

Summary

SCOPING PROGRAM

As the initial step in formulating and adopting a management plan for the Headwaters Forest Reserve (Reserve) in Humboldt County, California, the Bureau of Land Management (BLM) (Arcata Field Office) and the California Department of Fish and Game (DFG) conducted a public scoping process from May 18 to August 18, 2000. The primary goal of the scoping process was to solicit, from the public and agencies, concerns, ideas, and proposals for long-term management of the newly created Reserve. Input was sought in two linked areas: appropriate management policy for the Reserve and potential environmental impacts of possible management options. The scoping program also included solicitation of comments via the formal filing of a Notice of Intent/Notice of Preparation of a joint environmental impact statement/environmental impact report under provisions of the National Environmental Policy Act and the California Environmental Quality Act.

The scoping program included:

- three public meetings in northern California in June 2000 (Eureka, San Francisco, and Sacramento);
- use of a website offering planning-process information and an electronic interface for public input;
- establishment of two information and message telephone lines (Eureka and Sacramento) to answer questions and allow input of verbal comments; and
- a written comment period, which was extended twice, as requested by interested parties.

ISSUES IDENTIFIED

Resource Preservation and Recreation

Many participants pointed out that the Reserve was created to preserve the largest remaining large stand of old-growth redwood forest then in private ownership and to protect several threatened or endangered species that depend on the forest for critical habitat. The U.S. Fish and Wildlife

Service noted that the Reserve provides one of only two nesting sites for marbled murrelet in the North Coast region. The participants urged the management agencies to identify protection of ecological integrity as the overriding priority for management of the Reserve. Though receptive to some forms of recreational activity, they tended to support the current interim management guidelines for the Reserve that exclude trails from old-growth groves and prohibit entry into them except for research and monitoring purposes. They favored limiting or precluding recreation activity other than day hiking, such as equestrian use, bicycle use, camping, and touring by motor vehicle, but acknowledged that further evaluation might indicate the suitability of some of these uses in some parts of the Reserve.

Recreation interest groups expressed a desire to have access to the Reserve, noting its proximity to the Humboldt Bay area and the limited opportunities on public land elsewhere in the area. Bicycling groups believe that some bicycle use can and should be accommodated without compromising species protection and safety of other users. Equestrians suggested that their activity is actually less threatening to wildlife than hikers and strongly urged development of facilities to support horseback riding in the Reserve.

Participants favoring priority on ecosystem preservation argued that the adopted size and configuration of the Reserve excluded the most logical trail routes and precluded having adequate biological buffers to accommodate equestrian and bicycling uses. Some participants urged the Reserve managers to seek acquisition of additional lands to resolve this issue.

Both those urging preservation priority and those seeking recreational access urged planners to consider a larger context than the legislated Reserve in the planning effort. Recreationists seek trails integrated into a regional trail network, as yet unplanned; others seek integrated watershed-wide planning to promote watershed and habitat restoration; and many seek enlargement of the legislated Reserve to ensure long-term maintenance of ecosystem integrity.

Other Issues

Reserve Access Roads

Residents living along both of the access roads to the Reserve are concerned about traffic, noise, dust, trespassing, and vandalism. They urged better access management or development of alternative access routes.

Watershed Restoration

Watershed restoration activities that focus on removal of former log landings and logging roads that are eroding and threatening water quality were generally viewed favorably. Many participants restated their concern that such activities not disturb murrelet nesting and activities of

other threatened and endangered species. Some recreationists were concerned that road removals would forego opportunities for trail development, while others noted that the existing roads provided poor locations for trails.

Forest Restoration

Forest restoration (i.e., treating second-growth forests to accelerate succession toward old-growth character) was viewed cautiously, and in some cases, opposed by the participants. The purpose of forest restoration was understood, but the experience of some participants with commercial logging operations has engendered skepticism. They felt that implementation of forest restoration in the Reserve would not meet stated objectives and might cause further damage to the forest.

Use of Motor Vehicles

Some of the participants urged allowance for off-highway vehicles or roads for motor touring in the Reserve. Several participants noted the difficulty of accessing locations to view old-growth groves at close range, because of the long, steep nature of the access trails, and urged that hikes to old-growth areas not exceed a distance of ½ mile.

ISSUES TO BE ADDRESSED OR DEFERRED

All of the identified issues will be considered and addressed in the planning process, with several important exceptions. The rationale for deferring these issues is described in the concluding section of this report “Issues to Be Addressed by or Deferred from the Planning Process”. These deferred issues are:

- Acquisition of additional lands—BLM and DFG have concluded that the legislation authorizing Reserve acquisition intends that the management plan address management of the acquired lands consistent with existing land ownership.
- Development of alternative or supplemental access routes—BLM and DFG have concluded that the legislation authorizing the Reserve intends that the plan address management of access along the two existing access routes that were acquired in the acquisition transaction.
- Development of a regional trail system—the planning process will not involve design of a regional trail system involving other lands not included in the acquisition transaction, but the trail system planned for the Reserve will be developed to be capable of

connecting with a reasonably foreseeable regional trail system that may develop in the future.

- Public vehicle use in the reserve—because such uses would inherently conflict with the legislated priority of preservation of ecological integrity, the planning process will not consider extending public road systems into the Reserve or the use of off-highway vehicles in the Reserve. However, access to designated trailheads interior to the Reserve, in conjunction with docent-led tours, will be considered.

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Section 1. Introduction

This document reports the results of the issue-scoping process conducted by the Bureau of Land Management (BLM) and California Department of Fish and Game (DFG) for the preparation of a long-term management plan for the Headwaters Forest Reserve (Reserve) in Humboldt County, California. Preparation of a management plan is required by the federal legislation that authorized purchase of the property from Pacific Lumber Company (1997 Interior Appropriations Bill). The legislation establishes the following management goal for the mandated management plan: “To conserve and study the land, fish, wildlife, and forests occurring on such land while providing public recreation opportunities and [meeting] other management needs.”

The legislation requires that the plan guide general management of the Reserve and address the following management issues:

- A) scientific research on forests, fish, wildlife, and other such activities that will be fostered and permitted on the Headwaters Forest;
- B) providing recreation opportunities on the Headwaters Forest;
- C) access to the Headwaters Forest;
- D) construction of minimal necessary facilities within the Headwaters Forest so as to maintain the ecological integrity of the Headwaters Forest;
- E) other management needs; and
- F) an annual budget for the management of the Headwaters Forest, which shall include a projected revenue schedule (such as fees for research and recreation) and projected expenses.

Interim management of the Reserve has focused on preserving its ecological integrity, as embodied in the interim management guidelines issued by BLM in June 1999. These guidelines limit public use to day hiking and, with permit, scientific research. The guidelines also call for treating high-priority logging roads and log landings that currently cause major degradation or imminently threaten to cause major degradation of the Reserve’s streams because of landslides or other forms of erosion.

To initiate development of the long-term management plan, the agencies responsible for Reserve management initiated a public scoping process. The process is intended to solicit public and

agency input about issues of concern, as well as ideas and proposals for long-term management. Because a joint environmental impact statement/environmental impact report (EIS/EIR) will be prepared in conjunction with the plan, the scoping process sought input on both desirable plan policy and the scope of the environmental analyses needed to support selection of a management plan among feasible plan alternatives.

REPORT ORGANIZATION

A description of the scoping process comprises the following section of this report. It is followed by a summary of presentations made by interest groups at three public meetings. The subsequent section is the core of this document: a summary of all of the input received in presentations, during meeting discussions, by e-mail, by phone message, and by letter. It is arranged by planning topic area. Following a summary of comments on the Notice of Intent/Notice of Preparation for the EIS/EIR, a final section identifies those issues to be considered in the planning process and those that will be deferred. The rationale for deferring certain issues is given.

Appendix A lists all the organizations and individuals who participated in the planning process.

Section 2. Public Scoping Process

GOAL OF THE SCOPING PROCESS

The primary goal of the scoping process was to solicit from agencies and the public their concerns, ideas, and proposals for long-term management of the newly created Reserve. Many groups and individuals have been involved with Reserve acquisition and management issues over several years, and their concerns and ideas were recognized as a valuable asset with which to begin the planning process. Input was needed and was sought in two inseparable areas: appropriate management policy for the Reserve and potential environmental impacts (physical, biological, social) of various management options.

THE SCOPING PROGRAM

The public scoping program was developed by the project sponsors, BLM (Arcata Field Office) and DFG, with the assistance of Jones & Stokes of Sacramento, California, and the Redwood Community Action Agency of Eureka, California. The program was designed to give the public a range of input opportunities, including:

- three public meetings in northern California in June 2000 (Eureka, San Francisco, and Sacramento) on weekday evenings;
- a website with planning process information and an electronic interface for public input;
- two information and voice mail lines (Eureka and Sacramento), to answer questions and allow input of verbal comments; and
- a written comment period, which was extended twice as requested by interested parties.

The scoping program also included the formal filing, publication, and notification of a Notice of Intent/Notice of Preparation of a joint EIS/EIR under provisions of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). The scoping period extended from May 18 to August 18, 2000.

A nontraditional forum for soliciting management proposals was used to focus the initial input gathering. Interest groups and individuals who had ideas and proposals for Reserve

management were invited to present their proposals to a general assembly at the meetings in Eureka and San Francisco. All groups and individuals wishing to make presentations were accommodated. A synopsis of the legislative scope of the management plan for the Reserve was provided to each presenter beforehand, to assist each presenter in formulating effective presentations. After these presentations, all meeting participants were given the opportunity to attend small-group “breakout sessions” to facilitate in-depth dialogue about the issues raised by the presenters and to solicit other concerns, ideas, and proposals. All ideas and concerns expressed during the presentations and breakout sessions were recorded.

OUTREACH

To initiate the scoping process, information about the planning process and comment opportunities was mailed to those who had expressed interest in Reserve management in the past and to additional groups and individuals who the planning team staff identified as potentially interested. Each mailed packet included a meeting and comment-process announcement, planning background information, legislative requirements for the scope of the plan, commenting guidelines, and a meeting/input flyer for posting. All of the mailings went out on the same date more than one month in advance of the first meeting.

Media outlets (print, television and radio) in Humboldt County, the San Francisco area, and the Sacramento area were sent several faxes in the weeks leading up to the public meetings, announcing the purpose, dates, times, and locations of the meetings. Several prominent media contacts were telephoned and encouraged to report on the Reserve planning process. One major article appeared in the Santa Rosa Press Democrat and others appeared in the Eureka Times-Standard and the Sacramento Bee. Additional announcements were made on radio and television broadcasts.

