

Chapter 7. Comments and Responses to Comments on the Draft Plan/EIS/EIR



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In this chapter, public and public agency comments and BLM/DFG responses to comments on the draft document are presented. The chapter is organized as follows:

- a summary of comments and summary of BLM/DFG responses
- public comment process
- public agency comments and responses to comments
- organization comments and responses to comments
- summary of public meeting comments and responses to comments
- summary of individuals' comments and responses to comments.

Summary

Summary of Comments Received on the Draft Document

By the close of the public review period for the draft document (dated May 2000), over 6,400 persons or organizations submitted comments. Of these, 3 were public agencies, 15 were organizations, 27 were individuals speaking at three public meetings held for this purpose, 76 were individuals submitting written comments, and the remainder were individuals submitting form letters organized by various interest groups.

Most of the comments are recommendations regarding the selection of various alternatives that were set forth in the draft document (Chapter 5). A few comments take issue with BLM's

interpretation of the guidance provided in the legislation authorizing creation of the Reserve (Chapter 2), with the proposed management policy common to all alternatives (Chapter 4), or with the assessment of impacts of the various alternatives (Chapter 6). No commenter argues that the range of alternatives considered was too narrowly drawn, while a few commenters argued that the range was too broad.

Most of the recommendations can be split into two general types: those recommending maximum protection and enhancement of the Reserve's ecosystems and those recommending emphasis on public use of the Reserve for recreational pursuits. Comments favoring ecosystem protection are much more numerous than comments favoring recreation priority. It should be noted that most commenters favoring recreation emphasis do not view such activities as compromising ecological integrity, while those favor ecosystem protection clearly do.

The most consistent issues revealed by comments from the general public include:

- allowance of equestrian and bicycling uses in the Reserve,
- continuation of the use of the southern access by the public,
- designation of Wilderness Study Area for some or all of the qualifying lands in the Reserve,
- designation of eligible streams as WSRs, and, to a lesser degree,
- imposition of user's fees.

Agency comments are rather limited in scope. The California Department of Forestry and Fire Protection argues for less restrictions on fire suppression than proposed (although it did not argue that abandoned logging roads should be retained for this purpose) and supports the preferred forest restoration program. The Regional Water Quality Control Board of the State of California calls for somewhat more emphasis on, and definition of, water-quality control measures. The federal Environmental Protection Agency (EPA), expressing general concurrence with the plan and adequacy of the impact assessment, recommends the use of a universal user's fee to help pay costs of watershed and forest restoration, urges consultation with Native American interests for interpretive services, and urges a fuller description of effects of the no-action alternative and cumulative effects of the proposed alternative.

Summary of BLM/DFG Responses

Responses to the submitted comments, given in each of the major sections of this chapter, are extensive. These responses are of two general types: responses to recommendations that alternatives other than the proposed alternatives be adopted, and comments which take issue with legal interpretations, the wisdom of specific management policy common to all alternatives, or impact assessments. Responses to the former type either explain the rationale for choosing the proposed alternatives or modify the proposed alternatives based on the comment. For the latter, responses explain the reasoning in the plan or indicate changes in the draft document to accommodate the comment. Accordingly, chapters 1- 7 of this final document include numerous changes relative to the draft document to accommodate comments or reconsideration by the agencies. In the responses to comments throughout this chapter references are made to the text changes that have been made.

After considering all of the submitted comments, the agencies (BLM/DFG) conclude that the initial selection of proposed alternatives is still valid, with two exceptions. The proposed alternative is amended to include:

- Alternative 5B – Bicycle use will be allowed on the Elk River Corridor Trail.
- Alternative 8A – Salmon Creek and Lower Little South Fork Elk River are recommended for WSR Designation.

Other changes to the proposed plan include:

- deferring prescriptive elements regarding fire suppression to subsequent activity planning with CDF and deleting the explicit prohibition of use of chemical foams in old-growth forest,
- changing some details of the plan-implementation monitoring program, and
- shifting the Universal Access Trail to the Elk River Trail and deleting the Alicia Pass universal access proposal,

A summary of responses to the five most cited issues noted above is as follows:

Equestrian Use

The agencies maintain that allowing equestrian use in the Reserve would require the construction of more-than-minimal facilities, which is precluded by the authorizing legislation. Such facilities would include an expanded parking area(s), stock watering sources, and enlarged trail dimensions relative to the minimal dimensions required for pedestrian-only access. Other areas in the region that are managed for recreational as well as ecosystem-preservation purposes are available for and are more suited to equestrian use.

Bicycle Use

The agencies maintain that allowing bicycling use on sloping trails in the Reserve would require the construction of more-than-minimal facilities, which is precluded by the authorizing legislation. Such facilities are trails with enlarged dimensions relative to the minimal dimensions required for pedestrian-only access. Other areas in the region that are managed for recreational as well as ecosystem-preservation purposes are available for, and are more suited to, sporting bicycle use. However, the proposed plan has been amended from the draft plan to adopt Alternative 5B, which allows for bicycle use on the gently-sloping, wide Elk River Corridor Trail. Bicycle use would be monitored for confinement to the Elk River Corridor Trail only, and for trail-user safety and trail-erosion impacts. Such use will be managed adaptively and would be reconsidered if significant impacts develop. This bicycle use will be encouraged by provision of secure bicycle parking at the Elk River trailhead and Elk River Corridor Trail terminus.

Management of Areas Having Wilderness Characteristics

The agencies maintain that the extent of ground disturbance and human and mechanized activity during watershed and forest restoration is not consistent with the definition of Wilderness because the “naturalness” criteria would not be met within the life of the plan. The draft proposed alternative for management of lands that may have wilderness characteristics is therefore maintained in the final plan.

WSR Designation

The additional protections of WSR designation may augment river protection beyond the authorities of the Headwaters Forest legislative mandate. However, the ability to manage the South Fork Elk River (segments 1 and 2) as a WSR over time consistent with BLM manual direction is limited, due to the private ownership of adjacent lands. The proposed alternative is therefore amended to include designation of river segments over which BLM can ensure that the outstandingly remarkable values can be properly maintained and afforded protection over time. These segments include Salmon Creek and the Little South Fork Elk River (with the eligible tributary).

Users' Fees

The agencies maintain that a general entrance fee is not warranted. The anticipated level of income generated from a general user fee is not expected to be significant to defray maintenance or restoration costs. The proposed alternative is amended to eliminate all recreational user fees.

Section I. Public Comment Process

A public/agency review period for the draft plan/EIS/EIR was conducted according to requirements of NEPA and CEQA. A 90-day review period was established via publishing a notice of availability of a draft EIS in the federal register on May 31, 2002, transmitting a notice of availability of a draft EIR to the clerk of the County of Humboldt, notifying all trustee agencies, publishing a notice in newspapers of general circulation (i.e. San Francisco Chronicle and Examiner, Oakland Tribune, Redding Record Searchlight, Times Standard [Eureka], Trinity Journal, Ukiah Press Democrat) and mailing a notice to all persons and organizations who had previously requested a copy of, or notice of availability of, the draft document. The notification list maintained by BLM was updated during the document preparation process via release of planning updates to assure currency. Approximately 500 copies of the draft document were distributed in hard copy or CD. The draft document was also posted on BLM's Headwaters web page, and it was accessed approximately 260 times during the review period.

The review period extended from May 31, 2002, to September 6, 2002. During this period, public comment meetings were held in Eureka (July 16, 2002), Sacramento (July 24, 2002), and San Francisco (July 25, 2002). Court reporters were present at all of the meetings and verbatim transcripts were prepared. (Copies of these transcripts are available upon request from the BLM Arcata Field Office.) These meetings, and various means of submitting comments, were publicized in the notices of availability. Press releases were provided to public communications media in the three cities to encourage additional notification through special reports.

Four means of submitting comments were provided: giving verbal comments at the public meetings or to a telephone voice mail center, and submitting e-mails or postal letters.

The comment solicitation process resulted in the submittal of comments from over 6,400 parties. These comment submittals are classified as follows:

- 3 comment letters from public agencies – see Section II below;
- 15 comments letters from organizations – see Section III below;

- 27 verbal commentaries by individuals at public meetings – see Section IV below;
- 6,372 written messages from individuals (e-mail and postal messages), of which 76 messages were individualized and 6,296 were form messages – see Section V below.

Section II. Commenting Public Agencies (3)

- 1 California Department of Forestry and Fire Protection, Humboldt-Del Norte Unit, Fortuna, CA. (K.R. Goings)
- 2 California Regional Water Quality Control Board, North Coast Region, Santa Rosa, CA. (Nathan P. Quarles)
- 3 United States Environmental Protection Agency, Region IX, San Francisco, CA. (Lisa B. Hanf)

Letters from these agencies are shown as Attachment 7-1. Individual comments as identified by BLM/DFG are identified by number in the right-hand margin. The substance of each letter is summarized below, followed by BLM/DFG'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-hand corner of the letter in Attachment 7-1, and the second number refers to the individual comment number assigned in the right-hand margin of each letter.

1. California Department of Forestry and Fire Protection (CDFFP)

Summary of Comments

The department expressed views that the estimated natural fire frequency for old-growth stands is too low, that it is inadvisable to limit the use of chemical suppression agents or monitor some fires in old-growth stands without immediate full suppression response, and that the proposed alternative for forest restoration is most favorable from a fire hazard point of view.

Responses

1-1. Natural Fire Frequency. The discussion of fire frequency is over-simplified in the plan and is now amended to reflect a fire occurrence interval of 6-10 years as suggested by CDF, and a stand-replacing fire frequency of 100-500 years.

1-2. Restrictions on Suppression Resources. The agencies maintain that the proposed restrictions on fire suppression resources are consistent with the stated goals for fire management in the Reserve; however, the level of detail in the plan is overly prescriptive with respect to tactics. The plan is amended to defer tactics formulation to specified operational planning with CDF.

1-3. Monitoring Fires in Old-Growth Stands. The plan is amended to address the comment. All fires will be suppressed with full consideration for the sensitivity of the resources in the Reserve.

1-4. Selection of Alternative for Forest Restoration. Comment noted.

2. California Regional Water Quality Control Board, North Coast Region

Summary of Comments

The Board comments on the proposed watershed restoration program, asking for priority for watershed restoration in the Elk River corridors and establishment of more rigorous erosion-control standards (i.e. implementation guidelines) and effectiveness-monitoring protocols than currently proposed. The Board recommends that the plan include an approach for assisting them in developing a sediment TMDL for the Elk River watershed, and consideration of removal of a barrier to fish migration in the Little South Fork Elk River.

Responses

2-1. Priority for Watershed Restoration in the Elk River Corridors. The plan does propose limited actions in the South Fork Elk River corridors to reduce sediment yield and delivery to the stream. As noted in the discussion of “Watershed Restoration Priorities”, the Elk River Road will be converted to a trail and simultaneously stabilized to reduce sediment yield and delivery. Moreover, all recreation improvements proposed for development in the lower corridor (e.g. pavilion, interpretive trails) will be designed and implemented with best erosion control practices.

Other roads in the corridors include two abandoned roads and two stream crossings for active roads. The latter are protected by easement. The reason that Table 4-2 assigns no priority to the corridors in terms of possible removal of the two abandoned roads is that they are fairly stable at this point in time and that the benefits of their removal would be small. The limitation on potential benefit results from the fact that the corridor is downslope of lands not within the management purview of the agencies

2-2 Policy for Minimizing Sediment Yield/Delivery from Restoration Sites. Operational guidelines for minimizing adverse effects to water quality and fish habitat will be specified in project-specific erosion control plans. These plans will identify the areas that pose the highest erosion potential and the management practices that will be implemented to reduce the risk of significant erosion. The plans will identify the person(s) responsible for implementing each plan, describe the erosion control measures that are to be utilized, and define when these measures will be implemented.

2-3. Monitoring Effectiveness of Erosion Control Plans. Project-specific erosion control monitoring plans will be developed and implemented to facilitate BLM's evaluation of the effectiveness of erosion control measures. The monitoring plans will specify the responsible person(s); the frequency and procedures for inspection of erosion control measures; a sampling schedule that identifies locations and frequencies and analytes for

water quality analysis; and how these data will be evaluated to ensure/improve the effectiveness of the erosion control measures.

- 2-4. Development of Sediment TMDL for Elk River Watershed.** BLM will continue to assist the Regional Board in developing and implementing a sediment TMDL program for the Elk River watershed. The actions proposed in the management plan will make a major contribution to reducing sediment delivery to Elk River. The goals of Reserve management will result in the gradual decrease in sediment delivery from both mass failures and surface erosion of exposed soils, so that eventually natural, low levels of sediment yield and delivery will be regained for the Reserve lands.
- 2-5.** Fish Migration Barrier in Little South Fork Elk River. The nature of the barrier was only recently discovered. The feasibility and desirability of its removal will be discussed with DFG and NMFS as a component of the watershed restoration program.

