbor	MI	48103
Qayum	Seemin	New York	NY	10012
Rademaker	Ted	Claremont	CA	91711
Rae	M.	Galveston	TX	77550
Rainville	Michelle	Santa Barbara	CA	93101
Ramsey	Jacqueline	Washington	MI	48094
Randall	David	Port Jefferson	NY	11777
Randolph	Bruce R	Key West	FL	33040
Rashan	Yautra	Naperville	IL	60565
Ray	W	Long Beach	CA	90805
Ray	Thomas	Novato	CA	94945
Reback	Mark	Los Angeles	CA	90027
Redmond	Devin	Berkeley	CA	94703
Reed	Timothy	Turlock	CA	95380
Reese	Stephanie	Redlands	CA	92374
Reid	John E.	Mountain City	TN	37683
Reisman	Emil	Dana Point	CA	92629
Renesse	Yolanda de	Los Angeles	CA	90068
Renninger	William	Duke Center	PA	16729
Rice	David	Los Angeles	CA	90069
Rich	Amy	Berkeley	CA	94704
Richards	Vivien	Eureka	CA	95501
Richmond	Lonna	Muir Beach	CA	94965
Rislow	Lillian	Houston	TX	77082
Rivera	Jerri	Alhambra	CA	91801
Robb	Linda	Long Beach	CA	90803
Roberts	Kristin	Berkeley	CA	94705
Robson	Elaine	Topsfield	MA	01983
Roderick	Diane	Agoura	CA	91301
Rodgers	Diana	Santa Monica	CA	90405
Rogers	David	Citrus Heights	CA	95621
Rogers	Elizabeth	Ferndale	CA	95536
Rogers	Lila	Culver City	CA	90232

Roo	Reeta	Sebastopol	CA	95475
Rose	Suzie	San Francisco	CA	94109
Rosenstein	David	Santa Monica	CA	90402
Rubenstein	Leah	Stamford	CT	06903
Rubin	Martin	Los Angeles	CA	90064
Rucker	Judy	Lake Hiawatha	NJ	07034
Rutkowski	Dennis	Garden Grove	CA	92841
Rutkowski	Robert	Topeka	KS	66605
Sabeck	Deanne	Encinitas	CA	92024
Sage	Jean	Weed	CA	96094
Salazar	Joe	Santa Rosa	CA	95407
Salgado	Elizabeth	San Francisco	CA	94110
Saliba	Virginia	Burbank	CA	91506
Sanchez	Meredith	San Jose	CA	95111
Sanders	Richard	Glendora	CA	91740
Santone	Deborah	San Ramon	CA	94583
Sarstedt	Joanna	Los Angeles	CA	90048
Sarver	Valerie	San Francisco	CA	94103
Sawaya	Salim	Arlington	VA	22207
Sayers	Lowell	Austin	TX	78704
Saylor	David	Upland	CA	91786
Scarborough	Alexandra	Culver City	CA	90232
Schaaf	Stephanie	Mountain View	CA	94040
Schepler	Kacey	Burlingame	CA	94010
Schiffman	Lauren	San Francisco	CA	94141
Schlumpf	Margene	Milton	WA	98354
Scholl	Cathy	Carlsbad	CA	92009
Schorling	Doug	Fresno	CA	93704
Schrader	Kimberly	Grayslake	IL	60030
Schramm	Beatrix	San Diego	CA	92116
Schulenberg	Amy	Los Angeles	CA	90027
Schwendimann	Reverend	Pasadena	CA	91107
Scripps	Theresa	San Francisco	CA	94122
Sealy	Stephen	Rancho Cucamonga	CA	91739
Sealy	Berenice	Rancho Cucamonga	CA	91739
Selle	Jane	Los Angeles	CA	90039
Seltzer	Rob	Beverly Hills	CA	90212
Seraso	Laura	Altadena	CA	91001
Seymour	Paula	Tahoe City	CA	96145
Shahrokhshahi	Rita	Orinda	CA	94563
Shanney	Christina	Santee	CA	92071
Shannon	Steve	Los Angeles	CA	90019
Sharp	Holly	West Hollywood	CA	90069
Shaw	Wendy	Richland	WA	99352

Shawvan	James	San Diego	CA	92104
Sheets	Sarah	Merced	CA	95340
Shell	Karen	La Jolla	CA	92037
Shepp	Jerrell	Los Angeles	CA	90024
Shields	Carol	Los Altos	CA	94024
Shinohara	Joanne	Santa Monica	CA	90404
Shirey	Keith	Altadena	CA	91001
Shook	Matthew	Orange	CA	92869
Shpiller	Natasha	Chicago	IL	60626
Shrode	Jan	Texarkana	TX	75503
Silan	Sheila	Somerset	CA	95684
Silva	Joe	San Diego	CA	92109
Silvers	Robert	San Rafael	CA	94903
Silvestrini	Sasha	Fort Bragg	CA	95437
Simmons	Barre	Springfield	VA	22151
Skrobiza	Kim	Solana Beach	CA	92075
Slaughter	Marianne	Camarillo	CA	93010
Slocum	Jessica	Mount Lebanon	CA	15228
Smith	Ruth	Carmel	CA	93923
Smith	Colin	Berkeley	CA	94708
Smith	Deborah	Oklahoma City	OK	73112
Snider-Gartin	Jennifer	Oxnard	CA	93035
Snyder	Mark	Wynantskill	NY	12198
Sobol	Charlotte	Los Angeles	CA	90028
Sonsteng	Melanie	Rodeo	CA	94572
Sopko Kurrell	Cynthia L.	Auburn	CA	95604
Souder	Margaret	Riverside	CA	92506
Southwick	Justin	Brentwood	TN	37027
Speckart	Carrie	San Rafael	CA	94901
Spinella	Nancy	Rescue	CA	95672
Spotts	Richard	St. George	UT	84770
Spring	Cindy	Oakland	CA	94611
St. Julien	Deborah	San Jose	CA	95136
Stahl	Maria	Montpelier	OH	43543
Stambler	Deborah	Los Angeles	CA	90048
Starke-Livermore	Shanna	Sacramento	CA	95814
Stavis	Alex	New York	NY	10128
Stearns	Elisabeth	Berkeley	CA	94704
Steele	William	Manhattan Beach	CA	90266
Steinman	Jesse	Playa del Rey	CA	90293
Stern	Evelyn	Los Angeles	CA	90049
Sternhagen	Paul	Van Nuys	CA	91406
Stewart	Rosalyn	Berkeley	CA	94703
Stewart	Mary	Greenbank	WA	98253

Stoltenberg	John	Elkhart Lake	WI	53020
Stone	Jessica	San Diego	CA	92128
Storper	Craig	Pacific Palisades	CA	90272
Stouffer	Brenda	Dana Point	CA	92629
Stranger	Peter	Los Angeles	CA	90068
Sullivan	Cynkay Morningson	Santa Rosa	CA	95404
Sullivan	Kelly	Santa Monica	CA	90403
Sumonnath	Sujada	Mojave	CA	93501
Sundberg-Hall	Signe	Downingtown	PA	19335
Suttkus	Jan	Atlanta	GA	30345
Sutton	Rebecca	Berkeley	CA	94708
Suval	Kathleen	Brooksville	ME	04617
Sweel	Greg	Santa Monica	CA	90405
Switzer	Andrew	Alameda	CA	94501
Tache	Bill and Jan	Occidental	CA	95465
Taggart	Carol	Menlo Park	CA	94025
Takagi	Richard	Cypress	CA	90630
Tan	Frances	Lawrence	KS	66047
Tasoff	Jack	San Pedro	CA	90731
Tate	Devon	Nederland	CO	80466
Taylor	Karen	San Diego	CA	92122
Taylor	Amy	San Francisco	CA	94118
Taylor	Robert	Los Angeles	CA	90075
Taylor	Beth	Harrisburg	PA	17101
Thomas	Richard	Richmond Hill	NY	11418
Thomas	Dennis	Pleasant Hill	CA	94523
Thompson	Floyd	Chicago	IL	60657
Thryft	Ann	Boulder Creek	CA	95006
Tillett	Kathryn	Irvine	CA	92620
Trejo	Tonatiuh	Marina	CA	93933
Triplett	Tia	Los Angeles	CA	90066
Troup	Scott	Encinitas	CA	92024
Trout	Sherri	Simi Valley	CA	93063
Trujillo	Deborah	Los Angeles	CA	90066
Turek	Gabriella	Pasadena	CA	91106
Turk	Kendra	Moffett Field	CA	94035
Turner	Leslie	Torrance	CA	90505
Tuttle	Brenda	Woodhaven	MI	48183
Tyler	Janet	Lower Lake	CA	95457
Tynberg	Alexander	San Francisco	CA	94118
Ulman	Barbara	Coarsegold	CA	93614
Underhill	Scott	Temecula	CA	92591
Urigo	John	Claremont	CA	91711
Valenzuela	Andrea	Benicia	CA	94510

Van Noord	Joel	Ann Arbor	MI	48103
Van Voorhis	Russell	Gualala	CA	95445
Vanman	Joyce	San Francisco	CA	94110
Villa	Marco	Corpus Christi	TX	78413
Villavicencio	Alan	Los Angeles	CA	90036
Viney	MaryAnne	Carlsbad	CA	92008
Vinson	John	Shelton	WA	98584
Vitale	Laura	Bellingham	WA	98225
Voet	Jim	Oxford	OH	45056
Vreeken	Margaret	San Rafael	CA	94901
Wald	Johanna	San Francisco	CA	94117
Waldron	Robert	Austin	TX	78745
Wales	Charlotte	Monticello	AR	71655
Wallace	Dawn	Fair Oaks	CA	95628
Watters	Ann	Salem	OR	97301
Waymire	Kristen	Augusta	KS	67010
Wead	Leslie	Durango	CO	81301
Webber	Rita	Canyon Country	CA	91351
Weinstein	James Modiano	Chico	CA	95928
Weintraub	Marisa Nuccio	Santa Monica	CA	90402
Weinzweig	Michael	San Francisco	CA	94110
Weiss	Chris	Long Beach	CA	90803
Wells	Kimball	Rancho Palos Verdes	CA	90275
Westmoreland	Carolyn	Strathmore	CA	93267
Weston	Maria	Long Beach	CA	90807
Wheeler	Breana	San Francisco	CA	94117
Whitaker	Samantha	Los Angeles	CA	90027
White	Ryan	Fullerton	CA	92838
White	Larry	North Highlands	CA	95660
White	Andrea	San Pedro	CA	90731
Whitesell	Kimberly	Herndon	CA	20171
Williams	Dianne	Emerald Isle	NC	28594
Williamson	Mark Jr.	Reno	NV	89503
Williamson	Dan	Pittsburgh	PA	15241
Williamson	Sandra	Fort Collins	CO	80528
Williamson	Peter	Los Altos	CA	94024
Willis	Jennifer	San Francisco	CA	94117
Wilson	Pamela	Oakland	CA	94619
Wilson	Michele	Redondo Beach	CA	90278
Wilson	Patricia and Peter	Santa Rosa	CA	95409
Winter	Michael	Santa Barbara	CA	93111
Wolds	Susana	Boulder	CO	80310
Wolosecki	Jerry Lynne	Sunrise	FL	33345
Wong	Teresa	San Gabriel	CA	91775

Wotherspoon	Robert	Minneapolis	MN	55408
Wright	Clea	Pasadena	CA	91107
Wright	Janet	La Mesa	CA	91942
Wullenwaber	Dana	Redding	CA	96001
Wyberg	Bryan	Coon Rapids	MN	55448
Wyberg	Ken and Sharon	Minneapolis	MN	55419
Yaecker	P	Chagrin Falls	OH	44022
York	Carole	San Jose	CA	95128
Young	Jo Ellen	Culver City	CA	90230
Yukus	Dawn	Stuart	FL	34994
Yule	Alex	Newton	MA	02459
Zaman	Nancy	Lake Isabella	CA	93240
Zoah-Henderson	Zak	Eureka	CA	95501

Comment Summary

- Recommends the protection of all wildlands that would be designated as the King Range Wilderness under the proposed Northern California Coastal Wild Heritage Wilderness Act.
- Suggest that none of the lands be opened to post-fire logging, road construction, or other human activities that could damage or degrade their wild character, especially for the 30 percent proposed for multiple use.
- Recommends the abandonment of the current RMP and instead requests the management of the entire proposed King Range Wilderness as backcountry.

Responses

The settlement of *Utah v. Norton Regarding Wilderness Study* clarified that the BLM's authority to expand Wilderness Study Areas or designate additional areas through the RMP process expired in 1993. However, the BLM can make land use allocations through the RMP to manage areas to protect their wilderness characteristics. Within the King Range RMP, the Backcountry Zone represents this allocation. Parcels 1B, 1EA, 1E, 1F, 1G, the portion of 1H other than Squaw Creek section (see response 6-1 above), 1HA, and 2B were not included in the Backcountry Zone. These parcels require silvicultural treatments in previously harvested forest stands to improve stand naturalness and reduce fuel loads. These prescriptions would protect the Backcountry Zone from fires originating on private rural subdivisions adjoining the King Range, and protect private lands and structures from fires originating in the KRNCA. Since a primary goal of all silvicultural treatments is to restore previously harvested stands to a late-successional ecological state, the treatments would serve to enhance wilderness characteristics of these lands over the long-term. The Proposed RMP also states that no actions will cause impacts to wilderness characteristics that would affect future consideration for Congressional wilderness designation or BLM management for these characteristics. The BLM is aware of the pending wilderness legislation S-738, "Northern California Coastal Wild Heritage Wilderness Act." Nothing in the Proposed RMP would preclude management of lands proposed in S-738 as wilderness, should this bill be passed into law.

The BLM recognizes concerns about the potential impacts of salvage logging and the importance of fire-killed trees/snags to ecosystem values. However, because of the harvest activities on these lands in the 1950s-60s (prior to BLM acquisition), many of the stands within the Frontcountry Zone have been

altered to the point that entering them after a stand-replacing fire will, in specific instances, provide an opportunity to correct existing problems and lead to development of more natural stand conditions. Any salvage efforts would be part of a comprehensive effort that would include replanting, erosion control etc., and would require that a snag component be left in place. Timber would only be removed after site-specific environmental analysis and within specified standards and guidelines adopted from the Northwest Forest Plan as shown in Section 4.14.4. No salvage operations would occur in the Backcountry Zone. Based on the fire history of the King Range in the Frontcountry Zone, it is anticipated that salvage would be a relatively small component of area forest management activities and is included as a tool for use in these specific instances (see Chapter 5 for estimates).

Any road re-opening would be temporary in nature and followed by restoration within 12-18 months, and would only occur in limited circumstances where environmental analysis shows direct benefit to improving late-successional forest characteristics and no major watershed impacts; see Section 4.14.5. In some cases these actions may serve the dual purpose of removal and restoration of old logging roads.

The 1970 King Range Act directed the BLM to develop a plan which identifies management of the area for a variety of primary and secondary compatible uses. The proposed zones in this plan reflect a strong emphasis on conservation and restoration of the area’s resource values while meeting the intent of the Act (Public Law 91-476). The Proposed RMP does not call for any major new developments, such as permanent roads or facilities (except trails) in the Frontcountry Zone. This zone is not intended to provide only a diminished level of protection; rather, it calls for a more intensively managed restoration effort on those lands impacted by timber harvesting prior to BLM acquisition. The zone also reflects a reality that much of the King Range is surrounded by rural subdivisions in a region with extreme fire danger, as evidenced by the fall 2003 lightning fires. Fuels management in the Frontcountry Zone would allow for “lighter-hand” suppression tactics to be employed when future wildfires occur, allowing the BLM to better protect the natural values of both the Front and Backcountry Zones.

6.4 LIST OF PREPARERS

This RMP/EIS has been prepared by an interdisciplinary team of resource specialists from the BLM King Range NCA Office and Arcata Field Office. EDAW, Inc., an environmental consulting firm in San Francisco, California, assisted the BLM in the preparation of these documents and in the planning process. These preparers are listed in Table 6-1.

Table 6-1: List of Preparers

NAME	POSITION	PLANNING ROLE
BLM Staff		
Lynda Roush	Field Manager	Field Manager
Dan Averill	Assistant Field Manager	Assistant Field Manager
Gary Pritchard-Peterson	King Range National Conservation Area Project Manager	King Range Manager, Wild and Scenic Rivers Study Team, Wilderness Study Team
Bob Wick	Planning and Environmental Coordinator	RMP Project Lead, Wild and Scenic Rivers Study Team, Wilderness Study Team, Visual Resources, Transportation

Table 6-1: List of Preparers

NAME	POSITION	PLANNING ROLE
Sky Murphy	Planner	Assistant RMP Project Lead, Wild and Scenic Rivers Study Team
Scott Adams	Outdoor Recreation Planner	Recreation, Wilderness Study Team, Wild and Scenic Rivers Study Team
Carol Sullivan	Interpretive Specialist	Interpretation/Environmental Education
Bruce Cann	Outdoor Recreation Planner	Wild and Scenic Rivers Study Team, Transportation
Paul Fritze	GIS Specialist	Mapping
Dave Fuller	Fisheries Biologist	Fisheries, Riparian/Aquatic Resources, Wild and Scenic Rivers Study Team
Marlene Grangaard	Archaeologist	Cultural Resources, Native American Consultation
Hank Harrison	Forester	Forestry, Special Forest Products
Charlotte Hawks	Realty Specialist	Lands, Rights of Way
Amy Krause	Wildlife Biologist	Wildlife
Brad Job	Engineer	Facilities, Transportation, Air/Water Quality
Sam Morrison	Geologist	Geology, Soils
Tim Jones	Fire Management Officer	Fire/Fuels, Air Quality
Jennifer Wheeler	Botanist	Botany, Range Management, Invasive Weeds
Paul Roush	Wildlife Biologist	Wildlife
Jeff Fontana	Public Affairs Officer	Public Outreach
John Price	Computer Specialist	Website Development
EDAW, Inc. Staff		
David Blau	Principal in Charge	Alternatives Development, QA/QC
Laura A. Watt	Project Manager, Social Scientist	Project Manager, Public Outreach, Alternatives Development, Lands and Realty, Historical and Cultural Analysis
Steve Nachtman	Senior Recreation Planner	Recreation, Special Designations, Alternatives Development, QA/QC
Kevin Butterbaugh	Senior Environmental Planner	QA/QC Document Review
Kimberly Christensen	Public Involvement Program Coordinator	Public Outreach, Alternatives Development, QA/QC
Megan Gosch	GIS Specialist	GIS Mapping
Mark Farman	Senior Resource Planner and Economist	Socioeconomic Analysis
Steve Pavich	Resource Economist	Socioeconomic Analysis
Michael Morelli	Senior Recreation Planner	Recreation
Anne Lienemann	Recreation Planner	Recreation
Brian Ludwig	Senior Archeologist	Cultural Resources
Mike Downs	Senior Social Scientist	Sociocultural Analysis
Jackson Underwood	Archeologist and Ethnographer	Sociocultural Analysis
Richard Nichols	Range Management Specialist	Grazing Resources

Table 6-1: List of Preparers

NAME	POSITION	PLANNING ROLE
Katrina Hardt	Environmental Planner	Transportation and Access
Christine Yang	Graphic Designer	Graphic Design
Nathan Cistone	Word Processor	Word Processing, Formatting
Ron LeValley	Mad River Biologists (subconsultant)	Terrestrial Ecology, Botany and Wildlife Biology, Alternatives Development
Alice Berg	Independent Contractor	Fisheries and Aquatic Biology
Bob Solari	Independent Contractor	Fire Management

6.5 ATTACHMENT: COMMENT LETTERS

The letters of comment received from government agencies and various organizations follow; letters of comment from individuals are on file at the BLM's Arcata Field Office.



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 To: Sky Murphy/CASO/CA/BLM/DOI@BLM
04/20/2004 08:18 AM 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 To: Robert Wick/CASO/CA/BLM/DOI@BLM
04/15/2004 05:56 PM cc:
Subject: King Range RMP

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



Patricia E Riley@USGS To: Lynda Roush/CASO/CA/BLM/DOI@BLM
04/14/2004 06:48 AM 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

Bob -
WR**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

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
State Historic Preservation Officer

BLM ARCATA FIELD OFFICE

3-1

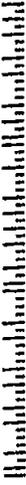


State of California • The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
P.O. Box 942896
Sacramento, CA 94296-0001

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



02 1A
0004328946 APR 07 2004
\$ 00.370
MAILED FROM ZIP CODE 95814



95221-4573 14



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

RECEIVED
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 initial "L" and "H".

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."



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

March 15, 2004

RECEIVED

BLM KING RANG 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



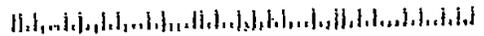
**CALIFORNIA
WILDERNESS
COALITION**

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.

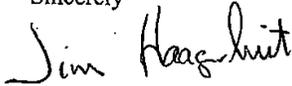
1. Please note that the California Department of Parks and Recreation is revising its management plan for the Sinkyone Wilderness State Park. IMBA submitted comments and spoke with staff regarding mountain bike use in this State Park Unit, specifically to be able to link from BLM's Lost Coast Trail, 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.

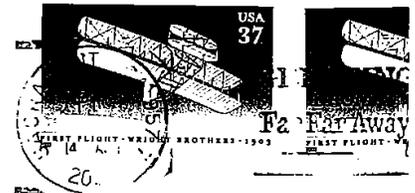
Mountain bikers truly understand that BLM has a difficult task to protect resources while allowing public access and providing for diverse recreation opportunities. We also fully appreciate that the King Range is that much more special than many other BLM lands and its scenic, "wilderness" attributes 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+4573





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

TABLE OF CONTENTS

INTRODUCTION

Viewpoint

Preliminary points

MANAGEMENT WITHIN THE KING RANGE WILDERNESS

The Wilderness

Boundaries

Grazing

Big Flat.

Spanish Flat

MANAGEMENT OF KING RANGE LANDS OUTSIDE WILDERNESS

Water Rights and Rights of Way

Management of Vegetation

Salvage logging

Shelter Cove

REGIONAL, HABITAT, AND ECOSYSTEM LINKAGES

Socioeconomic concerns

Links to region

King Range Marine Sanctuary

About the Authors

APPENDIX: REFERENCES AND INFORMATION RELATED TO MARINE PRESERVE

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



PRINTED ON RECYCLED PAPER

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,



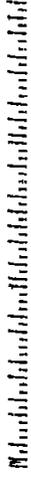
Jim Groeling,
President, Mill Creek Watershed Conservancy

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 are. 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	Gorca	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

BOARD OF DIRECTORS

Jim Danisch
CHAIR

Paul Ehrlich

Lois Juodeika
TREASURER

Steve Lovett

Judy Nash
SECRETARY

Gabrielle Roach

Edwin Smith

Claire Trower

Stephen Umbertis

STAFF

Chris Larson
EXECUTIVE DIRECTOR

Dylan Brown
Jessica DeKolver
Jen Glorioso
Mike Roskam
GOOD ROADS, CLEAR CREEKS

Ali Freedlund
Brook Smith
FOREST PRACTICES REVIEW

Amanda Freeman
RIVER AND RANGE

Keith Leatherwood
REFORESTATION

Amanda Malachuk
RESOURCE CENTER &
DEVELOPMENT ASSOCIATE

C. Moss
EDUCATION

Nancy Smith
RESOURCE CENTER
ADMINISTRATIVE
ASSISTANT

Sabrina Stadler
WATERSHED PLANNER

Claire Trower
BOOKKEEPER

Jeremy Wheeler
GIS PROGRAM

Sam Yellen
AMERICORPS WSP

**Mattole Restoration Council**

PO Box 160 • Petrolia, CA 95558 • 707.629.3514

PO Box 223 • Whitethorn CA 95589 • 707.986.1078

www.mattole.org • mrc@inreach.com

RECEIVED

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

14-1

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.

14-2

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.