PUBLIC MEETINGS

Public meetings were conducted between 6 and 10:30 p.m. at easily accessible locations, with ample parking, that provided comfortable space for many people. At each meeting, Lynda Roush, the Arcata BLM Field Office Manager, welcomed the public, gave an overview of the Reserve history and the present planning process, and introduced the meeting moderator, who described the meeting format and agenda. Interest groups then made their presentations. Ten interest groups made presentations at Eureka, and five interest groups made presentations at San Francisco. Major points were recorded (see following section). Presentations provided the public with background and context about a spectrum of interests in Reserve management that would help stimulate their thinking during the subsequent breakout sessions. In Eureka, four breakout sessions were conducted. In San Francisco and Sacramento, because of the lesser attendance and with group consensus, public input was recorded from the general assembly. At all meetings, the moderator provided active

facilitation, and input was recorded on large charts that allowed correction and refinement during these interactive sessions.

The innovative meeting format proved to be particularly successful in gathering key management ideas early in the planning process. Participants were generally supportive of the approach, and several participants expressed the view that the meeting format was an improved method of public involvement, especially appropriate for a planning process. Overall, approximately 100 people attended the public meetings.

COMPILATION OF PUBLIC SCOPING COMMENTS

As noted above, scoping comments were generated in several forms: meeting presentations, meeting discussions, written submittals (email and letter), and voice mail. All of these expressions were systematically analyzed, broken into discrete subject areas, and coded accordingly. To aid this approach, potential commenters were asked to self-code their emails and letters. The planning team coded meeting presentation and discussion comments, voice mail comments, and uncoded email and letter comments. These categorized comments were then distributed to the project sponsors and various resource specialists for interpretation and summarization. The resulting summaries of comments by subject area are presented below in “Issues Identified by Participants”.

Section 3. Summary of Presentations at Public Meetings

Presentations by interest groups were made at the Eureka and San Francisco meetings, but not at the Sacramento meeting.

EUREKA SCOPING MEETING

Introduction

Bureau of Land Management, Arcata Field Office

Lynda Roush

- After a controversial acquisition process, BLM and DFG became joint managers of Headwaters Forest.
- A Habitat Conservation Plan on adjacent 220,000 acres of Pacific Lumber Co. property bans clear cutting for 12 years.
- Secretary of Interior Babbitt visited the forest soon after acquisition and determined the area would be managed as a Reserve.
- The Reserve contains ancient redwood forests—including high quality habitat for the marbled murrelet, coho salmon, spotted owl, and other species—as well as previously managed lands and over 40 miles of logging roads.
- Interim management guidelines are being used during this process. Access is limited to day hiking. Elk River trailhead is open to public and receives about 350 visitors per month, and access from Salmon Pass trailhead is only allowed by guided hikes during part of the week.
- The Management Plan will take approximately 18 months to complete and will address three general areas: research and monitoring, restoration, and recreation. BLM hired Jones & Stokes of Sacramento as the consulting firm to help prepare the plan.

Interest Group Presentations

Newburg Road Residents

Kim Eubanks

- Residents are shocked and appalled that access was developed on Newburg Road.
- Request that a research study be conducted on impacts of using Newburg Road as access to Reserve.
- Road is quiet, peaceful, safe now. Much of the road is single lane, especially when activities require on-street parking. Increased traffic and parking is a safety issue. Sixteen children live along the road—more with visiting friends and family.
- Dust, litter, vandalism spurred by Reserve access needs to be controlled.
- County or Fortuna law enforcement already have a slow response time.
- Reserve access added to logging road use creates more impacts to residents.
- Private water sources exist along road. What will the impacts be of bathroom use?
- Residents prefer selection of another access route (like Yager Creek, Carlotta access -- not currently used by logging trucks on Sunday, good road). If there is to be access, residents want minimized access, like current docent-led tours (e.g., small groups, kids groups, etc.).
- Use of road by political activists and the potential for political actions also concerns residents.
- There have been impacts to Strongs Creek. Residents would like fish back in creek and encourage restoration as part of management plan.
- Current guided tour vans travel on Newburg Road too fast.

Humboldt Bay Watershed Advisory Committee (HBWAC)

Mark Wheatley

- HBWAC is a diverse coalition of governments, industries, community groups, non-profits, private landowners, and others working toward cooperative management of lands in the watershed. The committee also prioritizes and promotes restoration of salmonid habitat and water quality in the watershed. We are interested in linkages between the Reserve and the greater watershed.

- Humboldt Bay is the second largest estuary on the Pacific Coast. It is fed by seven major drainages. The bay provides 70% of California’s oyster crop and 10% of the U.S. crop, and it is a major stopover on the Pacific Flyway that provides shorebird habitat.
- HBWAC wants to see reduction of upland sediment delivery and would like the plan to have erosion and sedimentation control objectives. The Committee supports development of an array of restoration techniques, including erosion control, road removal, and riparian restoration.
- HBWAC encourages working with the timber industry to ensure habitat improvement in the watershed.
- The Reserve is a majestic classroom with great interpretive value.
- Recreation opportunities should be linked with other resources in the region. All recreation use should be monitored closely and adapted over time to reduce impacts.
- Conservation easements should be sought with other landowners, otherwise the Reserve has tough boundaries to manage, especially for recreation. Opportunities exist to work with other landowners, and solutions exist outside current boundaries for conservation and recreation/trails.
- A spirit of collaboration is needed to coordinate activities outside and inside of the Reserve for greatest benefits to habitat and the public. HBWAC is available to provide input and assistance in this realm.

Environmental Protection Information Center (EPIC)

Paul Mason

- EPIC has a 15-year advocacy history for the Reserve and a legal interest in its habitat protection.
- Congressional language recognizes need for protection of this critical area of biological concern. Federal and state intent is embodied in legislation: “to conserve and study the land, fish, wildlife...while providing public recreational opportunities...”. Activities allowed need to be measured in terms of biological habitat and resource effects.
- EPIC is concerned about equestrian and bike uses and impacts: erosion, exotic introduction, effects on road-removal goals. Horses and bikes don’t belong in the Reserve.
- A key issue: introduction of people and their trash and the subsequent increase in non-native species—particularly birds such as ravens and Steller’s jays that are predators of murrelets and whose populations increase with increases in trash, refuse.

- The Reserve is one of only three significant nesting areas for murrelets. An example of the murrelet's susceptibility to predation because of recreational impacts is what occurred at Prairie Creek State Park.
- Numerous other opportunities exist outside the Reserve for high-impact uses, such as horseback riding, mountain biking, and motorized access. The Headwaters forest should be kept as a benchmark, baseline, or reference site for natural ecological conditions protected from human impacts.

U.S. Fish and Wildlife Service (USFWS)

Phil Dietrich

- Marbled murrelet is of primary concern to USFWS; it was federally listed as endangered in 1992 and state listed as threatened in fall of 1992. Primary reasons for listings are loss of habitat, decline in population, and low reproductive rates.
- Murrelets nest on large limbs (greater than 7 inches in diameter) of coastal old-growth trees and lay one egg in a nesting season. Locating actual nests is difficult, but nesting occupancy behavior has been observed at numerous survey stations in the Reserve, indicating that nesting/breeding is likely nearby. This is evidence of a high density of murrelet occupation in the Reserve. (Note: surveys have been done in only part of the Reserve.)
- Predation of nesting murrelets by ravens, crows, jays is enhanced by creation of more forest edge (as after timber harvest) and by human intrusion.
- The Headwaters Reserve and Humboldt Redwoods State Park are only two areas on the North Coast (in fact, north of San Mateo County) supporting nesting populations.
- The Endangered Species Act (ESA) mandates consultation with USFWS on projects that may have effects on endangered species. ESA also mandates creation of a recovery plan. A recovery plan for marbled murrelet exists, and acquisition of lands with nesting or nesting potential is key. The Reserve is identified as area to protect/acquire for nesting habitat. The next 50 years is critical to murrelet survival.
- USFWS recovery plan web site is <http://endangered.fws.gov/RECOVERY/RECPLANS/Index.htm>. The contact is Lynn Roberts of the Arcata office at (707) 822-7201.

- IMBA/ABC was founded in the 1980s to 1) advocate keeping trails open to bike use on public land, 2) promote responsible bike use, and 3) assist with trail maintenance and repair. We encourage members to ride only on open trails, yield trail to other users, leave no trace, maintain control of bikes, respect animals, and other principles.
- The organizations support conservation, species protection, restoration, water quality protection.
- Mountain biking is both recreation and access, uses both mandated in the Reserve legislation.
- The Reserve is attractive to cyclists because of the proximity to Eureka and the ability to travel there directly without use of a car.
- Mountain bike access to private and public lands in the Humboldt Bay region is limited. The few areas available are the Arcata Community Forest, Humboldt Redwoods State Park, and Prairie Creek State Park.
- Two opportunities at Headwaters include a) family bike access on the Elk River Road to the Falk site and b) fitness riding within/around the Reserve.
- IMBA has two full-time trail crews available for assistance to assist BLM in improving trails for bicycle access.

- AFI has a great deal of history with Reserve issues. Early on we advocated including the northern portion of the Reserve, largely for recreational access and because it is the most appropriate area for recreation. I authored the recreation component of the Stewardship Plan.
- Political development of the existing Reserve boundaries did not adequately consider what was most appropriate for managing both ecological and recreational resources. Best recreational access is outside of existing Reserve lands. The “Hole in the Headwaters” has the best roads for conversion to trails. The most logical placement of a north-south through trail is just outside of (to the west) the existing boundary along an existing road alignment.
- Because of inadequate size/configuration of the adopted Reserve, AFI recommends allowing low-impact day use only, not including equestrian or bike use unless additional lands are acquired.

- AFI would like to get together with equestrian and mountain bike groups to discuss appropriate recreation access; equestrians should help advocate for acquisition of the “Hole”.
- Network of existing roads is poorly placed for recreation planning. Many existing roads may be in wrong place altogether and should be pulled and a new trail system designed. BLM should conduct a study before constructing or opening trails in or to the Reserve to minimize/avoid impacts on murrelets (e.g., by not locating them through old growth).
- The old Eureka-to-Fortuna trail through the Reserve is a problem as it goes directly through old growth.