3. United States Environmental Protection Agency

Summary of Comments

The agency expresses support for the proposed actions, recommends the use of a universal user's fee to help pay costs of watershed and forest restoration, urges consultation with Native American interests for interpretive services, and urges a fuller description of effects of the no-action alternative and cumulative effects of the proposed alternative.

Responses

- 3-1. EPA Ratings of Impact and EIS Adequacy.** Document rating by EPA of "LO" (Lack of Objections) noted.
- 3-2. Universal User Fee.** The comment expresses a preference for Alternative 10A: imposition of a universal user fee to help fund the proposed watershed and forest restoration programs. Only some of these actions would benefit the recreationists' experiences, who would pay these fees. Most benefits are to ecosystems, and therefore costs should be borne by the public at large, unless they are needed to cover degradation caused by recreation access. Moreover, given the rather low level of Reserve recreation, user fees would not result in revenue of significance when applied to the costs of forest and watershed restoration. The plan is amended to recommend no recreational user fees in the proposed alternative to help meet costs of recreation management.
- 3-3. Native American Participation in Interpretive Projects.** The draft plan includes provisions for pursuing Native American interests in participation in interpretive activities and in regards to traditional activities on page 4-38.
- 3-4. No-Action Alternative.** As the comment states, the no-action alternative would result in a declining environmental condition, as old log landings and roads divert runoff and fail into watercourses, suppressing salmonid populations, and fire possibly destroys overstocked stands of pole-sized trees. Such fire may enter and destroy old-growth

forest. To further reflect the comment, a summary discussion has been added to address these effects relative to current conditions.

Of note in the draft document, under each resource section of the Environmental Consequences chapter, the effects of the no-action alternative and each of the other alternatives relative to current conditions are already discussed. Full disclosure is thus provided. The questioned statement on page 6-2 (which contained a typographical error now corrected) only defines how the terms “beneficial” and “adverse” are used in the document, and as such is consistent with NEPA guidelines for assessing impacts of a proposed action relative to the impacts of no-action.

- 3-5. Cumulative Effects.** A section is added discussing potential cumulative effects of the proposed action, considering both adverse and beneficial effects.

Section III. Commenting Organizations (15)

4	The League of Women Voters of Humboldt County (Nancy Kay Eureka and Rudy Ramp)		CA
5	PALCO, The Pacific Lumber Company (Craig Anthony)	Scotia	CA
6	Bay Area Coalition for Headwaters & the Environmental Protection Information Center (Karen Pickett)	Berkeley & Garberville	CA
7	Friends of the River (Marc E. Christopher)	Sacramento	CA
8	Sierra Club, North Group, Redwood Chapter (Diane Fairchild Beck)	Arcata	CA
9	Wildlife Management Institute (Robert P. Davison)	Bend	OR
10	Forests Forever (Kristen Kirk)	San Francisco	CA
11	Forest Unlimited (Rick Coates)	Cazadero	CA
12	Friends of Yosemite Valley for Future Generations (Joyce M. Eden)	Cupertino	CA
13	The North Coast Environmental Summit (T. McClure)	Kenwood	CA
14	Blueribbon Coalition (Don Amador)	Pocatello	ID
15	Antelope Valley Trails, Recreation & Environmental Council (Elaine Macdonald)	Quartz Hill	CA

16	California Equestrian Trails & Lands Coalition (Charles Horst)	Tollhouse, Clovis	CA
17	Back Country Horsemen of California (Carole Polasek)	Eureka (?)	CA
18	International Mountain Bicycling Association (Tim Blumenthal)	Boulder	CO

Similar to the agency comment section above, letters from these organizations are shown as Attachment 7-1. Individual comments as identified by BLM/DFG are identified by number in the right-hand margin. The substance of each letter is summarized below, followed by BLM/DFG’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 is marked in the upper-right-hand corner of the letter in Attachment 7-1, and the second number refers to the individual comment number assigned in the right-hand margin of each letter.

4. The League of Women Voters of Humboldt County

Summary of Comments

The League expresses support for most of the proposed alternatives, expresses concern about costs for maintaining and providing safe access to the Reserve on the Elk River Road, suggesting use of a universal visitor’s fee to cover such costs, recommends imposition of a visitor permit system, expresses opposition to the entry of dogs into the Reserve and urges they be restrained by leash and that owners remove their wastes if they are allowed to enter, and recommends imposition of a universal visitor’s fee.

Responses

- 4-1. Recommendation.** The League’s support for certain proposed alternatives as summarized above is noted.
- 4-2. Road Safety and Maintenance.** As noted on page 6-42 of the draft report (and summarized as noted by the commenter in Table 6-1), a decrease in roadway safety or an increased need for road maintenance has not materialized with creation of the Reserve. Accordingly, at this time these circumstances would not be expected to develop under any alternatives. Humboldt County is aware of increased traffic on this road and under normal county procedures will provide roadway maintenance and manage traffic conflicts through signing and roadway improvements, should conflicts arise. Reasonable user’s fees may offset some of the costs of internal management of Reserve visitation, but with the current and expected level of visitation they would not be expected to be sufficient to meet offsite capital improvement needs, should any arise.
- 4-3. Access Permits.** The current level of visitation of the Reserve is low, and it is expected to remain so under all of the alternatives, especially the proposed alternatives. Significant adverse effects on Reserve resources are not occurring as a result of visitor use in the Elk River corridor.

- 4-4. Dog Access.** The League's opposition to allowing dog entry into the Reserve in the Elk River Trail is noted. The adverse effect of dog entry causing annoyance of some visitors has been added to Table 6-1 and to the discussion of draft document page 6-27. As currently stated in the proposed alternative, if dogs are beyond voice control and cause resource damage, dog owners will be cited by Reserve rangers. The agencies intend to address this resource issue adaptively, by reconsidering plan policy if desired outcomes are not attained. Additional wording has been added on page 4-32 to expand the adaptive management provisions with respect to dog access.
- 4-5. Universal Fee.** The League expresses preference for the universal user fee alternative, with the addition of another fee for BLM-sponsored tours. However, the agencies are amending the proposed alternative to delete all recreational user fees because the amount of revenue that could be generated is not significant, given the relatively low level of visitation.

5. Pacific Lumber Company (PALCO)

Summary of Comments

PALCO urges adoption of a high-intensity forest restoration program to enhance marbled murrelet habitat as soon as possible, produce a useful commodity, and reduce the risk of fire. It questions whether high-intensity forest restoration would result in excessive fuel loadings and whether stands older than pole size are not responsive to thinning.

Responses

- 5-1. Thinning Mid-Successional Stages to Accelerate Recovery of Old-Growth Characteristics.** The comment is accurate in its characterization of the benefits of a high intensity, "thinning from below" approach to managing early mature stands in the Reserve. Such continued management would maintain growth rates for selected trees. A recent synthesis of research in the Pacific Northwest (Tappener et. al.) supports the main tenet of the Proposed Alternative that maximum benefits to the eventual maturing stand is dependent upon timely thinning at the shrub and pole stages. The selection of the Moderate-Intensity Alternative is based on this recent information to an extent, but is also based on a policy decision to not maintain the infrastructure required to manage older stands.
- 5-2. Utilization of Thinnings.** As noted in Appendix J, utilization of thinnings of mid-successional stands would require reopening of abandoned roads and log landings, which have been removed or are proposed for removal to reduce sediment yield to the Reserve's streams. New skid trail development would be required. These activities would be counter to the goals of watershed restoration, requiring it to be deferred for several years until the effective thinning program was complete, and increasing sediment yield and delivery to aquatic habitats supporting endangered anadromous fish species. This trade-off between the beneficial effects of managing early mature stands and restoring watersheds rapidly was considered and resolved in favor of rapid watershed restoration.

- 5-3. Fire Hazard.** The proposed thinning program will cause a substantial reduction in fire hazard at the Reserve, compared to the current level of hazard. Overstocked pole stands, planned for extensive treatment, have repeatedly been shown to present the highest hazard of fire spread.

6. Bay Area Coalition for Headwaters & the Environmental Protection Information Center

Summary of Comments

The coalition expresses support for many of the proposals in the draft plan, urges renaming from Reserve to Preserve, urges management based on conservation biology, and offers considerable comment on details of the proposed plan. Comments express support for:

- the preferred watershed and forest restoration alternatives;
- closing the southern access to public use;
- relocating the Little South Fork Elk River trail to reduce its contact with old-growth forest;
- designating all eligible lands into appropriate special-area status, including Wild & Scenic River designation and Wilderness Study Area designation.

Responses

- 6-1. Preserve vs. Reserve.** The Coalition expresses a preference for the word “preserve”, which was used in the State of Californian authorizing legislation. Neither term was used in the federal authorizing legislation, and the area was referred to as the “Headwaters forest”. Headwaters was described variously in the Habitat Conservation Plan between Pacific Lumber Company and Fish and Wildlife Service. The agencies considered the issue open to interpretation at the time of acquisition. The interpretation chosen relied on a definition of “reserve” as a tract of public land set apart for a special purpose that was specified in its enabling legislation. The agencies also chose to refer to the property as “Reserve” because of the Arcata Field Office management of a system of late-successional reserves which was a consideration in early deliberations over the selection of a managing agency.
- 6-2. Basis for Reserve Management.** Comment noted.
- 6-3. Support for Preferred Watershed Restoration Alternative.** Comment noted.
- 6-4. Monitoring Effects of Watershed Restoration.** Project-specific erosion control monitoring plans will be developed and implemented to facilitate BLM's evaluation of the effectiveness of erosion control measures. The monitoring plans will specify the responsible person(s); the frequency and procedures for inspection of erosion control measures; a sampling schedule that identifies the locations, frequency, and analytes for water quality analysis; and how these data will be evaluated to ensure and/or improve the effectiveness of the erosion control measures. Proposed monitoring of effects of watershed restoration is described in Table 4-7.

- 6-5. Fish Passage Obstruction.** The nature of the barrier was only recently discovered. The feasibility and desirability of its removal will be discussed with DFG and NMFS as a component of the watershed restoration program.
- 6-6. Near-Term Sediment Yield.** Operational guidelines for minimizing adverse effects to water quality and fish habitat will be specified in project-specific erosion control plans. These plans will identify the areas that pose the highest erosion potential and the management practices that will be implemented to reduce the risk of significant erosion. The plan will identify the person(s) responsible for implementing the plan, describe the erosion control measures that are to be utilized, and define when these erosion control measures will be implemented.
- 6-7. Use of Heavy Equipment.** Use of heavy equipment is not the universal approach to watershed restoration in the Reserve. Many small-scale manual techniques are utilized. Large-scale watershed restoration cannot be carried out at a without substantial involvement of heavy equipment. The use of heavy equipment does not necessarily result in sediment delivery to streams. See comments 6-4 and 6-6 above.
- 6-8. Support for Preferred Forest Restoration Alternative.** Comment noted.
- 6-9. Monitoring Effects of Forest Restoration.** Proposed monitoring of effects of forest restoration is described in Table 4-7.
- 6-10. Potential Adverse Effects on Marbled Murrelets from Enlarged Trail Access.** Minimization of effects to marbled murrelets is a cornerstone of the proposed alternative, which would concentrate recreational uses into areas of the Reserve where murrelet habitat values are currently, and are projected to be, minimal. The agencies acknowledge that significant human and corvid incursions into murrelet habitats carry a potential risk of disturbance. BLM is currently funding considerable research into human- and corvid-disturbance effects on murrelets in cooperation with Redwood National Park. The proposed plan for the Reserve includes long-term monitoring of corvid abundance and corvid intrusion into murrelet habitat areas. Additionally, implementation of the plan will be consistent with terms and conditions in the biological opinion from USFWS.
- 6-11. Recommended Closure of Southern Access.** The factors described by the coalition that affect the suitability of providing recreation entry via Salmon Pass trailhead are discussed in the draft document (chapters 4, 5, and 6). The proposed alternative excludes the more intrusive trail options. The comment is noted regarding the potential impacts to murrelet nesting which could be avoided by closure of Salmon Creek trail and access from the south in general. Experience with tours to date affirms that restricting access to docent-led tours can minimize disturbance to nesting birds and the discarding of food wastes. The agencies contend that the level of disturbance is minimized to an extent that opportunities to provide public access and stimulate public support through tours can be realized. There is no evidence that unauthorized entry into the Reserve is related to tour exposure.
- 6-12. Picnic Sites.** Picnic sites are concentrated away from murrelet habitat areas and are intentionally located where visitors can expect a very high level of agency contact during their visit. This contact includes direct visitor contact by rangers and signage that

specifically identifies picnic areas, provides visitor instructions, and educates users about values at risk. The agencies favor a management approach of concentrating food consumption in the Elk River corridor to the degree feasible rather than passively accepting dispersed consumption.

- 6-13. Extent of Trail System.** The Coalition recommends a more conservative alternative, which is noted.
- 6-14. Re-Routing Little South Fork Elk River Trail.** The agencies contend that the isolated old-growth grove – due to its elevation, size, and location – can provide visitors an old-growth experience without significantly affecting murrelets in the Reserve. It is the only opportunity for unescorted public access to old-growth that is recommended in the plan. Visitors will access it from the Elk River Trail, where a high level of agency contact will help to ensure compliance with the prohibition of off-trail hiking.