14-3

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

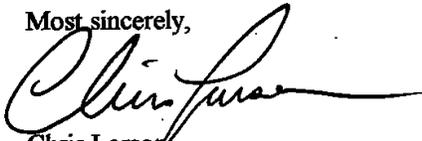
It does seem imperative to include a visitor registration system at the Mattole Beach for both the trails and the campground. We do agree that visitor numbers are a problem and suggest a tighter control, one that puts a cap on the amount of visitors on each trail, each day, as well as the campground. 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 Commen
Attn: Lynda Roush
Bureau of Land Management
1695 Heindon Rd.
Arcata, CA 95521



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.] 15-1
- 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.] 15-2
- 4. Permits should not be required. A self-registration system is acceptable to document use.] 15-1 cont.
- 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.] 15-3
- 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.] 15-4

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>
--	--

<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>
---	--

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:	
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. If</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>
---	---

<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>
--	--

<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>
--	--

<p>Evaluate possibility of group/overflow camping near river.</p> <p>Develop additional trails as needed.</p> <p>Expand and improve interpretive trail between Wailaki 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>
---	---

<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 McGuinness
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,



Richard McGuinness, Middle Mattole Conservancy

McGuinness
637 Humboldt St
Eureka, CA
95501



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

95521#4573





CHAPTER SEVEN : Bibliography



7.0 BIBLIOGRAPHY

7.1 PRINTED REFERENCES

- Amaranthus, Michael and David Pilz, 1996. "Productivity and Sustainable Harvest of Wild Mushrooms," in D. Pilz and R. Molina, eds., *Managing Forest Ecosystems to Conserve Fungus Diversity and Sustain Wild Mushroom Harvests*. General Technical Report PNW-GTR-371, May 1996. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, Portland, OR.
- Anders, Jentri, 1990. *Beyond Counter-Culture: The Community of Mateel*. Washington State University Press, Pullman, WA.
- Arthur, S. M., W. B. Krohn, and J. R. Gilbert, 1989. "Habitat use and diet of fishers." *Journal of Wildlife Management* 53:680-688.
- Barnhart, R.A., 1986. "Species profiles: Life histories and environmental requirements of coastal fishes and invertebrates (Pacific Southwest)--steelhead." *U.S. Fish and Wildl. Serv. Biol. Rep.* 82(11.60). 21 pages.
- Baumhoff, Martin, 1958. "California Athabascan Groups." *Anthropological Records* 16:5, University of California, Berkeley, CA.
- Bell, M. C., 1986. *Fisheries Handbook of Engineering Requirements and Biological Criteria*. US Army Corp of Engineers, Office of the Chief of Engineers, Fish Passage Development and Evaluation Program, Portland, OR.
- Bicknell, Susan H., D. J. Bigg, R. P. Godar, and A. T. Austin., 1993. *Sinkyone Wilderness State Park Prehistoric Vegetation: Final Report*. Interagency agreement No. 4-100-0252 between California Department of Parks and Recreation and Humboldt State University.
- Blaustein, A. R., J. J. Beatty, D. H. Olson, and R. M. Storm, 1995. *The biology of amphibians and reptiles in old-growth forests in the Pacific Northwest*. U.S. Forest Service, Pacific Northwest Research Station, General Technical Report PNW-GTR-337.
- Bodin, P., W. Brock, et al., 1982. *Are California's North Coast Rivers Really "Wasting Away to the Sea"?: A Compendium of Information on the Impacts of River Diversion*. Northcoast Environmental Center, Arcata, CA.
- Brown, Peter M., M. W. Kaye, and D. Buckley, 1999. "Fire History in Douglas-fir and Coast Redwood Forests at Point Reyes National Seashore, California." *Northwest Science* 73(3).
- Buehler, D. A., 2000. "Bald Eagle (*Haliaeetus leucocephalus*)." In *The Birds of North America*, No. 506, A. Poole and F. Gill, eds. The Birds of North America, Inc, Philadelphia, PA.
- Burcham, L. T., 1982. *California Range Land*. 261 pp.

- Bureau of Economic Analysis, U.S. Department of Commerce. 2003. Regional Economic Information System, Regional Accounts Data. <http://www.bea.doc.gov>
- Busby, P. J., T. C. Wainwright, G. J. Bryant, L. J. Lierheimer, R. S. Waples, F. W. Waknitz, and I. V. Lagomarsino, 1996. *Status review of west coast steelhead from Washington, Idaho, Oregon, and California*. U.S. Department of Commerce, NOAA Tech. Memo. NMFS-NWFSC-27. 261 pp.
- Busby, M. S., R. A. Barnhart and P. P. Petros, 1988. *Natural resources of the Mattole River estuary, California: Natural resources and habitat inventory summary report*. Prepared for the BLM Arcata Resource Area, Arcata, CA. California Cooperative Fishery Research Unit, Humboldt State University, Arcata, CA. 81 pp.
- California Native Plant Society, 2001. *California Native Plant Society's Inventory of Rare and Endangered Plants of California* (Sixth Edition). California Native Plant Society, Sacramento, California.
- California Oak Mortality Task Force, 2003. <http://www.suddenoakdeath.org/> Accessed March 10, 2003.
- California Department of Fish and Game, 2002. Peregrine Falcon database. California Department of Fish and Game, Eureka, CA.
- California Department of Fish and Game, 2003. "Historical Sales Data by Decade." Website: <http://www.dfg.ca.gov/licensing/statistics/statistics.html>. Accessed February 20, 2003.
- California Department of Parks and Recreation, 1998. *Public Opinions and Attitudes on Outdoor Recreation in California, 1997*. Sacramento, CA.
- Chai, Yu-Fong Grace, 1999. Hmong Minority in Eureka. Masters Thesis, Department of Sociology, Humboldt State University, Arcata, CA.
- Clark, T. K., 1983. *Regional History of Petrolia and the Mattole Valley*. Miller Press, Eureka, CA.
- Clawson, M., 1979. "Forests in the Long Sweep of American History." *Science* 204(4398):1168-1174.
- Collins, Glendon, 1962a. "Minerals Program Inventory." Unpublished report, U.S. Department of the Interior, Bureau of Land Management, Ukiah District.
- Collins, Glendon, 1962b. "Validity of the Buck Horn 1 Lode Mining Claim of Chris Reinke et al." Unpublished report, U.S. Department of the Interior, Bureau of Land Management, Ukiah District.
- Colwell, M. A., R. R. LeValley, J. Hall, S. E. McAllister, C. B. Millett, A. N. Transou, J. J. Meyer, and D. LeValley, 2002. *Final Report: 2002 Snowy Plover Breeding in Northern California, with Emphasis on Humboldt County*. Unpublished report, Humboldt State University Wildlife Department, Arcata, CA.

- Congressional Record—House, 1961. Testimony of Representative Clem Miller “New Frontiers in the King Range and the Bureau of Land Management,” June 13, 1961.
- Cordell, H. K., 1999. *Outdoor Recreation in American Life: A National Assessment of Demand and Supply Trends*. Sagamore Publishing. Champaign, IL
- Council on Environmental Quality, 1997. “Environmental Justice: Guidance Under the National Environmental Policy Act,” December 10, 1997.
- Coy, O. C., 1930. *The Humboldt Bay Region, 1850-1875*. California State Historical Association, Los Angeles, CA.
- Criley, Lance, 2003. “Environmental History of Northwestern California.” Unpublished draft, Dept. of Environmental Science, Policy and Management, University of California, Berkeley, CA.
- Dean Runyon Associates, 2002. “California Travel Impacts by County, 1992-2000.” Prepared for *California Tourism*, a joint marketing venture of the California Travel and Tourism Commission & the Division of Tourism, Technology, Trade and Commerce Agency.
- Driver, Harold E., 1939. “Culture Element Distributions X, Northwest California.” *Anthropological Records* 1(6):297-433. University of California, Berkeley.
- Durant, Chris, 2002. “Pot in Humboldt County: Both Sides of the Story.” Accessed at <http://www.cannabisnews.com/news/thread14509.shtml>, 29 July 2002.
- Eastman, Bright and Adrian Praetzellis, 1995. “Documentation and Evaluation of Historical Resources Within the King Range National Conservation Area.” Report prepared by the Anthropological Studies Center of Sonoma State University, Rohnert Park, CA, on file at the BLM Arcata Field Office.
- Edwards, S., 1992. “Observations on the prehistory and ecology of grazing in California.” *Fremontia* 20:2-11.
- Elsasser, Albert B., 1978. “Mattole, Nongatl, Sinkyone, Lasik, and Wailaki.” In *California*, edited by Robert F. Heizer, pp. 190-204. Handbook of North American Indians, vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.
- Engle, R. O. and W. G. Duffy, 2000. *Biological Assessment of Seven Streams in the King Range Conservation Area, California*. Prepared by the U.S. Geological Survey California Cooperative Research Unit Humboldt State University Arcata CA for BLM Arcata Office in Fulfillment of Interagency Agreement 1422-B300A82008.
- Evans Mack, D., W. P. Ritchie, S. K. Nelson, E. Kuo-Harrison, P. Harrison, and T. E. Hamer, 2002. “Methods for surveying Marbled Murrelets in forests: a revised protocol for land management and research.” Pacific Seabird Group unpublished document available at <http://www.pacificseabirdgroup.org>; McKinleyville, CA.

- Fredrickson, David A., 1974. "Cultural Diversity in Early Central California: A View from the North Coast Ranges." *Journal of California Anthropology* 1(1):41-54.
- Fix, D., and A. Bezener, 2000. *Lone Pine Field Guide: Birds of Northern California*. Lone Pine Publishing, Renton, WA.
- Fredrickson, David A., 1984. "The North Coastal Region," in *California Archaeology*, edited by Michael J. Morrato, pp. 471-526. Academic Press, San Diego, CA.
- French, Sally, 2002. "The French Family: 100 Years in Etersburg." *Newsletter of the Buckeye Conservancy* 3(2)1-3. Eureka, CA.
- Great Outdoor Recreation Pages (GORP), 2003. "Lost Coast Romance: Hiking the California Coastal Trail through the wilds of Humboldt County." Website: http://gorp.away.com/gorp/location/ca/lost_co1.htm. Accessed February 19, 2003.
- Greengo, Robert, 1950. Letter report on file, BLM field office, Arcata, CA.
- Griggs, G. B. and J. R. Hein, 1980. "Sources, dispersal, and clay material composition of fine-grained sediment off central and northern California." *Journal of Geology* 88:541-566.
- Hall, P.A., 1984. *Characterization of nesting habitat of goshawks (Accipiter gentilis) in northwest California*. Unpublished M.S. Thesis, California State University, Humboldt. Arcata, CA.
- Harris, S.W., 1996. *Northwestern California Birds*. Humboldt State University Press, Arcata, CA.
- Harrison, S., B. D. Inouye, and H. D. Safford, 2003. "Ecological Heterogeneity in the Effects of Grazing and Fire on Grassland Diversity." *Conservation Biology* 17(3): 837-845.
- Hassler, T. J., 1987. "Species profiles: Life histories and environmental requirements of coastal fishes and invertebrates (Pacific Southwest)--Coho salmon." *U.S. Fish and Wildl. Serv. Biol. Rep.* 82(11.70). 19 pages.
- Hastey, Ed, 1995. Unpublished comments from 25th anniversary ceremony at KRNCA, October 21, 1995; on file with Public Lands Foundation Archive, Phoenix, AZ.
- Healey, M. C. 1991. "The life history of Chinook salmon (*Oncorhynchus tshawytscha*)." Pages 213-393 *In*: C. Groot and L. Margolis (eds.), *Life History of Pacific salmon*. Univ. B.C. Press, Vancouver, B.C.
- Hickman, J. C. (ed.), 1993. *The Jepson Manual: Higher Plants of California*. University of California Press, Berkeley, CA.
- Hight, J., 2000. *Food, Fiber and Flowers: A Special Report on Agriculture in Humboldt County*. Humboldt County Farm Bureau, Eureka, CA.

- Hildebrandt, William Reid, 1981. *Native Hunting Adaptations on the North Coast of California*. Doctoral dissertation, on file at BLM Arcata Field Office.
- Hildebrandt, William Reid, not dated. "Hunting Patterns at the Mouth of the Mattole River." A Preliminary Report, on file at the BLM Arcata Field Office.
- Hosford, David, David Pilz, Randy Molina, and Michael Amaranthus, 1997. *Ecology and Management of the Commercially Harvested Matsutake Mushroom*. General Technical Report PNW-GTR-412, November 1997. U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station, Portland, OR.
- House, Freeman, 1999. *Totem Salmon: Life Lessons from Another Species*. Beacon Press, Boston, MA.
- Howe, H. F., 1999. "Dominance, Diversity and Grazing in Tallgrass Restoration." *Ecological Restoration* 17:59-65.
- Humboldt County, CA, 2000. *Prosperity: The North Coast's Strategy for the Anew Economy*. Volume I: Strategy and Volume III: Demographics.
- International Association for Impact Assessment, 1994. *Guidelines and Principals for Social Impact Assessment*. Prepared by the Interorganizational Committee on Guidelines and Principles for Social Impact Assessment.
- Jennings, M. R., and M.P. Hayes, 1994. *Amphibian and reptile species of special concern in California*. California Department of Fish and Game, Inland Fisheries Division, Rancho Cordova, CA.
- Jutila, H., 1999. "Effect of grazing on the vegetation of shore meadows along the Bothnian Sea, Finland." *Plant Ecology* 140: 77-88.
- Kroeber, A. L., 1925. *Handbook of the Indians of California*. Dover Publications, New York, NY.
- LaJoie, K. R., 1986. "Rapid tectonic uplift near the Mendocino triple junction recorded by emergent marine strandlines" (abstract). *EOS Trans. American Geophysical Union* 67(44):1224.
- LaJoie, K. R., A. M. Sarna-Wojcicki, and Y. Ota, 1982. "Emergent Holocene marine terraces at Ventura and Cape Mendocino, California-Indicators of high tectonic uplift rates." *GSA Abstracts with Programs* 13(4):178.
- Laymon, S.A., and M. D. Halterman, 1985. *Yellow-billed Cuckoos in the Kern River Valley: 1985 population, habitat use, and management recommendations*. California Department of Fish and Game, Nongame Bird and Mammal Section Rep. 85.06.
- Lehman, R. N., 1979. *A survey of selected habitat features of 95 Bald Eagle nests in California*. California Department of Fish and Game, Wildlife Management Branch Admin. Rep. 79-1, Sacramento, CA.

- LeValley, R., 1999. *Snowy Plover nesting season 1999*. Report prepared for Humboldt County Planning Department by Mad River Biologists, McKinleyville, CA.
- Levulett, Valerie, 1979. *Report of the Archaeological Investigations of Shelter Cove*. Report submitted to the California Coastal Conservation Commission, North Coast Region, Eureka, CA. Contract No. R1-77-27
- Levulett, Valerie, 1981. *Report on the Investigation of Five Coastal Mattole Archaeological Sites*, Humboldt County, California. BLM Ukiah District. Contract No. YA-510-PH7-82
- Levulett, Valerie, 1985. *The Prehistory of Southwestern Humboldt County: A Study of Coastal Archaeological Sites in the King Range National Conservation Area*. Unpublished doctoral dissertation, U.C. Davis, Davis, CA.
- Levulett, Valerie, and William Hildebrandt, 1987. *The King Range Archaeological Project: Results of the 1984 Field Season*. BLM Ukiah District. Contract No. CA-950-CA4.
- Lidicker, W. Z., 1989. Ch.12, "Impacts of non-domesticated vertebrates on California Grasslands," in *Grassland Structure and Function: California Annual Grassland*, at 135-150.
- Maachi, R., and Alfred Kroeber, 1954. Letter report and site records on file at the BLM Arcata Field Office.
- Machi, Mario, 1984. *Gem of the Lost Coast: A Narrative History of Shelter Cove*. Eureka Printing Company, Eureka, CA.
- Markegard, Gary G., E. A. Yeary, and Lynn Horel, 1981. *Beef Production Cost Study, Humboldt County*. University of California Cooperative Extension, Eureka, CA.
- Martin, Steven R. and Carolyn J. Widner, 1998. *Final Management Report for 1997 Lost Coast Trail Backcountry Visitor Study*, Report to the Bureau of Land Management King Range National Conservation Area. Dept. of Natural Resources Planning and Interpretation, Humboldt State University, Arcata, CA.
- Martinez, Carla and Eric Grammar, 1998. "Hidden Cultures of Humboldt." *The Osprey*, Humboldt State University, Arcata, CA. Accessed at <http://www.humboldt.edu/~osprey/fall98/cultures.html>
- Mattole Restoration Council, 1989. *Elements of Recovery*. Mattole Restoration Council, P.O. Box 160, Petrolia, CA 95558.
- Mattole Restoration Council, 1995. *Dynamics of recovery—A Plan to Enhance the Mattole Estuary*. Mattole Restoration Council, P.O. Box 160, Petrolia, CA 95558. February 1995.
- Mattole Restoration Council, 1998. *The road to recovery—King Range road removal project*. Mattole Restoration Council, P.O. Box 160, Petrolia, CA 95558. April 1998.

- McGeechy, Linda, and A. Bell, 1979. *A Study of the Impacts of Human Use on Coastal Dunes South of the Mattole River*. BLM Ukiah District. Contract No. CA-050-CT9-4.
- McLaughlin, 1982. Geologic Map of the King Range, Mineral Potential. Bureau of Land Management, Arcata Resource Area, CA.
- McLaughlin, R. J., S. D. Ellen, M. C. Blake, Jr., A. S. Jayko, W. P. Irvin, G. A. Carver, and S. H. Clarke, Jr., 2000. *Geology of the Cape Mendocino, Eureka, Garberville, and Southwestern part of the Hayfork*, 30 x 40 Minute Quadrangle, and Adjacent Offshore Area, Northern California, US Geological Survey, Miscellaneous Field Studies, MF-2336.
- McLaughlin, R. J., K. R. LaJoie, D. H. Sorg, S. D. Morrison, and J. A. Wolfe, 1983. "Tectonic uplift of a middle Wisconsin marine platform near the Mendocino triple junction." *California Geology* 11:35-39.
- McLaughlin, R. J., S. A. Kling, R. Z. Poore, K. A. McDougall, and E. C. Beutner, 1982. "Post-middle Miocene accretion of Franciscan rocks, northwestern California." *Geological Society of America Bulletin* 93(7):595-605.
- McLaughlin, R. J., W. V. Sliter, N. O. Frederikson, W. P. Harbert, and D. S. McCulloch, 1994. "Plate motions recorded in tectonostratigraphic terranes of the Franciscan Complex and evolution of the Mendocino triple junction, northwestern California." *U.S. Geological Survey Bulletin* 1997, 60 p.
- Meighan, Clement C. and C. Vance Haynes, 1970. "The Borax Lake Sites Revisited." *Science* 167(3922):1213-1221.
- Merritts, D. J., P. Bodin, E. C. Beutner, C. S. Prentice, and J. Muller, 2000. "Active Surface Deformation in the Mendocino Triple Junction Process Zone." *Proceedings of the Third Conference on Tectonic Problems of the San Andreas Fault System*, Stanford University, Sept 6-8, 2000.
- Merritts, D. J., and W. B. Bull, 1989. "Interpreting Quaternary uplift rates at the Mendocino triple junction, northern California, from uplifted marine terraces." *Geology* 17:1020-1024.
- Merritts, D. J., T. B. Dunklin, K. R. Vincent, E. E. Wohl, and W. B. Bull, 1992. "Quaternary tectonics and topography, Mendocino triple junction." In R. M. Burke and G. A. Carver, eds., *A Look at the Southern End of the Cascadia Subduction Zone and the Mendocino Triple Junction, Field Trip Guidebook*, Pacific Cell, Friends of the Pleistocene, Northern Coastal California, Humboldt State University, Arcata, California, p. 119-169.
- Myers, J. M., R. G. Kope, G. J. Bryant, D. Teel, L. J. Lierheimer, T. C. Wainwright, W. S. Grant, F. W. Waknitz, K. Neely, S. T. Lindley, and R. S. Waples, 1998. *Status review of Chinook salmon from Washington, Idaho, Oregon, and California*. U.S. Department of Commerce, NOAA Tech. Memo. NMFS-NWFSC-35, 443 pp.

- National Oceanic and Atmospheric Administration, 2003. Fisheries Northwest Region (NWR) Office of Protected Species Federal Register Actions. Website:
<http://www.nwr.noaa.gov/1salmon/salmesa/marfish.htm>.
- Nehlsen, W., J. E. Williams, and J. A. Lichatowich, 1991. "Pacific salmon at the crossroads: Stocks at risk from California, Oregon, Idaho, and Washington." *Fisberies* 16(2):4-21.
- Nickelson, T. E., J. W. Nicholas, A. M. McGie, R. B. Lindsay, D. L. Bottom, R. J. Kaiser, and S. E. Jacobs, 1992. "Status of anadromous salmonids in Oregon coastal basins." Unpublished paper.
- Nomland, Gladys A., 1935. "Sinkyone Notes." University of California Publications in American Archaeology and Ethnology 36(2): 149-178.
- Nomland, Gladys A., 1938. "Bear River Ethnography." *Anthropological Records*, University of California, Berkeley. 2:2.
- Nussbaum, R. A., and C. K. Tait, 1977. "Aspects of the life history and ecology of the Olympic salamander, (*Rhyacotriton olympicus*)." *American Midland Naturalist*, 98(1).
- Oswald, D. D., 1968. *The Timber Resources of Humboldt County*. U.S. Department of Agriculture, Forest Service, Pacific Northwest Forest and Range Experiment Station, Portland, OR.
- PALCO, 1998. Pacific Lumber Company, wildlife surveys. Scotia, CA.
- Paton P.W., C.J. Ralph, and R. A. Erickson, 1987. "Seasonal changes in Marbled Murrelets at inland sites in northwestern California." U.S. Forest Service, Redwood Science Laboratory, Arcata, CA.
- Perala, N. C., T. Dunklin, F. Euphrat, W. Smith and C. May, 1993. "Rapid evaluation of sediment budgets: Annual sediment contribution from roads in the Mattole watershed." Unpublished paper.
- Peterson, Gene, 1996. *Pioneering Outdoor Recreation for the Bureau of Land Management*. Public Lands Foundation, McLean, VA.
- Peterson, N. P., A.Hendry, and T. P. Quinn, 1992. *Assessment of cumulative effects on salmonid habitat: some suggested parameters and target conditions*, TFW-F3-92-001. Prepared for the Washington Department of Natural Resources and The Coordinated Monitoring, Evaluation and Research Committee, Timber Fish and Wildlife Agreement. University of Washington, Center for Streamside Studies, Seattle, WA.
- Philpott, W., 1997. "Summaries of the life histories of California bat species." Unpublished document, U.S. Forest Service, Sierra National Forest, Pineridge Ranger Station. 30pp.
- Pickart, A. J., and J. O. Sawyer, 1998. *Ecology and Restoration of Northern California Coastal Dunes*. California Native Plant Society, Sacramento, CA.

- Pierson, E. D., W. E. Rainey, and D. M. Koontz, 1991. "Bats and mines: Experimental mitigation for Townsend's big-eared bat at the McLaughlin mine in California." *Proc. Issues Technol. Manage. Impacted Wildl.* (Thorne Ecol. Inst.) No. 5.
- Pierson, E. D., and W. E. Rainey, 1994. *Distribution, status, and management of Townsend's big-eared bat (Corynorhinus townsendii) in California*. California Department of Fish and Game BMCP Technical Report Number 96-7.
- Pine, W. D., 1956. *My timber is gone... What shall I do now?* University of California Agricultural Extension Service, Berkeley, CA.
- Powell, R. A., 1993. *The Fisher (life history, ecology, and behavior)*. Second Edition. University of Minnesota Press, Minneapolis, MN.
- Powell, R. A., and W. J. Zielinski, 1994. "Fisher," in *The scientific basis for conserving forest carnivores: American marten, fisher, lynx, and wolverine in the United States*, Ruggiero, L. F., K. B. Aubry, S. W. Buskirk, L. J. Lyon, and W. J. Zielinski, technical editors. U.S. Forest Service General Technical Report RM-254.
- Powers, Stephen, 1976. *Tribes of California*. Reprinted by University of California Press. Originally published 1877, Contributions to North American Ethnology III, U.S. Department of the Interior, U.S. Government Printing Office, Washington, DC.
- Praetzellis, Adrian, 1995. *Documentation and Evaluation of Historical Resources Within the King Range National Conservation Area*. Report prepared by the Anthropological Studies Center, Sonoma State University, Rohnert Park, CA.
- Prentice, C. S., D. J. Merritts, E. C. Beutner, P. Bodin, A. Schill, and J. R. Muller, 1999. "Northern San Andreas fault near Shelter Cove, California." *Geological Society of America Bulletin* 111(4):512-523.
- Ralph, C. J., G. R. Geupel, P. Pyle, T. E. Martin, and D. F. DeSante, 1993. *Handbook of field methods for monitoring landbirds*. U.S. Forest Service General Technical Report No. PSW No. 144, Redwood Sciences Laboratory, Arcata, CA.
- Ralph, C. J., S. K. Nelson, M. M. Shaughnessy, S. L. Miller, and T. E. Hamer, 1994. "Methods for surveying Marbled Murrelets in forests: a protocol for land management and research." Pacific Seabird Group, Marbled Murrelet Technical Committee. March 1994, McKinleyville, CA.
- Raphael, Ray, 1974. *An Everyday History of Somewhere, Being the True Story of Indians, Deer, Homesteaders, Potatoes, Loggers, Trees, Fishermen, Salmon, and Other Living Things in the Backwoods of Northern California*. Real Books, Redway, CA.
- Raphael, Ray, 1976. *Edges: Backcountry Lives in America Today on the Borderlands between the Old Ways and the New*. Alfred A. Knopf, New York, NY.
- Raphael, Ray, 1985. *Cash Crop: An American Dream*. Real Books, Redway, CA.