League of Women Voters (LWV)

Byrd Lochtie

- LWV is a local Humboldt area organization that studies issues and creates position documents for advocacy. The following recommendations are approved by unanimous vote of the local board.
- General LWV tenets:
 - support managing/conserving natural resources of interrelated ecosystems and controlling pollution,
 - support coordinated interagency planning (rivers and streams/watersheds should be maintained in their natural state and restored when degraded),
 - economic and aesthetic issues can be in harmony, and greenbelts are desired along streams.
- Recommendations for Reserve management are to:
 - protect the ecosystem,
 - restore degraded watersheds; remove roads to prevent sedimentation,
 - keep roadless areas roadless,
 - control introduction of non-native species,
 - reduce impacts on access road residents,
 - allow nonimpacting uses only,
 - allow access by hiking trails only (bike and horse use may be too destructive),
 - access from the north should consider impacts to residents on road,
 - day use only; camping outside Reserve only,
 - education/interpretive development encouraged,
 - address and control noise,
 - use permits to regulate access and impacts, maybe restrict use seasonally,
 - no dogs,
 - user fees should be zero or modest, and
 - the resource management plan should serve as a model for County General Plan update.

- RRER protests the use of term “Reserve” as being too exclusionary. The term was illegally added by BLM after the legislation was enacted. It was set aside for generations of *people*.
- Horses are herbivores. A four-footed herbivore is less likely to disturb wildlife than man: a two-footed hunter.
- We recommend having unpaved trails and parking areas, both having occasional water troughs.
- Trails properly designed do not contribute to erosion, especially when best management practices are used as guides. Natural sediment yield is greater than that from erosion of trails.
- Trails can channel users into appropriate areas. Equestrians do not deviate from trails. Equestrian could provide trail patrol and maintenance.
- Equestrian use has historical/cultural value.
- Equestrians can travel far; Headwaters could provide a needed link to a regional equestrian trail network.
- A multiuse trail system should be developed.
- Headwaters is close to developed areas and allows direct access by horseback, reducing the need to accommodate trailers by allowing lower gasoline use than is offered by existing equestrian opportunities in parks. Access to Headwaters would also disperse use/impacts now occurring on other public lands.
- Encourage tourism and recreation because it can make up for tax base lost from conversion of Headwaters from private to public ownership.

- I am a hiker and mountain biker and have been an advocate of Reserve acquisition and proper management.
- Protection of the murrelet and coho salmon should be the highest priority of Reserve, but we recognize the need for recreation.
- Human access and related trash may increase murrelet predation and must be managed.

- It is beneficial that the existing, unrestricted northern access is a difficult 5-mile hike to get near the old-growth groves. Allowing the shorter southern access without a docent is a concern. We recommend that access to old growth be only docent lead and that no trails go into old-growth groves.
- I have observed increased access and related impacts to wildlife: no scat from bears anymore and many new volunteer trails.
- Put horse and bike use access on hold until increased acquisition can provide for these uses.
- Agree that bike access to, but not past, Falk may be acceptable, but how would you prevent bike use beyond this point?
- We have concerns regarding timber harvests in the "Hole". Timber management on adjoining lands may impact the public land, as happened at Redwood National Park. We encourage acquisition of these areas.

Fisheries Biologist

Pat Higgins

- The Reserve acts as a sponge: it filters rainfall and mediates run off, providing a summer-long base flow. It lowers water temperatures. Erodible soil covered by vegetation prevents sediment contribution to streams (turbidity is especially a problem for young salmon and redds). These factors are important for restoration of salmon/steelhead populations.
- Elk River has rare combination of steelhead, chinook, and coho; fish counts in Headwaters show robust numbers relative to other streams.
- Reserve has a role in restoring salmon: existing populations elsewhere are nonanadromous remnants, except seven creeks, including the South Fork of the Elk River, which can act as donor to other streams.
- Remove roads.

SAN FRANCISCO SCOPING MEETING

Introduction

Bureau of Land Management, Arcata Field Office

Lynda Roush

- Ms. Roush discussed the same points addressed in the Eureka scoping meeting.

Interest Group Presentations

Bay Area Coalition for Headwaters

Michael Passoff

- For 12 years there was a tremendous public effort to protect the Reserve. It involved enormous demonstrations, thousands of arrests, and organized political efforts. During this entire time there was no call for recreational access. The Reserve should be considered an ancient-forest preserve, serving the highest value of habitat preservation.
- Any activity (including recreation, restoration, etc...) poses a risk to the integrity of the ecosystem. BLM needs to analyze all proposed activities in terms of risk to species, including cumulative impacts. Plans and activities that promote recovery of those species should be prioritized. Ecological goals should be set; for instance, the Reserve should be free of roads and exotic species.
- There should be consideration of the declining status of old-growth-dependent species and an emphasis on principles of conservation biology.
- The Reserve is a small fraction of the area originally proposed, and adjacent areas in the watershed should be protected.
- There should be assessment and consultation regarding plant surveys, historic surveys, tribal involvement, etc.
- “No public access” should be one alternative considered. Recreational access is being prematurely promoted prior to completion of the plan. If any access is allowed, it should be docent led outside of old-growth groves and have an interpretive component. Trails should be designed so they do not cause sediment yield.
- Many other recreational opportunities exist in other redwood parks in the region that should be evaluated, but there are no habitat reserves.

- There should be stiff financial penalties for access violations.

Public Access to Headwaters (PATH)

Mary Miles and Robert Anderson

- PATH is a newly formed group that supports public hiking access to the Reserve.
- Recreational access should be limited to footpaths that are accessible from trailheads/parking lots located relatively close to old-growth groves. Elk River is not an adequate trailhead; the distance to old-growth groves is too great to hike. Some existing roads and potential locations for parking and trails are not shown on existing maps, and with better information one might locate suitable trailheads at Salmon Pass, Alicia Pass, and near Elk Head Springs.
- Pursuant to CEQA/NEPA, a full range of access options should be pursued, i.e., no access, moderate access, full access.
- Locked gates prohibiting access at the end of day should be enforced with stiff penalties.
- We do not support equestrian, bike, or vehicular access to the Reserve.
- Picnicking (if food is allowed at all), trash, and restroom facilities should be made available at parking/trailhead areas.
- Public access is compatible with ecosystem management—we want the public to appreciate what hard work has saved.
- Murrelets in nests are not sensitive to people below.

Forests Forever (FF)

Eric Brooks

- For over ten years, FF has been the primary force behind the public movement to save a 60,000-acre tract. We are now shifting to overall forest protection and are the group most in touch with what the public wanted, and now wants, for the Reserve.
- The Reserve is a small fraction of the proposed area that the public expected to be protected (a hole in the Headwaters is not what public expected). We urge a focus on the entire watershed. BLM/DFG should exercise aggressive oversight over activities outside of the Reserve, which should be *a preserve*. Focus on watershed integrity and acquisition of adjacent lands (especially the Hole) should be the primary goal.

- A great deal of research and information collection—on the ecosystem; recreational use, impacts, and violations; the watershed and adjacent lands; and restoration impacts—should provide the basis for the plan.
- This reserve should serve as a world model for ancient forest restoration. Clear guidelines need to be set for full restoration and for complete analysis of the ecosystem.
- Until these processes of analysis and restoration are complete, public access should be very limited. Afterwards, footpath access could be developed to facilitate interpretation of restoration activities. Bike and equestrian access could possibly be allowed on the periphery, not in the old-growth groves.
- Indicator species should be given primary concern, especially salmonids.
- No commercial access or use should be allowed.

Humboldt Bay Watershed Advisory Committee (HBWAC)

Mark Wheatley

- HBWAC is a diverse coalition of governments, industry, community groups, non-profits, private landowners, and others working toward cooperative management of lands in the Humboldt Bay watershed. The committee also prioritizes and promotes restoration of salmonid habitat and water quality in the watershed. We are interested in linkages between the Reserve and the greater watershed.
- Humboldt Bay is the second largest estuary on the Pacific Coast. It is fed by seven major drainages. The bay provides 70% of California's oyster crop and 10% of the U.S. crop, and it is a major stopover on the Pacific Flyway that provides shorebird habitat.
- BLM Arcata Field Office is very experienced in the management of old-growth forests. Only remnants of these remain today: a number of Reserves on North Coast under BLM management. This Reserve is the last linkage to pristine habitat around the bay. With this acquisition, 30% of Salmon Creek is now in public ownership.
- HBWAC wants to see reduction of upland sediment delivery, and would like plan to have erosion and sedimentation control objectives. The Committee supports development of an array of restoration techniques, including erosion control, road removal, and riparian restoration.
- HBWAC encourages working with timber industry to ensure habitat improvement in watershed.
- The Reserve is a majestic classroom with great interpretive value.

- Recreation opportunities should be linked with other resources in the region. All recreation use should be monitored closely and adapted over time to reduce impacts.
- Conservation easements should be sought with other landowners, otherwise the Reserve has tough boundaries to manage, especially for recreation. Opportunities exist to work with other landowners, and solutions exist outside current boundaries for conservation and recreation/trails.
- Spirit of collaboration is needed to coordinate activities outside and inside of the Reserve for greatest benefits to habitat and the public. HBWAC is available to provide input and assistance in this realm.

U.S. Fish and Wildlife Service

Lynn Roberts

- The marbled murrelet is in the alcid family: forages at sea and nests in forests, which is unique. It lays eggs on duff, litter, or moss on large limbs or platforms. Murrelets are secretive, have cryptic plumage, and fly during low light, quickly from sea to nest. They are very vulnerable to predation. Murrelets nest particularly in old growth redwoods but sometimes nest in residual groves with old growth characteristics or in old-growth Douglas-fir.
- Murrelets are federally listed as threatened, and state listed as endangered. Factors of decline include habitat loss and a low rate of reproduction.
- Reserves and state and national parks have the highest populations in California. The nearest populations to the south are far, in Santa Cruz and San Mateo Counties, where populations are small.
- “Occupied” behavior confirmed at all of numerous survey stations in Reserve, meaning that nesting is likely occurring near these survey stations and that density of murrelet occupation is high in the Reserve.
- Section 7 of the ESA guides federal protection, which is administered through informal consultation (for determining potential effects of a project during early stages) and formal consultation, which culminates in a biological opinion, which may include mandatory measures for protection.
- The recovery plan created for the murrelet after federal listing is advisory, not mandatory. It recognizes the next 50 years as critical for conservation of the species, mitigation of further habitat degradation is needed, existing nesting areas are insufficient to maintain current population levels, and acquisition and protection of more habitat is needed. The recovery plan is on the web at <http://endangered.fws.gov/RECOVERY/RECPLANS/Index.htm>.