This plan will establish overall guidance for a final trail plan feasibility study that will follow. The proposed routes as identified in this draft plan are sufficient for NEPA and ESA analysis at the planning level. The Little South Fork Elk River Trail as now proposed would be downslope from the spotted owl nest site in the vicinity so that potential impacts will be avoided. This particular owl site has not had confirmed occupancy since 1997. The site was monitored in 2002 and 2003, and owl occupancy was not observed. BLM will continue to monitor this and all other owl sites in the Reserve, including those which may appear near trails or developments, to ensure that effects of management are minimized to the extent possible.

- 6-15. Dogs Access.** The Coalition's opposition to allowing dog entry into the Reserve in the Elk River Trail is noted. The adverse effect of dog entry causing annoyance of some visitors has been added to Table 6-1 and to the discussion of draft document page 6-27. As currently stated in the proposed alternative, if dogs are beyond voice control and cause resource damage, dog owners will be cited by Reserve rangers. The agencies intend to address this resource issue adaptively, by reconsidering plan policy if desired outcomes are not attained. Additional wording has been added on page 4-32 to expand the adaptive management provisions with respect to dog access.
- 6-16. Universal Access Trail.** The Universal Access Trail at Alicia Pass has been eliminated from the proposed alternative due to the environmental effects of the trail and parking area. However, Universal Access would be provided in the proposed alternative on the lower mile of the Elk River Trail.
- 6-17. Bicycle and Equestrian Access.** The agencies have re-considered the preferred alternative with respect to bicycle use. The proposed alternative now allows bicycle use on the Elk River Corridor Trail only, subject to adaptive management based on monitoring and evaluation of impacts and compliance with the limitation of use to this trail only. No adverse environmental impacts were attributable to bicycle use in the relatively flat terrain and on the wider, hardened trail in the Elk River Corridor.
- 6-18. Endangered Plant Species Effects.** The species, *Trillium ovatum*, occurs commonly throughout the Reserve. The subspecies *oettingeri* is a California Native Plant Society watch list species but is not expected to occur in this region. Plant surveys to date in the

Reserve have been comprehensive and could be characterized as “intuitive controlled”. “Survey and Manage” (S&M) species per the 2001 amendment to the Northwest Forest Plan have been surveyed extensively. Among hundreds of non-vascular species identified, over 40 S&M species have been documented along with two vascular species which are no longer on the S&M list. Attention to rare or little known species in the Reserve is ongoing.

- 6-19. Effects on Threatened and Endangered Aquatic Species.** BLM has entered into formal consultation with NMFS. At this time no relationship has been established between availability of the southern access and salmonid populations. BLM is working directly with NMFS to develop a recovery plan for these species.
- 6-20. Marbled Murrelet Effects.** The characterization of potential threats to the region’s and the Reserve’s marbled murrelet populations is generally accurate. As the commenter notes, the agencies considered these facts and circumstances in recommending a trail network that allows only limited old-growth forest contact. Careful control of visitation and the forest-restoration program are expected to protect and enhance conditions for the species. Regarding the commenter’s two questions about contingency actions should certain circumstances develop in the future (corvid populations increase, or Redwood National Park develops new insights about human disturbance to nesting murrelets), the agencies are committed to adaptive management as necessary to minimize effects to murrelet habitat. At this time is it not possible to specify what management actions could be changed, because it will depend upon the actual insights and circumstances.
- BLM has entered into formal consultation with FWS to determine if the proposed plan has the potential to jeopardize murrelet populations or interfere with their recovery.
- 6-21. Northern Spotted Owl Effects.** The Reserve does not fall under the direct management purview of the Northwest Forest Plan (see Chapter 1). However, the draft plan clearly outlines specific measures for ensuring that northern spotted owl habitat is protected and expanded at the Reserve (Chapter 4) and that monitoring is performed to assess effects of Reserve management on owl population (Table 4-7).
- 6-22. Wilderness Study Area Designation.** The agencies have re-evaluated the use restrictions with regard to forest management, i.e. thinnings to accelerate the development of late seral stage conditions. The agencies maintain that, the planned extent of ground disturbance and ongoing human and mechanized activity related to restoration is not consistent, with the definition of Wilderness because the “naturalness” criteria will not be achieved in those currently early seral stands within the life of the plan. The draft proposed alternative is maintained in the final draft with corrections to rationale in Chapters 4, 5, and 6.
- 6-23. State of California Ecological Preserve Designation.** Comment noted.
- 6-24. ACEC, RNA, and SRMA Designations.** Comment noted.
- 6-25. Recognition of Historical Significance.** National Register of Historic Places (NRHP) nominations for the three cultural properties in the Reserve are a reflection of their meeting the specific criteria in the Act. The agencies do not perceive a conflict between

any ecosystem restoration activities and the continued protection of the cultural properties. The Military Ridge Trail consists mostly of a mapped routing with only minor remnants of an actual trail. The railroad grade, which is an element of the “historic district”, consists of trestle remnants in the Reserve and possibly minor grade remnants. Thus, even if the sites were nominated or listed, none of their features would preclude restoration actions.

6-26. WSR Designation. See comments 7-1 through 7-6.

6-27. Research. The recommended restrictions are not linked to identified resource conservation issues and would potentially be detrimental to the completion of research appropriate to the Reserve. The enabling legislation clearly defines research as a desired activity.

6-28. Management Revenue. Comment noted.

6-29. Conclusion. Comment noted.

7. Friends of the River

Summary of Comments

The commenter urges federal Wild & Scenic River (WSR) designation for all eligible streams in the Reserve. Commenter contends that river length and number of other designated WSRs in the same geographical province are not proper criteria for determinations of designation suitability. Commenter also notes that inclusion of a river into the federal WSR system does, in fact, imply certain higher levels of protection in some potential instances, than the management plan alone can provide.

Responses

7-1. WSR Suitability of Eligible Streams. The agencies concur with the comment that four stream segments on the Reserve are eligible for designation and have further considered the suitability recommendations for the affected river segments. The final plan has been changed to include a partial-suitability alternative that involves a suitable recommendation for Salmon Creek and Little South Fork Elk River with its primary tributary. The remaining segments, South Fork Elk River Segments 1 and 2, continue to be considered unsuitable for designation, based on the inability of the agencies to manage them for the protection of their outstanding values due to adjacent private land ownership and uses.

7-2. Other WSRs in Vicinity. The comment is correct in that length and number of streams in this province should not be a consideration factor for suitability. The discussion in the eligibility and suitability study (Appendix H) is amended.

- 7-3. **Higher Level of Protection from WSR Designation.** The comment is correct in that in some specific instances designation of streams as Wild & Scenic Rivers implies an additional level of protection greater than the protection provided in a resource management plan. The discussion in the eligibility and suitability study (Appendix H) is amended.
- 7-4. **Heightened Protection by Congressional Designation.** Comment noted. The comment does not address a criterion for suitability.
- 7-5. **No Designation Cost or Opposition.** Comment noted.
- 7-6. **Recommendation.** Comment noted.

8. Sierra Club, North Group, Redwood Chapter

Summary of Comments

The Chapter endorses the proposed alternatives.

Responses

- 8-1. **Recommendation.** Comment noted.

9. Wildlife Management Institute

Summary of Comments

The institute recommends that forest restoration include provision for maintaining forest openings and grassland, as well as nurturing old-growth habitat. Allowance for hunting and fishing is also recommended.

Responses

- 9-1. **Management for Early-Successional Habitats.** The management plan proposes management that restores natural ecosystems and does not recommend actions to impede natural succession. At this site, grasslands and larger forest openings do not naturally develop. Early successional habitat would need to be maintained in perpetuity through tree cutting. Such management is counter to the purpose for which the Reserve was created and would reduce the effectiveness of the Reserve in meeting its role as envisioned in the HCP for surrounding commercial timberlands.
- 9-2. **Hunting and Fishing.** Fishing is currently closed within the Reserve by California Department of Fish and Game regulation. Hunting would be closed through the State of California Ecological Reserve designation proposed for the Reserve.
- 9-3. **Monitoring Plan.** Comment noted.

- 9-4. Adaptive Responses.** Table 4-7 indicates those monitoring results of planning implementation that will require reevaluation of management actions. To predict the proper action to be taken after such reevaluations would be speculative at this time. Adaptive management is intended to accommodate actual future conditions where they differ from currently-expected future conditions.

10. Forests Forever

Summary of Comments

The group supports the goals for Reserve management contained in the draft plan. It supports the proposed alternatives with some exceptions: maximum eligible area of WSA is recommended, without compromising the extent of forest restoration actions.

Responses

- 10-1. Recommendation.** Comment noted.
- 10-2. WSA Designations.** See comment 6-22.
- 10-3. Forest and Watershed Restoration.** Comment noted.
- 10-4. Wild & Scenic River Designation.** See comment 7-1.
- 10-5. Public Access.** Commenter advocates no new trails, no rerouting of the Little South Fork Elk River trail, and closure of southern public access (including Salmon Pass Trail) until marbled murrelet and other northern spotted owl populations have recovered. The agencies maintain that confining BLM or docent-led visitor use of the Salmon Creek Trail and other linking trail loops as proposed can provide for full protection of these species in the Reserve, with concurrence of FWS in its prior biological opinion on interim management and its pending opinion on the proposed plan.
- 10-6. Research.** See response 6-27 above.

11. Forests Unlimited

Summary of Comments

The group supports watershed and forest restoration, limiting public access to the Elk River corridor, and Wilderness Study Area and Wild & Scenic River designations for all eligible lands.

Responses

Comment noted. See responses 6-22 and 7-1.

12. Friends of Yosemite Valley for Future Generations

Summary of Comments

The commenter supports the proposed alternative with exceptions, recommending maximum protection of the Reserve's ecosystem values. These include closure of the southern access, no new trails into old growth, and designation of the maximum eligible lands as WSA and WSR.

Responses

12-1. Additions to the Reserve. Regarding additions to the Reserve, see draft document page 2-8 and 2-12. The commenter's recommendation is outside the purview of this plan.

12-2. Recommendation. Comment noted.

13. The North Coast Environmental Council

Summary of Comments

The group recommends no entry by unleashed dogs, and WSR designation for all eligible streams.

Responses

See comments 4-4 and 7-1.

14. Blueribbon Coalition

Summary of Comments

The Coalition urges maximum accessibility of the Reserve for equestrians and bicyclists and submits a schematic drawing of an extensive trail system.

Responses

14-1. Alternatives Considered. The agencies maintain that within the legislative mandate a reasonable range of access alternatives is evaluated in the draft document. These range from access only to the Elk River corridor to extensive access throughout the Reserve and its old-growth stands. Various uses, including pedestrian, equestrian, and bicycling, have been considered. The alternatives reflected public comments on the recreation issue during the scoping period.

14-2. Proposed Trails. The proposed trail routes have either been addressed in the draft document and found to be inappropriate intrusions into old-growth habitat used for nesting marbled murrelets and/or northern spotted owls, or they traverse such steep ground that they would require considerable use of switchbacks for equestrians; the disturbance

would be counter to the goals of the watershed restoration program. One such alternative (Alternative 4A) was formulated and assessed in the draft document.

15. Antelope Valley Trails, Recreation & Environmental Council

Summary of Comments

The Council urges allowance for equestrian use of the Reserve, conceiving it to be continuation of historical use. It also express support for alternatives allowing bicycle use, no watershed or forest restoration, opening the southern access to individual vehicles, constructing an extensive trail system through old-growth forest, no special area designations, and continuance of a fee only for BLM sponsored tours.

Responses

- 15-1. Continuing Equestrian Use of the Reserve.** The recommendation for allowing equestrian access to the Reserve is noted. Since becoming public land, the Reserve has not been open to horseback riding and bicycling, as described under “Interim Management” in the draft plan. Prior to public acquisition, the Headwaters Forest was privately-owned commercial timberland. Some unauthorized use of the Elk River Road by the public may have occurred at a low level (compared to that at publicly-available riding areas).
- 15-2. Recommended and Legally-Sufficient Alternatives.** The agencies maintain that none of the alternatives in the draft plan/EIS/EIR are in violation of the legislation authorizing creation of the Reserve, except potentially those involving bicycling or equestrian use. The legislation does not specify that the southern access remain open. Public rights for the southern access did not exist when the legislation was enacted. Although the legislation requires the provision of recreational opportunities, nothing in it precludes limiting public access to the Elk River corridor for purposes of maintaining ecological integrity of the Reserve. Designation of the Reserve as a State of California Ecological Reserve would help to implement the federal legislative direction and is essential to conservation of the Reserve’s wildlife and ecological integrity.

16. California Equestrian Trails & Lands Coalition

Summary of Comments

The Coalition comments that exclusion of equestrians from the Reserve is discriminatory and is based on flawed reasoning. It questions need for higher trail standards and the conflicts with other users that the presence of horses requires. The Coalition comments that legislative intent requires general public access for all reasonable uses.