- Reeves, G. H., F. H. Everest, and J. D. Hall, 1987. "Interactions between the redbside shiner (*Richardsonius balteatus*) and the steelhead trout (*Salmo gairdneri*) in western Oregon: the influence of water temperature." *Can. J. Fish. Aquat. Sci.* 44:1603-1613.
- Rich, A. A., 1997. Testimony of Alice A. Rich, Ph.D., regarding water rights applications for the Delta Wetlands Project, proposed by Delta Wetlands Properties for Water Storage on Webb Tract, Bacon Island, Bouldin Island, and Holland Tract in Contra Costa and San Joaquin Counties. July. Calif. Dept. of Fish and Game Exhibit DFG-7. Submitted to State Water Resources Control Board.
- Roscoe, J., 1977. *The Mattole Valley: Economic Survival in a Rural Community*. Thesis, Humboldt State University, Arcata, CA.
- Roscoe, Kathleen, 1983. *King Range Coast Cultural Resource Management Plan*. USDI Bureau of Land Management, Arcata Resource Area, Ukiah District.
- Rosenberger, Randall S. and John B. Loomis, 2001. *Benefit transfer of outdoor recreation use values: A technical document supporting the Forest Service Strategic Plan (2000 revision)*. Gen. Tech. Rep. RMRS-GTR-72. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fort Collins, CO. 59p.
- Rumph, Leslie, 1982. *Lost Coast Archaeological District—King Range National Conservation Area Cultural Resource Management Plan (Draft)*. USDI Bureau of Land Management, Arcata Resource Area, Ukiah District.
- Sandercock, F. K., 1991. "Life history of Coho salmon." Pages 397-445 in C. Groot and L. Margolis (eds.), *Pacific salmon life histories*. Univ. British Columbia Press, Vancouver. 564 pages.
- Schoenherr, Allan A., 1992. *A Natural History of California*. University of California Press, Berkeley, CA.
- Seymour, A. H., 1956. *Effects of temperature on young Chinook salmon*. Ph.D. thesis. University of Washington, Seattle, WA.
- Shapovalov, L., and W. Berrian, 1940. "An experiment in hatching silver salmon *Oncorhynchus kisutch* eggs in gravel." *Transactions of the American Fisheries Society* 69:135-140.
- Shipley, William F., 1978. "Native Languages of California." In *California*, edited by Robert F. Heizer, pp. 80-90. Handbook of North American Indians, vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, DC.
- Smith, A. K., 1973. "Development and application of spawning velocity and depth criteria for Oregon salmonids." *Trans. Am. Fish. Soc.* 102(2):312-316.
- Solis, D. M., and R. J. Gutierrez, 1990. "Summer habitat ecology of Northern Spotted Owls in northwestern California." *Condor* 92:739-748.

- Sonoran Institute, 2003. "Population, Employment, Earnings and Personal Income Trends for Humboldt County and Mendocino County."
- Sorenson, D. L., M. M. McCarthy, E. J. Middlebrooks, and D. B. Porcella, 1977. *Suspended and dissolved solids effects on freshwater biota*. EPA-600/3-77-042. U.S. Environmental Protection Agency, Corvallis, Oregon.
- Spence, B. C., G. A. Lomnický, R. M. Hughes, and R. P. Novitzki, 1996. *An Ecosystem Approach to Salmonid Conservation*. TR-4501-96-6507. pages 219, 228.
- Squires, J. R., and R. T. Reynolds, 1997. "Northern Goshawk (*Accipiter gentiles*)." In *The Birds of North America*, no. 298 (A. Poole and F. Gill, Eds.). The Academy of Natural Sciences, Philadelphia, Pennsylvania; The American Ornithologists' Union, Washington, D.C.
- State of California, Board of Equalization, 1982. *1980-1981 Annual Report*.
- State of California, Board of Equalization, 1992. *1990-1991 Annual Report*.
- State of California, Board of Equalization, 2002. *2000-2001 Annual Report*.
- State of California, Department of Finance, 1998. *County Population Projections with Age, Sex and Race/Ethnic Detail*. Sacramento, California, December 1998
- State of California, Department of Finance, 2002a. *City/County Population and Housing Estimates, 2002, Revised 2001, with 2000 Census Counts*. Sacramento, California.
- State of California, Department of Finance, 2002b. Revised Historical City, County and State Population Estimates, 1991-2000, with 1990 and 2000 Census Counts. Sacramento, California.
- State of California, Department of Finance, 2003a. Report 84 E-4, Population Estimates for California Cities and Counties, 1970-1980. Sacramento, California.
- State of California, Department of Finance, 2003b. Report SR 91-2, State Populations and Changes: 1970, 1980 & 1990. Sacramento, California.
- State of California, Employment Development Department, Labor Market Information Division, 2000. *Occupational Projections, 1999-2006, Humboldt County and Mendocino County*. Sacramento, California.
- State of California, Employment Development Department, Labor Market Information Division, 2003. *Civilian Labor Force, Employment, and Unemployment*. Sacramento, California.
- State of California, Employment Development Department. 2002a. *County Snapshots: Humboldt County*. Prepared by the Labor Market Information Division (LMID), Sacramento, California.

- State of California, Employment Development Department. 2002b. *County Snapshots: Mendocino County*. Prepared by the Labor Market Information Division (LMID), Sacramento, California.
- Stebbins, R. C., 1966. *A field guide to western reptiles and amphibians*. Houghton Mifflin Company, Boston, MA.
- Swanson, F. J., and G. W. Lienkaemper, 1978. *Physical consequences of large organic debris in Pacific Northwest streams*. General Technical Report PNW-69. U.S. Department of Agriculture, Forest Service, Pacific Northwest Forest and Range Experiment Station, Portland, OR.
- Thomasm, L. E., T. Drummer, and R. O. Peterson, 1991. "Testing the habitat suitability index model for the fisher." *The Wildlife Society Bulletin* 19:291-297
- Tuttle, Donald, 1982. *Investigations of Coastline Retreat at Shelter Cove, California*. Sea Grant Project No. R/NP-1-10-F.1
- Udvardy, M. D. F., 1998. *Audubon Society Field Guide to North American Birds: Western Region*. Alfred Knopf, New York, NY.
- U.S. Congress, House of Representatives, 1970. *Report No. 91-1440, to Accompany H.R. 12870, Providing for the Establishment of the King Range National Conservation Area in the State of California*. Committee of Interior and Insular Affairs, Subcommittee on National Parks and Recreation, 91st Congress, Second Session, Washington, DC.
- U.S. Department of Agriculture, Economic Research Service, 2003. County Poverty Rates for California. <http://www.ers.usda.gov/Data/PovertyRates>
- U.S. Department of Agriculture, Forest Service, 1984. Forest Service Handbook 1909.17, *Economic and Social Analysis Handbook, Chapter 30 – Social Analysis*.
- U.S. Department of the Interior, Bureau of Land Management, 1974. *King Range National Conservation Area Management Program*. USDI Bureau of Land Management, Arcata Field Office. Arcata, California.
- U.S. Department of the Interior, Bureau of Land Management, 1979a. *Wilderness: Final Intensive Inventory, Public Lands Administered by BLM California Outside the California Desert Conservation Area*. USDI Bureau of Land Management, Arcata Resource Area, CA.
- U.S. Department of the Interior, Bureau of Land Management, 1979b. *Interim Management Policy and Guidelines for Lands Under Wilderness Review*. USDI Bureau of Land Management.
- U.S. Department of the Interior, Bureau of Land Management, 1981. Manual Transmittal Sheet 1600-Land Planning. USDI Bureau of Land Management, September 15, 1981.
- U.S. Department of the Interior, Bureau of Land Management, 1982. *Guide to Social Assessment, BLM Social Effects Project* (prepared by Mountain West Research-North).

- U.S. Department of the Interior, Bureau of Land Management, 1986. *King Range Transportation Plan*. USDI Bureau of Land Management, Arcata Resource Area, CA, September 1986.
- U.S. Department of the Interior, Bureau of Land Management, 1988. *Final Environmental Impact Statement on the Wilderness Recommendations for the Arcata Resource Area King Range WSA and Chemise Mountain WSA*. USDI Bureau of Land Management, Ukiah District Office, CA.
- U.S. Department of the Interior, Bureau of Land Management, 1992a. *King Range National Conservation Area Final Visitor Services Plan*. USDI Bureau of Land Management, Arcata Resource Area, CA, October 1992.
- U.S. Department of the Interior, Bureau of Land Management, 1992b. *King Range National Conservation Area Updated Fire Management Plan*. USDI Bureau of Land Management, Arcata Resource Area, CA.
- U.S. Department of the Interior, Bureau of Land Management, 1995. *Bear Creek Watershed Analysis*. USDI Bureau of Land Management, Arcata Resource Area, CA, May 1995.
- U.S. Department of the Interior, Bureau of Land Management, 1996. *Honeydew Creek Watershed Analysis*. USDI Bureau of Land Management, Arcata Resource Area, CA, November 1996.
- U.S. Department of the Interior, Bureau of Land Management, 1997a. Cooperative Fire Protection Agreement between the United States Department of the Interior, Bureau of Land Management, California and Nevada; United States Department of the Interior, National Park Service, Pacific-West Field Area; United States Department of Agriculture, Forest Service, Regions Four, Five and Six; and the State of California Department of Forestry and Fire Protection.
- U.S. Department of the Interior, Bureau of Land Management, 1997b. *Environmental Assessment and Plan Amendment for the King Range National Conservation Area*. USDI Bureau of Land Management, Arcata Resource Area, CA, October 1997.
- U.S. Department of the Interior, Bureau of Land Management, 1998a. *Late Successional Reserve Assessment*. USDI Bureau of Land Management, Arcata Resource Area, CA, June 1998.
- U.S. Department of the Interior, Bureau of Land Management, 1998b. *Rangeland Health: Standards and Guidelines for California and Northwestern Nevada Final EIS*. USDI Bureau of Land Management, California State Office, Sacramento, CA.
- U.S. Department of the Interior, Bureau of Land Management, 2001a. *Pre-Plan Analysis for the King Range National Conservation Area*. USDI Bureau of Land Management, Arcata Resource Area, CA, May 2001.
- U.S. Department of the Interior, Bureau of Land Management, 2001b. *Mill Creek Watershed Analysis*. USDI Bureau of Land Management, Arcata Resource Area, CA, July 2001.

- U.S. Department of the Interior, Bureau of Land Management, 2002a. Instruction Memorandum No. 2002-167, *Social and Economic Analysis for Land Use Planning*. Prepared by Assistant Director, Renewable Resources and Planning.
- U.S. Department of the Interior, Bureau of Land Management, 2002b. "Birds of the King Range National Conservation Area: bird checklist." USDI Bureau of Land Management, Arcata Resource Area, CA.
- U.S. Department of the Interior, Bureau of Land Management, 2003a. King Range National Conservation Area Website. http://www.ca.Bureau of Land Management.gov/arcata/king_range.html.
- U.S. Department of the Interior, Bureau of Land Management, 2003b. *Scoping Report for King Range National Conservation Area Resource Management Plan*, Arcata Resource Area, CA.
- U.S. Department of the Interior, Fish and Wildlife Service, 1986. *Pacific Bald Eagle Recovery Plan*. U.S. Fish and Wildlife Service, Portland, OR. 163 pp.
- U.S. Department of the Interior, Fish and Wildlife Service, 1997. *Recovery plan for the threatened Marbled Murrelet (*Brachyramphus marmoratus*) in Washington, Oregon, and California*. U.S. Fish and Wildlife Service, Portland OR. 203 pp.
- U.S. Department of the Interior, Fish and Wildlife Service, 1998. *Seven Coastal Plants and the Myrtle's Silverspot Butterfly Recovery Plan*. Portland, OR.
- U.S. Department of the Interior, Fish and Wildlife Service, 2003. Webpage: <http://fa.r9.fws.gov/surveys/surveys.html>. Accessed February 19, 2003.
- Velasquez, Manuel G., 1997. *Business Ethics: Concepts and Cases*. Prentice Hall, Paramus, NJ.
- Vaux, H. J., 1955. *Timber in Humboldt County*. California Agricultural Experiment Station, Berkeley, CA.
- Vaux, H. J. and E. A. Hofsted, 1956. *An Economic Appraisal of Forest Resources and Industries in Humboldt County, California*. University of California School of Forestry, Berkeley, CA.
- Weitkamp, L. A., T. C. Wainwright, G. J. Bryant, G. B. Milner, D. J. Teel, R. G. Kope, and R. S. Waples, 1995. *Status review of Coho salmon from Washington, Oregon, and California*. U.S. Department of Commerce, NOAA Tech Memo. NMFS-NWFSC-24, Northwest Fisheries Science Center, Seattle, WA. 258 pages.
- Welsh, H. H., and G. R. Hodgson. Unpublished data. U.S. Forest Service, Pacific Southwest Research Station, Redwood Science Laboratory, Arcata, CA.
- Whistler, K. A. 1979. "Linguistic Prehistory in the Northwest California Cultural Area." In *A Study of Cultural Resources in Redwood National Park*, edited by P.M. Bickel. Document on file with the National Park Service, Denver, CO.

Whitaker W. O. Jr., ed., 1998. *National Audubon Society Field Guide to North American Mammals*. Alfred A. Knopf Inc., New York, NY.

Zielinski, W. J., and R. T. Golightly, 1996. "The status of marten in redwoods: is the Humboldt marten extinct?" College of Natural Resources, University of California, Berkeley, CA.

Zielinski, W. J., K. M. Slauson, C. R. Carroll, C. J. Kent, and D. G. Kudrna, 2001. "Status of American marten in coastal forest of the Pacific States." *Journal of Mammalogy* 82(2):478-490.

7.2 PERSONAL COMMUNICATIONS

Ashton, Donald, 2003. Herpetologist, U.S. Forest Service, Pacific Southwest Research Station, Redwood Science Laboratory, Arcata, CA.

Dayton, Jeff, 2003. Biologist, California Department of Fish and Game.

Falxa, Gary, 2003. Biologist, U.S. Fish and Wildlife Service, Arcata, CA.

Fix, David, 2003. Biologist, Mad River Biologists, McKinleyville, CA.

Green, Lloyd, 2003. Inspector, North Coast Unified Air Quality Management District.

Hodgson, Garth, 2003. Biologist/Herpetologist, U.S. Forest Service, Pacific Southwest Research Station, Redwood Science Laboratory, Arcata, CA.

Mazurek, Mary Jo, 2003. Wildlife Biologist, U.S. Forest Service, Pacific Southwest Research Station, Redwood Science Laboratory, Arcata, CA.

Pierson, E. D, 1996. Presentation to the natural history and management of bats in California and Nevada workshop, November 13-15, 1996, Sacramento, CA.

Purdy, Daniel, 2003. Associate Professor of Biology, College of the Redwoods, Eureka, CA.

Smith, Edward, 2003. Bear River Band EPA Officer, Rohnerville Rancheria.

Welsh, H. H., 2004. Research Ecologist, U.S. Forest Service, Pacific Southwest Research Station, Redwood Science Laboratory, Arcata, CA

Zielinski, K., 2003. Research Ecologist, U.S. Forest Service, Pacific Southwest Research Station, Redwood Science Laboratory, Arcata, CA.

7.3 LIST OF ACRONYMS

4-WD	Four Wheel Drive
ACEC	Area of Critical Environmental Concern
ASQ	Allowable Sale Quantity
AUM	Animal Unit Month
BLM	Bureau of Land Management
BMP	Best Management Practices
CC	California Coastal
CCC	California Conservation Corps
CDF	California Department of Forestry and Fire Protection
CDFG	California Department of Fish and Game
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CNDD	California Natural Diversity Database
CNPS	California Native Plant Society
CRMP	Cultural Resource Management Plan
CWA	Clean Water Act
DOD	Department of Defense
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Administration
ESA	Endangered Species Act
FAA	Federal Aviation Administration
FLPMA	Federal Land Policy and Management Act
FWS	Fish and Wildlife Service
GIS	Geographic Information System
GLO	General Land Office
HSU	Humboldt State University
IMP	Interim Management Policy
KRNCA	King Range National Conservation Area
LCIA	Lost Coast Interpretive Association
LCT	Lost Coast Trail
LSOG	Late Successional Old Growth
LSR	Late Successional Reserve
MNBMC	Migratory Nongame Birds of Management Concern
MOU	Memorandum of Understanding
MPA	Multiple Pair Area
MSA	Magnuson-Stevens Act
NAGPRA	Native American Graves Protection and Repatriation Act
NCA	National Conservation Area
NCUAQMD	North Coast Unified Air Quality Management District
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act

NLCS	National Landscape Conservation System
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWFP	Northwest Forest Plan
NWSRS	National Wild and Scenic River System
OHV	Off-Highway Vehicle
ORV	Outstanding Resource Value
PALCO	Pacific Lumber Company
PILT	Payments in Lieu of Taxes
PL	Public Law
RCRA	Resource Conservation and Recovery Act
RDM	Residual Dry Matter
RMP	Resource Management Plan
RNA	Resource Natural Area
ROD	Record of Decision
ROW	Right-of-Way
RR	Riparian Reserve
RWQCB	Regional Water Quality Control Board
S&G	Standards and Guidelines
S&M	Survey and Manage
SDWA	Safe Drinking Water Act
SHPO	State Historic Preservation Officer
SONCC	Southern Oregon/Northern California Coast
SWRCB	State Water Resources Control Board
T&E	Threatened and Endangered
TMDL	Total Maximum Daily Load
TOT	Transient Occupancy Tax
TSI	Timber Stand Improvement
USDA	U.S. Department of Agriculture
USDI	U.S. Department of Interior
VRM	Visual Resource Management
WSA	Wilderness Study Area

This page intentionally left blank.



APPENDICES



APPENDIX A

KING RANGE ACT OF 1970

APPENDIX A

Public Law 91-476
91st Congress, H.R. 12870
October 21, 1970

AN ACT

94 Stat/67

To provide for the establishment of the King Range National Conservation Area in the State of California

Be it enacted by the Senate and the House of Representatives of the United States of America in Congress assembled, That the Secretary of the Interior (hereinafter referred to as the “Secretary”) is hereby authorized and directed, after compliance with Sections 3 and 4 of this Act, to establish, within the boundaries described in Section 9 of this Act, the King Range National Conservation Area in the State of California (hereinafter referred to as the “Area”), and to consolidate and manage the public lands in the area with the purpose of conserving and developing, for the use and benefit of the people of the United States, the lands and other resources therein under a program of multiple usage and of sustained yield.

Section 2. (a) In the management of lands in the area, the Secretary shall utilize and develop the resources in such a manner as to satisfy all legitimate requirements for the available resources as fully as possible without undue denial of any of such requirements and without undue impairment of any of the resources, taking into consideration total requirement and total availability of resources, irrespective of ownership or location.

(b) The policy set forth in subsection (a) implies—

(1) that there will be a comprehensive, balanced, and coordinated plan of land use, development, and management of the Area, and that such plan will be based on an inventory and evaluation of the available resources and requirements for such resources, and on the topography and other features of the Area.

(2) that the plan will indicate the primary or dominant uses which will be permitted on various portions of the Area.

(3) that the plan will be based on a weighing of the relative values to be obtained by utilization and development of the resources for alternative possible uses, and will be made with the object of obtaining the greatest values on a continuing basis, and that due consideration will be given to intangible values as well as to tangible values such as dollar return or production per unit.

(4) that secondary or collateral uses may be permitted to the extent that such uses are compatible with and do not unduly impair the primary or dominant uses, according to reasonable schedule or otherwise.

(5) that management of the renewable resources will be such as to obtain a sustained, regular, or periodic yield or supply of products or services without impairment of the productivity, or the enjoyment or carrying capacity of the land.

(6) that the plan will be reviewed and reevaluated periodically.

(7) that the resources to be considered are all the natural resources including but not limited to the soils, bodies of water, including the shorelines thereof, forest growth including timber, vegetative cover including forage, fish, and other wildlife, and geological resources including minerals.

(8) that the uses to be considered are all of the legitimate uses of such resources including but not limited to all forms of outdoor recreation including scenic enjoyment, hunting, fishing, hiking, riding, camping, picnicking, boating, and swimming, all uses of water resources, watershed management, production of timber and other forest products, grazing and other agricultural uses, fish and wildlife management, mining, preservation of ecological balance, scientific study, occupancy and access.

Section 3. The Secretary shall use public and private assistance as he may require, for the purpose of preparing for the Area a program of multiple usage and of sustained yield of renewable natural resources. Such program shall include but need not be limited to (1) a quantitative and qualitative analysis of the resources of the Area; (2) the proposal boundaries of the Area; (3) a plan of land use, development, and management of the Area together with any proposed cooperative activities with the State of California, local governments, and others; (4) a statement of expected costs and an economic analysis of the program with particular reference to costs to the United States and expected economic effects on local communities and governments; and (5) an evaluation by the Secretary of the program in terms of the public interest.

Section 4. The Secretary shall establish the Area after a period of at least ninety calendar days from and after the date that he has (1) submitted copies of the program required by section 3 to the President of the Senate and the Speaker of the House of Representatives, the Governor of the State of California, and the governing body of the county or counties in which the area is located and (2) published a notice of intention to establish the area in the Federal Register and in at least two newspapers which circulate generally within the Area.

Section 5. The Secretary is authorized—

(1) to conduct a public hearing or hearings to receive expression of local views relating to establishment of the area.

(2) to acquire by donation, by purchase with donated funds or with funds appropriated specifically for that purpose, or by exchange, any land or interest in land within the area described in section 9, which the Secretary, in his judgment, determines to be desirable for consolidation of public lands within the Area in order to facilitate efficient and beneficial management of the public lands or otherwise to accomplish the purposes of this Act: *Provided*, That the Secretary may not acquire, without the consent of the owner, any such lands or interests therein which are utilized on the effective date of this Act for residential, agricultural, or commercial purposes so long as he finds such property is devoted to uses compatible with the purposes of this Act. Any lands or interests in lands acquired by the United

States under the authority of this section shall, upon acceptance of title, become public lands and shall become a part of the area subject to all the laws and regulations applicable thereto.

(3) in the exercise of his authority to acquire land or interests in land by exchange under this Act, to accept title to any non-Federal land located within the Area and to convey to the grantor of such land not to exceed an equal value of surveyed, unappropriated, and unreserved public lands or interests, in lands and appropriated funds when in his judgment the exchange will be in the public interest and in accordance with the following:

(A) The public lands offered in exchange for non-Federal lands or interests in non-Federal lands must be in the same county or counties, and must be classified by the Secretary as suitable for exchange. For a period of five years, any such public lands suitable for transfer to nonpublic ownership shall be classified for exchange under this Act.

(B) If the lands or interests in lands offered in exchange for public lands have a value at least equal to two-thirds of the value of the public lands, the exchange may be completed upon payment to the Secretary of the difference in value, or the submittal of a cash deposit or a performance bond in an amount at least equal to the difference in value assuring that additional lands acceptable to the Secretary and at least equal to the difference in value will be conveyed to the Government within a time certain to be specified by the Secretary.

(C) If the public lands offered in exchange for non-Federal lands or interests in non-Federal lands have a value at least equal to two-thirds of the value of the non-Federal lands, the exchange may be completed upon payment by the Secretary of the difference in value.

(D) Either party to an exchange under this Act may reserve minerals, easements, or rights of use either for its own benefit, for the benefit of third parties, or for the benefit of the general public. Any such reservation, whether in lands conveyed to or by the United States, shall be subject to such reasonable conditions respecting ingress and egress and the use of the surface of the land as may be deemed necessary by the Secretary. When minerals are reserved in a conveyance by the United States, any person who prospects for or acquires the right to mine and remove the reserved mineral deposits shall be liable to the surface owners according to their respective interests for any actual damage to the surface or to the improvements thereon resulting from prospecting, entering, or mining operations; and such persons shall, prior to entering, either obtain the surface owner's written consent, or file with the Secretary a good and sufficient bond or undertaking to the United States in an amount acceptable to the Secretary for the use and benefit of the surface owner to secure payment of such damages as may be determined in an action brought on the bond or undertaking in a court of competent jurisdiction.

(4) in the exercise of his authority to purchase lands under this Act to pay for any such purchased lands their fair market value, as determined by the Secretary, who may, in his discretion, base his determination on an independent appraisal obtained by him.

(5) to identify the appropriate public uses of all of the public lands and interests therein within the Area. Disposition of the public lands within the Area, or any of the lands subsequently acquired as part of the area, is prohibited, and the lands in the Area described in Section 9 of this Act are hereby withdrawn from all forms of entry, selection, or location under existing or subsequent law, except as

provided in Section 6 of this Act. Notwithstanding any provision of this section, the Secretary may (A) exchange public lands or interests therein within the area for privately owned lands or interests therein also located within the area, and (B) issue leases, licenses, contracts, or permits as provided by other laws.

(6) to construct or cause to be constructed and to operate and maintain such roads, trails, and other access and recreational facilities in the area as the Secretary deems necessary and desirable for the proper protection, utilization, and development of the area.

(7) to reforest and revegetate such lands within the area and install such soil- and water-conserving works and practices to reduce erosion and improve forage and timber capacity as the Secretary deems necessary and desirable.