- USFWS's primary interest in Reserve consultation for adoption of the Headwaters Reserve management plan is to avoid an increased risk of predation, particularly by corvids, and to avoid an increased risk of human disturbance.

Section 4. Issues Identified by Participants

This section is a summarized compilation of issues identified by all scoping participants, including meeting presenters, meeting attendees in general assembly or breakout sessions (from comments recorded on flip charts), and individuals and organizations submitting written or voice-mail comments.

ECOSYSTEM PRESERVATION

General

Many comments were received that address preservation of natural values of the Reserve generally. All of these comments pertain to ecosystem protection or restoration. Major comments include:

- management of the Reserve must be developed within the congressional mandate;
- all management activities should be analyzed in light of the purposes and prohibitions of ESA;
- the primary focus of the plan should be full ecosystem protection and restoration of a sustainable ecosystem;
- preservation of the old-growth ecosystems should be the first priority;
- maintaining natural processes should be given first consideration in making decisions;
- decisions should be guided by the principles of conservation biology;
- management alternatives that promote ecosystem recovery should be favored;
- restoration activities should be minimized and applied only where absolutely necessary;
- restoration should occur only in previously disturbed areas;

- experimental restoration forestry approaches should be analyzed in the context of the legislative goal of addressing “scientific research on forests”, as well as the legislation’s general conservation mandate;
- only activities that result in no impacts should be allowed;
- pollution of resources should be controlled to preserve the physical, chemical, and biological integrity of ecosystems;
- cumulative impacts should be analyzed, including the logging impacts of Pacific Lumber;
- harmful scientific work should not be allowed; and
- old-growth should be managed as a Research Natural Area (National Forest Service definition).

Watershed Restoration

Many comments were received that pertain to watershed restoration in the Reserve. The majority of these comments deal with the removal of preexisting roads. Major comments are listed below.

General

General comments include:

- damage to streams and watershed should be repaired;
- the watershed should be kept intact;
- areas of erosion should be noted, and a plan to stop erosion should be developed;
- exposed soils in previously clear-cut areas need restoration action;
- caution should be used in intervening with restoration treatments;
- heavy equipment should not be used;
- total watershed management should be left to qualified professionals;
- a larger watershed assessment is needed of areas within and outside the Reserve; and

- linking the regional watershed and the Reserve should be considered.

Roads

Major comments that address roads include:

- there should be no roads within the preserve;
- roads should remain open;
- logging roads should be removed without damaging the ecosystem;
- some roads do not cause impacts;
- early priority should be given to decommissioning unnecessary and unneeded roads;
- all roads except the one leading to the Salmon Pass parking lot should be removed;
- the “Death Road” should be removed;
- abandoned roads, skid trails, and landings should be recontoured;
- road stability should be evaluated;
- to evaluate potential road removals, consider the contribution of the road systems to stream turbidity and the impacts on salmonids and the effects of road soil compaction on revegetation efforts;
- landings should be converted to staging areas;
- roads that are revegetated should be left alone;
- problems like Humboldt crossings should be left to heal unaided;
- simply letting roads revegetate is not enough to restore the changes they cause in runoff and subsurface flow diversion;
- no monoculture planting should take place in restoring roads;
- consider revegetating roads with clover;
- the following impacts should be evaluated for road removal proposals: heavy-equipment noise, sedimentation, vegetation removal, and stream bank or bed alteration; and

- mitigation for road removal should include proper fuel storage and spill avoidance, fill stabilization, temporary and permanent drainage/erosion control structures, and revegetation.

Streams

Major comments that address streams include:

- rivers and streams should be left in their natural state;
- healthy streams should be protected;
- sediment buildup in salmon spawning streams should be prevented;
- the forest should be managed to preserve and enhance the viability of the salmon population through sound watershed management;
- restoration activities should address river temperature, turbidity, oxygenation, and stream cover.

Forest Restoration

Many comments were received that indicate possible options for forest restoration in the Reserve. Most comments pertain to management of the second-growth stands that resulted from prior logging within the Reserve. Major comments include:

- restoration should aim to restore old growth and associated species populations to sustainable levels, to restore the forest to late seral forest conditions;
- old-growth areas should not be logged for any reason;
- no form of logging should be allowed anywhere in the reserve, to protect the forest;
- salvage logging should not be recommended in the management plan;
- leave young stands alone unless there is a fire hazard;
- management should take place only on previously logged stands and should be analyzed in conjunction with a “no-action” alternative;

- an assessment should be drafted that indicates how the forest's denuded, damaged, and second-growth areas will grow back to old-growth forest;
- use a 500-year planning horizon;
- don't experiment with the Reserve, experimental forest management models already exist;
- mandate that DFG, BLM, and the California Department of Forestry and Fire Protection work together for forest management;
- include members of the environmental community when writing the plan for forest restoration;
- harvests should be excluded 100 yards from streams and creeks;
- harvest should be selective, only 1% of any area should be harvested per year;
- forest material produced in restoration projects should not be removed;
- replanting activities should be conducted to reflect the diversity of plants that are present in old-growth forests;
- planted trees should not be genetically similar trees;
- fire history research is needed to determine need for controlled burning;
- restoration should be performed by a highly trained work force;
- document forest restoration process for interpretive studies and public education; and
- the Reserve should serve as a world model for ancient forest restoration.

Wildlife and Fish Habitat Conservation

Many comments were received pertaining to the conservation, preservation and restoration of wildlife and fish habitats. Comments range from recommendations for general goals and objectives to recommendations for specific species or groups of species that should be given priority in restoration efforts. Major comments include:

- the goal of the plan should be to preserve a sanctuary for native species;

- habitat values should be paramount, and species recovery should be the ultimate goal;
- habitat restoration should provide for long-term maintenance of resident species;
- conservation plans should not disrupt the area's ecosystem;
- wildlife should be included in the management plan;
- assess need for habitat linkages within the Reserve and to neighboring areas;
- coordinate with the timber industry to ensure habitat improvement throughout the watershed;
- focus should be placed on habitat management for the marbled murrelet, northern spotted owl, and Coho salmon;
- the Headwaters Reserve and Humboldt Redwoods State Park are the only two areas on the North Coast supporting nesting populations of murrelets;
- consider creating murrelet habitat in previously harvested areas;
- conduct an analysis to determine if public access would increase the numbers of marbled murrelet predators, predator control should be addressed;
- restoration activities should promote salmonid habitat and water quality in the watershed;
- upslope, offsite habitats should be considered when examining risk to coho salmon;
- restoration of riparian forest should be considered;
- the South Fork of the Elk River can act as a salmon donor to other streams;
- the following species should be addressed: marbled murrelet, northern spotted owl, great grey owl, coho salmon, southern torrent salamander, tailed frog, northern red-legged frog, foothill yellow-legged frog, northwestern pond turtle, bald eagle, little willow flycatcher, bank swallow, golden eagle, California wolverine, pacific fisher, California red tree vole, American peregrine falcon, and western snowy plover;
- the following plants should be addressed by the management plan: *Arctostaphylos canescens* spp. *sonomensis*, *Astragalus agnicidus*, *Bensoniella oregona*, *Boschniakia hookeri*, *Calamagrostis foliosa*, *Caren leptalea*, *Carex praticola*, *Epilobium oreganum*, *Glyceria grandis*, *Hesperolinon adenophyllum*, *Lathyrus biflorus*, *Lathyrus palustris*, *Lilium occidentale*, *Lycopodium clavatum*, *Microseris borealis*, *Monardella villosa* ssp. *globosa*, *Monotropa uniflora*, *Montia howellii*, *Oenothera wolfii*, *Sanguisorba*

officinalis, *Sanicula tracyi*, *Sidalcea malachroides*, *Sidalcea malvaeflora* ssp. *patula*, *Sidalcea oregona* ssp. *eximia*, *Theropsis robusta*, *Thlaspi californicum*, and *Tracyina rostrata*; and

- any plans should consider the impacts to species that are not currently listed but meet the criteria for listing as threatened or endangered.

Exotic Plant Control

Several comments were received that address the need for exotic plant control in the Reserve. The majority of comments urge use of nontoxic alternatives for exotic plant removal. Other comments address specific invasive plant species and locations that should be considered for eradication. Major comments include:

- removal of non-native plants should be aggressive;
- removal of non-native plants should be performed using hand, mechanical, and prescribed fire methods;
- removal of non-native plants should not be done with the use of toxic herbicides; herbicides should not be used anywhere in the vicinity of the Reserve;
- removal and control should not cause harm to other species in the ecosystem;
- overstory canopy should be allowed to grow to shade out the problem plants;
- the management plan should address the control of Scotch Broom (*Cytisus scoparius*), Pampas grass (*Cortaderia jubata*), and Tansy ragwort (*Senecio jacobaea*);
- the plan should call for elimination of pampas grass before sprouts become established;
- species composition on either side of the road in the Little South Fork Elk River area should be examined to determine what to plant and the need for exotic species control;
- plants that are not genetically engineered should be planted in order to negate the edge effects brought about by the road near the Little South Fork Elk River; and
- horse feces are not vectors for non-native plant species seeds.

Ecosystem Monitoring

Several comments were received that address the need for ecosystem monitoring in the Reserve. Major comments include:

- the plan should include provisions for regular monitoring of special-status species and those species for which populations are declining;
- monitoring should be conducted to ensure that populations are returning to historic natural levels;
- the plan should include an adaptive management strategy that would trigger reevaluation of permitted activities if the murrelet population declines;
- salmon, steelhead, and amphibian populations should be monitored regularly;
- baseline aquatic and riparian habitat assessment should be conducted;
- wildlife health is a valuable indicator of successful restoration;
- a monitoring plan should be developed that evaluates species diversity;
- monitoring of human activities should ensure that the preserve is not being misused (e.g., illegal logging, fishing, hunting); and
- monitoring information should be made available to the public.