Responses

- 16-1. Basis for Exclusion of Equestrians.** The staging-area, trail, and water source improvements needed to bring equestrian recreation into the Reserve would not constitute minimal necessary facilities for providing recreation opportunities in the Reserve as called for in

the enabling legislation. Implications of equestrian use to trail standards are described on page 6-30 of the draft document. The draft document notes that equestrian use does not pose a conflict with walkers/hikers and also notes that some walkers/hikers find horse manure offensive.

16-2. Impacts of Horse Manure. The draft plan does not state that horse manure is harmful to the environment but notes that some walker/hikers find it offensive. Removing manure when leaving (if practical) still involves the presence of manure when walkers/hikers are present.

16-3. General Recreation Access. The agencies interpret the authorizing legislation for the Reserve to embody an intention to primarily manage the Reserve as a conservation area for the benefit of fish, wildlife, and forests. It was not created as a park, with recreation being a primary purpose. Some recreation must be accommodated, but only that involving minimal necessary facilities. General access as the commenter recommends is thus counter to the legislative direction. The legislation clearly considers the entire Reserve to be a fragile ecological area, the viability of which is a key component of a larger management plan for Headwaters Forest and the surrounding private landscape.

17. Back Country Horsemen of California

Summary of Comments

The group expresses support for the alternative allowing most equestrian use of the Reserve and for no imposition of user fees. It also believes that no group should be excluded from access to any public lands.

Responses

17-1. Recommended Alternative. Comment of support for Alternative 6A is noted.

17-2. Use Fees. Comment of opposition to user fees is noted. The proposed alternative has been amended to delete all recreational user fees.

17-3. Local Equestrian Opportunities. Comment that equestrian opportunities in the local recreation area are limited is not supported by regional information gathered to date. Availability of areas allowing equestrian use is discussed in detail in the draft plan (see draft document page 3-33, Figure 3-8, and Table 3-11).

18. International Mountain Bicycling Association (IMBA)

Summary of Comments

IMBA objects to the draft document's characterization of impacts of mountain bicycle use and believes that mountain bicycle use can be accommodated in the Reserve compatibly with the goal of conserving its natural resources.

Responses

18-1. Bicycle Use in the Reserve. Comments noted. The agencies regret that IMBA finds the draft document's discussion of bicycling impacts "disparaging and inaccurate". The comment prompted a reconsideration of the assessment and its conclusions, and resulted in some changes and additions to the discussion of this issue in the final document.

18-2. National Mountain Bicycling Strategic Action Plan. The draft plan is not inconsistent with the BLM draft National Mountain Bicycling Strategic Action Plan with regard to the issue of bicycle use in the Reserve. The Action Plan does not address impacts of bicycle use. The Action Plan also does not address the determination of need for area closures to bicycle use, but acknowledges that special policy for elements of the National Landscape Conservation System needs to be formulated. This formulation must be done for each site, through consideration of enabling legislation (e.g. for the Headwaters forest) and the purposes for which the area is being given special protection status.

Regarding consistency with the "tone and ideas" of the strategic plan, the draft discussion of the issues and considerations facing Reserve managers is fair and accurate. The comment is accurate in that among the various potential effects, conflict with other users is the most certain type to occur. Potential impacts to noxious plant control (because of wider canopy openings) and sediment yield (because of increased area of exposed soils) from trails on sloping ground are also significant. Potential impacts to wildlife are not judged to be significant.

18-3. Compatibility of Mountain Bicycling with Interpretive Focus of Recreation Management. Comment noted that some bicyclists travel very slowly. The proposed plan has been amended from the draft plan to adopt Alternative 5B, which allows for bicycle use on the gently-sloping, wide Elk River Trail. Bicycle use would be monitored for confinement to the Elk River Trail only, and for trail-user safety and trail-erosion impacts. Such use will be managed adaptively and may be reconsidered if significant impacts develop. This bicycle use will be encouraged by provision of secure bicycle parking at the Elk River trailhead and Elk River Trail terminus. With respect to the specifics of the comment, based on extensive experience managing recreation uses on public lands, the agencies maintain that speed and sport are involved in many mountain bicycling experiences. Beyond the Elk River Corridor Trail, all of the existing or possible future trails at the Reserve have relatively steep gradient. That is not to suppose that all bicyclists are oblivious to the wilderness experience, but given the fact that the focus of management of the Reserve is on ecosystem preservation, and the concomitant focus of Reserve recreational management is on contemplative activities of natural history interpretation, the agencies maintain that bicycle activity beyond the Elk River corridor is not compatible and is inconsistent with the legislative intent for the Reserve.

18-4. Effects of Bicycling on Wildlife. The referenced statement in Appendix J has been deleted. After review of the draft discussion of potential impacts of bicycling use to wildlife on page 6-40 (cited by commenter as page 6-20), the agencies maintain that it is fair and impartial. The discussion concludes that such potential impacts are found to be less than significant. Indeed, walkers, bicyclists, and equestrians are likely to pose similar levels of disturbance or take of wildlife. Accordingly, the plan does not assert that bicycles should be banned because of wildlife effects.

18-5. Trail Erosion Due to Bicycles. Trail design experts in California's northwest region agree that in general bicycle use causes more trail erosion on sloping trails than does hiking use, although good trail construction can reduce the difference (Beers pers. comm., Turner pers. comm.). Limited quantified studies in the scientific literature to date have not shown a difference in sediment yield from a given trail tread between the two uses (Wilson and Seney 1994; Thurston and Reader *in prep.*). Nonetheless, trails designed for both bicycle and pedestrians would disturb a significantly greater area of ground than would a minimal standard pedestrian trail on sloping ground because of wider trail tread, increased sinuosity, and larger switchbacks. Because soil erosion is primarily correlated with areas of exposed soils (and slope), trails to accommodate bicycles will tend to increase sediment yield compared to minimal-standard pedestrian trails. Staff geologists involved in Headwaters Reserve watershed restoration maintain that the linear nature of bicycle tracking on steeper slopes in the Wildcat series soil types is problematic. The discussion on page 6-34 is revised to reflect this situation.

18-6. Preferred Design of Bicycle Trails. The referenced statement in Appendix J has been revised to reflect the commenter's point that wider trails with extended visibility tend to induce higher speeds.

The comment resulted in a further assessment of various trail design standards that would be involved in accommodating pedestrians, bicycling, or equestrians on steeper slopes in the Reserve. Trails on sloping ground built to accommodate bicycle use in addition to pedestrian use would involve designs to reduce bicycle speeds. Even for "single-track" trails, such designs involve higher trail sinuosity for diminished sight distance, a wider tread (36-48" compared to 18-24"), larger cuts, wider vegetation/obstacle clearance, larger switchbacks, and more frequent use of erosion/grade control devices. Such trails constitute more-than-minimal recreation facilities and as such are not consistent with the legislative mandate for the Reserve.

18-7. Relative Conflict Potential for Bicycle and Equestrian Uses. The agencies maintain that control of bicycles on steep trails inherently poses a greater threat to walkers than does control of horses on such trails. Local trail planners use special trail design to slow bicyclists on sloping ground, as described in the prior response.

18-8. Local Accident Data. The requested data is not available.

18-9. Favoring User Groups. The agencies maintain that the preferred alternative which precludes bicycle use on steeper trails is not an example of favoring one user group over another. The primary reason for exclusion of cyclists is rooted in the agencies' interpretation of the legislative intent for recreation in the Reserve, which was supported by the preponderance of public comment on this subject. The agencies also rely on local expertise in the Wildcat soil series, which leads to a management intent to minimize the extent of trail development, such as would be necessary to support bicycle trail use. The agencies fully recognize that the bicycling community is a legitimate user of public lands and seek to promote such use throughout the majority of public lands in the West and northwestern California in particular.

18-10. Guided Bicycle or Equestrian Tours. The agencies maintain that bicycle use, whether part of a docent-led tour or not, or whether limited to specific times/days or not, is

generally inconsistent with the legislative policy for recreation at the Reserve. However, the agencies recognize that the Elk River Corridor Trail provides the opportunity for an exception, because it is a gently-sloping, wider, hardened trail that is distant from the old-growth groves.

- 18-11. Guided Bicycle Tour on the Salmon Creek Trail.** This trail is relatively steep and would not be suited to an interpretive tour via bicycle.
- 18-12. Flexibility to Institute Management Change.** The plan is intended to provide definitive planning direction, to the extent feasible, for the planning period (at least 10-15 years). The agencies do not anticipate a scenario where recreational demands in the region, or the ecological systems in the Reserve, will significantly change within this period. However, a plan amendment can be adopted at any time, should changed conditions warrant.
- 18-13. “Positive” Approaches.** The agencies do not view the bicycling issue as a positive approach versus a negative approach, but as a question of identifying uses that are consistent with legislated direction for the Reserve and would not result in significant environmental impacts.
- 18-14. Wilderness Study Area.** The formulation of alternatives for management of areas containing wilderness characteristics is driven by the issue of the existing “naturalness” of the landscape. To the degree that recently-harvested areas of the forest are considered to have low naturalness, these areas would not be considered to qualify for wilderness management, and are not expected to attain any degree of naturalness during the life of the plan. (See “Management of Areas Having Wilderness Characteristics” under “Summary of BLM/DFG Responses” above.)
- 18-15.** Table 3-11 is an attempt to present the factual situation regarding existing and planned facilities for bicycling and horseback riding in the region. The agencies agree that the primary issue is whether bicycling and horseback riding are appropriate and sustainable activities within the legislated Reserve. As noted in other responses, the agencies maintain that bicycle use is not consistent with legislative direction for the Reserve, with the noted exception of use on the Elk River Corridor Trail.
- 18-16. Regional Recreation Opportunity Survey.** Table 3-11 does an adequate job of serving the intended purpose, i.e. to portray the relative general availability of opportunities for horseback riding and backcountry bicycling in the region. Certainly the analysis could be repeated in a manner that would address some of the details of interest to the commenter, but a more detailed assessment of existing opportunities is not needed for decision-making for the Reserve. While some bicyclists seek singletrack opportunities, experience in this region indicates that many others seek unsurfaced forest road opportunities, while still others seek paved-road opportunities, and that time of year, number of people, purpose of the ride, and many other factors enter into the rider’s preference. Constructing a single-track bicycle use trail would involve construction of more-than-minimal facilities, which is precluded by the authoring legislation for the Reserve. All of the areas surveyed are accessible by day motor trip from Arcata or Eureka.

18-17. Balancing Interests. The comment suggests that all public lands ought to be open to all users, regardless of ecological sensitivity. The Headwaters Forest was acquired to prevent its destruction for commodity use and to protect its unique ecological values in support of habitat conservation planning on the adjacent landscape. BLM’s responsibility is to assess what kinds of human activities are consistent with the overriding imperative of preserving ecological integrity. See also responses 18-1 and 18-9 above.

Section IV. Persons Commenting at Public Meetings (27)

Name	Tracking Number
Eureka Meeting July 16, 2002	
Carroll, Buck	1
Polasek, Carole	2
Mayo, Dennis	3
Kupilik, Van	4
Miller, David	5
Beck, Diane	6
McKay, Tim	7
MacMullen, Bob	8
Acord, Tom	9
Smith, Doug	10
Brooks, Karen	11
Metz, Timothy	12
Walsh, David	13
Driscoll, Iri	14
Bryan, Chris	15
Johnston, Riggs	16
Sacramento Meeting – July 24, 2002	
Van Brocklin, David	17
Keyser, Christine	18
Evans, Steve	19
San Francisco Meeting – July 25, 2002	
Howe, Alan	20
Pickett, Karen	21
Dimiceli, Robert	22
Simon, Donald	23
Silvers, Rodger	24
Kirk, Kristin	25
Stromsmoe, Kent	26
Rockafellow, Will	27

Comments from these individuals are summarized by BLM/DFG below, and BLM/DFG responses are given. Persons commenting are listed below in the order that they spoke. A tracking number is used so that individual comment summaries can be correlated with the

commenter. Copies of the meeting transcripts are available from the BLM Arcata Field Office upon request.