(8) to enter into such cooperative arrangements with the State of California, local governmental agencies, and nonprofit organizations as the Secretary deems necessary or desirable concerning but not limited to installation, construction, maintenance, and operation of access and recreational facilities, reforestation, revegetation, soil and moisture conservation, and management of fish and wildlife including hunting and fishing and control of predators. The Secretary shall permit hunting and fishing on land and waters under the jurisdiction within the boundaries of the recreation area in accordance with the applicable laws of the United States and the State of California, except that the Secretary may designate zones where, and establish periods when, no hunting or fishing shall be permitted for reasons of public safety, administration, fish and wildlife management, or public use and enjoyment. Except in emergencies, any regulations of the Secretary pursuant to this section shall be put into effect only after consultation with the appropriate State fish and game department.

(9) to issue such regulations and to do such other things as the Secretary deems necessary and desirable to carry out the terms of this Act.

Section 6. (a) Subject to valid existing rights, nothing in this Act shall affect the applicability of the United States mining laws on the federally owned lands within the Area, except that all prospecting commenced or conducted and all mining claims located after the effective date of this Act shall be subject to such reasonable regulations as the Secretary may prescribe to effectuate the purposes of this Act. Any patent issued on any mining claim located after the effective date of this Act shall recite this limitation and continue to be subject to such regulations. All such regulations shall provide, among other things, for such measures as may be reasonable to protect the scenic and esthetic values of the Area against undue impairment and to assure against pollution of the streams and waters within the Area.

(b) Nothing in this section shall be construed to limit or restrict rights of the owner or owners of any existing valid mining claim.

Section 7. Except as may otherwise be provided in this Act, the public lands within the area shall be administered by the Secretary under any authority available to him for the conservation, development, and management of natural resources on public lands in California withdrawn by Executive Order Numbered 6910, dated November 26, 1934, to the extent that he finds such authority will further the purposes of this Act.

Section 8. The objectives of Executive Order Numbered 5237, dated December 10, 1929, which withdraw certain public lands for classification, having been accomplished by the enactment of this Act, that Executive order is hereby revoked effective as of the date the Secretary establishes the area.

Section 9. (a) The survey and investigation area referred to in the first section of this Act is described as follows:

MOUNT DIABLO MERIDIAN, CALIFORNIA

- Township 24 North, Range 19 West, Sections 4 and 5.

HUMBOLDT MERIDIAN, CALIFORNIA

- Township 5 south, range 1 east, all sections in township.
- Township 5 south, range 2 east, section 6, lots 4 through 9; 16 through 21; and 24 through 26; section 7, lots 2 through 7; 10 through 15; section 18, lots 1 through 16; section 19, lots 1 through 16; southwest quarter northeast quarter and west half southeast quarter and sections 30 and 31; section 32, southwest quarter northeast quarter; south half northwest quarter; northwest quarter northwest quarter; southwest quarter and west half southeast quarter.
- Township 4 south, range 1 west, all sections in township.
- Township 4 south, range 1 east; section 4, south half; south half northeast quarter and south half northwest quarter; sections 5 through 9; 15 through 23; section 24, west half; section 25, west half; sections 26 through 35; section 36, lots 3 through 5 and 8 through 11 and southeast quarter.
- Township 4 south, range 2 east, section 31, west half southeast quarter and southwest quarter.
- Township 3 south, range 2 west, section 12, southeast quarter southeast quarter; sections 13 through 16 and 22 through 25.
- Township 3 south, range 1 west, section 9, southwest quarter southwest quarter; section 12, south half southeast quarter and south half southwest quarter; sections 13 through 36.
- Township 3 south, range 1 east, section 18, lots 1 through 4; section 19, lots 1 and 2, southwest quarter and west half southeast quarter; section 29, southwest quarter northwest quarter and west half southwest quarter; section 30 and 31; section 32, west half.
- Township 2 south, range 2 west, section 31, north half of lot 2 of the southwest quarter (43.40 acres of public land withdrawn by Executive Order 5237 of December 10, 1929); and 22.8 acres of acquired fee lands described by metes and bounds in section 31, township 2 south, range 2 west, and section 36, township 2 south, range 3 west; and 31.27 acres of acquired easements described by metes and bounds across certain sections in township 2 south, ranges 2 and 3 west.

(b) In addition to the lands described in subsection (a) of this section, the Secretary is authorized to acquire such land outside the area but in close proximity thereto as is necessary to facilitate sound management. Acquisition hereunder shall, however, not exceed three hundred and twenty acres and shall be limited to such purposes as headquarters facility requirements, ingress and egress routes and, where necessary, to straighten boundaries or round out acquisitions.

Section 10. There are authorized to be appropriated such sums as may be necessary to accomplish the purposes of this Act, but not to exceed \$1,500,000 for the purchase of lands and interests in lands and not to exceed \$3,500,000 for the construction of improvements.

Approved October 21, 1970.

LEGISLATIVE HISTORY:

HOUSE REPORT NO. 91-1440 (Comm. On Interior and Insular Affairs).

SENATE REPORT No. 91-1270 (Comm. On Interior and Insular Affairs).

CONGRESSIONAL RECORD, Vol. 116 (1970):

Sept. 21, considered and passed House.

Oct. 7, considered and passed Senate, amended.

Oct. 8, House occurred in Senate amendments.

APPENDIX B

SUPPLEMENTAL RULES

APPENDIX B

SUPPLEMENTAL RULES

PROPOSED RULES

Areas of Critical Environmental Concern

The following rules apply to Areas of Critical Environmental Concern under authority of 43 CFR 1610.7.2(2)b:

Mill Creek and Mattole ACECs

- Commercial harvesting of vegetative materials (i. e. special forest products including mushrooms, beargrass, floral boughs etc.) is not permitted.

Mill Creek ACEC Only (680 acres)

- Day-use only (no overnight camping).
- No campfires are permitted.
- Pets must be on a leash and under control at all times.

The rules above would automatically apply to any additional lands that the BLM acquires within the Mill Creek Watershed.

Mattole ACEC only (655 Acres)

- Firewood collecting is not permitted, except that driftwood may be collected for campfire use during a stay at the Mattole Campground or surrounding dispersed sites. Wood may only be collected with hand tools/saws. No chainsaws or power saws may be used.
- Use of watercraft with internal combustion engines, including all inboard and outboard motor boats, jet skis and other personal watercraft is not permitted within the Mattole Estuary.
- (see Camping limits below for limits that apply to the Mattole ACEC)

Planning Area-Wide

The following rules apply to the entire planning area, except where noted.

Bear Canister Requirement (43 CFR 8365. 1-6)

Note: This rule has been in place as an emergency rule since 2002.

All dispersed use overnight users camping on BLM-administered public lands within the boundaries of the King Range National Conservation Area planning area are required to carry and use hard-sided bear-proof food storage canisters. The canisters must be of sufficient size to permit storage of all food, toiletries, sunscreen, surfboard wax, insect repellent, and other scented items for the duration of the trip.

Each person must possess a minimum of one canister, and must use the canister to store the above types of items, plus any food scraps and scented trash items such as empty cans, energy/candy wrappers, surf wax wrappers etc. For the purposes of this rule, a “dispersed use” location is defined as any place outside of a developed campground where food and other scented items cannot be stored inside a locked vehicle. Also, “hard sided” means a container made of rigid material of a size and shape that cannot be grasped by the mouth or paws, or otherwise be carried for any significant distance by bears. The container must also have a closing and latching lid that is tested and proven effective against bears. Stock users must use either portable bear canisters or bear proof panniers of sufficient size to store materials for all party members for the duration of the trip. This proposed supplemental rule does not apply to overnight use within designated campgrounds or camping near vehicles where food can be stored and locked inside.

Requirement for Permits

- **Commercial Groups:** All commercial groups are required to obtain Special Recreation Permits for use of BLM managed lands as outlined in 43 CFR 2932.11(a)(1)
- **Organized non-commercial groups:** A non-commercial permit will be required but no commercial fee will be charged (dispersed use fees and permit processing fees may still apply) and no insurance required for noncommercial and certain educational group use. This includes such groups as outdoor clubs, scouts, fraternal organizations, school field labs and other organizations/group outings where charges are limited to a sharing of group expenses. No paid guides accompany the group, and fees do not offset other costs of running the organization. (Authority 43 CFR 2932.11(b)(2) and (3) (i – iii))
- **Individual and family use** (applies to Backcountry Zone only): A permit system will be established for individual and family users who access the Backcountry Zone for overnight use. This will be an interim measure to improve information dispersal to the public and to provide visitor use statistics for inclusion in developing the visitor use allocation plan. The permit will document information on group size, trail and camping destinations, and other information necessary to determine use trends. (The permit system would be established under the authority of 43 CFR 2932.11(b)(1) special area permits)
- **Competitive uses** (applies to Backcountry Zone only): Competitive uses as defined under 43 CFR 2932.5 (1) and (2) will not be permitted in the Backcountry Zone.

Interim Visitor Use Allocation Measures

43 CFR 2932.40 and .41 authorize the following stipulations and conditions to meet management goals and objectives and to protect lands and resources and the public interest. These rules apply only to the Backcountry Zone:

- **Commercial Outfitters only:** Commercial outfitters would not be allowed to operate during Memorial Day weekend, or the Fourth of July and closest weekend preceeding or following the 4th of July. Commercial groups must camp a minimum of ¼ mile north of Black Sands Beach trailhead.
- **Commercial and Organized Groups only:**
 - Daily Trailhead Limit: 30 people per day may leave each trailhead. Stock animals will not be counted in this total.

- Group Use Areas: Permit stipulations will direct groups to specific locations that can accommodate larger groups without overwhelming the campsite capacity and diminishing the quality of the backcountry experience at other locations. Initially identified group use areas include the following: Permitted groups having multiple layover days are required to camp at *Big Flat/Miller Flat*. *Spanish Flat* has been identified as a second location to focus organized group camping.
- Group Avoidance Areas: Commercial and organized group camping is not permitted at Buck, and Shipman Creeks except under special circumstances as approved on a case-by-case basis by the authorized officer.
- **All Overnight Visitors to Backcountry Zone**
 - Group Size Limits: On all trails, a maximum of 15 people per group.
 - Stock Use groups: Up to 25 “heartbeats” (people/stock combination), with a maximum of 15 people per group.

Motorized Watercraft Landings

(43 CFR 8365.1-6) Shore landings of motorized watercraft, including boats, zodiacs, jet skis, and other craft powered with internal combustion engines is prohibited, as this use is not consistent with the primitive recreation use objectives of the Backcountry Zone. This would not affect offshore anchorages or emergency landings.

Visitor Use Fees

(43 CFR 2932.30 and .31(d)(1)) (Backcountry Zone only) A fee would be established for overnight backcountry use in conjunction with implementing the permit program and visitor use allocation system. No fees are anticipated for day use. All fees would be used to offset costs associated with the visitor use allocation system. Funds would also be reinvested into management and protection of backcountry resources, providing maintenance, and visitor services.

Off Highway Vehicle Designations

As required under 43 CFR 8342.1 AND .2, all public lands in the planning area have been identified as either open, limited or closed to Off Highway Vehicle (OHV) Use. In addition, the proposed RMP identifies specific routes and their use limitations in Section 4.18.4. A map is also available for public review (Figure 4.9)

Camping Requirements (43 CFR 8364.1)

- **Mattole Beach Campground**: Public lands north of Lighthouse Road and south of the Mattole River for a distance of one mile inland from the Mattole Campground are closed to overnight camping. Public lands along Mattole Beach for 500 feet north (up the coast) and south (down the coast) of the Mattole Campground boundaries as denoted by the driftwood log barriers surrounding the campground are also closed to camping. The closure boundary will be displayed on a map at the entrance to the Mattole Campground.

Existing Rules

All supplemental rules relating to public lands in the King Range National Conservation Area that were in place prior to this RMP process will remain in effect.

APPENDIX C

LAND ACQUISITION AND EXCHANGE

APPENDIX C – LAND ACQUISITION AND EXCHANGE

Table 1: Type of Acquisition

TYPE OF ACQ.:	# PARCELS	ACREAGE TOTAL
Purchase	69	3,076.33
Exchange	46	22,207.89
Donation	4	0.69
Condemnation	2	440.08 (360 = “friendly” in 1975)
Total	121	25,724.99

Table 2: Land Transactions by Year

YEAR	# PARCELS	# ACRES ACQUIRED	# ACRES EXCHANGED	TIMBER ON EXCHANGED ACRES (MBF)*
1966	1	160	120	
1969	2	200	240	
1973	5	1812.92	360	775 (gained 2466)
1974	7	3691.30	1424.54	17688
1975	7	1862.96	1130.61	14379
1976	3	927.77	164.28	2850
1977	2	729.59	160	151
1978	4	2126.15	713.77	2960 (gained 522)
1979	2	1875.46	280	7879 (gained 919)
1980	3	111.28	0	0
1981	3	610	200	3062 (gained 1813)
1982	4	3024.68	2065.36	51599
1983	7	4612.83	3262.95	55152
1984	7	1756.66	1699.99	27805
1985	16	376.524	476.24	1077
1986	8	581.67	200	1241
1987	9	348.02	280	0
1988	3	86.57	0	0
1989	6	337.61	0	0
1990	3	120.21	0	0
1991	4	118.98	0	0
1992	1	44.88	0	(gained 666)
1993	4	1.02	0	0
1994	1	3.6	0	0
1998	7	204.006	0	0
2001	2	0.3	0	0
TOTALS		25,724.99	12,777.74	186,618 (gained 6,386)

* note that this figure does not include previously forested but cut-over lands acquired by BLM.

This page intentionally left blank.

APPENDIX D

**WILD AND SCENIC RIVER ELIGIBILITY AND
SUITABILITY STUDY**

APPENDIX D

WILD AND SCENIC RIVER ELIGIBILITY AND SUITABILITY STUDY

WILD AND SCENIC RIVER SYSTEM

The Wild and Scenic Rivers Act of 1968 (Public Law 90-542) was passed by Congress to preserve riverine systems that contain outstanding features. The law was enacted during an era when many rivers were being dammed or diverted, to balance these developments by ensuring that certain rivers and streams remain in their free-flowing condition. The BLM is mandated to evaluate stream segments on public lands as potential additions to the National Wild and Scenic Rivers System (NWSRS) during the Resource Management Plan (RMP) Process under Section 5(d) of the Act. The NWSRS study guidelines are found in BLM Manual 8351, U.S. Departments of Agriculture and Interior Guidelines, published in *Federal Register* Vol. 7, No.173, September 7, 1982 and in various BLM memoranda and policy statements. Formal designation as a Wild and Scenic River requires Congressional legislation, or designation can be approved by the Secretary of Interior if nominated by the Governor of the state containing the river segment. The following discussion provides information on how BLM considered waterways for potential inclusion in the NWSRS.

The NWSRS study process has three distinct steps:

- Determine what rivers or river segments are eligible for NWSRS designation
- Determine the potential classification of eligible river segments as wild, scenic, recreational or any combination thereof
- Conduct a suitability study to determine if the river segments are suitable for designation as components of the NWSRS

This report documents all three steps of the process for the streams in the planning area.

ELIGIBILITY OF KING RANGE STREAMS

Identification

A variety of sources were reviewed to identify waterways which could have potential for wild and scenic river designation. They include the Nationwide Rivers Inventory List, the Outstanding Rivers List compiled by American Rivers, Inc., river segments identified by state or local government, river segments identified by the public during formulation of this Resource Management Plan, and river segments identified by the planning team as having potential to meet Wild and Scenic River eligibility requirements.

The Wild and Scenic Rivers Act defines a river as a “flowing body of water or estuary or a section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes.”

Thirty-five stream segments totaling 103 miles within or immediately adjacent to the KRNCA boundaries were identified for review. Some streams were divided into segments, based on land status or classification criteria (see below). These rivers are listed in Table 1: Wild and Scenic River Inventory, and shown on Figure 3-2.

Eligibility Determination

Each identified river segment was evaluated to determine whether it is eligible for inclusion in the NWSRS. To be eligible, a river segment must be “free flowing” and must possess at least one “outstandingly remarkable value” (ORV). These values include:

- Scenic
- Recreational
- Geological
- Fish
- Wildlife
- Historical
- Cultural
- Ecological
- Riparian
- Botanical
- Hydrological
- Scientific

To be considered as “outstandingly remarkable,” a river-related value must be a unique, rare, or exemplary feature that is significant at a comparative regional or national scale. Only one such value is needed for eligibility. All values should be directly river related, meaning they should:

- Be located in the river or on its immediate shorelands (generally within ¼ mile on either side of the river);
- Contribute substantially to the functioning of the river ecosystem; and/or
- Owe their location or existence to the presence of the river.

These are the only factors considered in determining the eligibility of a river segment. All other relevant factors are considered in determining suitability. A river need not be navigable by watercraft to be eligible. For purposes of eligibility determination, the volume of flow is sufficient if it is enough to maintain the outstandingly remarkable value(s) identified within the segment.

The KRNCA has long been recognized as having significant values as a wild, rugged, coastal landscape. Approximately 100 inches of annual rainfall contributes to the abundance of rivers and streams that are integral to the values of the area. The stream systems can be generally categorized into two groups based on their geology and other watershed characteristics:

1. West Slope Streams: West slope stream segments include many short, steep watersheds running directly to the ocean. None of the watersheds penetrate further inland than the spine of the King Crest which extends no further than three miles from the ocean. The west slope offers a backcountry setting of rugged coastal mountains and undeveloped coastline unique in California. River segments pass through a mosaic of vegetation types including Douglas fir, tanoak, and chaparral. Natural landslides

from intense winter storms are common in these watersheds. The lower segments of these streams are focal points for primitive backcountry recreational activities such as hiking, backpacking, and equestrian use on the Lost Coast Trail, one of the few coastal backpacking trails in the U.S. The entire west slope has received a Class “A” scenery rating in the BLM’s visual resource management program inventory due to its wild, rugged nature and outstanding ocean views. A number of significant archaeological sites exist at creek mouths and most of the perennial streams include spawning and rearing habitat for federally listed threatened steelhead populations.

2. East Slope Streams: East slope watersheds, although still steep, are generally more extensive with longer, lower gradient stream channels. All east slope streams feed into the larger Mattole River watershed, which envelops the eastern side of the KRNCA as it flows northward, emptying into the ocean near Petrolia. The Mattole is one of the few major rivers in California that has no dams along its entire length. It is a major spawning stream for steelhead trout and Coho and Chinook salmon, all federally listed as threatened. Like most rivers in northwest California, the Mattole watershed was extensively logged from the 1940s-70s, increasing erosion; the resulting sedimentation has severely impacted fishery values. The east slope tributaries within the KRNCA contain some of the remaining habitat most suitable for anadromous fish spawning and rearing.

Vegetation is dominated by Douglas fir and tanoak forest with chaparral on the upper slopes, and extensive old-growth forests along the major drainages. As a result, the watersheds contain important wildlife values including verified activity centers for the northern spotted owl, also federally listed as threatened. Other values include some rare plants, archaeological sites, and scenic and recreational values.

Table 1 summarizes the eligibility evaluation of all identified river segments. The table includes information on the length of stream segments studied, BLM acreage (including a ¼ mile corridor on either side of the stream), indicates if outstandingly remarkable value(s) are present, and identifies the potential classification of each eligible segment. Table 2 gives more detailed descriptions of each eligible river segment’s location and a brief narrative of its outstandingly remarkable value(s).

CLASSIFICATION

The Wild and Scenic Rivers Act and subsequent interagency guidelines provide the following direction for establishing preliminary classifications for eligible rivers:

Wild Rivers: Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.

Scenic Rivers: Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.

Recreational Rivers: Those rivers or sections of rivers readily accessible by road or railroad that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

TABLE1: WILD AND SCENIC RIVER INVENTORY

River Name/Segment	Reason for Consideration (1)	BLM Length (mi.)	Other Length (mi.)	Free Flowing	ORV (2)	Eligibility	Preliminary Classification	BLM Acres	Percent of Corridor (%)
Bear Creek, Main Stem	C	2.1	5.5	yes	E,H	Eligible	Wild	568.7	27.8
Bear Trap Creek	C	2.4	0.8	yes	A	Noneligible		797.5	75.6
Big Creek	C	4.4	0.0	yes	E	Eligible	Wild	584.0	100.0
Big Finley Creek	C	3.1	1.9	yes	E,G	Eligible	Wild	1141.5	61.7
Big Flat Creek	C	11.0	0.0	yes	B,C,E,G	Eligible	Wild	948.8	99.9
Bridge Creek	C	2.7	4.0	yes	A	Noneligible		899.4	40.6
Buck Creek	C	1.7	0.0	yes	B,C	Eligible	Wild	282.5	100.0
Chaparral Creek	C	0.5	0.5	yes	A	Noneligible		188.7	54.1
Chemise Creek	C	1.3	0.0	yes	A	Noneligible		209.0	100.0
Cooskie Creek	C	0.9	4.5	yes	B,C,E,G	Eligible	Wild	322.9	16.9
Fourmile Creek	C	4.3	1.3	yes	B,C,E,G,H	Eligible	Wild	1399.0	77.2
Gitchell Creek	C	4.0	0.0	yes	B,C,E	Eligible	Wild	641.3	100.0
Honeydew Creek	C	14.8	4.0	yes	E,H	Eligible	Wild	4406.7	78.7
Horse Mountain Creek	C	4.1	0.0	yes	B,C,E	Eligible	Wild	598.9	100.0
Humboldt Creek	C	0.2	1.1	yes	F	Noneligible		51.5	14.6
Indian Creek	C	1.2	1.4	yes	F,G	Eligible	Wild	424.3	45.5
Kinsey Creek	C	1.6	0.0	yes	B,C	Eligible	Wild	230.5	100.0
Little Finley Creek	C	1.8	1.2	yes	E,F,G	Eligible	Wild	569.2	59.7
Mattole River	A,B	4.0	65.7	yes	B,C,E,F,G,H	Eligible	Scenic	406.3	5.8
McKee Creek	C	1.8	0.0	yes	A	Noneligible		209.1	100.0
Mill Creek	C	2.2	0.0	yes	E	Eligible	Scenic	609.9	98.2
Nooning Creek	C	1.8	0.0	yes	E	Eligible	Scenic	595.7	100.0
North Fork Bear Creek	C	4.4	1.8	yes	E,H	Eligible	Scenic	1771.0	71.3
Oat Creek	C	1.8	0.0	yes	B,C,E	Eligible	Wild	283.6	100.0
Randall Creek	C	2.0	0.0	yes	B,C,E,G	Eligible	Wild	321.6	100.0
Sea Lion Gulch	C	1.3	0.0	yes	B,C	Eligible	Wild	228.3	100.0
Shipman Creek	C	4.2	0.0	yes	B,C,E,G	Eligible	Wild	658.9	100.0
South Fork Bear Creek (A)	C	1.4	1.3	yes	E,F,G,H	Eligible	Recreational	492.9	50.7
South Fork Bear Creek (B)	C	7.6	0.5	yes	E,F,G,H	Eligible	Scenic	2408.9	93.9
Spanish Creek	C	2.4	0.0	yes	B,C,E,G	Eligible	Wild	323.1	100.0
Squaw Creek	C	7.5	21.5	yes	E	Eligible	Wild	2485.9	25.9
Stansberry Creek	C	2.4	0.0	yes	A	Noneligible		76.9	100.0
Telegraph Creek	C	0.7	3.2	yes	E	Eligible	Scenic	359.9	18.4
Whale Gulch	C	3.1	1.8	yes	B,C,F	Eligible	Scenic	476.0	64.0
Woods Creek	C	1.5	1.0	yes	E,H	Eligible	Wild	521.6	60.3

<p>(1) A – National Rivers Inventory B – 1988 Outstanding Rivers List, American Rivers, Inc. C – Potential eligible rivers inventory, King Range planning team D – Other</p>	<p>(2) A – Non-existent B – Scenic C – Recreational D – Geological E – Fish and Wildlife F – Historical G – Cultural H – Other (including Ecological)</p>
<p>(3) Shoreline and adjacent lands within ¼ mile of the river segment not to exceed 320 acres per mile measured from the ordinary high water mark on both sides of the river.</p>	

TABLE 2: ELIGIBLE KRNCA RIVER SEGMENTS

River Segment	Segment Description	Description of Outstanding Values
Bear Creek, Main Stem	From confluence with North Fork and South Fork in sec. 9, T4S, R1E to private land boundary in south ½ or sec. 11, T4S, R1E. Includes all perennial tributaries.	Contains spawning and rearing habitat for federally listed steelhead and Coho and Chinook salmon.
Bear Creek, North Fork	From its headwaters in secs. 6 and 7, T4S, R1E to confluence with main stem in sec. 9. Includes all perennial tributaries.	Contains spawning and rearing habitat for federally listed steelhead and Coho and Chinook salmon. Contains verified activity center for federally listed threatened northern spotted owl. Contains <i>Usnea longissima</i> (rare lichen) listed by CA Lichen Society as a Survey and Manage species.
Bear Creek, South Fork (segment A)	From its headwaters just east of Wailaki Campground (unsurveyed section) to Shelter Cove road.	Contains spawning and rearing habitat for federally listed steelhead and Coho and Chinook salmon. Contains many significant prehistoric and historic sites. Contains <i>Usnea longissima</i> (rare lichen) listed by CA Lichen Society as a Survey and Manage species.
Bear Creek, South Fork (segment B)	From Shelter Cove road to confluence with main stem in sec. 9, T4S, R1E. Includes all perennial tributaries.	Contains spawning and rearing habitat for federally listed steelhead and Coho and Chinook salmon. Contains verified activity center for federally listed threatened northern spotted owl. Contains many significant prehistoric and historic sites. Contains <i>Usnea longissima</i> (rare lichen) listed by CA Lichen Society as a Survey and Manage species.
Big Creek	From its headwaters in sec. 28, T3S, R1W to the Pacific Ocean. Includes all perennial tributaries.	Scenic class “A” rating. Part of unique coastal backcountry backpacking and camping area. Contains spawning and rearing habitat for federally listed threatened steelhead.
Big Finley Creek	From its headwaters in sec. 35, T4S, R1E to its junction with the Mattole River. Includes all perennial tributaries.	Contains spawning and rearing habitat for federally listed threatened steelhead. Contains verified activity center for federally listed threatened northern spotted owl. Contains several significant prehistoric sites.