PUBLIC ACCESS TO THE RESERVE

Several comments were received pertaining to the nature and use of access routes to the Reserve. Major comments include:

- additional access roads to the Reserve should be considered to minimize visitor impacts to residential neighborhoods on Elk River and Newberg Roads;
- rights for alternative access through private timberlands should be acquired;
- alternate southern access points should be considered;
- the north and south entrances to the Reserve should be closed to public access;

- unrestricted public access should be provided at both the northern and southern entrances;
- parking areas should not be expanded and perhaps even reduced;
- locked gates prohibiting access at the end of day should be enforced with stiff penalties;
- dust, litter, and vandalism affecting residents along Elk River Road and Newburg Road that is being caused by public access to the Reserve needs to be controlled;
- consider a parking lot located a significant distance from the southern entrance (Elk River Road access) to the Reserve with scheduled van transport of visitors, to minimize neighborhood impacts from visitor traffic;
- large vehicle access cannot be accommodated by Elk River Road and should be prohibited;
- landowners on Elk River Road should be consulted regarding impact mitigation;
- research the impacts of using Newburg Road as access to the Reserve;
- prohibit parking on Newburg Road;
- the current guided tour vans travel on Newburg Road too fast;
- Newburg Road should be widened and regraded to accommodate increased traffic and eliminate existing safety hazards;
- Newburg Road citizens are concerned about effects of trespassers on their water sources along the road and about use of the road by political activists;
- only docent-led hikes should be permitted from southern entrance;
- there should be no further consideration of an Alicia Pass parking lot;
- regional trail connections should be provided to the Reserve; and
- the costs and benefits of all decisions related to public access should be carefully considered and documented.

RECREATION

In this section, comments about appropriate recreation uses of the Reserve have been divided into categories: proposed uses and recreational facilities. It is recognized that uses and facilities are not entirely separable and that some of the comments in one category may also apply to the other.

Proposed Uses

Many comments were received that address the type of public recreation that would be compatible with the legislative mandate to maintain ecological integrity of the Reserve. Most of these comments address the compatibility of hiking, horseback riding, and bicycling with preservation of old-growth ecosystems and associated threatened and endangered species. Some of these comments support providing for a diverse mix of recreational activities. Other comments urge a conservative approach that limits the type of allowable uses while conducting monitoring of impacts. Other comments regarding recreation use cannot be classified in this manner; they are included after the “Diverse Recreation” and “Limited Recreation” comments.

Diverse Recreation

Major comments encouraging a diversity of recreational opportunities include:

- planned access for hikers, equestrians, and bicyclists should be allowed in the Reserve;
- equestrian and bicycle use should be permitted at the Elk River access;
- north access (Elk River) should be open only to existing uses and bicycles;
- backpacking and hiking are benign activities and should therefore be permitted;
- restricted and regulated camping should be provided in the Reserve away from sensitive areas;
- marbled murrelets have been shown to nest successfully in parks that allow car camping;
- consumptive recreational uses (hunting, fishing) should be permitted in the Reserve;
- Governor’s Grove may be appropriate for controlled access to old growth because it is close to the road;

- mountain bike access to private and public lands in the Humboldt Bay region is limited; the few areas available are the Arcata Community Forest, Humboldt Redwoods State Park, and Prairie Creek State Park;
- two opportunities at Headwaters are a) family bike access on the Elk River Road to the Falk site and b) fitness riding within/around the Reserve;
- finding suitable areas for bicycling in the Reserve should give deference to species protection;
- bicycle use is beneficial because it can be conducted directly from the Eureka area without the need for vehicle use to reach the Reserve;
- clubs like IMBA could provide no-cost trail patrols and other services in cooperation with local entities to monitor use;
- bicycle access should be permitted on Ridge Road;
- equestrian use is compatible with the Reserve because horses are nonthreatening to wildlife, do not require extensive maintenance of facilities and trails, do not introduce non-native plant seeds; equestrian use has cultural and historical values; and equestrians are most likely among recreational user groups to stay on designated trails;
- equestrian access should be permitted as some visitors (disabled, elderly) can only access wilderness areas via horseback riding, and should not suffer discrimination;
- equestrians could be required to remove horse waste from Reserve;
- backcountry horsepeople are willing to assist BLM in any way, including helping to build trails; and
- there should be no access restrictions (seasonal, daily, etc.) imposed on Reserve visitors.

Limited Recreation

Major comments urging limited recreational opportunities include:

- habitat preservation should take precedence over recreational use;
- restoration of the forest should occur before recreational uses are allowed;

- seasonal and hourly access restrictions to protect marbled murrelets and other nesting species should be considered;
- all recreational activities, including hiking, biking, and equestrian use, should be prohibited throughout the entire Reserve to protect sensitive species and the old-growth ecosystem;
- all recreational activities, including hiking, biking, and equestrian use, should be prohibited in old-growth areas of the Reserve to protect sensitive species and the old-growth ecosystem and in areas prone to erosion problems;
- old-growth access is most appropriate in state parks;
- old-growth areas should be accessed only by visitors accompanied by a docent;
- ample opportunities for recreational uses are available along the north coast and throughout California; only foot travel on hiking trails should be permitted in the Reserve;
- horse and bicycle use access should be put on hold until increased acquisition can provide for these uses;
- bicycling and equestrian uses are known to disrupt sensitive species and create erosion problems and should therefore be prohibited from use in the Reserve;
- multiple uses of trails may pose safety hazards;
- bicycle use in the Reserve should be more strictly regulated;
- north access should be open only to existing use and bicycles;
- campgrounds and picnic areas should be prohibited or strictly limited in the Reserve to avoid attracting predators of sensitive species, namely the marbled murrelet;
- camping facilities should not be provided;
- camping should be allowed only for school classes;
- road access would be costly and allow for inappropriate increased access;
- motorized vehicle use and off-road vehicle use should be prohibited throughout the Reserve;
- hunting, fishing, and trapping in the Reserve should be prohibited;

- electronics, unattended children, and social gatherings should be prohibited in the Reserve;
- dogs and other pets should be prohibited from entering the Reserve;
- noise pollution should be controlled;
- for-profit touring uses should be prohibited;
- impacts resulting from human presence should be analyzed with special emphasis on threatened and endangered species; and
- additional study of public access and its impacts should be completed prior to adoption of a management plan.

Other Recreation-Use Recommendations

Other suggestions that pertain to recreational uses in the Reserve include:

- adaptive management and monitoring should be used in managing recreational uses;
- the Reserve belongs to the taxpayers who worked to save it and therefore public access should not be denied;
- access by reservation is too limiting;
- the ability to enforce restrictions on recreation must be considered in formulating restrictions;
- legislative intent must be considered in developing recreation plans;
- pursuant to CEQA/NEPA, a full range of access options should be pursued, i.e., no access, moderate access, full access;
- the EIS/EIR should consider these alternatives: no recreation access, existing level of recreation access, docent-led hikes only, provision of elevated boardwalk trails, and no-action;
- impacts, including cumulative, interrelated, and interdependent impacts, from public access and recreation must be considered during the EIS/EIR process;
- areas of the Reserve that have been more impacted may be more appropriate for recreational use;

- managers should reserve the right to revoke public access following habitat restoration;
- a system should be developed that facilitates user stewardship of resources while granting access;
- consider a “use pass” or permit system to manage recreational use;
- there should be stiff financial penalties for access violations;
- placards, pamphlets, information kiosks, and rangers should be provided to disseminate information about responsible use of the Reserve;
- interpretive/educational materials should not be established along trails, only at the entrance;
- education can foster awareness and practice of nonuse;
- the public should be exposed to the effects of commercial logging via docent-led tours into impacted areas; and
- access to clear cut and other logged areas would provide the public an opportunity to witness the effects of logging on the landscape.

Recreational Facilities

Many comments that pertain to recreational access roads, trailheads, trails, and camping facilities were received. Many of them are interrelated with the recreation-use comments above.

Roads

Major comments that address roads include:

- develop roads to parking areas within ½ mile of old-growth groves, linked by public foot paths, on both the north and south sides of the Reserve.
- the Reserve should be ADA compliant and provide roaded access for disabled visitors; the issue of access equity must be addressed;
- only a few narrow roads should be provided for driving through the Reserve;
- SUV trails should be established within the Reserve;

- an access road should be located as close as possible to the (?) river;
- Ridge Road should be opened as a trail/road;
- road stability must be evaluated when considering use for access; and
- roads not slated for conversion should be revegetated and out-sloped; adjacent streams should be restored.

Trailheads and Developed Campgrounds

Major comments that address trailheads and developed campgrounds include:

- provide adequate parking and other facilities at both the northern and southern entrances;
- gate and fence aesthetically designed parking areas; provide restrooms, trash cans, and possibly picnic facilities; post parking regulations and tow-away warnings to allow day-use only; provide trail maps/regulations; and charge parking fees;
- consider establishing recycling receptacles at trailheads;
- develop unpaved parking facilities to accommodate horses and horse trailers;
- provide restroom facilities at the entrances of the Reserve;
- permanent restrooms at trailheads are more cost-effective over the long-term than portable outhouses; and
- provide camping facilities, including toilets, showers, tent landings, corrals, and fire pits.

Trails

Major comments that address trailheads and developed campgrounds include:

- one or more additional trails should be established for public access into the Reserve;
- shared-use trails, open to hiking, biking, and equestrian travel, should be considered;
- footpaths allowing public access to old-growth areas should be established;
- footpaths allowing public access to old-growth groves should be provided on both the north and south sides and be no more than 1/2-mile long;

- an extensive trail system should be established throughout the old-growth forest;
- trails should be located along the edges of the forest and not in the interior of the old growth;
- trail access to old-growth areas of the forest should be prohibited or strictly limited to protect sensitive species;
- conduct a study before constructing or opening trails in or to the Reserve to minimize/avoid impacts on murrelets (e.g., by not locating them through old growth);
- trails should be limited to those that already exist; no expansion or improvements of trails should be allowed;
- trail stability must be evaluated when considering use for access;
- road-to-trail conversion for a multiuse trail system should be considered for the Reserve's retired logging roads;
- the network of existing roads is poorly placed for becoming trails; many existing roads may be in wrong place altogether and should be pulled and a new trail system designed;
- Elk Head Trail should be reduced to a footpath;
- bike access should be improved along Elk River Road within the Reserve;
- bicycle parking areas should be provided so that visitors can ride to the Reserve and then walk on the trails;
- to facilitate equestrian use, do not pave trails and provide horse water troughs at about 10-mile intervals;
- use turnstiles to restrict horse movement along trails;
- campsites should be located at Train Barn Meadow, junction of Line Creek and Elk River, and top of Reserve/Elk Head Springs area;
- consider installing composting outhouses along trail;
- provide bear-proof receptacles and frequent trash removal to control human waste and litter for the protection of marbled murrelets; and
- develop an "adopt-a-trail" program for trail maintenance.