Summary of Comments and Responses

Legislative Authorization and General Management Direction

Comment Summary

- We should reap the natural opportunities offered by the Headwaters forest, but in a responsible manner to avoid destruction and exploitation. (15)
- Strong support in general for the proposed plan. (21)
- Expresses strong general support for the plan. (23)
- Support bulk of the proposed plan, but it needs fine tuning. (26)
- Support for most of the proposed plan. (27)
- People who fought to save the Headwaters Forest from timber harvesting now want it thoroughly preserved. (6)
- Support for focus on preservation and restoration of ecosystem functions and processes, which was the purpose of fighting to save the Headwaters forest. (17)
- Preserve the old growth and endangered species. (1)
- Approve of overriding management goal of habitat protection, limiting public use as warranted. (12)
- Approve of BLM's recognition that Headwaters needing saving for habitat purposes, not recreation purposes. (18)
- From the internet, it can be seen that Headwaters forest has always been thought of as an ecological preserve, not a recreational area. The recreational concept is very recent. It should be managed as an ecological preserve. (22)
- Headwaters does not need to provide for recreational activities as plenty of parks are intended for those purposes. The Headwaters forest should be maintained as an ecological baseline preserve. (23)
- Support effort to preserve ecosystems and endangered species. Critical of current administration's efforts to roll back protections and accommodate recreational vehicles. (24)
- Headwaters was saved to preserve wilderness values, not as place for recreation (camping, horseback riding, or biking). Support proposed alternatives. (25)
- Cannot restore wilderness at the Reserve because it is small and surrounded by commercial timberlands. (11)

Responses

The agencies recognize a high level of support for the proposed focus of Reserve management, which is embodied in the authorizing federal legislation. Regarding the last comment above, FWS believes that preservation and enlargement of the population of marbled murrelets at the

Reserve (as second growth forests acquire old-growth characteristics) will contribute significantly to recovery of this threatened and endangered species.

Species Management

Comment Summary

- Express strong concern for probable attraction of corvids and consequent murrelet nesting failure due to increased public access within the Reserve. (20)
- Wilderness users do not discard garbage; the potential threat of corvid attraction that may affect endangered bird species is overstated. (5)
- Murrelets are tolerant of people; consider the intrusions caused by researchers. (5)
- 80% of the Reserve's area should be committed to protection of endangered species. (7)
- Facilitate human use, but give priority to protection of murrelets and coho salmon. (7)
- The document should not display endangered species nest sites. (10)
- Don't create pools in the Reserve's streams, because they are easily fished by egrets and blue herons. (16)

Responses

The draft document describes research regarding effects of humans on murrelet nesting which supports the agencies' and FWS' conclusions that human presence near nest sites, or human discard of food wastes which in turn attracts corvids, are potentially significant threats to continued viability of murrelets populations.

As displayed, the data on observations of murrelet nesting behavior in the document does not in any way jeopardize these nesting activities. These are not nest locations, but the documentation of flight behavior suggesting nesting. Murrelet nest locations are very difficult to locate. Moreover, these stands are not accessible by trail, and are closed to human entry. Enforcement of this closure has been effective to date.

The plan does not propose to undertake actions to alter stream morphology in the Reserve.

Watershed Restoration

Comment Summary

- Restore the watershed. (2)
- The watershed restoration program should be implemented. (7)
- Support for Alternative 1A – full watershed restoration program. (17)
- Support full watershed restoration. (25)
- Favor full watershed restoration. (12)
- Remove roads, including those being used for trails. (10)

- Because of surrounding private lands, need to keep roads in the Reserve for fire suppression. (11)
- Plant rye grass for erosion control on abandoned logging roads, but do not tear them out. (16)
- In road decommissioning, don't grade most areas, just plant them, to minimize sediment yield. (3)
- The document has insufficient information about where roads have already been removed or the existing condition of roads that will be converted to trails. (10)

Responses

Regarding roads for fire suppression, the agency responsible for fire suppression, California Department of Forestry and Fire Protection, did not express the view that abandoned logging roads need to be retained for fire suppression purposes, but offered other significant comments to facilitate fire suppression (see Section II above). Such road retention would be counter to the authorizing legislation for the Reserve, which calls for minimal necessary facilities to maintain ecological integrity.

Regarding the recommendation that abandoned-road restoration should involve only revegetation and not earthwork, this approach has proven to be ineffectual. Existing roads and log landings are intercepting runoff, causing saturation of fills and incipient failure to watercourses. The problem is primarily mass failure rather than surface erosion.

Regarding information on where roads have already been removed and the conditions of roads that will be converted to trails, such information has been provided in the draft document.

Forest Restoration

Comment Summary

- Favor proposed forest restoration. (12)
- Support for Alternative 2A – full forest restoration program. (17)
- Favor thinning of second-growth stands, including merchantable trees. (8)
- Plant trees in thinned areas to speed recovery of old-growth characteristics. (8)

Responses

The alternative of thinning older stands by removal of merchantable trees is discussed in the draft document. The agencies maintain that it would be less effective in speeding recovery of old-growth characteristics and reducing fire hazard, though it would maintain tree growth to an extent. It would cause considerable watershed disturbance due to the required road infrastructure and maintenance.

Experience in the Reserve to date is that tree planting is not necessary except in the case of promoting redwood density in a primarily Douglas-fir mix. Environmental conditions in the Reserve favor rapid natural revegetation of native conifer species.

Research Management

Comment Summary

- Limit research activity to day time only and prohibit motorized vehicles for researcher transport. (21)

Responses

The agencies do not recognize the need for such restrictions. On a case-by-case basis, the agencies intend to manage research in a manner that ensures ecosystem integrity while facilitating appropriate research as directed in the legislation. See also Response 6-27.

Fire Management

Comment Summary

- Roads should remain for fire suppression purposes. (3)
- Because of surrounding private lands, need to retain roads in the Reserve for fire suppression. (11)

Responses

See responses to watershed restoration comments above.

Recreation Management – Equestrian Uses

Comment Summary

- Horseback riding is incompatible with the overriding purpose of habitat preservation. (18)
- Because Headwaters should be managed as an ecosystem refuge, restrict public access to hiking; horses involve many impacts. Horse would involve the spread of invasive exotic species. (21)
- Support exclusion of horseback riding. (26)
- Concur with excluding access by equestrians. Horses spread grass species. This use degrades water quality and increases maintenance costs. (27)
- Equestrian use cannot be accommodated without violating the mandate of preserving ecological integrity of the Reserve. (6)
- Equestrians do not need to use the Reserve; it really isn't suitable. (10)
- Equestrian opportunities in the Region could be expanded by acquiring easements across the extensive timberlands. (13)
- Those that fought to save the Headwaters Forest did it not for horses but for humans. (13)
- Old-growth forest from which equestrian use is excluded has precedence in Redwood National Park, so why not this very special place? (13)

- Accommodate equestrian use on Elk River Trail and Little South Fork Elk River Trail. (2)
- Favor Alternative 6A – equestrian use on trails accessed from Elk River Trailhead. (8)
- Retain most existing logging roads for horseback riding. (3)
- Equestrian use is compatible with interpretive education programs. (9)
- Equestrian use does not pose a safety hazard to other users. (9)
- Horse manure doesn't spread invasive nonnative plants. (3)
- Equestrian use does not increase potential for stream sedimentation. (9)
- Opportunities for hiking as well as equestrian use are extensive in the region – but these hiking opportunities are not documented in the report. (9)
- Equestrian use should not be discriminated against and should be allowed in the Reserve. (9)
- Allow equestrians because equestrian opportunities in local region are limited. (2)
- Other recreation areas in the region are not underutilized by equestrians; equestrians avoid using potentially slippery trails during the wet season. (11)
- Roads in the Reserve could be part of a horseback riding and bicycling network for inhabitants of Fortuna and Carlotta, especially children. This can be done with increasing sediment delivery to streams. (14)
- Require that equestrians carry shovels and fix any damage they cause. (16)
- Restrict equestrians to certain areas, or a lot of maintenance will be required. (16)
- If horses are allowed, do it on a trial basis. (16)
- Equestrian use will increase management costs. (16)
- Equestrians remove trash; hikers will leave it in the Reserve. (3)
- To control equestrian use and pay costs, install locked gates and sell keys to equestrians. (3)

Responses

Most of the points raised above were also raised in letters from various organizations; See responses 6-17, 15-1, 16-1, 16-2, 16-3, and 17-3.

The agencies maintain that accommodating equestrian use in the Reserve would require construction of more-than-minimal facilities. Trails to accommodate equestrian use must be designed and maintained to a more extensive standard than that required for only pedestrian use. Whereas trail widths of 1.5-3 feet may accommodate hikers, trail widths of at least 4 feet are needed to allow concurrent hiking and equestrian use. Depending on the steepness of the terrain that is traversed, greater trail width requires greater construction disturbance, extent of switchbacks, volume of material moved, and area of cut- and fill-slopes. Moreover, removal of obstructions adjacent to the trail, such as trees and rocks, is more extensive. Watering sources, isolated from natural waters, would need to be developed at appropriate intervals along trails. The parking area at the Elk River Trailhead would need to be substantially enlarged. This

situation was described in Chapter 6 the draft document, which has been amended in the final document; see “Effects of Recreation Management on Recreation Alternatives – Alternatives for Equestrian Use” and “Effects of Recreation Management on Aquatic Ecosystems – Alternatives for Equestrian Use”.

The construction of more-than-minimal facilities is precluded by the authorizing legislation for the Reserve.

Recreation Management – Bicycle Use

Comment Summary

- Bicycle use cannot be accommodated without violating the mandate of preserving ecological integrity of the Reserve. (6)
- Bicycles do not need to use the Reserve; it really isn’t suitable. (10)
- Bicycling is incompatible with the overriding purpose of habitat preservation. (18)
- Do not allow or sharply restrict mountain bicycling; it results in the blazing of unauthorized trails and there are plenty of other areas available for this use. (18)
- Because Headwaters should be managed as an ecosystem refuge, restrict public access to hiking as bicycling involves many impacts. Bicycle use would require wider trails and additional trail maintenance. (21)
- Concur with excluding access of bicyclists. Bicycles can cause erosion. This use degrades water quality and increases maintenance costs. (27)
- Roads in the Reserve could be part of a bicycling network for inhabitants of Fortuna and Carlotta, especially children. This can be done without increasing sediment delivery to streams. (14)
- Require that bicyclists carry shovels and fix any damage they cause. (16)
- Restrict bicyclists to certain areas, or a lot of maintenance will be required. (16)
- If bicycles are allowed, do it on a trial basis. (16)
- Bicycle use will increase management costs. (16)

Responses

See responses to organization comments (Section III above), particularly Responses 6-17, 16-3, and 18-1 through 18-17. With the exception of the Elk River Corridor, bicycle use in the Reserve would require construction of more-than-minimal facilities and is inconsistent with the legislative intent of the Reserve. Regarding trail erosion, scientific studies do not support the contention that bicycles caused increased trail erosion relative to hikers, but local trail designers, geologists, and maintenance staff contend otherwise.

Recreation Management – Extent of Public Access

Comment Summary

- Keep recreation to a manageable minimum. (12)
- Favor no more new trails. (10)
- Keep southern access only for guided tours. (12)
- Do not allow camping, it will result in trash and occupancy by homeless. If camping is allowed, law enforcement must be around the clock. (4)
- Need for locked gates and guided tours at Elk River Trailhead to avoid the partiers and trouble. (16)
- Opening the Reserve for camping will increase the objections from neighbors on Elk River Road. (16)
- Close the southern access until murrelet population recovery to a certain extent; people can learn about the ecosystem values along the South Fork Elk River access. (20)
- Wheelchair access to old-growth redwood forest is provided in 10 locations, primarily in state parks. The proposed Universal Access Trail at Alicia Pass isn't needed and is too remote. (20)
- Close the southern access until murrelet population recovers on the whole. (21)
- Oppose expanding public access, especially creating trail access into the discontinuous old-growth patch from the south (proposed New Little South Fork Elk River Trail). (26)
- Provide for Universal Access from the Elk River Trailhead. (21)
- The EIS/EIS does not show that impacts of hiking and camping warrant keeping humans out of old-growth. (5)
- Allow public access to old-growth forest. (5)
- Establish a permanent trail system. (8)
- Favor Alternative 4A – extensive old-growth contact. (8)
- Headwater's location near Eureka makes it ideal for children's backpacking and camping. (11)
- Recommend allowing full recreation access now, monitoring effects, and reevaluating plan in 10 years. (11)
- We bought Headwaters, we ought to be able to use it, kindly and with respect, and not just through guided tours. (14)
- Urge that access be allowed along the abandoned road in the upper South Fork Elk River corridor, to allow the public to witness the failed silvicultural methods and criminal activities of the industrial timberland owners adjacent to the corridor. (26)

Responses

The agencies maintain that the authorizing legislation makes it clear the primary purpose of creating the Reserve was for the conservation and study of undisturbed and restored old-growth ecosystems. Recreation activity, while it must clearly be provided for, is to be constrained as necessary to meet the primary goal. Among other constraints, the legislation calls for construction of only the minimal necessary facilities. The plan attempts to strike the appropriate balance between conservation of endangered species/undisturbed ecosystems and human access. The plan proposes to enlarge the existing trail system somewhat to allow viewing of old-growth ecosystems without their daily penetration by visitors. The proposed recreation program focuses on contemplative and interpretive activities as appropriate human uses of the Reserve. See also Responses 6-10, 6-11, 6-13, 6-14, 6-19, 6-20, and 10-5, 14-2.