River Segment	Segment Description	Description of Outstanding Values
Big Flat Creek	North Fork from its headwaters in sec. 35, T3S, R1W and Main fork from its headwaters in sec. 36, T3S, R1W to Pacific Ocean. Includes all perennial tributaries.	Scenic class "A" rating. Part of unique coastal backcountry backpacking and camping area. Popular hiking trail extends along 2 miles of creek. Contains spawning and rearing habitat for federally listed threatened steelhead. Contains several large, significant prehistoric sites near mouth of creek.
Buck Creek	From its headwaters in sec. 18, T4S, R1E to the Pacific Ocean.	Scenic class "A" rating. Part of unique coastal backcountry backpacking and camping area. Popular hiking trail near creek connects King Crest Trail with beach.
Cooskie Creek	From intersection with Chaparral Creek in sec. 9, T3S, R2W to the Pacific Ocean.	Scenic class "A" rating. Provides important upland trail access and camping. Contains spawning and rearing habitat for federally listed threatened steelhead. Contains significant prehistoric sites.
Fourmile Creek	From its headwaters in sec. 27, T2S, R2W to Pacific Ocean.	Scenery class "A" rating. Part of unique coastal backcountry backpacking and camping area. Contains spawning and rearing habitat for federally listed threatened steelhead. Contains significant prehistoric site.
Gitchell Creek	From its headwaters in sec. 17, T4S, R1E to the Pacific Ocean. Includes all perennial tributaries.	Scenery class "A" rating. Part of unique coastal backcountry backpacking and camping area. Contains spawning and rearing habitat for federally listed threatened steelhead.
Honeydew Creek	Includes West Fork, East Fork, and Main Fork from headwaters in sec. 26, T3S, R1W to junction with Mattole River. Includes all perennial tributaries.	Contains spawning and rearing habitat for federally listed threatened steelhead and Coho and Chinook salmon. Contains verified activity center for federally listed threatened northern spotted owl.
Horse Mountain Creek	From its headwaters in sec. 28, T4S, R1E to the Pacific Ocean. Includes all perennial tributaries.	Scenery Class "A" rating. Part of unique coastal backcountry backpacking and camping area. Contains spawning and rearing habitat for federally listed threatened steelhead. Contains verified activity center for federally listed threatened northern spotted owl.

WILD AND SCENIC RIVER ELIGIBILITY AND SUITABILITY STUDY

River Segment	Segment Description	Description of Outstanding Values
Humboldt Creek	From its headwaters in sec. 9, T5S, R1E in Shelter Cove to the Pacific Ocean.	One pre-historic site of unknown value.
Indian Creek	From its headwaters in sec. 27, T2S, R2W to its junction with the Mattole River. Includes all perennial tributaries.	Contains significant prehistoric and historic sites.
Kinsey Creek	From its headwaters in sec. 20, T3S, R1W to the Pacific Ocean. Includes all perennial tributaries.	Scenery Class "A" rating. Part of unique coastal backcountry backpacking and camping area.
Little Finley Creek	From its headwaters in sec. 14, T4S, R1E to its junction with the Mattole River. Includes all perennial tributaries.	Contains spawning and rearing habitat for federally listed steelhead. Contains verified activity center for federally listed threatened northern spotted owl. Contains significant prehistoric and historic sites.
Mattole River	From private land boundary between sec. 8 and 17, T2S, R2W to the Pacific Ocean.	Major recreation site. Campground, hunting, and wildlife viewing area. Contains spawning and rearing habitat for federally listed threatened steelhead and Coho and Chinook salmon. Estuary contains endangered and rare plants including federally listed endangered <i>Layia carmosa</i> , and BLM sensitive (1B) <i>Astragalus pynchonostachys</i> , <i>Sidalcea malachroicles</i> , <i>Castilleja affinis littoralis</i> , and <i>Gilia millifoliata</i> .
Mill Creek	From its headwaters in sec. 21, T2S, R2W to its junction with the Mattole River. Includes all perennial tributaries.	Contains verified activity center for federally listed threatened northern spotted owl. Contains spawning and rearing habitat for federally listed threatened steelhead and Coho salmon. Only known Coho population along the lower Mattole watershed.
Nooning Creek	From its headwaters in sec. 1, T5S, R1E to its junction with the Mattole River. Includes all perennial tributaries.	Contains spawning and rearing habitat for federally listed threatened steelhead and Coho and Chinook salmon.
Oat Creek	From its headwaters in sec. 19, T3S, R1W to the Pacific Ocean. Includes all perennial tributaries.	Scenery class "A" rating. Part of unique coastal backcountry backpacking and camping area. Contains spawning and rearing habitat for federally listed threatened steelhead.

River Segment	Segment Description	Description of Outstanding Values
Randall Creek	From its headwaters in sec. 13, T3S, R2W to the Pacific Ocean.	Scenery class "A" rating. Part of unique coastal primitive backpacking and camping area. Contains spawning and rearing habitat for federally listed threatened steelhead.
Sea Lion Gulch	From its headwaters in sec. 32, T2S, R2W to the Pacific Ocean.	Scenery class "A" rating. Part of unique coastal primitive backpacking and camping area.
Shipman Creek	From its headwaters in sec. 1, T4S, R1W to the Pacific Ocean. Includes all perennial tributaries.	Scenery class "A" rating. Part of unique coastal primitive backpacking and camping area. Contains spawning and rearing habitat for federally listed threatened steelhead.
Spanish Creek	From its headwaters in sec. 18, T3S, R1W to the Pacific Ocean. Includes all perennial tributaries.	Scenery class "A" rating. Part of unique coastal primitive backpacking and camping area. Contains spawning and rearing habitat for federally listed threatened steelhead.
Squaw Creek	From its headwaters in sec. 21, T3S, R1W to private land boundary in the NW ¼ of section 8, T3S, R1W. Includes all perennial tributaries within this segment (not counting tributaries west of Little Moorehead Ridge).	Contains verified activity center for federally listed threatened northern spotted owl. Contains spawning and rearing habitat for federally listed threatened steelhead and Chinook salmon.
Telegraph Creek	From its headwaters in sec. 11, T5S, R1E to the Pacific Ocean. Includes all perennial tributaries.	Contains spawning and rearing habitat for the federally listed threatened steelhead.
Whale Gulch	From its headwaters just north of the Humboldt Co./Mendocino Co. line (unsurveyed area) to the Pacific Ocean. Includes all perennial tributaries.	Scenery class "A" rating. Part of unique coastal primitive backpacking and camping area.
Woods Creek	From its headwaters in sec. 15, T3S, R1W to its confluence with the Mattole River.	Contains verified activity center for federally listed threatened northern spotted owl. Contains <i>Usnea longissima</i> (rare lichen) listed by CA Lichen Society as a Survey and Manage Species.

SUITABILITY OF KING RANGE STREAMS

Twenty-eight river segments displayed in Table 1 were found to be eligible for inclusion into the NWSRS. Section 4(a) of the Wild and Scenic River Act mandates that all rivers found eligible as potential additions to the NWSRS be studied as to their suitability for such a designation. The purpose of this study is to provide information upon which the President of the United States can base his recommendation and Congress can make a decision. The study report describes the characteristics that do or do not make the stream segment a worthy addition to the system, the current status of land ownership and use in the area, the reasonably foreseeable potential uses of the land and water which would be enhanced, foreclosed, or curtailed if the area were included in the system, and several other factors. The suitability study is designed to answer these questions:

1. Should the river's free-flowing character, water quality, and ORVs be protected, or are one or more other uses important enough to warrant doing otherwise?
2. Will the river's free-flowing character, water quality, and ORVs be protected through designation? Is it the best method for protecting the river corridor? (In answering these questions, the benefits and impacts of wild and scenic river designation must be evaluated, and alternative protection methods considered.)
3. Is there a demonstrated commitment to protect the river by any nonfederal entities that may be partially responsible for implementing protective management?

Pursuant to Sections 4(a) and 5(c) of the Wild and Scenic Rivers Act, the following factors were considered and evaluated as a basis for the suitability determination for each river:

1. Characteristics that do or do not make the area a worthy addition to the NWSRS.
2. The current status of land ownership, minerals (surface and subsurface), and use in the area, including the amount of private land involved and associated or incompatible uses.
3. The reasonably foreseeable potential uses of the land and water that would be enhanced, foreclosed, or curtailed if the area were included in the NWSRS. Historical or existing rights which could be adversely affected.
4. The federal agency that will administer the area should it be added to the NWSRS.
5. The estimated cost to the United States of acquiring necessary lands and interests in lands and of administering the area should it be added to the NWSRS.
6. A determination of the degree to which the state or its political subdivisions might participate in the preservation and administration of the river should it be proposed for inclusion in the NWSRS.
7. An evaluation of the adequacy of local zoning and other land use controls in protecting the river's ORVs by preventing incompatible development.
8. Federal, public, state, local, or other interests in designation or non-designation of the river, including the extent to which the administration of the river, including the cost thereof, may be shared by state, local, or other agencies and individuals. Support or opposition to the designation.
9. The consistency of designation with other agency plans, programs, or policies and in meeting regional objectives.
10. The contribution to river system or basin integrity.

11. The ability of BLM to manage the river segments under designation, or ability to protect the river area other than Wild and Scenic designation.
12. The potential for water resources development.

1. Characteristics that Do or Do Not Make the River Segments Worthy Additions to the NWSRS

The stream segments in the KRNCA are located within the California Coast Range Physiographic Province. This province was used as a basis to determine if the study segments possess characteristics of at least regional significance that would make them worthy additions to the NWSRS. The Coast Range Physiographic Province contains the highest rainfall and density of streams in California. Also, many of these streams provide habitat for anadromous fisheries. There are currently five designated Wild and Scenic Rivers within the province. They include portions of the Smith River, Klamath River, Van Duzen River, the Main Stem and Middle Fork of the Eel River, and the entire South Fork Eel River. This amounts to a total of approximately 150 miles of designated Wild and Scenic River segments in the region. Many of the eligible river segments within the KRNCA have anadromous fisheries and outstandingly remarkable scenic and recreational values. However, when considered in the context of other streams in the region, which also contain these same values to varying levels, the BLM planning team found that some river segments provided average or low quality values in this regional context and therefore were not considered to be worthy additions to the system.

Eight river segments on seven streams in the KRNCA possess characteristics that make them worthy additions to the NWSRS. These include the Mattole River, Mill Creek, Honeydew Creek, South Fork Bear Creek (Segments A and B), Big Flat Creek, Big Creek, and Gitchell Creek, totaling 40.5 miles of river corridor on BLM public lands. These eight segments are high quality representatives of the outstandingly remarkable values when considered in the regional context.

Mattole River

The Mattole River is listed in the National Rivers Inventory and the 1988 Outstanding Rivers List published by American Rivers, Inc. The Mattole River estuary and associated beach is a focal point for recreation visitors to the Lost Coast Region and is one of the most popular sites in the KRNCA. The river carves a wide opening in the coastal mountains and offers a magnificent setting for a variety of recreational opportunities including camping, wildlife viewing and beach access. Visitors explore the estuary and beach and view the many bird species who seek refuge in the area's sheltered waters. Excellent spawning and rearing habitat exists for federally listed threatened steelhead and Coho and Chinook salmon. The estuary provides critical habitat for smolting salmon as they transition from the river to a salt water environment. The adjoining dune system contains the federally listed endangered *Layia carmosa* and other BLM sensitive rare plant species.

This significant fishery also historically attracted native Americans to the estuary, and the area contains numerous cultural sites and has been designated as an Area of Critical Environmental Concern (ACEC) to protect these values. The original human occupants of the Mattole River watershed were the Mattole and the Sinkyone. The Mattole occupied the lower watershed, including the estuary area, and the Sinkyone occupied the upper watershed. The first known Europeans to explore the area arrived in 1854, and friction between these new settlers and the native people was evident by 1858. In the span of eleven

years, the native cultures that occupied the area for hundreds or thousands of years were completely decimated. Archaeological sites are the only remaining evidence of this culture, making them especially significant.

Mill Creek

Much of the Mill Creek watershed was acquired by BLM in 1997 through a land exchange. The stream corridor contains a verified activity center for federally listed threatened northern spotted owl. Mill Creek is also an important cold water tributary to the Mattole River that provides critical spawning and rearing habitat for federally listed threatened steelhead and Coho salmon. The creek hosts the only known Coho population along the lower Mattole watershed. Much of the western part of the watershed contains a significant remnant stand of old-growth Douglas fir known locally as the “Mill Creek Forest.”

Honeydew Creek

Honeydew Creek is the fourth largest tributary to the Mattole River. The Northwest Forest Plan (NWFP) identifies the watershed as a part of the King Range Late-Successional Reserve and as a Tier-1 Key Watershed (USDA, USDI 1994). Much of the original old-growth forest in the Mattole watershed was heavily logged with the advent of tractor logging after World War II. In Honeydew Creek, however, the extreme topography and unstable slopes prevented logging in much of the upper watershed. Therefore, the upper watershed is one of the few major reaches of stream within the Mattole that has been relatively unaltered by humans. Public lands within the watershed are 93% forested. Most late successional forest stands occur near stream channels; Honeydew Creek contains the second largest acreage of this forest in the Mattole watershed (MRC 1989). Verified activity centers for the federally listed threatened northern spotted owl exist within the quarter-mile corridor of Honeydew Creek. The northern spotted owl requires habitat features provided by late-seral or old-growth forests, such as closed canopy, multiple-layer, open understory, coolness, high-humidity, and structural complexity, which are present in the Honeydew Creek watershed.

Honeydew Creek also contains anadromous fisheries, including the federally listed threatened steelhead and Coho and Chinook salmon. With regard to anadromous fish habitats, Honeydew Creek may be the most intact watershed in the Mattole River basin. The lower four miles of the main stem is rather unique in the mid-Mattole basin, contained in a broad U-shaped alluvial valley with a gradient of 2% or less. Almost all other stream channels in the watershed have a gradient of 5-15% or greater. Recent research from the Oregon Cascades and Oregon Coast Range shows that flatter reaches of streams, such as the lower main stem, tend to be the most productive areas for fish and other aquatic organisms (MRC 1995).

The river corridor has other outstandingly remarkable ecological values associated with Survey and Manage Species from the NWFP Record of Decision (ROD). Seven ROD –listed species were identified in the Honeydew Creek corridor that require protection “until they can be thoroughly surveyed and site-specific measures prescribed,” including a rare truffle, *Choriomyces venosus* (NWFP ROD 1997).

South Fork Bear Creek

The South Fork of Bear Creek is the largest watershed on the eastern slope of the King Range. The creek originates in the Chemise Mountain area, and flows northward between Paradise Ridge and the

King Crest. For the purpose of the evaluation, South Fork Bear Creek was divided into Segments A and B, separated by Shelter Cove Road, with Segment A to the south (upstream) and Segment B to the north (downstream). Segment A contains outstandingly remarkable cultural values while Segment B represents a majority of the spawning and/or nesting habitat for sensitive fish and wildlife species. Furthermore, Segment A has trails connecting from Nadelos and Wailaki campgrounds and Hidden Valley trailhead, which offer outstanding scenic, recreational, and interpretive opportunities on the east slope of the King Range.

While most of the South Fork of Bear Creek runs through very steep and narrow drainages, the terrain on the upper South Fork (Segment A) is relatively gentle, with some flood plain development, openings in the forest canopy, and large wet meadows in the Hidden Valley area. It contains significant cultural values including historic pioneer wagon trails and local Native American seasonal harvesting grounds, considered eligible for inclusion on the National Register of Historic Places. The original inhabitants in this watershed belonged to the Sinkyone tribe, the southernmost people to share the northwest salmon culture. Archaeologists have identified several cultural sites along the upper reaches of South Fork Bear Creek, from the headwaters area north to the vicinity near present-day Shelter Cove Road. These archaeological sites indicate long periods of continuous use.

South Fork Bear Creek, especially Segment B, provides excellent spawning and rearing habitat for the federally listed threatened steelhead and Coho and Chinook salmon. Chinook salmon spawn during the late fall, while coho salmon and steelhead spawn during the winter. Much of the watershed was logged in the mid-twentieth century, but restoration efforts and natural recovery over the last several decades have greatly improved fishery habitat. Bear Creek is the third largest tributary to the Mattole River and contributes significant flows to the main river during the late summer when water volume from the upper Mattole reaches a seasonal low. During the fall of 2002, Bear Creek continued to flow even after the main stem of the upper Mattole River ran dry.

Big Flat Creek

Big Flat Creek is located on the western slope of the King Range approximately 8.5 miles north of Shelter Cove. The entire watershed is within the King Range Wilderness Study Area (WSA). Big Flat Creek lies directly beneath the sentinel of 4,087 foot King Peak, carving its way through a deep boulder strewn canyon before flowing across a broad alluvial plain at the coast. The creek corridor and mouth make up the largest relatively flat area in the King Range backcountry and are a focal point for recreation visitors to the Lost Coast, who often camp at the creek mouth to enjoy the spectacular combination of creek, ocean, and mountains. Alluvial deposits from the creek also created a “point break” just offshore, making Big Flat a prominent surfing destination.

Rattlesnake Ridge Trail traverses the canyon of Big Flat Creek as it climbs from Big Flat to the King Crest. The forested fern-lined canyon trail offers a welcome contrast to the windswept Lost Coast Trail. It is the only trail in the King Range backcountry offering visitors an opportunity to explore a creek corridor.

Big Flat Creek contains anadromous fisheries, consisting primarily of federally listed threatened steelhead Trout. Preliminary information suggests that Big Flat Creek and other West Slope creeks of the King Range may support a subspecies of steelhead that have adapted to the area’s difficult habitat conditions,

i.e., more tolerant of shallow pools and high water temperatures. A biological assessment completed in 2000 showed that estimates of juvenile steelhead trout for Big Flat Creek and Big Creek (described below) were greater than all other west slope streams included in the study (Engle and Duffy 2000).

Big Creek

Big Creek is also located on the western slope of the King Range, approximately 11.5 miles north of Shelter Cove. In addition to high juvenile steelhead populations (see above), Big Creek has outstandingly remarkable scenic and recreational values and a popular campsite for backpackers along the Lost Coast Trail. Big Creek covers the second largest drainage area on the KRNCA west slope, and a large number of natural landslides have created a wide gravel channel in the lower watershed. Therefore, the creek corridor is easy to explore and offers hikers dramatic vistas of the King Crest, rising over 3,000 feet at the head of the canyon.

Gitchell Creek

Gitchell Creek is also located on the west slope, approximately 3.5 miles north of Shelter Cove. Gitchell Creek supports a steelhead fishery in its highly scenic corridor, with alternating deep pools and boulder strewn riffles bordered by dense alder stands. The mouth of the creek is a popular overnight camping destination, and the creek corridor offers off-trail hiking and exploring opportunities. Gitchell Creek contains no individual stand-out value when compared to other streams along the Lost Coast, but instead combines a number of outstandingly remarkable values to make it an exemplary example of west slope streams.

Additional River Segments

As illustrated in Table 1, twenty other river segments in the KRNCA meet minimum eligibility criteria for inclusion in the NWSRS. The streams were grouped by location (east vs. west slope) for descriptive purposes.

Most west slope streams have anadromous fisheries (except Buck Creek, Kinsey Creek, Whale Gulch, and Sea Lion Gulch). Based on their location on the dramatic coastal slope of the King Range, all have outstandingly remarkable scenic and recreational values. They have “Class A” scenery ratings and most are popular camping destinations along the Lost Coast Trail. In addition to these values, Cooskie Creek, Fourmile Creek, Randall Creek, Shipman Creek, Whale Gulch Creek, and Spanish Creek contain known prehistoric cultural sites. Finally, Horse Mountain Creek includes a verified activity center for the federally listed northern spotted owl. Although these are significant values that meet eligibility criteria, the study team has determined that the values are not at a level that would make these segments worthy additions to the NWSRS when viewed in the context of the KRNCA as a whole, or within the California Coastal Range Physiographic Province.

On the east slope of the King Range, Big and Little Finley creeks, the North Fork and main stem of Bear Creek, Noonung Creek, Squaw Creek, and Woods Creek were noted for the presence of anadromous fisheries. Indian Creek and Little Finley Creek also have known stream-related historical sites. Most of these watersheds have been substantially modified through past logging activities and the associated construction of roads, landings, and skid trails. The resulting landscapes would not broaden the

representation of key ecosystems within the system. Although the river segments found suitable have also been impacted from past logging, the impacts are not as extensive as has occurred in these other watersheds.

In summary, although these values meet the minimum eligibility criteria, when viewed in the context of the California Coastal Range Physiographic Province, the study team determined that these river segments were not of a level of quality to make them worthy additions to the NWSRS.

2. Status of Land Ownership and Current Use

Mattole River

Only 5.2% of the Mattole River crosses public land, with most of the remainder in private ownership. A small portion of the Mattole River passing through BLM land near the King Range Administrative Site was evaluated for Wild and Scenic River designation in the Arcata Resource Management Plan (1989). Therefore, evaluation for the King Range Wild and Scenic River suitability study focuses on the remaining public land portion, known as the Mattole River mouth and estuary. The length of the Mattole River mouth and estuary study segment is approximately 4.0 miles. On this segment, 84% of the river is in BLM ownership and 16% is owned by the California State Lands Commission, yet the entire segment is managed by BLM. The State Lands Commission has granted BLM the authority to administer “all that portion of the State-owned bed of the Mattole River and the Mattole River Estuary” by Permit No. PRC 5633.9. A local rancher maintains a road through BLM lands and a low-water crossing to access his private property on the north side of the estuary. This rancher also leases public lands within the corridor for grazing. These uses do not require improvements that would conflict with Wild and Scenic River Designation. In 1981, the BLM King Range Extension Plan designated the Mattole River mouth and estuary an Area of Critical Environmental Concern (ACEC) for the protection of the estuary, archaeological sites and native sand dune ecosystems on Mattole Beach. This ACEC designation complements Wild and Scenic River designation.

The area just south of the estuary is one of the most popular recreation sites in the KRNCA, serving as a coastal/estuary access point, campground, and trailhead. This use is compatible with designation.

Mill Creek

Much of the Mill Creek watershed, including the entire length of the study segment, was purchased by the BLM in 1997. Protection of this cold water tributary was a primary purpose for acquisition of the Mill Creek parcel and was supported by the State of California and surrounding property owners. The watershed is proposed for ACEC designation in this Plan. Public use is low for dispersed day-use recreation activities. All present and anticipated uses are compatible with designation.

Honeydew Creek

Honeydew Creek drains the eastern slope of King Peak and exits the KRNCA before crossing Wilder Ridge Road. It then re-enters BLM public land for a short segment near the Honeydew Creek Campground. Approximately 82.5% of the river segment under evaluation is on BLM public land. The remaining 2.5 miles crosses private ranch lands with a couple of scattered residences. Minor use of the creek for livestock watering occurs on private lands on the lower main stem and East Fork. Current

grazing is limited to small-scale operations on individual ownerships; there are no active grazing permits on public lands in the watershed. One campground located on the lower main stem of Honeydew Creek receives moderate use for camping, picnicking, and swimming. No anticipated public or private land uses within the corridor would conflict with Wild and Scenic River designation.

Other East Slope Creeks

All east slope streams determined to be eligible for Wild and Scenic River designation have river segments crossing private lands except Nooning Creek. Those located 60% or more on BLM public land include Big Finley Creek, Woods Creek, Whale Gulch, and North Fork Bear Creek. Those located less than 60% on BLM public land are Little Finley Creek, Indian Creek, Squaw Creek, and Bear Creek's main stem. Private lands in the creek corridors are used for ranching and rural low-density residential use. No anticipated uses on private or public lands would conflict with Wild and Scenic River designation.

Bear Creek

The South Fork of Bear Creek is located mostly within the KRNCA boundary, although 49% (1.3 miles) of Segment A and 18% (1.7 miles) of Segment B pass through private property. Two existing power line rights-of-way cross BLM lands along Shelter Cove Road and Chemise Mountain Road. Also, Chemise Mountain Road parallels Segment A, and provides access to two BLM campgrounds (Wailaki and Nadelos). This combination of development has resulted in a different classification (Recreational) for Segment A, but is not incompatible with designation. There are no current uses on private lands in the corridor that are incompatible with Wild and Scenic River designation for both segments.