RESERVE MAINTENANCE REQUIREMENTS

Several comments were received that address fire protection needs. Comments range from advocating traditional fire suppression approaches to treating fire as a natural element of the ecosystem. Major comments include:

- fires are rare in coastal redwood forests;
- restore natural fire to the Reserve; minimize fire suppression and, if necessary, use prescribed fire;
- fire history research is needed to determine need for controlled burning;
- suppress unnatural burns (fires that would completely burn the Reserve);
- allow no development of new roads;
- maintain existing roads and construct new roads for Reserve-wide fire access, normally serving as trails but that could be opened for fire suppression, including in the old-growth groves;
- conduct fuel reduction program by removing some large fallen trees and dead understory brush;
- install fire suppression equipment and emergency call boxes at all trailheads;
- communicate with, cooperate with, and fund local community fire districts and their volunteers; and
- if needed for medical evacuation or fire suppression, allow helicopter use only over second-growth stands in the Reserve.

Only one comment addressed security, suggesting that provision of 24-hour security is probably needed.

SCIENTIFIC RESEARCH AND MONITORING

Appropriate Areas of Research

A few comments were received that pertain to the research topics that should be studied at the Reserve. Major comments include:

- expand water quality monitoring in the Reserve;
- research on old-growth ecology is badly needed;
- research should be limited to species population statistics and means of making the forest ecosystem sustainable;
- research should be conducted to determine how large the Reserve must be to ensure sustainability for several millennia; and
- extensive research and information collection is needed to provide a basis for the plan.

Conduct of Research

Additional comments addressed appropriate standards for conducting research and screening criteria for approving research. Major comments include:

- scientific research should not interfere with the use of the park for people;
- in cases of conflict, natural values and natural functioning of the Reserve should be given priority over research interests; capturing wildlife or altering vegetation should be critically examined; species removal should not be permitted;
- allowance should be made for public input on major research proposals;
- a panel of scientists, Reserve managers, and forest activists should examine and approve proposed research; they should investigate the reputation of potential researchers and require frequent progress reports;
- Reserve managers should supervise research and terminate it if ecosystem integrity is threatened;

- greater latitude could be given to more authoritative researchers compared to, say, high school science projects;
- researchers should not be allowed that are funded by interests inimical to the Reserve; and
- fees should be charged of researchers to cover the cost of monitoring their activities.

MANAGEMENT BUDGET AND FUNDING

User Fees

Several comments were received that address issues regarding the potential imposition of user fees. Most comments supported modest fees for recreation. Major comments include:

- fees should be charged for guided hikes and programs;
- entrance fees should be avoided because this county has sufficient financial resources to not exclude visitors based on personal wealth;
- recreational user fees are not unreasonable because intensive supervision of recreation will be required;
- user fees should be reasonable and not interfere with the use of the park by average middle-class people;
- user fees should be modest (say \$5 or less) so that access is not limited;
- fees should be low because no camping is allowed, say \$5 to park or \$2 for walk-ins;
- parking fees should be \$5–10 per day;
- establish annual passes for those living in the area or making an annual contribution; and
- fees should be charged of researchers to cover the cost of monitoring their activities.

Other Revenues, Cost-Savings, and Expenditures

A few other comments were received that address the funding of management activities, suggesting other sources of revenue and means to reduce management costs. One comment addresses the proper balance of management expenditures. Major comments include:

- if BLM/DFG engender a sense of public ownership, private donations may become a significant revenue source; set up a fund for this purpose;
- to engender public participation, draw on available volunteer labor for construction of trailheads and trails;
- provide needed improvements by use of inmate crews;
- employ California Conservation Corps crews for restoration work and for making needed improvements because they are trained in the applicable subjects and are based very near the site;
- funds should be raised from foundations to acquire the remaining portions of the 60,000-acre area originally proposed; and
- government funding of the Reserve should be evenly split between a restoration/acquisition fund and a public education fund to raise conservation consciousness.

NEED FOR ACQUISITION OF ADDITIONAL LANDS

Although scoping solicitation materials noted that only the existing Reserve land area would be the subject of the management plan, many comments were received concerning perceived needs for expansion of the Reserve. Major comments include:

- the “Hole in the Headwaters” should be acquired and included in the Reserve, through condemnation if need be, based on a debt-for-nature principle;
- the Reserve should be expanded because 7,400 acres is not large enough to maintain a functioning old-growth ecosystem, especially when surrounded by damaged/destroyed lands;
- to prevent resource degradation from activities on adjacent lands, acquire all of the watershed draining to the Reserve’s streams;

- wildlife corridors connecting the Reserve to other known and potential habitats for threatened and endangered species should be identified and appropriate rights in these lands should be acquired;
- the EIS/EIR should analyze the potential for acquisition of important buffer areas adjacent to sensitive habitat in the Reserve; acquisition could use unspent funds of the state’s contribution; and
- the planning process should consider land acquisitions because the State of California is free to expend funds for this purpose, even if the federal agencies cannot without specific legislative action.

STATUS OF THE RESERVE

Several comments received pertain to the appropriate status of all or parts of the Reserve. Major comments include:

- do not use the term “Reserve” for the Headwaters Forest because it implies exclusion of people, which contradicts the legislative intention;
- rename the “Headwaters Reserve” the “Headwaters Preserve” (as in the state funding legislation);
- the EIS/EIR should determine the level of protection and the restriction on restoration that various special designations would involve, and the plan should designate appropriate Wilderness Study Areas, Research Natural Areas, and Areas of Critical Environmental Concern within the Reserve;
- zone the Reserve as follows: northern area (second growth) with a recreation focus, central area (old growth) as an old-growth reserve, and southern area (second growth) with a restoration and restoration-monitoring focus;
- consider conversion to a National Park;
- the old-growth groves in the Reserve should be given a protective status as sacred ground, and entry should be limited to Native American teachers, healers, and their students/patients; and
- the Bear River Band of Rohnerville Rancheria wishes to acquire ownership or management rights of the Reserve and to employ holistic forest management allowing sanitation tree removal in old-growth groves and active timber management in second-growth stands to produce a dynamic “subclimax” forest condition.

APPROPRIATE MISCELLANEOUS ACTIVITIES IN THE RESERVE

Comments about Reserve management and allowance for recreation in the Reserve were presented in the preceding sections. A few other comments address miscellaneous issues about the appropriateness of certain activities in the Reserve:

- clarify that “Reserve” status does not allow the following uses or actions: logging, log-hauling, mining, cattle grazing, herbicides, vehicles, monoculture, planting genetically modified or genetically similar trees, and low-flying aircraft;
- hunting and fishing should be allowed because this is primarily a plant reserve;
- hunting by Native American groups could be authorized; and
- dogs should definitely not be allowed in the Reserve because of their negative behavior toward both wildlife and people.

OTHER COMMENTS/ISSUES

A few other comments were received that do not fall in the categories above. They include:

- timber harvest on surrounding timberlands not included in the Reserve, particularly the “Hole in the Headwaters”, should be allowed or should not be allowed;
- accurate maps and descriptions of existing roads, trails, and parking areas need to be included in the EIS/EIR; and
- the discussion of issues at public meetings is frustrated by the approach of recording ideas on large charts; simply use court reporters and let the discussions proceed.

Section 5. Scoping Comments in Response to the Notice of Intent/Notice of Preparation

No agencies responded to the Notice of Intent.

Two agencies submitted responses to the Notice of Preparation of an EIR for the project:

- California Regional Water Quality Control Board, North Coast Region, and
- California Department of Conservation, Division of Mines and Geology.

The Regional Water Quality Control Board urged the installation of index-monitoring stations in the Reserve to provide information on background water quality objective parameters and properly functioning conditions for aquatic species. The objectives of such monitoring would be to evaluate the benefits of watershed restoration under the plan and to allow comparison of water quality in an old-growth watershed (the Reserve) to water quality in more actively managed coastal lands elsewhere.

The Division of Mines and Geology urged the sponsors to address in the EIR road decommissioning and maintenance and other restoration activities within the context of the project area's seismologic environment, geologic formations, geomorphic and landslide features, relative slope stability, and erosion and mass wasting potential.

Section 6. Issues to Be Addressed by or Deferred from the Planning Process

ISSUES TO BE ADDRESSED

Based on the legislative direction for preparation of the management plan and on the comments received during the scoping process, BLM and DFG have determined that the following issues/topics will be addressed by the management plan:

- *Ecosystem Preservation.* The primary focus of the management plan will be the protection and monitoring of natural aquatic and terrestrial habitats, particularly the old-growth groves and habitats for threatened and endangered species. Management of previously harvested areas will focus on exotic-species suppression and restoration of natural watershed conditions and late-successional vegetation, to allow recovery of mature forest communities in an essentially roadless landscape. Potential treatments to abandoned roadways and cut-over forest stands will be evaluated for relative benefits versus monetary and environmental costs.
- *Public Access.* Existing provisions for public access to the Reserve will be reviewed and additional access needs and limitations will be evaluated. Means to reduce impacts to property owners adjoining access routes will be examined. (Regarding alternative access routes, see “Issues to Be Deferred” below.)
- *Recreation.* Recreation activities will be identified that can be supported with minimal facilities and conducted so as to preserve ecological integrity. Activities to be evaluated for at least portions of the Reserve include hiking, horseback riding, bicycling, picnicking, overnight camping, wildlife viewing, nature study, universal access, and interpretive activities. Possible low-impact trail systems to support these activities will be considered. Means of providing pedestrian access to view old-growth groves without strenuous hiking will be examined. (Regarding provision of public roads and off-highway-vehicle use in the Reserve, see “Issues to Be Deferred” below.) The need for seasonal, daily, and hourly restrictions on potential activities will be evaluated.

In addition to required support facilities, control of human debris and waste from various recreation activities will be considered in evaluating potential impacts to ecological integrity. It is anticipated that some proposed recreation activities may require more than

minimal support facilities or may compromise ecological integrity; such uses would therefore be limited to certain areas or excluded from the Reserve.

- *Maintenance and Administrative Access.* Maintenance strategies and access requirements for vegetation manipulation, fire suppression, security, restoration, monitoring, and research will be identified and evaluated. Maintenance of some road access not open to the public may be required.
- *Special Designations.* The suitability of some or all of the Reserve for special designations identified by the public (Wilderness Study Area, Research Natural Area, Area of Critical Environmental Concern) will be evaluated.
- *Ecosystem Monitoring and Scientific Research.* To support adaptive management of the Reserve, recreation, restoration, and research activity levels and effects on ecosystem integrity will be monitored. Concurrently, the uniqueness of the Reserve may provide opportunity for scientific research by other parties. Management monitoring needs and processes for evaluating, permitting, and monitoring research will be examined and procedures will be established.
- *Management Budget and Funding.* Measures to avoid or reduce management costs will be evaluated, appropriate levels of management funding will be examined, and potential funding sources will be identified. Potential benefits and impacts of establishing fees for recreation and/or research activities will specifically be evaluated.