Recreation Management – Other Issues

Comment Summary

- Increased use of Elk River Road has caused theft, litter, trespass, and teenage drinking. (4)
- Install a gate at Elk River Trailhead to close the parking area at night. (4)
- Provide handicapped access, at least in the perimeter of the Reserve. (7)
- Eliminate southernmost proposed picnic site (Figure 4-2). (26)
- Enforce no discarding of trash. (8)
- Expresses opposition to allowing dogs into the Reserve; they don't belong in an ecological reserve and plenty of other places to be free. (23)
- Dogs are incompatible with the overriding purpose of habitat preservation. (18)
- Oppose allowance for dogs in the Reserve, even with a leash restriction, because dogs adversely affect wildlife and deny the opportunity for others to see wildlife. (26)
- Prohibit bow hunting – it is not an appropriate activity for the Reserve. (18)
- Educational values of the Reserve are among its most important attributes. (18)

Responses

Regarding effects of increased use of Elk River Road, the agencies are aware that the type of problems noted have tended to increase and will continue to work with the Humboldt County Sheriffs Department to assist them in their task of controlling any such violations of law. The day-use provision for access will be reinforced by the installation of the recommended gate to reduce the attractiveness of the area for evening social activities. The lower portion of the Elk River Trail will be improved to provide universal access. Reserve rangers give priority to enforcement of prohibition on discarding of food wastes and trash. Regarding picnic sites, see Response 6-12. Regarding dog access to the Reserve, see Response 4-4 and 6-15.

Cultural Resource Management

No comments on this subject were made.

Special-Area Designation and Management

Comment Summary

- Favor maximum Wilderness designation; none of the roads in the Reserve preclude it. (10)
- Maximize Wilderness Study Area designation – including additional lands as forests are restored. (18)
- Maximum WSA designation should be made. It does not preclude forest restoration because it is exempt from the general prohibition on vegetative manipulation. (23)
- Urges WSA designation. Disagree that BLM handbook would disallow the proposed forest restoration if the area was designated as a WSA. (27)
- WSA designation should be based on a management plan that allows equestrian use. (2)
- Recommends maximum WSA and WSR designations. (21)
- Recommend WSA designation for all eligible streams. (25)
- Urge BLM to recommend WSR status for Reserve – even if it would not change proposed management, the symbolic value and possible future preservation value warrant it. (18)
- Contrary to BLM’s analysis, the WSR Act and implementing guidelines require that BLM evaluated that all lands within one-quarter mile be studied for inclusion, which includes private as well as public lands in the case of the South Fork Elk River. (19)
- Support finding that the three streams on the Reserve are eligible for WSR designation. (19)
- Not finding the Reserve’s three streams suitable for WSR status based on prior inclusion of other streams in the region is incorrect – there are important physical and policy differences between those streams and the Reserve’s stream. Regarding policy differences, the Smith, Klamath, Trinity, and Eel Rivers were designated under a provision of the SWR Act that requires state and not federal management of private lands along those streams. However the California WSR Act no longer requires preparation of management plans. Portions of these streams on public lands are being managed as WSRs, but portions on private lands are not. In the case of the Reserve, the streams would be classified as requiring federal management of both private and public lands within the designated area (one-quarter mile from the streams). Regarding physical differences, most existing designated rivers in the region flow through federal lands, are higher up in the coast range, and have very few federally-managed forests along them. (19)
- Not finding the Reserve’s three streams suitable for WSR status based on the assertion that the management plan affords as much protection as designation is incorrect. WSR status precludes federally-permitted and federally-funded hydropower projects. It also requires that water resource projects upstream and downstream of the WSR not unreasonably diminish the WSR values. Also, such status may not protect the stream’s other resources, especially cultural resources, as well as would adoption of BLM’s management plan. (19)
- Support designation as a State of California Ecological Reserve, especially to prevent overflight by Maxxam (PALCO) logging helicopters. (23)
- Special designations are beneficial in attracting more special management funding. (23)
- Support research natural area designation, to elevate status for funding priority. (23)

- Support listing on both the federal and state registers of historic places. (23)

Responses

The agencies acknowledge the high level of public support for maximum designations of special areas. Regarding the issue of whether forest restoration would be allowed under WSA designation, see Responses 6-22. WSA designation would allow for trails and equestrian use, but not bicycle use. Regarding issues related to WSR designation, see Responses 6-26 and 7-1 through 7-6. Regarding effect of State of California Ecological Reserve designation on overflights, such a restriction would depend upon the particular designation action by the State Fish and Game Commission, which would occur after adoption of the resource management plan by BLM. At this time, staff of the California Department of Fish and Game will incorporate recommendations to allow overflights or motor vehicle use for emergency operations and for other operational activities related directly to management, research, and monitoring.

Plan Implementation Monitoring and Evaluation

No comments on this subject were made.

Access Fees and Permits

Comment Summary

- Enact no user fees; these lands already belong to the public. (2)
- Oppose fees for pedestrians using the northern access (Elk River Trail). (26)

Responses

- The proposed alternative has been amended to delete all recreational user fees.

Other Comments

Comment Summary

- This meeting was not adequately publicized. (10)
- Fix the hole in the Headwaters Forest, and connect the Reserve to Humboldt Bay. (10)
- The document does not discuss what BLM has been up to and infrastructure changes BLM has made to the area to date. (10)

Responses

The public meetings were widely publicized via notice to all persons on BLM's Headwaters mailing list, by special notice in newspapers, by release of press releases to various media in the three meeting regions, and by newspaper and radio pieces produced by the media in response to the press releases. An ample amount of time between announcements and meeting dates was provided.

For reasons described in the draft document, acquisition of additional lands was determined to be beyond the scope of this planning process.

The draft and final documents do describe in detail the interim management of the Reserve (i.e. management from time of acquisition until preparation of the draft document).

Section V. Individuals Commenting Via Mail (6,372)

Form Message 1: Postcards from 2,962 individuals

Form Message 2: E-mails from 3,311 individuals

Form Message 3: (E-mail and postal mail from 15 individuals)

Last Name	First Name	City	State
Allen	Richard	?	?
Alfsen	Wendy	Berkeley	CA
Bauer	Isabel	Redwood City	CA
Clarkson	Lauren	?	?
Downs	Anne	?	?
Hall	Garth C.	Palo Alto	CA
Hofland	Freda B.	Los Altos Hills	CA
Jindrich	Denise	Mill Valley	CA
Keimer	Jeffrey and Marsha	Portola Valley	CA
Lacy	Susan	Pleasanton	CA
Martin	Gita Dev and Tim	Woodside	CA
O'Neill	Alice	?	?
Puff	Ron	San Rafael	?
Salman	Elizabeth S.	Mill Valley	?
Stephens	Jan	Willits	CA

Form Message 4: ((E-mail and postal mail from 8 individuals)

Last Name	First Name	City	State
Cross	Carol	Redwood City	CA
Feuer	Marie	Los Angeles	CA
Hill	?	Redding	CA
Kaiser	Terry	Shadow Hills	CA
Meaden	Casey	Cutten	CA
Oster	Cindy	Sacramento	CA
Rice	Judy	Fortuna	CA
Schmitz	Donald	Malibu	CA

Individualized Messages (E-mail and postal mail from 76 individuals)

Last Name	First Name	City	State	Tracking Number
Al-Haddad	Amber	Haines	AL	1
Alfsen	Wendy	Berkeley	CA	2
Ballentine	Wanda	Cleveland Heights	OH	3
Beverly	P.R.	?	?	4
Blum	Jim	San Jose	CA	5
Brister	Bob	Salt Lake City	UT	6
Brown	Dorothy	?	?	7
Bryan	Chris	Eureka	CA	8
Carroll	Buck	Fortuna	CA	9
Carroll	Chris	Fortuna	CA	10
Clensay	Maruja A.	Santa Cruz	CA	11
Cochrane	Andrew P.	Port Townsend	WA	12
Conroy	Michael	?	?	13
Crosthwait	Lynn	?	?	14
de Forest	John	San Francisco	CA	15
Dieges	Jennifer	Berkeley	CA	16
Dimiceli	Bob	Oakland	CA	17
Driscoll	Carol	Arcata	CA	18
Driscoll	Uri	Arcata	CA	19
Dunew(?)	Carol	?	?	20
Dunn	Nancy	Loleta	CA	21
Dwyer	Jim	Chico	CA	22
Eliot	Richard G.	Hydesville	CA	23
Forsell	Warner M.	Hydesville	CA	24
Griffin	Adrian	Sacramento	CA	25
Hagemann	David & Susan	Rio Dell	CA	26
Hampton	Craig	?	?	27
Hay	Douglas	Mill Rift	PA	28
Hewitt	Robert	Arcata	CA	29
Hoffman	Jeff	San Francisco	CA	30
Howe	Alan D.	Oakland	CA	31
Huber	Patrick	Davis	CA	32
Jacobson	John	?	?	33
Johnson	Bonnie	Flagstaff	AZ	34
Jones	Michael	Chico	CA	35
Kaczorowski	Mary Rose	Oakland	CA	36
Kagan	Batya	Mt. Hermon	CA	37
Katz	Nancy	?	?	38
Keimer	Jeffrey & Marcia	Portola Valley	CA	39
Krupnick	Wendy	Santa Rosa	CA	40
Lang	Michael	Berkeley	CA	41
Lee	Rob	?	?	42
Loctie	Byrd A.	Eureka	CA	43
Marques	Louise	Berkeley	CA	44
Marsh	Kathleen Nora	Auburn	CA	45
McGuiness	Richard	Eureka	CA	46

Last Name	First Name	City	State	Tracking Number
Medefind	Jedd	?	?	47
Morgan	Tom	?	?	48
Nesbitt	Dale	Berkeley	CA	49
Noggle	Jon	Marina	CA	50
Palmer	Neil	Fortuna	CA	51
Papler	Roger W.	San Pablo	CA	52
Peterson & Family	Ron	Gasquet	CA	53
Piazza	Tony	?	?	54
Pratt	L. Darlene	Berkeley	CA	55
Prenner	J.C.	Brisbane	CA	56
Quinn	Bethica	San Francisco	CA	57
Reimer	Nancy	Canyon	CA	58
Reno	Frank & Lavinia	Lafayette	CO	59
Richardson	Delta	Coralville	IA	60
Roehr	Keegan	Venice	CA	61
Schmitz	Donald	Malibu	CA	62
Smith	Felicia	Fairfax	CA	63
Smith	James D.	Willits	CA	64
Sperling	Ruth S.	Palmdale	CA	65
Suddjian	David L.	Capitola	CA	66
Thompson	June & Bill	Bayside	CA	67
Vana	Mary Ellen	Mammoth Lakes	CA	68
Victor	Arisa	Richmond	CA	69
Wade	Isabel	San Francisco	CA	70
Walters	Bill	Pleasanton	CA	71
Williams	Barbara	Lodi	CA	72
Wren		Freshwater	CA	73
Wyberg	Bryan	Coon Rapids	MN	74
Yokoi	Mr. & Mrs. George	El Cerrito	CA	75
Zadis	Peter	Jamaica	N.Y.	76
Zurcher	Randy	San Francisco	CA	77

Comments in each of the four form messages are summarized by BLM/DFG below, followed by BLM/DFG responses. Following them, individualized comments are summarized, and BLM/DFG responses are given. 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 actual comment messages are available from the BLM Arcata Field Office upon request.

Form Message 1

Comment Summary

- The highest and best use of the Reserve is a refuge for wildlife species.
- Indicates support for some proposed alternatives:

- full watershed and forest restoration,
- no bicycle or equestrian use, and
- designation as State Ecological Reserve.

- But recommends adoption of some other alternatives:
 - closing the southern access to public use,
 - no new trails,
 - maximum WSA designation, and
 - maximum WSR designation.

Responses

Comments of support noted for the primary focus of Reserve management and for various proposed alternatives. With regard to recommendations for adoption of other alternatives:

- closure of the southern access, see Response 6-11;
- extent of trails, see Response 6-13;
- WSA and WSR designations, see Responses 6-22, 6-26, 7-1 through 7-6, and 10-2.

Form Message 2

Comment Summary

- Expresses support management emphasis upon protecting unique ecological features of the Reserve.
- Supports no bicycle or equestrian use, noting that provisions for them are being made in other areas.
- Supports full watershed and forest restoration for benefit of endangered species.

Responses

Comments of support noted for the primary focus of Reserve management and for the proposed alternatives for watershed and forest restoration and for allowable types of recreation.

Form Message 3

Comment Summary

- Supports proposed alternatives except recommends:
 - closing the southern access,
 - providing no old-growth contact,

- maximum WSA and WSR designations, and
- no user fees.

Responses

Comment of support noted for most of the proposed alternatives. With regard to recommendations for adoption of other alternatives:

- closure of the southern access, see Response 6-11;
- extent of trails, see Response 6-13;
- WSA and WSR designations, see Responses 6-22, 6-26, 7-1 – 7-6, and 10-2;
- user fees, the proposed alternative has been amended to eliminate all user fees.