Other West Slope Creeks

Big Creek, Big Flat Creek, Buck Creek, Horse Mountain Creek, Kinsey Creek, Oat Creek, Randall Creek, Sea Lion Gulch, Spanish Creek, and Gitchell Creek are almost completely under public ownership, with the exception of small private parcels in the corridor at Big Flat Creek and Fourmile Creek. Currently, all of these river segments are protected under the BLM's Interim Management Policy for Lands under Wilderness Review, pending a final decision by Congress regarding Wilderness designation. No proposed land uses would conflict with Wild and Scenic River management.

Sixty-eight percent of Fourmile Creek is located on BLM public land. The remainder of the watershed is on lands used for low density residential use or ranching. This use would be compatible with designation.

Less than 14% of Humboldt Creek and 17% of Telegraph Creek are located on public lands. The remainders of these corridors are in the Shelter Cove Subdivision, zoned for residential development. BLM has authorized one right-of-way for a water facility and pipeline in the Telegraph Creek corridor for Shelter Cove. The community uses the creek as its main water supply. In the long term, a large number of residences could be constructed in these watersheds. This level of development would likely be incompatible with Wild and Scenic River designation. In addition, only 16% of Cooskie Creek is located on public land. BLM Manual 8351.33A(2) entitled "Wild and Scenic Rivers – Policy and Program Direction for Identification, Evaluation and Management" states: "In situations where there is limited public land (shoreline and adjacent land) administered by the BLM within an identified river study area, it

may be difficult to ensure those identified outstandingly remarkable values could be properly maintained and afforded adequate management protection over time. Accordingly, for those situations where the BLM is unable to protect or maintain any identified outstandingly remarkable values, or through other mechanisms (existing or potential), river segments may be determined suitable only if the entity with land use planning responsibility supports the finding and commits to assisting the BLM in protecting the identified river values. An alternative method to consider these segments is for state, local governments or private citizens to initiate efforts under section 2(a)(ii), or a joint study under section 5C of the Wild and Scenic Rivers Act.” Humboldt County has land use planning responsibility for the private lands on these segments. The BLM has not approached the county regarding their support for Wild and Scenic River designation of these three segments, since the study team determined that they are not worthy additions to the system.

3. Potential Uses of the Land to be Enhanced or Curtailed by Designation/ Historical or Existing Rights That Could Be Adversely Affected, including Water Resources Projects

Public lands in the King Range are either Administratively Withdrawn or designated as a Late-Successional Reserve (LSR) in the Northwest Forest Plan ROD (1994). This land allocation conveys a specific set of stipulations regarding management and protection of old-growth forest dependent wildlife and fishery habitats. Also, all of the corridors include Riparian Reserve designations under this same plan. All west slope streams (except Telegraph and Humboldt Creek), and Honeydew Creek are located in the King Range WSA, which is being managed to protect wilderness character pending consideration for wilderness designation by Congress. All of these management designations would be enhanced by Wild and Scenic River designation.

Mattole River

The Mattole River mouth and estuary is a popular recreation site for local residents and visitors to the King Range. The Mattole River Campground is BLM’s only developed campsite on the KRNCA coastline and is located within the ¼ mile river corridor under evaluation. BLM has proposed improving this campground in the future to protect resource values and enhance the quality of the visitor experience. This development will be modest and would complement Wild and Scenic River designation by enhancing opportunities for visitors to enjoy the river corridor.

Locally, the gravel bar surrounding the estuary is treated as a commons and is used by local residents as a source for personal-use gravel or sand, firewood cutting, and target practice. In recent years, the gravel bar has also become a gathering place for overflow campers from the developed campground. This RMP includes goals to manage uses in the estuary to protect the area’s significant ecological values, including limiting vehicle use to designated corridors. Wild and Scenic River designation would be compatible with these management goals.

Fishing was historically a major use of the estuary; fishermen came to the area annually during salmon runs to fish at the first riffles. However, use declined with the corresponding decline in populations of salmon. In 1991 the State Fish and Game Commission closed the river to fish harvesting to protect salmonids, in response to requests from the Mattole Watershed Alliance (NCRWQCB 2002). Currently,

catch-and-release fishing for steelhead trout is still allowed (as of 2003) in the upstream portion of the study segment, and drift-boat fishermen use the gravel bar as a takeout point. Fishing use is carefully managed by the California Department of Fish and Game and the National Marine Fishery Service to protect remaining runs of salmonids.

The Mattole Salmon Group and Mattole Restoration Council have completed projects to anchor root-wads and driftwood logs in the estuary in an effort to increase habitat for salmonids. Placement of further habitat improvement structures in the river would have to undergo an evaluation to ensure that they do not negatively impact the free-flowing character of the river (Section 7). However, these projects would probably be minimally affected by designation since their intent is to enhance the outstandingly remarkable fishery values.

The beneficial uses and water quality objectives for the Mattole River are contained in the *Water Quality Control Plan for the North Coast Region* (Basin Plan) as amended in 1996 (NCRWQCB). These beneficial uses include:

1. Municipal and Domestic Supply (MUN)
2. Agricultural Supply (AGR)
3. Industrial Service Supply (IND)
4. Water Contact Recreation (REC-1)
5. Non-Contact Water Recreation (REC-2)
6. Commercial or Sport Fishing (COMM)
7. Cold Freshwater Habitat (COLD)
8. Estuarine Habitat (EST)
9. Wildlife Habitat (WILD)
10. Migration of Aquatic Organisms (MIGR)
11. Spawning, Reproduction, and/or Early Development (SPWN)

In addition, the beneficial use of water related to rare, threatened, or endangered species (RARE), has been proposed for this basin, because federally-listed Coho and Chinook salmon and steelhead trout are found in the watershed (NCRWQCB 2001a). Also, aquaculture (AQUA) in the watershed is listed in the Basin Plan (NCRWQCB 1996) as a potential beneficial use.

There is a great deal of local concern over in-stream flows and potential water development proposals to export river water out of the Mattole basin. Part of this concern was fueled by a private developer's proposal to pump water from North Coast rivers into large polymer bags and haul them by barge to southern California. No specific proposal was made for such an operation in the Mattole watershed. During recent years, the upper river has dried up completely during the late summer, threatening survival of salmon and steelhead fry. Local restoration groups are encouraging water users to store water for dry season use and not draw upon the limited river flows. Wild and Scenic River designation would not impact existing water rights on the Mattole or other streams in the KRNCA. However, designation would establish a federal water right for the designated segments which could limit future proposals to remove water from the river, especially if these uses impacted outstandingly remarkable values such as salmonid populations.

Bear Creek

Foreseeable uses on public lands in the Bear Creek watershed would not be impacted by designation. Campgrounds in the corridor have all been recently reconstructed, with future plans limited to development of small trailhead parking areas and non-motorized trails. Designation would establish a federal reserve water right, which would not affect existing private land uses/water rights but could affect future stream diversions, especially during the low-flow summer period. However, protection of flow levels would be required under the Endangered Species Act, with or without Wild and Scenic River Designation.

Mill Creek

Mill Creek was evaluated for potential uses of the land as a requirement for the acquisition agreement in 1997. Identified uses within the Mill Creek corridor include overnight camping and multiple use trails for day use and/or accessing the remainder of the King Range backcountry. None of these uses will be impacted or curtailed by designation, and recreational opportunities could be enhanced.

Honeydew Creek

Honeydew Creek includes one recreational development (Honeydew Creek Campground). This site would not be affected by Wild and Scenic River designation.

All other east slope streams with river segments crossing private lands have similar potential uses for rural residential and ranching purposes that would not be curtailed by Wild and Scenic River designation.

West Slope Creeks

Eligible streams on the west slope, including Fourmile Creek, Sea Lion Gulch, Big Creek, Big Flat Creek, Whale Gulch, Gitchell Creek, and Shipman Creek, have similar potential uses due to their location inside the King Range WSA that would be enhanced by Wild and Scenic River designation. Primarily, these river segments' potential uses are limited to recreational purposes for backcountry visitors, but may include scientific studies for educational purposes and/or recreation research, which would be enhanced by Wild and Scenic River designation.

Humboldt Creek and Telegraph Creek are both located in the Shelter Cove subdivision. Only a small percentage of land along both of these segments is administered by the BLM. Shelter Cove is expected to continue growing at a moderate rate, and over the long-term a large number of residences will likely be developed within these corridors. This development could be curtailed by designation.

Diversion of additional water from any of the streams during the summer low-flow period could impact outstandingly remarkable values. Wild and Scenic River designation would not impact current water rights, but could affect future diversions from the streams.

Alterations to existing water withdrawal facilities may be approved under Section 7 of the Wild and Scenic Rivers Act, as long as there is no direct adverse effect to the values for which the river was designated.

4. Federal Agency that will Administer KRNCA Wild and Scenic River Segments

The U.S. Department of the Interior Bureau of Land Management (BLM) would administer all river segments under evaluation should they be included in the NWSRS.

5. Estimated Cost of Acquisition and Administration

There would be no need to acquire additional lands for most KRNCA river segments to be included in the National Wild and Scenic River System. The exception would be Telegraph and Humboldt Creeks; a large number of residential lots would need to be acquired (or placed under conservation easements) in these stream corridors to maintain their character. There would also be a modest cost associated with developing management plan(s) for all designated streams, and coordinating with adjacent private landowners to ensure that their activities would not cause offsite (downstream or downslope) impacts that could potentially affect river values.

6. State or local political subdivision participation in river preservation and management

During the initial scoping period for this Plan, no government agencies commented or expressed interest specifically in wild and scenic river designation. However, numerous state and federal agencies have committed funding and effort to protecting river related values on the study segments. For example, the California Coastal Conservancy and Wildlife Conservation Board have funded land acquisitions to protect Mill Creek and the Mattole River. The U.S. Fish and Wildlife Service (FWS), California Department of Fish and Game (CDFG), and BLM have existing agreements to support salmon recovery in the Mattole River. The North Coast Regional Water Board has prepared a Technical Support Document (TSD) that addresses sources of sediment and temperature impairments, loading capacities, and load allocations necessary to restore sediment and temperature conditions supportive of beneficial uses related to the cold water fishery in the Mattole River watershed. Humboldt County has cooperated with the BLM in storm-proofing county roads to reduce sedimentation of area streams. In summary, there is already a strong established level of cooperation among federal, state, and local agencies to restore and protect streams in the region.

7. Local Zoning and Land Use Planning Adequacy in protecting the river values

Most portions of the study segments are located on federal lands administered by the BLM and local zoning would not apply. Where the segments cross private lands, most stretches are zoned for grazing/timber management with low density residential use. These uses at the scales foreseen within the study segments would be compatible with Wild and Scenic River designation. The private lands encompassing most of the Telegraph Creek and Humboldt Creek segments are zoned for residential development. As the community of Shelter Cove grows, a large percentage of the land base in these watersheds could be developed for residences at a high density level. Wild and Scenic River designation would not be compatible with this development.

8. Federal, public, state, local or other interests in designation/non-designation of the river. Support or Opposition to the Designation.

A description of other federal, state, and local agency involvement and interest in river management is contained under Item 6 above. Residents of the Mattole Valley and southern Humboldt County have a long history of active interest in river conservation (House 1999). During the scoping period for this plan, several local residents expressed concerns specific to the Mattole River estuary and the potential impacts of any projects to export water from the area. These comments were in response to proposals by a private water developer to construct a system to export water from the mouths of north coast rivers to Southern California. Wild and Scenic River designation was supported as one avenue to stop this potential development. No other comments specific to Wild and Scenic River designation were received during the scoping period. However, many comments were received regarding protection of river related values including water quality/quantity, anadromous fisheries, and scenic values.

A number of grass roots organizations in the region directly support watershed management and restoration efforts that protect and enhance the outstandingly remarkable values of many of the study segments. The Mill Creek Watershed Conservancy is a consortium of local residents from Petrolia and the surrounding region that assisted BLM in acquiring the Mill Creek parcel in 1997, and continues to lead efforts to restore the health of the watershed. The Mattole Salmon Group has also done considerable salmonid enhancement and watershed rehabilitation work in the Mattole Watershed. The group initiated a Chinook salmon hatchbox program in 1982, and installed a Coho hatchbox facility in 1987 on the South Fork of Bear Creek. The Mattole Restoration Council oversees watershed restoration projects on public and private lands throughout the Mattole Valley. Other organizations involved with watershed management include Sanctuary Forest and the Middle Mattole Conservancy. In summary, there is exceptionally strong local support in the area for river conservation.

9. The consistency of designation with other agency plans, programs or policies and in meeting regional objectives.

Wild and Scenic River designation for most of the study segments would be consistent with other agency plans and programs for the region. All of the study segments except Telegraph and Humboldt Creek flow through public lands designated as a Late Successional Reserve or administratively withdrawn under the Northwest Forest Plan. The segments are also classified as Riparian Reserves under the Aquatic Conservation Strategy of this regional plan for public lands in the Pacific Northwest. These designations are intended to conserve in-tact forest and aquatic ecosystems and are compatible with Wild and Scenic River designation. Wild and Scenic designation of Humboldt and Telegraph Creek would not be compatible with local zoning or land use management plans.

10. Contribution to River System or Basin Integrity

The Mattole River estuary has a seasonal cycle, open to the ocean from fall to late spring, and closed by a sand berm that develops during the summer and early fall. When the river mouth is closed by the berm, a small lagoon of approximately seven acres is formed. This variable wetland is rich in wildlife, and the lagoon serves a critical function in the life cycle of the king salmon. The limits to anadromous fisheries populations are not clearly understood, but are related to water temperature, diet, and predation, which are, in turn, related to the availability of riparian habitat. In gross terms, all ecological problems in the

estuary are related to its function as an endpoint of in-river storage of sediment. Any management action that reduces the input of sediment into the river system will benefit the Mattole River estuary and lagoon. Furthermore, because native Mattole king salmon populations are diminished to a point where their viability remains a question, Wild and Scenic River designation of the river segment under evaluation will contribute significantly to the integrity of the Mattole River system as a whole.

Bear Creek is a 13,820 acre tributary to the Mattole River. Along with adjacent Honeydew Creek, Bear Creek is comprised of predominately public land in the Mattole basin. These are also the least impacted (relative to other sub-basins in the Mattole watersheds) by historic and on-going land use practices. Within the Mattole basin they are the tributaries best suited as functional refugia for anadromous fisheries, as well as for high restoration potential. The restoration impetus of Honeydew Creek and Bear Creek in particular contributes to the current focus on ecosystem management through watershed restoration. It provides a foothold for public/private cooperation and a starting point from which to assess and prioritize watershed conditions, and to enhance the integrity of both river systems and the entire Mattole River basin.

The upper two-thirds of the Honeydew Creek watershed have been under public management since 1970. It has been managed by BLM as part of Zone 7 of the KRNCA with the primary use of wildlife habitat conservation. The second largest stand of old-growth forest in the entire Mattole River basin protects the headwaters of Honeydew Creek. Because of these relatively undisturbed headwaters areas, overall habitat conditions are recovering slightly quicker than other Mattole watersheds. Considering the size of the basin, relatively few active sources of sedimentation have been identified (MRC 1989). In summary, Honeydew Creek is a major component of the Mattole watershed and contributes greatly to its integrity.

Part of the Mill Creek watershed was logged prior to 1975, with the exception of 210 acres which now constitute the largest grove of old-growth habitat within the lower Mattole watershed (MRC 1989). This grove, located on the west side of a middle reach of the creek, accounts for the relative stability of the lower reaches of the creek, which is the coldest and cleanest tributary in the lower river, contributing significantly to the river environment and integrity.

Other study segments in the Mattole watershed contribute in varying degrees to the integrity of the watershed, but not at a level of significance comparable to the above described segments.

All of the west slope streams are individual distinct watersheds flowing directly into the Pacific. Therefore they are complete systems in and of themselves and do not contribute to the integrity of any larger river system.

11. Management or Protection other than Wild and Scenic River Designation

In the case of river segments that are found not suitable for designation, BLM will continue to manage these streams as integral ecosystem components of the King Range. Management objectives in the King Range RMP call for continued emphasis on restoration of anadromous fisheries, riparian ecosystems, late successional forests and other components of healthy watersheds in Mattole River tributaries. West slope streams (with the exception of Telegraph and Humboldt Creeks) are all located in the King Range WSA.

The preferred alternative for this plan also calls for the BLM to file on water rights to protect the aquatic habitat of KRNCA streams. Also, most water resource projects would be incompatible with the King Range Act, Northwest Forest Plan, and the BLM's Interim Management Policy for Lands under Wilderness Review. For example, hydropower facilities, dredging, diversion and channelization, irrigation, and flood control measures are inconsistent with the vision of the King Range, and would therefore not be permitted to the extent of BLM's authority.

ANALYSIS OF ALTERNATIVES

In accordance with NEPA and the Wild and Scenic River Act of 1968, BLM used an interdisciplinary planning team to draft an array of alternatives for Wild and Scenic Rivers. These alternatives ranged from proposing that none of the eligible river segments be found suitable and recommended for designation under Alternative A, eight river segments found suitable and recommended for designation under Alternative B, fifteen river segments found suitable and recommended for designation under Alternative C, and all twenty-eight eligible river segments to be found suitable and recommended for designation under Alternative D (Preferred). Specifically:

- Alternative A (No Action): No segments recommended
- Alternative B: Big Creek, Big Flat Creek, Gitchell Creek, South Fork Bear Creek (Segments A and B), Honeydew Creek, Mill Creek, and Mattole Estuary recommended.
- Alternative C: Same as B with the addition of Shipman Creek, Buck Creek, Randall Creek, Horse Mountain Creek, Kinsey Creek, Oat Creek, and Spanish Creek.
- Alternative D (Preferred Alternative): All study segments recommended.

The impacts of these alternatives are analyzed in Chapter IV of the plan.

RECOMMENDATION

It is recommended that the following river segments, as defined in Table 2, be designated as components to the NWSRS: Mattole River Estuary, Mill Creek, Honeydew Creek, Segments A and B of the South Fork of Bear Creek, Big Creek, Big Flat Creek, , and Gitchell Creek. The remaining study segments were found to be unsuitable.

PROTECTIVE MANAGEMENT

All river segments found to be eligible for inclusion in the NWSRS are placed under protective management by the BLM. Subject to valid existing rights, the BLM is required to protect the free-flowing characteristics and outstandingly remarkable values in the stream corridors. The BLM must also protect the corridor from modifications that would impact the tentative river classification (i.e., change the classification potential from Wild to Scenic, or from Scenic to Recreational). These management restrictions apply only to public lands. Once suitability is determined and the Record of Decision (ROD) for the RMP signed, protective management continues only for those segments found suitable for designation. This protective management remains in effect until Congress makes a final decision regarding designation, or the RMP is amended.

Rationale

Many of the river segments under evaluation have similar land tenure status, historical uses, and potential or existing uses. Therefore, the primary distinction for the KRNCA streams found suitable for designation by the planning team was the exceptional combination of outstandingly remarkable values that make them worthy additions to the NWSRS. In selecting the eight segments found suitable and recommended for designation in Alternative D, the planning team determined these streams represent the “crown jewels” of the King Range with their wild character, scenic beauty, outstanding recreation opportunities, quality anadromous fisheries, and/or significant cultural values.

The Mattole River mouth and estuary, Mill Creek, Honeydew Creek, South Fork Bear Creek, Big Creek, Big Flat Creek, and Gitchell Creek would make worthy additions to the NWSRS for the following reasons:

- Magnificent scenery, extensive recreational opportunities for day use, camping, and access to backcountry trails in the KRNCA.
- Excellent spawning and rearing habitat for federally listed salmonids. The Mattole Estuary also contains habitat for the federally listed endangered *Layia Carnosa*.
- The presence of these quality anadromous fisheries is also related to the significant cultural sites found at the Mattole River, South Fork Bear Creek, and several coastal streams.
- Designation would preserve and protect the free-flowing character, water quality, and outstandingly remarkable values of these exceptional river segments.
- A commitment has been demonstrated by the local community and non-federal entities to work collaboratively with BLM in implementing protective management of the resource values in these streams.
- No land ownership or potential uses would be in conflict or curtailed if these river segments were designated.
- No costs would be involved in acquiring necessary lands and interest in lands, as the BLM already manages the majority of land in the suitable corridors.

Of the river segments found non-suitable, the primary factor was the conclusion that they would not make worthy additions to the system. Although the segments have outstandingly remarkable values that meet eligibility criteria, the study team has determined that the values are not at a level that would make these segments worthy additions to the NWSRS when viewed in the context of the KRNCA as a whole, or within the California Coastal Range Physiographic Province.

Many of these watersheds have been substantially modified through past logging activities and the associated construction of roads, landings, and skid trails. The resulting landscapes would not broaden the representation of key ecosystems within the system. Although several of the segments found suitable have also been impacted from past logging, the impacts are not as extensive as has occurred in the non-suitable watersheds. A second factor contributed to the non-suitable recommendation for Humboldt and Telegraph Creeks. Although these watersheds are currently somewhat undeveloped, local (County) and

regional (Coastal Zone) planning calls for these stream corridors to be developed as residential areas within the Shelter Cove subdivision. This high level of development will change the character of the watersheds and be incompatible with Wild and Scenic River designation. Fisheries and other watershed values for all streams including the non-suitable segments will be afforded protection through state and local land use plans, the Endangered Species Act, and the Northwest Forest Plan.

APPENDIX E

RIPARIAN/AQUATIC STANDARD AND GUIDELINES

APPENDIX E

RIPARIAN/AQUATIC STANDARD AND GUIDELINES

DESCRIPTION – RIPARIAN RESERVE WIDTHS

Riparian Reserves are specified for five categories of streams or waterbodies as follows:

- **Fish-bearing streams** - Riparian Reserves consist of the stream and the area on each side of the stream extending from the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance (600 feet total, including both sides of the stream channel), whichever is greatest.
- **Permanently flowing nonfish-bearing streams** - Riparian Reserves consist of the stream and the area on each side of the stream extending from the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of one site-potential tree, or 150 feet slope distance (300 feet total, including both sides of the stream channel), whichever is greatest.
- **Constructed ponds and reservoirs, and wetlands greater than 1 acre** - Riparian Reserves consist of the body of water or wetland and: the area to the outer edges of the riparian vegetation, or to the extent of seasonally saturated soil, or the extent of unstable and potentially unstable areas, or to a distance equal to the height of one site-potential tree, or 150 feet slope distance from the edge of the wetland greater than 1 acre or the maximum pool elevation of constructed ponds and reservoirs, whichever is greatest.
- **Lakes and natural ponds** - Riparian Reserves consist of the body of water and: the area to the outer edges of the riparian vegetation, or to the extent of seasonally saturated soil, or to the extent of unstable and potentially unstable areas, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance, whichever is greatest.
- **Seasonally flowing or intermittent streams, wetlands less than 1 acre, and unstable and potentially unstable areas** - This category applies to features with high variability in size and site-specific characteristics. At a minimum, the Riparian Reserves must include:
 - The extent of unstable and potentially unstable areas (including earthflows),
 - The stream channel and extend to the top of the inner gorge,
 - The stream channel or wetland and the area from the edges of the stream channel or wetland to the outer edges of the riparian vegetation, and
 - Extension from the edges of the stream channel to a distance equal to the height of one site-potential tree, or 100 feet slope distance, whichever is greatest.

A site-potential tree height is the average maximum height of the tallest dominant trees (200 years or older) for a given site class.

Intermittent streams are defined as any nonpermanent flowing drainage feature having a definable channel and evidence of annual scour or deposition. This includes what are sometimes referred to as ephemeral streams if they meet these two physical criteria.

TIMBER MANAGEMENT

TM-1. Prohibit timber harvest, including fuelwood cutting, in Riparian Reserves, except under the following conditions:

- a. Where catastrophic events such as fire, flooding, wind, or insect damage result in degraded riparian conditions, allow forest health treatments and fuelwood cutting if required to attain Fisheries/Watershed Objectives objectives.
- b. Allow forest health treatments (such as thinning over stocked and/or diseased stands) only when watershed analysis determines that present and future coarse woody debris needs are met and other Fisheries/Watershed Objectives objectives are not adversely affected.
- c. Apply silvicultural practices for Riparian Reserves to control stocking, reestablish and manage stands, and acquire desired vegetation characteristics needed to attain Fisheries/Watershed Objectives objectives. For example, in the Mattole Basin consider riparian silviculture treatments to reduce hardwood canopy and to replant conifers to accelerate future large woody debris recruitment potential.

ROADS MANAGEMENT

RF-1. BLM will cooperate with other entities to achieve consistency in road design, operation, and maintenance necessary to attain Fisheries/Watershed Objectives objectives.