ISSUES TO BE DEFERRED

The following issues, raised by some scoping participants, will not be addressed in the management plan for the reasons described below.

Acquisition of Additional Lands

Acquisition negotiations conducted by federal and state legislators and administration personnel covered a range of potential acquisition sizes and configurations, and the negotiators ultimately agreed on the lands embodied in the final acquisition. The legislation authorizing the Reserve does not include the issue of potential land acquisitions in the list of planning issues that the management plan should address. Based on these circumstances, BLM and DFG conclude that the authorizing legislation intends that the management plan address management of the acquired lands consistent with existing land ownership.

One exception to this general conclusion exists: without additional federal legislation, incidental expansion of the Reserve (less than 5 acres) to facilitate roadway access is authorized. The plan may address such incidental expansion if a need is identified.

Development of Alternative or Supplemental Access Routes

The legislation creating the Reserve required that transfer of the property to the government could not occur until “adequate provision has been made for public access to the property”. The northern access was embodied in the configuration of the property, which provides direct access from Humboldt County’s Elk River Road. To acquire access from the south, an easement for access along Felt Springs Road, from the City of Fortuna’s Newburg Road to the southern periphery of the Reserve, was granted by Pacific Lumber upon the transfer of the property to the government on March 1, 1999. The easement requires that BLM restrict the types and number of vehicles using the road in a manner consistent with the management plan. This easement is considered appurtenant to the Headwaters Forest ownership. The authorizing legislation also requires that the plan address the management issue of “access to the Headwaters Forest”.

Based on these circumstances, BLM and DFG conclude that the legislation intends that the plan address alternatives for management of access along the existing access routes that were acquired in the acquisition transaction. The management plan will not examine other potential routes that might be acquired and developed to provide access to the Reserve.

Development of a Regional Trail System

Development of a regional trail system would require acquisition of easements or right-of-way across private land. As described above, the management plan will not address additional access routes to the Reserve. The first priority will be to provide recreation opportunities in the Reserve with minimal necessary facilities so as to maintain the ecological integrity of the Reserve. The recreation trail system within the Reserve can be designed with a recognition of the potential to connect to new trails across surrounding private lands, should the needed rights be acquired by public/nonprofit entities in the future.

Thus, the basis of the management plan will be an assumption that external trail access to the Reserve may or may not materialize. The plan will not design a regional trail system involving other lands, but the trail system onsite will be developed to be capable of interfacing with a reasonably foreseeable trail system that may develop in the future.

Public Vehicle Use in the Reserve

Most commenters recognized that public vehicle use is inherently contrary to the primary legislative mandate to “conserve . . . the land, fish, wildlife, and forests” and to “maintain ecological integrity” of the Reserve. Some commenters suggested that requirements for providing access to disabled individuals supported the universal right to use off-highway vehicles in the Reserve. This interpretation is not supported by American Disabilities Act or Presidential Executive Orders 11989 and 11644, governing the use of off-highway motor vehicles on public land. All public land management agencies retain the right to control road and trail access consistent with the purposes for which the land holding was acquired and their general land-management mandates.

While the plan will not consider extending public road systems into the Reserve or the use of off-highway vehicles in the Reserve, it will consider allowing access farther into the Reserve if to designated trailheads and where it would be consistent with maintenance of ecological integrity and protection of species habitats.

Off-Trail Hiking Beyond the Elk River Corridor

Hiking or exploring off of designated trails beyond the confluence of the Little South Fork and South Fork of the Elk River is considered to fundamentally conflict with the legislative imperative to “conserve . . . the land, fish, wildlife, and forests . . .” of the Reserve. Non-vascular plants on the forest floor, and nesting and roosting of marbled murrelet and spotted owl, are highly sensitive to uncontrolled human intrusion. For this reason, off-trail activities beyond the river corridor zone will not be considered as a possible alternatives in the planning process.

Appendix A. Persons and Organizations Submitting Scoping Comments

PRESENTERS AT PUBLIC MEETINGS

Eureka Scoping Meeting (June 13, 2000)

Name	Group/Organization
Kim Eubanks	Newburg Road Residents
Mark Wheatley	Humboldt Bay Watershed Advisory Committee (HBWAC)
Paul Mason	Environmental Protection Information Center (EPIC)
Phil Dietrich	United States Fish and Wildlife Service (USFWS)
Dave Morrow	Arcata Bike Club (ABC) and International Mountain Bike Association (IMBA)
David Walsh	Ancient Forests International
Byrd Lochtie	League of Women Voters (LWV)
Karen Brooks	Redwood Region Endurance Riders (RRER)
Josh Brown	Earth First!
Pat Higgins	Fisheries Biologist

San Francisco Scoping Meeting (June 20, 2000)

Name	Group/Organization
Michael Passoff	Bay Area Coalition for Headwaters
Mary Miles and Robert Anderson	Public Access to Headwaters
Eric Brooks	Forests Forever (FF)
Mark Wheatley	Humboldt Bay Watershed Advisory Committee

PARTICIPANTS AT PUBLIC MEETINGS
Eureka Scoping Meeting (June 13, 2000)

Name	Group/Organization	City
Lois Stone	League of Women Voters	
Jeff Jones		
Jennifer Chase	Horsemen	Arcata
Tara Nuth		
Christian Rose		
Mark Wheatley	Humboldt Bay Watershed Advisory Committee	Eureka
Jason Wilson	Individual	Bayside
Mitch Farro	Individual	Trinidad
Paul Ruiz	Individual	Eureka
Byrd Lochtie	League of Women Voters	Eureka
Robert Freckey	California Conservation Corps	
Dan Welsh	Ancient Forests International	Redway
Attila Gyems	Freshwater Watershed	
Greg Niekrasz	Children of Humboldt	Eureka
Adam Jamesek		
Jessica Maria Scanlon		Arcata
Brent Siemer	City of Eureka	Eureka
Kim Eubanks	Newburg Rd. Residents	Fortuna
Mark Brodesser	Bureau of Land Management	Arcata
Michael Gay	Back Country Horsemen	
News Department	KIEM-TV	Eureka
Anne Hubbard	FOE	

Name	Group/Organization	City
Karen Brooks	Redwood Empire Endurance Riders	Bayside
Colman Fockens		Arcata
Andrew Carlson	Individual	Eureka
Tim McKay	NEC	
URI Driscoll	National Marine Fisheries Service	Arcata
Cynthia Noel	Individual	
Wendy Reordan	Individual	
Ethan Casaday	Casaday Construction	Arcata
Susan Nolan	California Wilderness Coalition	Bayside
Kevin R. Hamblin	City of Eureka	Eureka
Dianne Beck	Sierra Club	Kneeland
Chris Preucil	Circle of Life Foundation	Garberville
Kristi Wrigley	Elk River resident	Eureka
Barbara Ellis	Assembly member Strone-Martin	Eureka
Dick Fedder	Back Country Horse of California	Arcata
Ken Wilbur	California State Parks	Eureka
Riggs Johnston		Eureka
Carol Driscoll	Redwood Empire Endurance Riders	
Dan Ehresman	THI Watch	Eureka
Mel Kreb	California Conservation Corps	Scotia
Steve Martin	HSU	Arcata
Tom Acord	Back Country Horsemen - Redwood Unit	Loleta
Paul Mason	Environmental Protection and Information Center	
Erik Willingham	KINS AM	
Rob Hatfield		Arcata
Sungnome Madrone	Individual	Trinidad
Matt Johnson	HSU	Eureka
Mary Shirley Boughton		Eureka

Name	Group/Organization	City
Steve Christianson		Eureka
Jeanette Jungers	Humboldt Watershed Association	Eureka
Paller Yon	Redwood Creek National Watershed Center	Orick

San Francisco Meeting (June 20, 2000)

Name	Group/Organization	City
Mary Miles	Public Access to Headwaters	San Francisco
Rob Anderson	Public Access to Headwaters	San Francisco
Tim Burton	Department of Fish and Game	
Rosalyn Johnson	U.S. Environmental Protection Agency	San Francisco
Lois Roberts		San Francisco
Gail Wechsler		San Francisco
Amy Bruce		
Michael Passoff	Bay Area Coalition for Headwaters	Kensington
Eric Brooks	Forests Forever	San Francisco
Mark Wheatley	Humboldt Bay Watershed Advisory Committee	Eureka
Alan Howe	Bay Area Coalition for Headwaters	Berkeley
David Van Brocklin	Bay Area Coalition for Headwaters	San Francisco
Rob Lee	Bay Area Coalition for Headwaters	San Francisco
Christine Karhi		San Francisco
Doug Bevington	John Muir Project of Earth Island Institute	Oakland
L. Darlene Pratt		Berkeley
Donald Simon	Bay Area Coalition for Headwaters	San Francisco
Chris Norem		Oakland
Kent Stromsmof		Martinez

Name	Group/Organization	City
Nina H. Eloessler Blamborn		San Francisco
Edward Giordano	Friends of the Urban Forest	San Francisco
Steven Chin		San Francisco
Randy Stemler	Redwood Community Action Agency	Petrolia

Sacramento Scoping Meeting (June 22, 2000)

Name	Group/Organization	City
Paulette Cuilla	Serving the Earth Committee	Sacramento
Rick Bettis	Sierra Club, League of Women Voters, others	Sacramento
Paul Carrillo	California Conservation Corps	Coloma
David Van Brocklin	Bay Area Coalition for Headwaters	Davis
Glenn Stilwell	International Mountain Bike Association	Sacramento
Ole and Jo Helleskov		Carmichael
Robb Deignan	FATRAC/International Mountain Bike Association	Sacramento
Sandi Osterman		Davis
Christy Anderson	Sacramento Open Space	Sacramento
Charles E. Gerdel	FATRAC	Sacramento
Dottie Higbee	Sierra Club	Sacramento
Candace Thurston		Sacramento
Shane Barrow	Bureau of Land Management	Sacramento
Anne Barrow	Bureau of Land Management	Sacramento
Richard A. Mills		Sacramento
Kent Stromsmof	GDI	Martinez
K. Shahbandi		Sacramento