Form Message 4

Comment Summary

- Asserts that 3 alternatives under consideration violate the authorizing legislation:
 - closing the southern access,
 - providing no old-growth experience, and
 - designation of state Ecological Reserve.
- Recommends various alternatives:
 - no forest and watershed restoration;
 - opening the southern access to individual vehicles;
 - providing extensive old-growth contact;
 - allowing maximum bicycle and equestrian use;
 - no designations of WSA, WSR, or state Ecological Reserve; and
 - no entry fees or fees only for BLM-sponsored tours.

Responses

Regarding the contention that some of the alternatives under consideration violate the authorizing legislation, see Response 15-2. Recommendations for adoption of various alternatives are noted. The alternatives recommended by the commenters were not selected as the proposed alternatives because of the impacts that would result, as described in Chapter 6 of the draft document.

Individualized Messages

Legislative Authorization and General Management Direction

Comment Summary

- Recommends various alternatives that maximize ecosystem protection. (5, 15, 17, 22, 30, 32, 40, 41, 44, 46, 48, 52, 53, 55, 56, 57, 58, 69, 77)
- Recommends most alternatives that maximize ecosystem preservation. (37)
- Recommends maximizing ecosystem protection. (33, 71)
- Recommends goal of preservation. (42)
- Support proposed alternatives except hesitant about no designation of WSR. (48)
- Recommends maximizing ecosystem protection and no change from current management. (4)
- Urges ecological protection and restoration. (6)
- Supports proposed alternatives. (1, 3, 13, 25, 38, 59, 65, 74)
- Supports proposed alternatives, with one exception. (12)
- Protect irreplaceable old-growth. (7)
- Form message 1, except no recommendation on bicycle or equestrian uses. (61)
- Form message 2, plus recommendation to save as many trees as possible. (60)
- Form message 2, and recalls abundance of wild redwoods in the past. (34)
- Recommends protecting the unique ecological features of the Reserve. (28)
- Urges BLM to restore, preserve, and maintain our beautiful natural heritage. (63)
- Recommends adopting the most stringent restrictions possible to restore the ecological integrity of the Reserve. (67)
- Supports proposed alternatives except for user fees. (12)
- Supports ecosystem preservation focus and use of principals of conservation biology. (76)
- Supports restoration, conservation, and refuge concept, and the management alternatives that the Bay Area Coalition for Headwaters recommends. (75)
- Recommends alternatives providing maximum ecosystem preservation and recovery of endangered species. (36)
- Expresses happiness that BLM rather than the National Park Service is managing the Reserve, because of automobile focus of the latter agency. (68)
- Urges management of the Reserve as a wilderness preserve. (26)
- Support focus on preservation of biodiversity and critical species of the Northern Temperate Rainforest. (64)

- Notes importance of old-growth forests in absorbing carbon dioxide from the atmosphere. (65)
- Seeks recognition in the plan that the Headwaters forest can reinvigorate the degraded habitats in the region and can be a part of a linked network of old-growth redwood forests. (46)
- Expresses agreement with management focus on maintaining a Reserve rather than a recreation area. (43)
- Concurs with the management focus on “conserve and study”; notes that providing recreation was never a goal of the forest activists who fought to preserve Headwaters. (24)
- Underscores the fact that the primary legislative direction is to conserve and study the lands *while providing public recreation opportunities*. (21)
- Argues that the authorizing legislation does not imply that recreation must be subordinate to resource conservation and maintenance of ecological integrity. (10)
- Asserts that the proposed plan does not meet legislative direction to provide recreation opportunities and access to the Reserve. (18)

Responses

Most comments support the proposed focus of Reserve management, which is embodied in the authorizing federal legislation. Regarding the provision of recreation opportunities, the proposed plan clearly provides for recreational activities; in fact it calls for additional opportunities than now exist. The agencies maintain that the authorizing legislation does imply that recreation must be subordinate to resource conservation and maintenance of ecological integrity. For example, the authorizing legislation requires that recreation facilities be only those that are minimally necessary, with the intent of protecting ecological integrity.

Species Management

Comment Summary

- As a marbled murrelet researcher in the Santa Cruz Mountains, supports focus on managing recreation to avoid stimulating corvid population at the Reserve, for protection of marbled murrelet nesting. (66)
- Notes that some level of corvid populations undoubtedly occurs in the old-growth groves now; urges completion of survey of corvid populations. (66)
- Has observed that human trail use in and of itself does not increase corvid numbers, but that destinations that are suitable for eating invariably do. (66)
- The proposed picnic sites in the Elk River corridor are too far from the old-growth groves to induce increased presence of jays, but may stimulate raven use of the old-growth groves. (66)
- Recommends not providing picnic tables. (30)

- Recommends corvid monitoring protocols: 5 years rather than 3 years of monitoring will be needed to identify population trends, and point counts will not be appropriate for currently small populations. (66)
- Recommends annual rather than 5-year monitoring frequency for marbled murrelet and northern spotted owl populations. (29)
- Recommends “all species” approach for monitoring including such species as fisher, various passerines and raptors. (29)
- Plan singles out riparian monitoring for “migrants” and fails to note undetected “nesting” species. (29)
- Northern spotted owl nest mapping is not detailed enough. (29)
- Barred owl effects on northern spotted owl are not mentioned in plan. (29)
- Northern spotted owl is erroneously noted as a migratory species. (29)
- The draft plan calls for reconsideration of public access if corvid monitoring indicates increasing populations, but adverse effects may not easily be reversed, and it is far wiser to proceed in a very conservative manner from the beginning. (66)
- Argues that the plan does not justify the viewpoint that dispersed recreationists will disturb nesting murrelets and northern spotted owls. (10)
- Believes that the corvid issue is somewhat exaggerated, and that both hiking and horseback riding can be accommodated with appropriate management. (24)
- Recommends establishment of a fur-bearer reintroduction program. (46)
- Recommends techniques to reduce access impacts, including some use of lumber boardwalk, controls on researcher’s disturbance, trapping of feral cats, and requiring dogs on leash. (46)
- Suggests construction of raised boardwalks to protect the Reserve’s resources and allow universal access. Suggests second boardwalk if bicycles allowed. Recycled plastic lumber could be used in lieu of wood. (8)
- Recommends tempering watershed and forest restoration as necessary to protect wildlife and their habitats. (68)

Responses

As indicated in the draft document, suppression of corvid penetration into old-growth groves is a key element of proposed management, which the agencies maintain is appropriately conservative. Given that public access (recreation) needs to be provided to the Reserve according to the authorizing legislation, the plan concentrates those uses in the Elk River corridor, to minimize impacts to murrelets, owls, and old-growth ecosystems. Given this access, the agencies contend that the discarding of food scraps can best be controlled by establishing designated picnic areas, as described in Response 6-12. Should corvid monitoring detect significant rises in populations attributable to Reserve management, visitation in the corridor and elsewhere would be reconsidered. In this regard, the proposed monitoring frequency and duration is amended in Table 4-7 to read “semimonthly in summer for 5 years and every third year thereafter”. The draft document describes research effects of human presence on murrelet nesting, which clearly support the conclusion that human presence near nest sites, or human discard of food wastes

which in turn attracts corvids, are potentially significant threats to continued viability of murrelets populations.

The issue of establishment of a fur-bearer reintroduction program was not introduced in scoping period and therefore is not addressed in the plan at this time. If the Reserve were found suitable for an introduction program and it was requested by DFG, a plan amendment would be required. Regarding use of boardwalks, this method of trail construction is available for use if needed. Reconnaissance of potential trail routings has not revealed a need for this technique. Regarding potential disturbances from researchers, Chapter 4 of the draft document includes guidelines for management of researchers, which will be made part of research permits; see also Research Management below.

Monitoring frequency for northern spotted owls has been amended in Table 4-7 to “annually for five years, subsequent interval to be determined”. Marbled murrelet monitoring on Table 4-7 has been amended to defer to ongoing baseline monitoring per the existing PALCO HCP which is currently on an annual cycle. An “all species” approach to monitoring is consistent with the wide range of organisms to which the agencies have committed in the plan, including the non-vascular plants. The agencies anticipate an increasing volume of species information in conjunction with research programs.

The reference to riparian monitoring for “migrants” has been amended to reflect the comment as has the erroneous note regarding the migratory status of northern spotted owl. Barred owl effects were noted in the species baseline information on page 3-20 of the draft plan. With respect to the lack of information on the northern spotted owl mapping (Figure 3-7), the agencies have purposely kept this mapping general in nature.

The issue of feral cats did not surface during scoping and therefore is not addressed by the plan. Regarding control of dogs, see Responses 4-4 and 6-15.

Policies for the conduct of the watershed and forest restoration programs in Chapter 4 include many provisions for protection of wildlife and their habitats; see policies under “Species Management”, “Watershed Restoration”, and “Forest Management”.

Watershed Restoration

Comment Summary

- Supports watershed restoration and road removal. (50)
- Concurs with purpose of the watershed restoration program. (24)
- Supports proposed alternative for watershed restoration. (51)
- Recommends techniques for effective watershed restoration. (46)
- Recommends management focus on restoring large salmon and steelhead runs to Salmon Creek. (9)
- Recommends primary management emphasis on protection from fire, which requires that all roads not be removed. (23)

- Expresses concern that full-contour watershed restoration is expensive and could be unnecessary. (24)

Responses

Most comments indicate general support for the watershed restoration program. Regarding roads for fire suppression, the agency responsible for fire suppression, California Department of Forestry and Fire Protection, did not express the view that abandoned logging roads need to be retained for fire suppression purposes (see Section II above). Such retention would be counter to the authorizing legislation for the Reserve, which calls for only minimal necessary facilities so as to maintain ecological integrity.

The agencies selected full-recontour watershed restoration relative to hydrologic stabilization because of the benefits described in Chapter 6 under “Watershed Restoration – Effects of Watershed Restoration on Water Quality and Aquatic Species – Relative Effects of the Watershed Restoration Alternatives – Benefits”. The proposed program provides much higher assurance that mass failures will not develop in the future, requiring reopening roads for reentry to the failure site. Though initial cost may be higher for the full-recontour program, long term maintenance costs will be considerably less.

Forest Restoration

Comment Summary

- Supports forest restoration. (50)
- Supports proposed alternative for forest restoration. (51)
- Supports removal of exotic species and road removals. (76)
- Recommends research to accompany forest restoration program. (46)
- Use management of the second growth stands as an opportunity for learning methods of restoring our forests to a healthy and sustainable state. (26)
- Recommends restoring the Headwaters forest without using chemicals; remove exotics by hand or natural methods. (73)
- Recommends removal of invasive exotic plant species, but without use of herbicides. (36)
- The preferred moderate-intensity forest restoration is needed to fire-proof the Reserve. Keep all tools available for this effort, including herbicides. (24)
- Do not cut trees. (73)
- Recommends no forest restoration. (64)

Responses

Most comments indicate general support for the forest restoration program. The program is intended to be implemented in an adaptive management mode; that is, to increase knowledge of treatment effectiveness as implementation proceeds. See Table 4-7 for planned monitoring of effectiveness.

Regarding both forest restoration and control of invasive nonnative species, effective programs can be implemented without the use of herbicides.

The agencies did not select the recommendations for no forest restoration (i.e. no tree cutting) because of the unacceptable condition of the second growth stands in the Reserve. Pole stands, for instance, pose an unacceptable fuel loading and fire hazard. Data from throughout the west clearly outline the benefits of thinning in shrub and pole stands to improve growth rates and morphological characteristics conducive to murrelet and owl habitat development.

Research Management

Comment Summary

- Recommends several approaches for focusing and evaluating research at the Reserve. (46)
- Recommends limiting researchers to no overnight occupancy and no use of motorized vehicles. (36)

Responses

Comments for focusing and evaluating research at the Reserve are consistent with the proposed approach as described in the “Research Management” section of Chapter. Regarding the proposed restrictions on researchers, given the rather long distance involved in accessing research sites or specific research objective, in some cases it will be infeasible to impose such restrictions. On a case-by-case basis, the agencies intend to manage research in a manner that ensures ecosystem integrity while facilitating appropriate research as directed in the legislation. See also Response 6-27.

Fire Management

Comment Summary

- Recommends primary management emphasis on protection from fire, which requires that all roads not be removed. (23)
- Urges against WSA designations, since they would inhibit use of equipment that may be desirable in fighting fire and won’t add much benefit. (24)
- Fire suppression is not healthy or natural for the forest ecosystem. (73)

Responses

Regarding retention of roads, see responses to watershed-restoration comments above. Regarding effects on WSA designations on fire suppression, see added discussion of this impact to Chapter 6 of the document (see “Management of Designated Special Areas – Wilderness Study Area” and Table 6-7).