RF-2. For each existing or planned road, meet Fisheries/Watershed Objectives objectives by:

- a. New roads are not allowed on west slope of KRNCA unless required for emergency purposes such as fire.
- b. completing watershed analyses (including appropriate geotechnical analyses) prior to construction of new roads or landings in Riparian Reserves.
- c. preparing road-specific maintenance plans for all roads in the KRNCA to minimize adverse impacts from roads.
- d. All above activities will not occur during wet weather. BLM will inspect road conditions prior to initiating any routine road maintenance activity.
- e. Heavy equipment operations will use all feasible techniques to prevent any sediment from entering a drainage system during operations. For example, operators will take precautions when

- operating near drainages to keep surface materials out of the stream channel. Only operators who are informed of all applicable Standards and Guides and conditions of operation will be permitted to commence work. A BLM project inspector, or designee, will be onsite to insure proper procedures are followed.
- f. Heavy equipment will be inspected daily by the BLM project inspector, or designee, to check for leaks. Equipment that may leak lubricants or fuels into drainages will not be used until leaks are repaired. Fuel trucks (if used) and/or re-fueling will be done outside of Riparian Reserves and stream crossings.
 - g. Vegetation trimming or removal conducted in Riparian Reserves will be completed in such a fashion as to not retard attainment of Fisheries/Watershed Objectives objectives. Specifically: 1) Downed woody material in Riparian Reserves will not be removed and will be moved only to the extent necessary to provide for safe road use. 2) Conifers exceeding three inches diameter will not be cut from Riparian Reserves unless it is absolutely necessary for safe use of the road segment. If a conifer exceeding three inches diameter must be cut, it may not be moved from the Riparian Reserve or stream corridor without review from a BLM fishery biologist or designee.
 - h. Water drafting will be conducted only at sites approved by BLM staff and will follow NMFS guidelines.
 - i. Mulching will be used, as necessary, to minimize sediment delivery from disturbed ground outside the active stream channel.

RF-3. Determine the influence of each road on the Fisheries/Watershed Objectives objectives through watershed analysis. BLM has completed several watershed analyses and has coordinated with MRC to inventory roads and to address road problems. Although much of the road work (decommissioning, closing, stabilizing) has been done, this program will continue and will be applied to other watersheds (untreated watersheds with smaller public land holdings and a few roads on the west side of the KRNCA) within the KRNCA. Meet Fisheries/Watershed Objectives objectives by:

- a. reconstructing roads and associated drainage features that pose a substantial risk.
- b. prioritizing reconstruction based on current and potential impact to riparian resources and the ecological value of the riparian resources affected.
- c. closing and stabilizing, or obliterating and stabilizing roads based on the ongoing and potential effects to Fisheries/Watershed Objectives objectives and considering short-term and long-term transportation needs and required access through BLM lands to private inholdings.

RF-4. New culverts, bridges and other stream crossings shall be constructed, and existing culverts, bridges and other stream crossings determined to pose a substantial risk to riparian conditions will be improved, to accommodate at least the 100-year flood, including associated bedload and debris. Priority for upgrading will be based on the potential impact and the ecological value of the riparian resources

affected. Crossings will be constructed and maintained to prevent diversion of streamflow out of the channel and down the road in the event of crossing failure.

RF-5. Minimize sediment delivery to streams from roads. Outsloping of the roadway surface is preferred, except in cases where outsloping would increase sediment delivery to streams or where outsloping is unfeasible or unsafe. Route road drainage away from potentially unstable channels, fills, and hillslopes.

RF-6. Provide and maintain fish passage at all road crossings of existing and potential fish-bearing streams.

RF-7. Develop and implement a Transportation Management Plan that will meet the Fisheries/Watershed Objectives objectives. As a minimum, this plan shall include provisions for the following activities:

- a. inspections and maintenance during storm events.
- b. inspections and maintenance after storm events.
- c. road operation and maintenance, giving high priority to identifying and correcting road drainage problems that contribute to degrading riparian resources.
- d. traffic regulation during wet periods to prevent damage to riparian resources.
- e. establish the purpose of each road by developing the Road Management Objective.

GRAZING MANAGEMENT

GM-1. Adjust grazing practices to eliminate impacts that retard or prevent attainment of Fisheries/Watershed Objectives objectives. If adjusting practices is not effective, eliminate grazing. BLM has completed consultation with regulatory agencies on their grazing allotments in the KRNCA and grazing practices have already been adjusted. If conditions change, such as a severe drought, further adjustments may be required in the future in order to meet Fisheries/Watershed Objectives objectives.

GM-2. No new livestock handling and/or management facilities will be located inside of Riparian Reserves. For existing livestock handling facilities inside the Riparian Reserve, ensure that Fisheries/Watershed Objectives objectives are met. Where these objectives cannot be met, require relocation or removal of such facilities.

GM-3. Limit livestock trailing, bedding, watering, loading, and other handling efforts to those areas and times that will ensure Fisheries/Watershed Objectives objectives are met.

RECREATION MANAGEMENT

RM-1. New recreational facilities within Riparian Reserves, including trails and dispersed sites, should be designed to complement Fisheries/Watershed objectives. Construction of these facilities should not prevent future attainment of these objectives. For existing recreation facilities within Riparian Reserves, evaluate and mitigate impact to ensure that these do not prevent, and to the extent practicable contribute to, attainment of Fisheries/Watershed Objectives objectives.

RM-2. Adjust dispersed and developed recreation practices that retard or prevent attainment of Fisheries/Watershed Objectives objectives. Where adjustment measures such as education, use limitations, traffic control devices, increased maintenance, relocation of facilities, and/or specific site closures are not effective, eliminate the practice or occupancy. As use increases, human waste may impact water quality in west slope streams requiring further education to redirect use. Wailaki, Nadelos and Honeydew Creek campgrounds are in Riparian Reserves and use needs to be focused on primary trails to protect streambanks from dispersed foot traffic.

RM-3. Wild and Scenic Rivers and Wilderness management plans will address attainment of Fisheries/Watershed Objectives objectives.

MINERALS MANAGEMENT

MM-1. Require a reclamation plan, approved Plan of Operations, and reclamation bond for all minerals operations that include Riparian Reserves. Such plans and bonds must address the costs of removing facilities, equipment, and materials; recontouring disturbed areas to near pre-mining topography; isolating and neutralizing or removing toxic or potentially toxic materials; salvage and replacement of topsoil; and seedbed preparation and revegetation to meet Fisheries/Watershed Objectives objectives.

MM-2. Locate structures, support facilities, and roads outside Riparian Reserves. Where no alternative to siting facilities in Riparian Reserves exists, locate them in a way compatible with Fisheries/Watershed Objectives objectives. Road construction will be kept to the minimum necessary for the approved mineral activity. Such roads will be constructed and maintained to meet roads management standards and to minimize damage to resources in the Riparian Reserve. When a road is no longer required for mineral or land management activities, it will be closed, obliterated, and stabilized.

MM-3. Prohibit solid and sanitary waste facilities in Riparian Reserves. If no alternative to locating mine waste (waste rock, spent ore, tailings) facilities in Riparian Reserves exists, and releases can be prevented, and stability can be ensured, then:

- a. analyze the waste material using the best conventional sampling methods and analytic techniques to determine its chemical and physical stability characteristics.
- b. locate and design the waste facilities using best conventional techniques to ensure mass stability and prevent the release of acid or toxic materials. If the best conventional technology is not sufficient to prevent such releases and ensure stability over the long term, prohibit such facilities in Riparian Reserves.

- c. monitor waste and waste facilities after operations to ensure chemical and physical stability and to meet Fisheries/Watershed Objectives objectives.
- d. reclaim waste facilities after operations to ensure chemical and physical stability and to meet Fisheries/Watershed Objectives objectives.
- e. require reclamation bonds adequate to ensure long-term chemical and physical stability of mine waste facilities.

MM-4. For leasable minerals, prohibit surface occupancy within Riparian Reserves for oil, gas, and geothermal exploration and development activities where leases do not already exist. Where possible, adjust the operating plans of existing contracts to eliminate impacts that retard or prevent the attainment of Fisheries/Watershed Objectives objectives.

MM-5. Salable mineral activities such as sand and gravel mining and extraction within Riparian Reserves will occur only if Fisheries/Watershed Objectives objectives can be met.

MM-6. Include inspection and monitoring requirements in mineral plans, leases or permits. Evaluate the results of inspection and monitoring to effect the modification of mineral plans, leases and permits as needed to eliminate impacts that retard or prevent attainment of Fisheries/Watershed Objectives objectives.

FIRE/FUELS MANAGEMENT

FM-1. Design fuel treatment and fire suppression strategies, practices, and activities to meet Fisheries/Watershed Objectives objectives, and to minimize disturbance of riparian ground cover and vegetation. Strategies should recognize the role of fire in ecosystem function and identify those instances where fire suppression or fuels management activities could be damaging to long-term ecosystem function.

FM-2. Locate incident bases, camps, helibases, staging areas, helispots and other centers for incident activities outside Riparian Reserves. If the only suitable location for such activities is within the Riparian Reserve, an exemption may be granted following review and recommendation by a resource advisor. The advisor will prescribe the location, use conditions, and rehabilitation requirements. Use an interdisciplinary team to predetermine suitable incident base and helibase locations.

FM-3. Minimize delivery of chemical retardant, foam, or additives to surface waters. An exception may be warranted in situations where overriding immediate safety imperatives exist, or, following review and recommendation by a resource advisor, when an escape would cause more long-term damage.

FM-4. Design prescribed burn projects and prescriptions to contribute to attainment of Fisheries/Watershed Objectives objectives.

FM-5. Immediately establish an emergency team to develop a rehabilitation treatment plan needed to attain Fisheries/Watershed Objectives objectives whenever Riparian Reserves are significantly damaged by wildfire or a prescribed fire burning outside prescribed parameters.

Other - In Riparian Reserves, the goal of wildfire suppression is to limit the size of all fires. When watershed and/or landscape analysis, or province-level plans are completed and approved, some natural fires may be allowed to burn under prescribed conditions. Rapidly extinguishing smoldering coarse woody debris and duff should be considered to preserve these ecosystem elements. In Riparian Reserves, water drafting sites should be located and managed to minimize adverse effects on riparian habitat and water quality, as consistent with Fisheries/Watershed Objectives objectives.

LANDS

LH-1. Identify in-stream flows needed to maintain riparian resources, channel conditions, and fish passage. Investigate water rights applications and consider cumulative water withdrawals before issuing permits. Work with County on the Shelter Cove water drafting site on Bear Creek to manage water withdrawals to meet Fisheries/Watershed Objectives objectives.

LH-2. Tier 1 Key Watersheds: For hydroelectric and other surface water development proposals, require in-stream flows and habitat conditions that maintain or restore riparian resources, favorable channel conditions, and fish passage. Coordinate this process with the appropriate state agencies. During relicensing of hydroelectric projects, provide written and timely license conditions to the Federal Energy Regulatory Commission (FERC) that require flows and habitat conditions that maintain or restore riparian resources and channel integrity. Coordinate relicensing projects with the appropriate state agencies.

For all other watersheds: For hydroelectric and other surface water development proposals, give priority emphasis to in-stream flows and habitat conditions that maintain or restore riparian resources, favorable channel conditions, and fish passage. Coordinate this process with the appropriate state agencies. During relicensing of hydroelectric projects, provide written and timely license conditions to FERC that emphasize in-stream flows and habitat conditions that maintain or restore riparian resources and channel integrity. Coordinate relicensing projects with the appropriate state agencies.

LH-3. Locate new support facilities outside Riparian Reserves. For existing support facilities inside Riparian Reserves that are essential to proper management, provide recommendations to FERC that ensure Fisheries/Watershed Objectives objectives are met. Where these objectives cannot be met, provide recommendations to FERC that such support facilities should be relocated. Existing support facilities that must be located in the Riparian Reserves will be located, operated, and maintained with an emphasis to eliminate adverse effects that retard or prevent attainment of Fisheries/Watershed Objectives objectives.

LH-4. For activities other than surface water developments, issue leases, permits, rights-of-way, and easements to avoid adverse effects that retard or prevent attainment of Fisheries/Watershed Objectives objectives. Adjust existing leases, permits, rights-of-way, and easements to eliminate adverse effects that retard or prevent the attainment of Fisheries/Watershed Objectives objectives. If adjustments are not

effective, eliminate the activity. Priority for modifying existing leases, permits, rights-of-way and easements will be based on the actual or potential impact and the ecological value of the riparian resources affected.

LH-5. Use land acquisition, exchange, and conservation easements to meet Fisheries/Watershed Objectives objectives and facilitate restoration of fish stocks and other species at risk of extinction. Much of this work has been completed for the KRNCA such that the west slope of the KRNCA would be the next priority.

GENERAL RIPARIAN AREA MANAGEMENT

RA-1. Identify and attempt to secure in-stream flows needed to maintain riparian resources, channel conditions, and aquatic habitat.

RA-2. Fell trees in Riparian Reserves when they pose a safety risk. Keep felled trees on-site when needed to meet coarse woody debris objectives.

RA-3. Herbicides, insecticides, and other toxicants, and other chemicals shall be applied only in a manner that avoids impacts that retard or prevent attainment of Fisheries/Watershed Objectives objectives.

RA-4. Locate water drafting sites to minimize adverse effects on stream channel stability, sedimentation, and in-stream flows needed to maintain riparian resources, channel conditions, and fish habitat. Drafting methods will follow NOAA Fisheries specifications (NMFS 1995), including the following: portable pumps will have screened intakes; streams will not be dewatered as a result of water drafting; and drafting will not reduce stream flows by more than 10%, measured at the first point of anadromy downstream of the drafting site.

WATERSHED AND HABITAT RESTORATION

WR-1. Design and implement watershed restoration projects in a manner that promotes long-term ecological integrity of ecosystems, conserves the genetic integrity of native species, and attains Fisheries/Watershed Objectives objectives.

WR-2. Cooperate with federal, state, local, and tribal agencies, and private landowners to develop watershed-based Coordinated Resource Management Plans or other cooperative agreements to meet Fisheries/Watershed Objectives objectives.

WR-3. Do not use mitigation or planned restoration as a substitute for preventing habitat degradation.

WR-4. Consider instream enhancement only when upland erosion problems have been addressed.

FISH AND WILDLIFE MANAGEMENT

FW-1. Design and implement fish and wildlife habitat restoration and enhancement activities in a manner that contributes to attainment of Fisheries/Watershed Objectives objectives.

FW-2. Design, construct and operate fish and wildlife interpretive and other user-enhancement facilities in a manner that does not retard or prevent attainment of Fisheries/Watershed Objectives objectives. For existing fish and wildlife interpretative and other user-enhancement facilities inside Riparian Reserves, ensure that Fisheries/Watershed Objectives objectives are met. Where Fisheries/Watershed Objectives objectives cannot be met, relocate or close such facilities.

FW-3. Cooperate with federal, tribal, and state wildlife management agencies to identify and eliminate wild ungulate impacts that are inconsistent with attainment of Fisheries/Watershed Objectives objectives. Consider reintroduction of Elk to the KRNCA.

FW-4. Cooperate with federal, tribal, and state fish management agencies to identify and eliminate impacts associated with habitat manipulation, fish stocking, harvest and poaching that threaten the continued existence and distribution of native fish stocks occurring on federal lands. Increase public education by installing signs at Lost Coast trailhead.

RESEARCH

RS-1. A variety of research activities may be ongoing and proposed in Key Watersheds and Riparian Reserves. These activities must be analyzed to ensure that significant risk to the watershed values does not exist. If significant risk is present and cannot be mitigated, study sites must be relocated. Some activities not otherwise consistent with the objectives may be appropriate, particularly if the activities will test critical assumptions of these standards and guidelines; will produce results important for establishing or accelerating vegetation and structural characteristics for maintaining or restoring aquatic and riparian ecosystems; or the activities represent continuation of long-term research. These activities should be considered only if there are no equivalent opportunities outside of Key Watersheds and Riparian Reserves. Continue cooperative research efforts with fisheries biologists at Humboldt State University.

RS-2. Current, funded, agency-approved research, which meets the above criteria, is assumed to continue if analysis ensures that a significant risk to Fisheries/Watershed Objectives objectives does not exist. Research Stations and other Forest Service and BLM units will, within 180 days of the signing of the Record of Decision adopting these standards and guidelines, submit a brief project summary to the Regional Ecosystem Office of ongoing research projects that are potentially inconsistent with other standards and guidelines but are expected to continue under the above research exception. The Regional Ecosystem Office may choose to more formally review specific projects, and may recommend to the Regional Interagency Executive Committee modification, up to and including cancellation, of those projects having an unacceptable risk to Key Watersheds and Riparian Reserves. Risk will be considered within the context of the Fisheries/Watershed Objectives objectives.

This page intentionally left blank.

APPENDIX F

**REPORTED FIRES IN THE KING RANGE NATIONAL
CONSERVATION AREA**

(1981 - 2003)

APPENDIX F

**REPORTED FIRES IN THE KING RANGE NATIONAL
CONSERVATION AREA**

(1981 – 2003)

The Fire Management Staff at the BLM, Arcata Field Office prepared the following wildfire information in 2003. The data exists in current BLM files and is listed by year, name, cause, and size for each incident of record

Reported Fires in the KRNCA for the Period of 1981 - 2003

YEAR	FIRE NAME	CAUSE	SIZE (ACRES)
1981	Mattole	Human	1
1983	BLM2	Human	10
	BLM3	Human	0.1
1984	Driftwood	Human	0.1
1988	Lake Ridge	Human	550
	Saddle	Human	6050
1990	CDF123	Lightning	0.1
	Mattole Beach	Human	1
	Mill Creek	Lightning	30
	Kings Peak	Lightning	3500
1991	Mattole	Human	1
	Tolkan	Human	0.1
	Punta	Human	5 (Only reported natural out)
1992	Cooskie	Human	270
1993	Flat	Human	0.6
1994	Cooskie	Human	65
1995	Mattole #1	Human	0.1
	Mattole #2	Human	0.1
1996	Shelter	Human	0.5
	Gitchell	Human	3
	Black	Human	0.1
	Kiosk	Human	0.1
1997	Mattole #1	Human	0.1
	Mattole #2	Human	0.1
	Mattole #3	Human	0.1
	Mattole #4	Human	0.1
	Mattole #5	Human	0.1
	Mattole #6	Human	0.1
	Collins	Human	2.5

YEAR	FIRE NAME	CAUSE	SIZE (ACRES)
1998	Honeydew Creek	Human	0.1
	Miller	Human	0.1
	Big Creek	Human	1
1999	Horse	Human	0.1
	Big	Human	2
2001	Spanish	Human	0.1
	Flat	Human	308
	Gitchell	Human	0.1
	Randall	Human	60
2003	Drift	Human	0.1
	Big	Human	0.1
	King	Human	4
	Ten	Lightning	226
	Twelve	Lightning	0.3
	Cham 1	Lightning	3
	Cham 2	Lightning	0.3
	Honeydew	Lightning	13,778
	Paradise	Lightning	0.1

No fires were reported on the King Range during the years 1980, 1982, 1985, 1986, 1987, 1989, 2000, and 2002.

Bureau of Land Management, Arcata Office, 2003

APPENDIX G

CONCLUSIONS FROM 1997 RECREATION VISITOR SURVEY

APPENDIX G

SUMMARY, CONCLUSIONS, AND RECOMMENDATIONS FROM 1997 LOST COAST TRAIL BACKCOUNTRY VISITOR SURVEY

Steven R. Martin and Carolyn J. Widner

In this section we will summarize the key findings of the study, and attempt to draw some conclusions as to the meaning of those findings, as well as translate selected conclusions into management recommendations. Appendix K lists all general comments made by respondents on the last page of the questionnaire.

Lost Coast Trail visitors tend to be experienced backcountry visitors in general, yet most are first-time visitors to the Lost Coast Trail, and most of the rest have visited only once or twice. It is likely that much of these visitors' previous backcountry experience has come in environments that are unlike the Lost Coast Trail, since there are few coastal backcountry or wilderness areas left in this country. Visitors with previous backcountry experience should be easier to educate about minimum impact practices, but extra effort will need to be made to instruct them about practices that are appropriate for coastal areas with which they are likely unfamiliar, as well as to break them of habits that may be appropriate for more typical backcountry areas but inappropriate for a coastal oceanfront environment (*e.g.* human waste disposal).

Solitude is a highly desired outcome sought by Lost Coast Trail visitors, and is the one type of experience that visitors rated the importance of higher than they rated their ability to obtain it. However, many of the steps that managers might consider taking to preserve opportunities for solitude could well interfere with another aspect of the Lost Coast Trail experience highly valued by visitors--autonomy and personal freedom. Reading the open-ended comments that visitors made in response to several questions in the survey, it is clear that visitors cherish the autonomy and opportunity for freedom from undue regulation on their behavior that is available on the Lost Coast Trail. This suggests that managers will have to carefully weigh the benefits of restricting use to preserve opportunities for solitude against the costs that such restrictions may have relative to the freedom and autonomy of visitors.

Respondents also showed a surprising degree of attachment to the area, especially considering that a majority of visitors were visiting for the first time. The item garnering the largest percentage of respondents was "This place says a lot about who I am." This suggests that people identify so closely with the area that the area becomes important to them in terms of self-identity. When people express such a high degree of attachment to an area they also tend to oppose changes in the area. Managers will have to move slowly in implementing management changes in an area with such a highly attached constituency.

Not surprisingly, the most common activity reported was hiking. However, wildlife viewing also showed up as an activity in which fully 95% of all respondents participate in--43% as the primary reason for their

trip. Sixty nine percent (69%) of visitors participate in nature study, 66% in tidepool exploration, and 50% in “collecting.” These are activities that lend themselves well to interpretation, especially since only one out of five people who participate in tidepool exploration (for example) said that it was a major reason for their trip. People who engage in activities such as wildlife viewing, collecting, tidepool exploration, and nature study, but who don’t list that activity as the major reason for their trip, represent a segment of visitors who 1) may not know a whole lot about that activity; 2) apparently are interested enough in the activity to participate, and therefore may be interested in learning more; and 3) since they may not know a lot about the activity but are still engaging in it may represent the potential for causing resource damage by not engaging in the activity in an environmentally sound manner. For example, 53% of respondents said they participated in tidepool exploration but that it was not a major reason for the trip. As casual participants in the activity, these visitors may not know how to go about tidepool exploration in a manner that minimizes their impact on the resources. Likewise with wildlife viewing-- 52% of visitors say they did it but that it wasn’t a major reason for the trip. Are these visitors, simply through ignorance, disturbing the very wildlife they seek to observe? We feel certain that the vast majority of visitors would not want to cause disturbance or resource damage, but as casual participants may be doing so unwittingly. Efforts to interpret wildlife, tidepool ecosystems, and so on can include an educational component that informs visitors of the proper etiquette for engaging in these activities. There is a large segment of visitors who are primed for such information due to their expressed interest in these activities, and who have also expressed an interest in information on the natural history and features of the area. This information could be presented in a publication (see next paragraph), and/or in a separate interpretive brochure or series of brochures.

Regarding information use and preferences, both first-time visitors and experienced visitors commented that road and trail maps and directions need to be improved--made more clear, specific, and detailed. The two types of information most desired by both experienced and first-time visitors are information on specific trail conditions and descriptions, and information on natural history and features of the area. The next two most desired types of information are directions to trailheads, and weather conditions. Both groups indicated that after friends/relatives and personal experience, maps and the BLM were the next two most often used and most preferred sources of information. Perhaps the BLM can produce a more detailed guide to the Lost Coast Trail, and include specific information on trail conditions, directions to the trailheads, and weather conditions, as well as interpretive information on the natural and cultural history and features of the area, guidelines for low impact camping practices, and hiker shuttle services. Such a publication could be sold at a modest price to recover publication costs.

It is sometimes helpful to compare the perceptions of experienced visitors with those of first-time visitors in order to assess trends in conditions. We compared these two groups of visitors on selected questions and found the following. Experienced visitors are more likely (than first-timers) to say that they saw too many surfers and too many OHVs. This suggests one of two things (or a combination of these two things): that the number of surfers and OHVs is increasing, and/or that the visitor population is changing and visitors who are sensitive to crowding from surfers or OHVs are no longer visiting the area as much as before. Similarly, experienced visitors were more likely than first-timers to complain that litter and human waste were problems. Again, this suggests that litter and human waste may be more of a problem now than in the past (or that first-time visitors are less sensitized to litter and human waste).

It can also sometimes be helpful to compare the perceptions of local and non-local users on selected issues. We compared these two groups on the question of the need to limit use, strategies for limiting

use, and willingness to pay to use the area. Locals were defined as residents of Mendocino and Humboldt counties. We found no differences between these groups on the need to limit use to the area, or on the need to limit group size. Only 27 to 30% of both groups felt there was currently a need to limit use, while only 18 to 23% felt that use limits should never be considered for the area now or at any time in the future. Half of both groups felt that use limits were not needed now but should be imposed in the future if and when overuse occurs. Of those in both groups who felt a group size limit was needed, a majority of both groups felt that a limit of 6 to 10 people was preferred.