SUBMITTERS OF WRITTEN COMMENTS

Last Name	First Name	Group/Organization	Location
Adams	Brian	Individual	Northampton, MA
Anderson	Laurie	Individual	Oroville
Andrews	Constance	Individual	Camarillo
Aulenbach	Bruce	Individual	Monroe, OR
BACH		Bay Area Coalition for Headwaters	Berkeley
Bailey	Kathy	Sierra Club	California
Bailey	Kathy	Sierra Club	Philo
Bain	James	Individual	Los Angeles
Barker	Nicholas	Individual	Deephaven, MN
Barone	Deana	Individual	San Francisco
Becker	Stacy	Individual	NA
Bevington	Doug	End Commercial Logging Committee, Sierra	Santa Cruz
Bianchi	Lisa	Individual	Fieldbrook
Bissinger	Eric	Individual	Sacramento
Borges	Leslie	Individual	Carlotta
Brehm	Judy	Individual	Cottonwood
Brenard	Donald Eugene	Heartlands Association	Loleta
Brenner	Jules	Individual	Novato
Brooks	Mary Jo	Individual	Sacramento
Brooks	Jen	Individual	Huntington Beach
Brooks	H.	Individual	Huntington Beach
Brooks	Karen	Individual	NA
Bruce	Deborah	Individual	San Francisco
Bruce	Constance	Individual	San Francisco
Burns	Lauren	Individual	Alameda
Cady	Cyndi	Individual	Fairfax

Last Name	First Name	Group/Organization	Location
Cain	Tim	Individual	Woodacre
California	Shasta Pacific Service	California Conservation Corps	Fortuna
Campbell	Chris	Individual	San Francisco
Campbell	Bruce	Individual	Los Angeles
Cantisano	Amigo	Organic Ag Advisors	Cedar Ridge
Caris	John and Mary	Individual	NA
Carr	Janet	Individual	Oakland
Cegrew	Michael	Individual	NA
Chen	Allan	Individual	Alameda
Cleaver	Jennifer	Individual	San Francisco
Coleman	Sandra	Individual	Sacramento
Coleman	Sandra	Individual	San Francisco
Conlee	May	Individual	Eureka
Conroy	James	Individual	Brick, NJ
Copple	Nathan	Individual	Arcata
Creel	Adele	Scotia Chamber of Commerce	Rio Dell
Crosby	Louise	Individual	Granite Bay
Crosby	Charles	Individual	Granite Bay
Davenport	Phyllis	Individual	Fortuna
Davis	Darcy	Individual	NA
Davy	Diane	Individual	Fortuna
Davy	Charles	Individual	Hydesville
Dibble	Gail	Individual	McKinleyville
Drake	David	Individual	Ben Lomond
Driscoll	Carol	Individual	Arcata
Driscoll	Uri	Individual	Arcata
Duhl	Judith	Individual	San Pablo
Duvernay	Joe	Individual	NA

Last Name	First Name	Group/Organization	Location
Elk	Joan	Individual	Bayside
Fazio	Rachel	John Muir Project of Earth Island Institute	Pasadena
Fenton	Clark	Salmon Forever	Arcata
Ferris	Jim	Individual	Morgan Hill
Fink	Michelle	Individual	Colorado
Fiorentino	Daniel	Individual	San Francisco
Fitzgerald	Tom	Individual	NA
Flowers	Bobbie	Individual	NY, NY
Friedman	Cary	Individual	Santa Cruz
Galford	Megan	Individual	NA
Ghias	Sera	Individual	NA
Giffin	Nancy	Individual	Willow Creek
Giffin	Zach	Individual	Willow Creek
Gillen	Cindy	Individual	Arcata
Granz	Arthur	Individual	Palo Alto
Gray	Leda Beth	Individual	Ben Lomond
Gross	Ray	Individual	San Francisco
Hale	Barbara	Individual	Round Mountain
Hanson	Matt	Individual	NA
Harlowe	Anna	Ecology Center of Southern California	Los Angeles
Haslett	Kurt	Individual	NA
Hayden	Kathleen	Individual	Santa Ysabel
Henry	Irene	Individual	Fortuna
Hillard	Landon	Individual	NA
Hines	James	Individual	Ventura
Hoffman	Jeff	Individual	San Francisco
Hoke	Kathryn	Individual	Carlotta
Howe	Alan	Individual	Berkeley

Last Name	First Name	Group/Organization	Location
Irikura	Beth	Individual	Oakland
Janson-Smith	Toby	Individual	San Francisco
Johnson	Douglas	Individual	NA
Johnson	Denver	Individual	NA
Johnston	Crystal	Individual	Carlotta
Keagler	Christian	Individual	NA
Keele	Scott	Individual	Elk River Rd.
Kendrick	Chris	Individual	San Francisco
Kenworthy	Katie	Individual	Eureka
Kerrigan	Elaine	Individual	Eureka
Keyser	Christine	Individual	Berkeley
Kinney	Nancy	Individual	Fortuna
Knapp	Vicki	Individual	Arcata
Kravitz	Scott	Individual	San Francisco
Lamore	Bette	Individual	San Luis Obispo
Landowski	Lowell	California State Parks	NA
Lang	Michael	Individual	Berkeley
Launi	Stephen	Individual	Eureka
Lewis	Stephen	Heartlands Association	Shelter Cove
Loctie	Byrd	League of Women Voters of Humboldt County	Eureka
Loctie	Byrd	Individual	NA
Logan	James	Individual	Santa Clara
Lusebrink	Karl	Individual	NA
Lykins	Sharon	Individual	Grass Valley
MacIntyre	Joan and Stuart	Individual	Oakland
Madsen	Nate	Individual	Kneeland
Mancia	Barbara	Individual	Mill Valley
Mandryk	Ted	Individual	Ventura

Last Name	First Name	Group/Organization	Location
Mariette	Marti	Individual	Santa Cruz
Marney	Christine and Joe	Individual	Carlotta
Marshall	Jason	Department of Conservation, Division of Mines	Sacramento
Maxwell	Joseph	Individual	Anderson
Maxwell	Cynthia	Individual	Anderson
McCarthy	Cindy	Individual	Rohnert Park
McCullough	Judy and Mac	Individual	Sacramento
McGowan	Evan	Individual	Bayside
Meyers	M. Sarah	Individual	Upland
Miles	Mary	Public Access to Headwaters (PATH)	San Francisco
Miller	Mary	Individual	Eureka
Miller	Gilene	Individual	Carlotta
Miller	Joanne	Individual	Carlotta
Modell	Larry	Individual	Petaluma
Moore	Michael	Individual	NA
Moreland	Julie	Individual	McKinleyville
Morosin	Alessandro	Individual	NA
Morrow	David	Individual	NA
Moss	Paul	Individual	White Bear Lake, MN
Muldavin	Brenda	Individual	NA
Munk	Ken	Individual	Hydesville
Murphy	Connie	Individual	Anderson
Murray	Kim	Individual	Palo Alto
Nayyar	Rena	Individual	Davis
Neiman	Dale	City of Fortuna	Fortuna
Nelson	Eli	Individual	NA
Noel	Cynthia	Individual	Eureka
Nolan	Susan	Individual	Bayside

Last Name	First Name	Group/Organization	Location
O'Connor	Maureen	Individual	Berkeley
Pangburn	Brooks	Individual	Duarte
Pawsey	Stewart	Individual	Berkeley
Penn	Robert	Individual	Oakland
Phaeton	Lillian	Individual	San Francisco
Pickett	Karen	Bay Area Coalition for Headwaters (BACH)	Berkeley
Pillitteri	Mariko	Individual	San Francisco
Pratt	Darlene	Individual	Berkeley
Rahner	Robert	Individual	NA
Ray	Thomas and Sandi	Individual	Durham
Reager	John	Individual	Berkeley
Rha	Julienne	Individual	Contra Costa Co.
Riley	Mike	Individual	Titusville, NJ
Rilla	Frances	Individual	Kentfield
Robbins	Donald and Marion	Individual	Redwood City
Robertson	Dee	Individual	Eureka
Ruger	Sam Mix and Kris	Individual	NA
Schafer	Ann	Individual	Piedmont
Schmidt	Christopher	Individual	Redwood City
Schulte	Ruthann	Scotia Pacific Company	Scotia
Schulte	Ruthann	Pacific Lumber Company (PALCO)	NA
Seidner	Cheryl	Table Bluff Reservation, Wiyot Tribe	Loleta
Selene	Jodi	Harmony Network	NA
Shah	Karen	Individual	Sacramento
Shaw	Karen	Individual	NA
Shea	Lari	Individual	Fort Bragg
Sherr	Christine and Greg	Big Basin Redwoods State Park	Boulder Creek
Sherr	Christina and Greg	Individual	Boulder Creek

Last Name	First Name	Group/Organization	Location
Shishino-Cruz	Linda	Individual	Moorpark
Shook	Linda	Individual	Memphis, TN
Sinclair	(Dr.) John	Individual	Petaluma
Smith	Cara	Individual	Sacramento
Sprung	Gary	International Mountain Bike Association	Crested Butte, CO
Sprung	Gary	International Mountain Bike Association	Boulder, CO
Steere	James	Individual	NA
Stephanky	Scott	Individual	Arcata
Stevens	Christine	Animal Welfare Institute	Washington, D.C.
Stokes	Kathryn	Individual	Corvallis, OR
Stone	Gary	Individual	Eureka
Stronach	Keren	Individual	NA
Summer	Julie	Individual	Blue Lake
Sundaram	Chandra	Individual	NA
Swanson	John	Individual	Minneapolis, MN
Sweet	Richard	Individual	NA
Thompson	Colleen	Individual	Kneeland
Thompson	Linda	Individual	Eureka
Van Dolen	Douglas	Individual	NA
Van Vleet	Alice and Erick	Individual	Loleta
Vanderbilt	Read	Individual	San Francisco
Viles	Aaron	Individual	New Orleans, LA
Walterspiel	Ruth	Individual	Healdsburg
Wang	Susan	Individual	NA
Waring	Alex	Individual	San Francisco
Waugh	Karel	Individual	Los Gatos
Webb	Loraine	Individual	Nevada City
Weisickle	Shelley	Individual	Granite Bay

Last Name	First Name	Group/Organization	Location
Werner	Susan	Individual	Berkeley
White	Sigrid	Individual	Sutter Creek
Williams	Geoffery	Individual	Sacramento
Wilson	Jason	Individual	Bayside
Wood	Angie	Shasta Pacific	NA
Worland	Moira	Individual	San Ramon

**AGENCIES RESPONDING TO THE NOTICE OF INTENT/
NOTICE OF PREPARATION**

Agency
Regional Water Quality Control Board, North Coast Region
California Department of Conservation, Division of Mines and Geology