Recreation Management – Equestrian Uses

Comment Summary

- Recommends no horses in the Reserve. (42)
- Recommends prohibiting horses. (68)
- Do not allow equestrian use because it conflicts with wild values. (73)
- Horses should not be allowed in the Reserve; if they are, recommend a very significant user fee for horses and for parking of horse trailers. (43)
- Suggests that equestrian uses be provided for on commercial timberlands in the area rather than in the Reserve. (46)
- Recommends allowing horses, with limits as need to protect endangered birds. (35)
- Allow horses in the Reserve, but such access need not be in the heart of the old-growth groves. (19)
- Recommends equestrian use but limited to the Elk River corridor. (64)
- Urges allowance for equestrians, who seek solitude with the quiet rapport of an equine companion, and who as taxpayers help to purchase the Reserve. (21)
- Horseback riding must be allowed in addition to hiking, according to legislative direction. (18)
- Notes that equestrian use is a historical recreational use of the Reserve property. (18)
- Form message 4 with recommendation for expanding recreation access, including unrestricted use by equestrians. (62)
- Urges provision of maximum public access, except possibly by motorized means. (23)
- Recommends alternatives that facilitate most extensive recreation use by equestrians. (51)
- Limiting access will favor irresponsible and illegal uses; horsemen are among the most responsible members of society. (19)

Responses

Most of the points raised above were also raised in letters from various organizations; See Responses 6-17, 15-1, 16-1, 16-2, 16-3, and 17-3, and Section IV above.

The agencies have no factual basis upon which to respond to the last comment.

Recreation Management – Bicycle Use

Comment Summary

- Recommends no bikes in the Reserve. (42)
- Recommends prohibiting bicycles. (68)

- Suggests that bicycling use be provided for on commercial timberlands in the area rather than in the Reserve. (46)
- Recommends protecting the unique ecological features of the Reserve but allowance for bicycle use – since some people no longer have the physical capacity for extensive walking. (28)
- Allow bicycles in the Reserve, but such access need not be in the heart of the old-growth groves. (19)
- Recommends bicycle use in the Elk River corridor. (64)
- Biking must be allowed in addition to hiking, according to legislative direction. (18)
- Acknowledges that bicycle use of trails will increase sediment yield but argues that it need not significantly increase sediment delivery to streams. (10)
- Recommends alternatives that facilitate most extensive recreation use by mountain bikers. (51)
- Urges provision of maximum public access, except possibly by motorized means. (23)

Responses

See responses to organization comments (Section III above), particularly Responses 6-17, 16-3, and 18-1 through 18-17. With the exception of the Elk River Corridor Trail, bicycle use in the Reserve would require construction of more-than-minimal facilities and is inconsistent with the legislative intent of the Reserve. Regarding trail erosion, scientific studies do not support the contention that bicycles caused increased trail erosion relative to hikers, but local trail designers, geologists, and maintenance staff contend otherwise, especially for steep slopes of the Wildcat soil series.

Recreation Management – Extent of Public Access

Comment Summary

- All public access to the Reserve should be eliminated. (30)
- Do not allow recreation because it conflicts with wild values; provide no trails and no motor vehicles (73)
- Recommends closing southern access. (70)
- Close southern access until endangered species recover. (37)
- Alternatives 3C (closed southern access) and 4C (no trails providing old-growth contact) are most consistent with the management focus of preservation/recovery of murrelets. (66)
- Recommends limiting access to guided tours until anadromous fish populations have recovered. (9)
- Recommends designating 80% of the wilderness habitat for tours [?]. (11)
- Recommends closing the southern access until endangered species recover. (50)

- Urges keeping the Reserve pristine and quiet as possible, refraining from blazing new trails and catering to human comforts. (68)
- Recommends no new hiking trails be created. (50)
- Recommends retaining the existing trail system. (64)
- Recommends not routing new LSFER Trail into isolated old-growth patch, and managing the patch to restore connectivity with the main grove. (40)
- Supports providing a hiking trail through a small part of the Reserve [presumably old-growth?] as an alternative to uncontrolled illegal access in the old-growth groves. (43)
- Asks why taxpayers are being banned from visiting the Reserve. (27)
- Recommends maximum public access (among alternatives considered). (47)
- Urges provision of maximum public access, except possibly by motorized means. (23)
- Form message 4 with recommendation for expanding recreation access, including providing motor vehicle access. (62)
- Recommends opening the southern access to individual vehicles. (64)
- Recommends opening southern access to individuals and construction of north-south connecting trail for pedestrian use only. (14)
- Recommends alternatives that facilitate most extensive recreation use by hikers, equestrians, and mountain bikers. (51)
- Contends that potential significant impacts to fish and wildlife from the extensive old growth contact alternative have not been substantiated. Points out that stream crossings can be adequately designed to prevent sediment delivery to streams. (10)
- In terms of the legislative mandate to provide recreation opportunities, guided tours fall in the realm of education, not recreation. (18)
- Recommends that visitation not be limited to guided tours, but believes that high visitation will not result. (24)
- Recommends allowing unguided access, with limits as need to protect endangered birds. (35)
- To minimize discarding of trash that may attract corvids, the primitive trail camp for Alternative 4A should be eliminated. (66)

Responses

See response to “Recreation Management – Extent of Public Access” in Section IV above. We would note that no-one is being banned from entry into the Reserve.

Regarding the proposed new Little South Fork Elk River trail looping through an isolated old-growth grove, see Response 6-14.

Regarding sediment delivery to streams from an expanded trail system, scientific evidence is clear that the more extensive the trail system, the more sediment will be delivered to streams. Because the streams in the Reserve suffer from excessive sedimentation at present, even with good trail design, this effect is considered potentially significant. The proposed alternative would

involve reconstructing existing eroding trails to reduce this effect, thereby offsetting some new sediment yield from a limited extent of new trails.

The agencies maintain that the provision of guided tours is a form of “recreation” (as referred to in the authorizing legislation). “Recreation” is not limited to activities devoid of educational or interpretive value.

Adoption of Alternative 4A (extensive old-growth contact experience) would require the provision of a primitive campsite, due to the long distance involved in traversing the Reserve on one of the north-south connecting trails in this alternative. If it were not provided, unauthorized camping would be likely to occur, possibly within old-growth groves.

Recreation Management – Other Issues

Comment Summary

- Prohibit ORV use. (76)
- Recommends absolutely no ATVs or dirt bikes. (68)
- Notes that tree canopy climbing and camping may come into demand. (46)
- Allow no fishing and no swimming (because it spreads disease). (73)
- Recommends no dogs in the Reserve. (42)
- Dogs should not be allowed in the Reserve. If allowed, recommends requiring use of leash at all times, owner-removal of wastes with plastic bags and disposal cans provided, reconsideration after 6-12 months, and consideration of a permit process and fee for dogs. (43)
- Suggests that the Reserve should be treated as a trail link between Eureka and Fortuna, as it did historically. (18)
- Allow for the opportunity to create a nonmotorized corridor connecting Fortuna, Carlotta, Kneeland, and Elk River. (19)
- Recommends maximum use of new technologies to provide interpretative services and to develop public awareness and participation in Reserve management issues. (46)
- Recommends surveillance technologies be used to enforce visitor compliance with Reserve regulations. (46)

Responses

No alternatives provide for ORV access in the Reserve. Regarding dog access to the Reserve, see Responses 4-4 and 6-15.

Development of a regional trail network is beyond the scope of this plan (see Chapter 2). If such a project is initiated by others, BLM and DFG will consider allowing use of the Elk River corridor for such a purpose. The reference to historical use is misleading; the Reserve property was privately-held timberland over which no rights-of-way or easements for public use existed.

The agencies are using the internet and will use any other suitable new technologies in the future to develop public awareness and participation in Reserve management issues, as well as appropriate technologies to assist in enforcement of Reserve regulations.

Cultural Resource Management

No comments on this subject were received.

Special-Area Designation and Management

Comment Summary

- Recommends all special-area designations. (64)
- Recommends maximum WSA and WSR designations. (76)
- Supports proposed alternative for designation of WSA. (51)
- Supports proposed alternatives, except recommends maximum WSA designation. (72)
- Urges WSA designations. (6)
- Express view that the proposed forest restoration action is provided for in BLM's exemption policy for WSA lands. (40)
- Recommends WSA inclusion after forest restoration. (33)
- Recommends WSR designations. (45, 70)
- Urges maximum WSR designations. (16, 45)
- Urges WSR designations for streams. (68)
- Recommends designating all streams as wild and endangered [?]. (11)
- Support proposed alternatives except hesitant about no designation of WSR. (48)
- Form message 3, with comments that WSR designation is critical to improving endangered species habitat. (2)
- Urges against WSA designations, since they would inhibit use of equipment that may be desirable in fighting fire and won't add much benefit. (24)
- Supports state Ecological Reserve designation to prevent intrusive recreation use. (68)
- Supports proposed alternative for designation of state Ecological Reserve. (51)
- Questions need for state Ecological Reserve designation, although believes that hunting, swimming, fires, and fishing are inappropriate uses of the Reserve. (24)

Responses

A majority of comments support maximum designations of special areas. Regarding the issue of whether forest restoration would be allowed under Wilderness Study Area designation, see Responses 6-22 and 10-2. Regarding effect of WSA designation on fire suppression, see "Fire Management" section above.

Plan Implementation Monitoring and Evaluation

Comment Summary

Recommends water/channel quality monitoring program. (46)

Responses

See Table 4-7.

Access Fees and Permits

Comment Summary

- Recommends universal and tour user fees. (64)
- Recommends imposition of user fees for both individuals and docent-led groups. (17)
- Traffic on Elk River Road is heavier and faster since the road was improved from S.R. 101 to Ridgewood Drive; increased use of the Reserve raises a safety issue, not just an annoyance issue, for local residents. Permits and user fees can be used to address this issue. (43)
- If horses are allowed in the Reserve, recommend a very significant user fee for horse entry and for parking of horse trailers. (43)
- If dogs are allowed in the Reserve, consider a permit process and fee for dog entry. (43)
- Recommends use of user fees and permits to mitigate some of the problems associated with overuse, with higher fees for specific uses (e.g. horses and dogs), but modest enough to not favor the wealthy. (43)
- Recommends establishing access fee with provision for in-lieu labor – the latter creating pride of participation in protecting the Reserve. (8)
- Recommends free access for persons with disabilities. (46)
- Form message 3, with comments that visitor fees impact the poor and are directly contrary to public access. (2)
- Recommend no entry fee, noting citizens have already paid for it, and use is light. (54)
- Recommends no user fees. The public has already spoken out for preservation and paid for the land. (12)
- Opposes user fees; management funds should come from state and federal taxes. (68)
- Recommends against imposition of users fees. The public has already paid a very high price for the Reserve. (12)

- Observes that with the limited visitation, that user fees might be a net cost to the government. (24)
- Recommends seeking public input on budget priorities for the Reserve. (9)

Responses

The agencies recognize a wide range of opinion on the appropriateness of imposing user fees. The proposed alternative has been amended to eliminate all recreational user fees.

The traffic increases cited by the commenter are not attributed to the creation of the Reserve but to roadway improvements constructed to serve community growth needs, thus use of Reserve entrance fees for traffic management is inappropriate. As stated in the draft document, Reserve creation has not significantly increased traffic on the Elk River Road; however, the agencies will continue to work with the County of Humboldt to effectively manage Elk River Road traffic.

As discussed in prior sections, the agencies maintain that equestrian use cannot be accommodated in the Reserve according to provisions of the authorizing legislation. Regarding fees for bringing dogs into the Reserve, see Response 3-2.

Annual budgeting for activities of BLM Arcata Field Office is not subjected to a formal public comment process at this time. Annual budgeting will be consistent with the policy direction established in this plan, subject to available funding from Congress.

Other Comments

Comment Summary

- Urges exploration of options for expanding the Reserve. (76)
- Recommends a focus on future expansion of the Reserve. (32)
- Save the “hole in the Headwaters”. (58)
- Recommends public purchase of the “hole in the Headwaters”, because habitats in the existing Reserve are too fragmented. (41)
- Urges State of California to acquire the “hole in the Headwaters” and other buffers. (73)
- Recommends that the State of California explore options for expanding the creating buffers for the Reserve. (36)
- Recommends changing name from “Reserve” to “Preserve”. (41, 44, 58, 64)
- Using internet search engine, determined that most references use the word “Preserve” rather than “Reserve”, and that references to “Reserve” and to recreation uses of the Headwaters forest have only developed in the past two years. (17)
- Asks for a management strategy if the Reserve’s forests where substantially destroyed through fire. (46)
- Asks for a hierarchy of removal of levels of protection for various types of public lands in the event of war and national need. (46)
- Identifies reference and scale errors. (31)
- Acknowledges plan to be the most well constructed, easy reading document ever received. (72)
- Criticizes DFG for not providing a higher level of protection of forests and streams. (58)

- Comment not understood. (20)

Responses

For reasons described in the draft document (Chapter 2), acquisition of additional lands was determined to be beyond the scope of this planning process. Regarding use of the term “Reserve” rather than “Preserve”, see Response 6-1.

The agencies consider speculative the development of a contingent management strategy addressing potential catastrophic loss of the Reserve’s forests through fire. Such a strategy would be entirely dependent upon the exact nature of the losses and effects on substrate conditions. The agencies also consider speculative the establishment at this time of a hierarchy for removal of levels of protection in the event of future national need. Addressing such an issue would depend upon the exact national need and resulting demand placed upon BLM management.