Differences between the two groups (locals and non-locals) on support for or opposition to specific use limit strategies were significant in two cases, and marginally significant in two more. The most significant differences between locals and non-locals were 1) locals were much more likely (53% to 32%) to strongly oppose a permit system based on a drawing or lottery; and 2) non-locals were much more likely (34% to 17%) to strongly support a permit system based on a reservation system. Marginally significant differences between the groups were 1) locals were much more likely (51% to 35%) to strongly oppose charging a flat rate user fee; and 2) locals were also generally less supportive and more opposed than non-locals to charging a higher fee at busier times. This difference also showed up in the question on willingness to pay--locals were less likely to indicate a willingness to pay to use the area than were non-locals, although interestingly a majority of both groups did indicate that they would be willing to pay to use the area, and there was no difference in the average amount per person per day that locals and non-locals said they were willing to pay. Finally, and not surprisingly, we found that if a use permit system were implemented, locals would be more likely than non-locals to visit the area even if they failed to obtain a permit. In conclusion, differences between locals and non-locals on use limit issues and willingness to pay are not very pronounced, with the largest difference being that locals are less likely to support fees in general and more likely to oppose fees as a method for limiting use.

Conflict was felt by about half of all users to the area, with conflict due to perceived resource impacts receiving the highest percentage of visitors reporting this to be a problem. Of the 43% of visitors that reported this aspect of conflict to be a problem, 38% of them indicated that hikers and backpackers were the primary user group responsible for the impacts. This is not surprising since the highest percentage of users to the Lost Coast is hikers and backpackers. However, it is surprising that for the two remaining index measures of conflict, the behavior of others, and crowding, the user group most blamed for these types of conflict were OHV users. It is surprising because OHV groups were the least encountered of any of the user group. The implication for managers is that although OHV use on the Lost Coast Trail is low, the resulting impact for visitors is great. In other words, although visitors had relatively few encounters with OHVs, those encounters had a disproportionately negative effect on visitors. Given the relatively light use of the area by OHVs, and the disproportionate amount of conflict this use causes, the BLM should carefully consider the appropriateness of continued OHV use of Black Sands Beach.

On the issue of limiting use along the Lost Coast Trail, most visitors agreed that controls were not needed now, but should be implemented in the future if overuse occurs. Open-ended comments from visitors indicated that the two primary indicators of overuse for visitors were trash and damage to the resource. The most frequent indicator was trash, and many visitors indicated that they would assess damage to the resource in terms of too much trash in the area. This perception of trash as resource damage is very different from an ecological perspective that views impacts to soil, vegetation, and water as primary indicators of resource damage, and trash as more of a sociological problem. In addition, if visitors are indicating that they assess overuse by the amount of trash on the trail, then strategies for

limiting use may not be the solution to the problem of “crowding.” When asked what they think should be done to limit use if the need arises, most visitors suggest that providing information regarding peak use times and allowing visitors to spread themselves out more is preferable to limiting access. One implication for management is that visitors to the Lost Coast Trail who highly value freedom from rules and regulations, and who may perceive trash as more of an indicator of overuse than simply numbers of visitors, might better be managed through light-handed techniques that focus on the old “pack-it-in-pack-it-out” rule, and not so much on the actual limitation of visitors to the area. However, if actual numbers of people would need to be limited, visitors indicated that they would prefer either the first-come first-served method or the reservation system over paying fees or limiting group sizes.

Visitors were generally highly satisfied with the management of the area, indicating that most issues were not a problem. Keeping with the above discussion, the issue that was reported as the biggest problem was litter. Since visitors are much less likely to litter an area that is clean to start with, and more likely to litter an area that is already littered, an early season clean-up of the area by backcountry personnel, followed by a concerted and continuing effort to promote a pack-it-in pack-it-out ethic is probably the best way to approach this problem. An annual clean-up day that involves locals and tackles the areas closest to the trailheads may also give people a sense of stewardship or ownership of the resource, which in turn often results in a user population that takes better care of that resource. Poorly marked trails and a lack of information (about the Lost Coast area, trails, and periods of heavy use) were the two other problems receiving the highest percentages of visitors indicating that it was a major or moderate problem. Providing better information, perhaps in the form of improved trailhead boards, brochures, or a more detailed guide, could help to alleviate this problem.

Other information that should be included in a publication, brochure, or trailhead contact station is information concerning low-impact camping practices specific to an ocean front area. As indicated above most visitors to the area are experienced in backcountry camping practices but have little or no site-specific experience. The result is a visitor population that knows little about the correct low-impact camping practices for a backcountry ocean front area.

APPENDIX H

MANAGEMENT OF LANDS WITH WILDERNESS CHARACTERISTICS

APPENDIX H

MANAGEMENT OF LANDS WITH WILDERNESS CHARACTERISTICS

MANAGEMENT DIRECTION

Management of Lands With Wilderness Characteristics is part of BLM's multiple-use mandate, and is recognized within the spectrum of resource values and uses.

Public lands with wilderness characteristics generally:

- Have been affected primarily by the forces of nature, with the imprint of humans substantially unnoticeable,
- Have outstanding opportunities for solitude or a primitive and unconfined type of recreation,
- Have at least five thousand acres of land or of sufficient size as to make practicable its preservation and use in unimpaired condition, and
- Potentially containing ecological, geological, or other features of scientific, educational, scenic, or historical value.

With exceptions, public lands having wilderness characteristics should be managed to protect these values. In addition, they should augment multiple-use management of the KRNCA and adjacent lands particularly for the protection of watersheds and water yield, wildlife habitat, natural plant communities, and similar natural values.

With exceptions, the following activities generally do not occur within lands having wilderness characteristics:

Commercial enterprises	Permanent roads
Temporary roads	Use of motor vehicles
Use of motorized equipment	Use of motorboats
Landing of aircraft	Mechanical transport
Structures	Installations

However, there are exceptions to these prohibitions and they are generally grouped into three categories.

- **Valid Existing Rights.** Prior-existing rights may continue. New discretionary uses that create valid existing rights are not allowed.
- **Administrative Activities.** New commercial activities or new permanent roads will not be authorized. BLM may authorize any of the other prohibitions if it is necessary to meet the minimum requirements to administer and protect the lands with wilderness character (called the

“minimum requirement exception”) and to protect the health and safety of persons within the area.

- **Other General Allowances.** Subject to limitations determined by the State Director, general allowances could include actions necessary to control fire, insects, and diseases, recurring Federal mineral surveys, established livestock grazing, commercial services to the extent necessary for activities which are proper for realizing the recreational or other wilderness character purposes and compatible with the defined values, and adequate access to inholdings.

SPECIFIC GUIDANCE

1. *Emergencies.* The use of motor vehicles and mechanical transport, and the construction of temporary roads, structures, and installations is allowed for emergency purposes and when consistent with the management principles of the NCA and the “minimum requirement exceptions.”

2. *Land Disposals, Rights-of-Ways, Use Authorizations.* These lands will be retained in public ownership. They will not be disposed through any means, including public sales, exchanges, patents under the Recreation and Public Purposes Act, color of title Class II, desert land entries (except where a vested right was established prior to October 21, 1976) or State selections.

Disposals may be permitted under normal BLM procedures for mining patents, color of title Class I, and desert land entries in which a vested right was established.

Prior existing rights, such as leases under the Recreation and Public Purposes Act, leases/permits under 43 CFR 2920, and rights-of-ways (ROWs) may continue. These also could be renewed if they are still being used for their authorized purpose. New authorizations, leases, permit, and ROWs will not be authorized since they are considered new valid rights.

3. *Routes of Travel.* The construction of new permanent roads will not be allowed. New temporary roads could be allowed if the BLM determines it is consistent with the “minimum requirement exception,” if it is necessary to protect the health and safety of persons within the area, or if necessary to control fire, insects, and diseases.

Motorized or mechanized use of the existing routes is allowed subject to prescriptions outlined in the route designation process or stipulations identified in an authorization. Unless stipulated in the plan, any motorized or mechanized uses off those routes of travel will not be allowed.

4. *Mining.* Existing and new mining operations will be regulated using the 43 CFR 3809 regulations to prevent unnecessary and undue degradation of the lands.

5. *Mineral Leasing.* Existing mineral leases represent a valid existing right. These rights are dependent upon the specific terms and conditions of each lease. Existing leases will be regulated to prevent unnecessary or undue degradation.

No new surface occupancy leases will be issued. Non-surface occupancy leases may be issued if they will not impact the area's wilderness character. This applies to public lands, including split-estate.

6. *Grazing.* Existing livestock grazing, and the activities and facilities that support a grazing program are permitted to continue at the same level and degree, subject to any additional prescriptions.

Adjustments in the numbers and kind of livestock permitted to graze would be made as a result of revisions in the land use plan. Consideration is given to range condition, the protection of the range resource from deterioration, and protection of the wilderness character of the area.

The construction of new grazing facilities would be permitted if they are primarily for the purpose of protecting wilderness characteristics and more effective management of resources, rather than to accommodate increased numbers of livestock.

The use of motorized equipment for emergency purposes is allowed.

7. *Fire Management.* Fire management will be consistent with Bureau policy. Fires must be controlled to prevent the loss of human life or property. They must also be controlled to prevent the spread of fires to areas outside of Lands With Wilderness Character where life, resources, or property may be threatened. Human caused wildfires will be prevented and/or controlled. It may be appropriate to allow natural fires to burn in conformity with a fire management plan. Prescribed fires are allowed in conformity with a fire management plan so long as it consistent in improving or maintaining the areas wilderness character. Light-on-the-land fire management techniques will be applied.

New fire management structures are allowed if it is necessary to meet the minimum requirements to administer and protect the Lands With Wilderness Character and to protect the health and safety of persons within the area.

8. *Forest/Vegetation Health.* Insects, disease, and invasive species may be controlled if determined that it is necessary to meet the minimum requirements to administer and protect these lands.

Insect and disease outbreaks must not be artificially controlled, except to protect timber or other valuable resources outside the Land With Wilderness Character, or in special instances when the loss to resources within these lands is undesirable.

Vegetative manipulation to control noxious, exotic, or invasive species is allowed when there is no effective alternative and when the control is necessary to maintain the natural ecological balances within the area. Control may include manual, chemical, and biological treatment provided it will not cause adverse impacts to the wilderness character.

Where naturalness has been impacted by past timber harvesting, forest stand treatments such as thinnings would be allowed in limited areas, as long as the primary purpose is to accelerate to return these impacted areas to a natural character.

9. *Recreation.* Primitive and unconfined recreational uses such as hiking, camping, rock climbing, caving, fishing, hunting, trapping, etc. are allowed on these lands. Recreational uses will not be allowed if they require:

- Motor vehicles or mechanical transport (e.g, mountain bikes) off routes designated as open or limited as designated through the route designation process.
- The use of motorboats.
- Permanent structures or installations (other than tents, tarpaulins, temporary corrals, and similar devices for overnight camping).

New commercial services will not be allowed unless they are necessary for realizing the primitive and unconfined recreational values. An example of an allowed commercial service would be an outfitting and guide service. Existing commercial recreational authorizations may be allowed to continue under its terms and conditions to their expiration date.

Recreational or hobby collecting of mineral specimens when conducted without location of a mining claim may be allowed. This use will be limited to hand collection and detection equipment.

10. *Cultural and Paleontological Resources.* Cultural and paleontological resources are recognized as unique and valuable. They are also important supplemental values to an area's wilderness character.

Resource inventories, studies, and research involving surface examination may be permitted if it benefits wilderness values. This same standard applies for the salvage of archeological and paleontological sites; rehabilitation, stabilization, reconstruction, and restoration work on historic structures; excavations; and extensive surface collection may also be permitted for a specific project.

Permanent physical protection, such as fences, will be limited to those measures needed to protect resources eligible for the National Register of Historic Places and will be constructed so as to minimize impacts on apparent naturalness.

11. *Wildlife Management.* Fish and wildlife resources are a special feature that may contribute to an area's wilderness character. Whenever possible, these resources should be managed to maintain that character.

Nothing will be construed as affecting the jurisdiction or responsibilities of the State agencies with respect to fish and wildlife management on these lands. Fishing, hunting and trapping are legitimate activities on these lands. The State establishes regulations and enforcement for these uses.

State wildlife agencies and the BLM are responsible for fostering a mutual understanding and cooperation in the management of fish and wildlife. Management activities on these lands will emphasize the protection of natural processes. Management activities will be guided by the principle of doing the minimum necessary to manage the area to preserve its natural character.

Management of public lands having wilderness character will follow the guidelines provided in the Memorandum of Understanding between the BLM and the International Association of Fish and Wildlife Agencies. It will also follow any additional site-specific wildlife decisions addressed through the land use planning process.

APPENDIX I

NOTICE OF AVAILABILITY

Liquefied Natural Gas to Shippers, Authorization of Site, Construction and Operation, Stratton Ridge Meter Station 2007, City of Freeport, Brazoria County, TX.

Summary: EPA expressed environmental concern regarding wetland impacts/mitigation, Clean Water Act Section 402 permitting, vaporization water intake and discharge impacts, and conformity with the state's implementation plan for air quality. EPA requested additional information on these issues.

ERP No. D-FRC-L05230-OR Rating LO, Pelton Round Butte Hydroelectric Project, (FERC No. 2030-036), Application for a New License for Existing 366.82-megawatt Project, Deschutes River, OR.

Summary: EPA Region 10 used a screening tool to conduct a limited review of this action. Base upon the screen, EPA does not foresee having environmental objections to the proposed project. Therefore, EPA will not conduct a detailed review.

ERP No. D-NOA-K91012-00 Rating EC2, Bottomfish and Seamount Groundfish Fisheries Conservation and Management Plan, Implementation, US Economic Zone (EEZ) around the State of Hawaii, Territories of Samoa and Guam, Commonwealth of the Northern Mariana and various Islands and Atolls known as the U.S. Pacific remove island areas, HI, GU and AS.

Summary: EPA expressed concerns regarding the integration of the proposed alternative with other restrictions on Bottomfish fishing in the Western Pacific, and impacts to federally-endangered Hawaiian Monk Seals.

ERP No. DS-COE-D36107-WV, Rating EC2, Lower Mud River at Milton Project, Updated Information on the Milton Local Protection Project, Proposed Flood Damage Reduction Measure, City of Milton, Cabell County, WV.

Summary: EPA expressed environmental concerns over impacts to wetlands and the effectiveness of the proposed wetland mitigation measures. EPA requested additional information regarding the mitigation measures, as well as baseline environmental conditions and predicted cumulative impacts.

Final EISs

ERP No. F-AFS-J65369-MT, Windmill Timber Sale and Road Decommissioning Project, Timber Harvesting, Road Construction and Road Decommissioning, Mill Creek Drainage, Absaroka Mountain Range, Gallatin National Forest, Park County, MT.

Summary: The Final EIS includes planning, design and mitigation measures which will reduce environmental impacts to water quality and old growth habitat. EPA does have concerns for potential adverse environmental impacts from development of land transferred through exchange, should insufficient revenue be generated by the Windmill Timber Sale for land acquisition under the Gallatin Land Consolidation Act.

ERP No. F-AFS-J70021-SD, Prairie Project Area, (Lower Rapid Creek Area) Multiple Resource Management Actions, Implementation, Black Hills National Forest, Mystic Ranger District, Pennington County, SD.

Summary: EPA continues to have environmental concerns with erosion and impacts to soils and fish and wildlife habitats from roads and transportation, water runoff and sediment.

ERP No. F-COE-E39060-GA, Lake Sidney Lanier Project to Continue the Ongoing Operation and Maintenance Activities Necessary for Flood Control, Hydropower Generation, Water Supply, Recreation, Natural Resources Management and Shoreline Management, US Army COE Section 10 and 404 Permits, Dawson, Forsyth, Lumpkin, Hill and Gwinnett Counties, GA.

Summary: EPA has no objections to the proposed project.

ERP No. F-FHW-J40154-WY, US 287/26 Improvements Project, Moran Junction to 12 miles west of Dubois to where the roadway traverses thru the Bridger-Teton and Shoshone National Forests and Grand Teton National Park, NPDES and U.S. Army COE Section 404 Permits Issuance, Teton and Fremont Counties, WY.

Summary: EPA has environmental concerns with the preferred alternative regarding impacts to endangered species, habitat, water quality and the National Parks as well as concerns regarding erosion.

ERP No. F-FRC-E03010-FL, Ocean Express Pipeline Project, Construction, Operation and Maintenance of an Interstate Natural Gas Pipeline extending from the Exclusive Economic Zone (EEZ) boundary between the United States and the Bahamas, (Docket No. CP02-090-001-1) Plan of Operations Approval, NPDES and U.S. Army COE Section 10 and Possible 404 Permits, Broward County, FL.

Summary: EPA expressed environmental concerns regarding (1) the uncertainty of the actual level of impacts during proposed pipeline placement, (2) the specifics of the final project mitigation, and (3) the potential

for public involvement in certain final project decisions such as contingencies.

ERP No. F-FRC-L05200-OR, Bull Run Hydroelectric Project (FERC No.477-024), Proposal to Decommission the Bull Run Project and Remove Project Facilities including Marmot Dam, Little Sandy Diversion Dam and Roslyn Lake, and an Application to Surrender License, Sandy, Little Sandy, Bull Run Rivers, Town of Sandy, Clackamas County, OR.

Summary: No formal comment letter was sent to the preparing agency.

ERP No. F-USA-C11021-NY, Thomas Jefferson Hall and Other Construction Activities in the Cadet Zone of the United States Military Academy, Implementation, West Point, Hudson River Valley, Orange and Putnam Counties, NY.

Summary: EPA has no objections to the proposed action.

ERP No. FS-BLM-K67051-NV, Millennium Expansion Project, New Facilities Construction and Existing Gold Mining Operations Expansion, Plan-of-Operations Approval, Winnemucca, Humboldt County, NV.

Summary: EPA expressed environmental concerns that additional measures may be needed to minimize potential air impacts and suggests that BLM pursue further reductions of mercury emissions and particulates, and require restoration of vegetation on future evaporation basins.

Dated: January 13, 2004.

Ken Mittelholtz,

Environmental Protection Specialist, Office of Federal Activities.

[FR Doc. 04-1051 Filed 1-15-04; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-6647-4]

Environmental Impact Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General Information (202) 564-7167 or <http://www.epa.gov/compliance/nepa>.

Weekly receipt of Environmental Impact Statements
Filed January 5, 2004 Through January 9, 2004

Pursuant to 40 CFR 1506.9.

EIS No. 040000, Final EIS, NPS, WA, Fort Vancouver National Historic Site, General Management Plan and Development Concept Plans, Implementation, Oregon County, WA, Wait Period Ends: February 17, 2004, Contact: Alan Schmierer (510) 817-1441.

EIS No. 040001, Draft EIS, BLM, CA, King Range National Conservation Area (KRNCA) Resource Management Plan, Implementation, Humboldt and Mendocino Counties, CA, Comment Period Ends: April 16, 2004, Contact: Lynda J. Roush (707) 825-2300. This document is available on the Internet at: <http://www.ca.blm.gov/aracta/>.

EIS No. 040002, Draft EIS, BLM, AK, Alpine Satellite Development Plan, Proposal to Construct and Operate Five Oil Production Pads, Associated Well, Roads, Airstrips, Pipelines and Powerlines, Northeast Corner of the National Petroleum Reserve-Alaska, Colville River Delta, North Slope Borough, AK, Comment Period Ends: March 1, 2004, Contact: James H. Ducker (907) 271-3130. This document is available on the Internet at: <http://www.apline-satellites-eis.com>.

EIS No. 040003, Final EIS, AFS, CA, Giant Sequoia National Monument Management Plan, Implementation, Establishment of Management Directions for Land and Resources, Sequoia National Forest, Fresno, Kern and Tulare Counties, CA, Wait Period Ends: February 27, 2004, Contact: Jim Whitefield (559) 784-1500.

EIS No. 040004, Final EIS, NOAA, AK, OR, WA, CA, Programmatic EIS—Pacific Salmon Fisheries Management Plan, Off the Coasts of Southeast Alaska, Washington, Oregon and California, and the Columbia River Basin, Implementation, Magnuson-Stevens Act, AK, WA, OR and CA, Wait Period Ends: February 17, 2004, Contact: D. Robert Lohn (206) 526-6734.

EIS No. 040005, Draft EIS, AFS, ID, WY, ID, EastBridge Cattle Allotment Management Plan Revision (AMP), Authorization of Continued Grazing, Caribou-Targhee National Forest, Soda Springs Ranger District, Caribou and Bonneville County, ID and Lincoln County, WY, Comment Period Ends: March 1, 2004, Contact: Victor Bradfield (208) 547-4356.

EIS No. 040006, Draft EIS, NOAA, AK, Essential Fish Habitat Identification and Conservation, Implementation, North Pacific Fishery Management Council, Magnuson-Stevens Fishery Conservation and Management Act, AK, Comment Period Ends: April 15, 2004, Contact: Jon Kurland (907) 586-7638.

EIS No. 040007, Final EIS, DOE, NY, West Valley Demonstration Project, Waste Management, Onsite Management and Offsite Transportation of Radioactive Waste, West Valley, Cattaraugus County, NY, Wait Period Ends: February 27, 2004,

Contact: Daniel W. Sullivan (716) 942-4016. This document is available on the Internet at: <http://www.tis.eh.doe.gov/nepa/docs.docs.htm>.

EIS No. 040008, Draft EIS, AFS, MT, UT, WY, ID, Northern Rockies Lynx Amendment, To Conserve and Promote Recovery of the Canada Lynx, NFS and BLM to Amend Land Resource Management Plans for 18 National Forests (NF), MT, WY, UT and ID, Comment Period Ends: April 15, 2004, Contact: Jon Haber (406) 329-3399. This document is available on the Internet at: <http://www.fs.fed.us/r1/planning/lynx.htm1>.

EIS No. 040009, Final EIS, NPS, AR, Arkansas Post National Memorial General Management Plan, Implementation, Osotouy Unit, Arkansas and Mississippi Rivers, Arkansas County, AR, Wait Period Ends: February 17, 2004, Contact: Edward E. Wood, Jr. (870) 548-2207.

EIS No. 040010, Final Supplement EIS, FHW, RI, Jamestown Bridge Replacement, Funding, North Kingstown and Jamestown, Washington and Newport Counties, RI, Wait Period Ends: February 17, 2004, Contact: Ralph Rizzo (401) 528-4548.

EIS No. 040011, Final EIS, NOAA, WA, CA, OR, 2004 Pacific Coast Groundfish Fishery Management Fishery, Proposed Acceptable Biological Catch and Optimum Yield Specifications and Management Measures, Magnuson-Stevens Act, Exclusive Economic Zone, WA, OR and CA, Wait Period Ends: February 17, 2004, Contact: Robert Lohn (206) 526-6150.

EIS No. 040012, Final EIS, FAA, NY, Adoption-Griffiss Air Force Base (AFB) Disposal and Reuse, Implementation of Federal Aviation Administration's Decisions Relative to Reuse, Oneida County, NY Contact: Marie Janet (516) 227-3811. US Department of Transportation's, Federal Aviation Administration (FAA) has Adopted the U.S. Department of the Air Force's (USAF) FEIS #950534, filed 11/09/1995 and FSEIS #990384, filed 10/15/1999. FAA was a Cooperating Agency on the USAF FEIS and FSEIS. Recirculation of the EISs is not necessary under Section 1506.3(c) of the CEQ Regulations.

Amended Notices

EIS No. 030266, Draft EIS, EPA, KY, VA, TN, WV, Programmatic—Mountaintop Mining and Valley Fills Program Guidance, Policies or Regulations to Minimize Adverse Environmental

Effects to Waters of the U.S. and Fish and Wildlife Resources, Implementation, Appalachia, Appalachian Study Area, WV, KY, VA and TN, Comment Period Ends: January 21, 2004, Contact: John Forren (EPA) (215) 814-2705. Revision of FR Notice Published on 11/22/03: CEQ Comment Period Ending 1/6/2004 has been Extended to 1/21/2004.

EIS No. 030586, Draft EIS, UAF, 00, Air Force Mission at Johnston Atoll Airfield (Installation) Termination, Implementation, Johnston Atoll is an Unincorporated Territory of the United States, Comment Period Ends: February 17, 2004, Contact: Patricia J. Vokoun (703) 604-5263. Revision of FR Notice Published on 1/2/2004: Title Correction and Removal of the State of Hawaii from the Record. Johnston Atoll is an Unincorporated Territory of the United States.

Dated: January 13, 2004.

Ken Mittelholtz,

Environmental Protection Specialist, Office of Federal Activities.

[FR Doc. 04-1050 Filed 1-15-04; 8:45 am]

BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[FRL-7610-8]

Environmental Laboratory Advisory Board (ELAB) Meeting Dates, and Agenda

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice of teleconference meeting.

SUMMARY: The Environmental Protection Agency's Environmental Laboratory Advisory Board (ELAB) will have teleconference meetings on January 21, 2004 at 1 p.m. e.t.; February 18, 2004 at 1 p.m. e.t.; March 17, 2004 at 1 p.m. e.t.; April 21, 2004 at 1 p.m. e.t.; May 19, 2004 at 1 p.m. e.t.; and June 16, 2004 at 1 p.m. e.t. to discuss ideas and views presented at the previous ELAB meetings, as well as new business. Items to be discussed by ELAB over these coming meetings include: the need to increase the participation of laboratories in NELAC; how to ensure the competency of laboratories involved in homeland security responses; environmental measurement issues; implementation of the performance approach to environmental monitoring; and increasing the value of NELAC accreditation. In addition to these teleconferences, ELAB will be hosting a

