



U.S. Department of the Interior
BUREAU OF LAND MANAGEMENT

Northwest California Integrated Resource Management Plan



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Cover Photo: Laura Brodhead
Sacramento Rail Trail, Chamise Peak and
Keswick Lake in the Redding Field Office

Northwest California
Integrated Resource Management Plan
Scoping Report

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ACRONYMS AND ABBREVIATIONS

Full Phrase

ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
CARA	Comment Analysis and Response Application
EIS	Environmental Impact Statement
Forest Service	US Forest Service
MOU	Memorandum of Understanding
NCIP	Northwest California Integrated Resource Management Plan
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NPS	National Park Service
OHV	Off-highway Vehicle
RMP	Resource Management Plan
ROD	Record of Decision
US	United States
USFWS	US Fish and Wildlife Service
VPM	Virtual Public Meeting
VRM	Visual Resource Management

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Introduction

The Bureau of Land Management (BLM), Northern California District, Redding and Arcata Field Offices are undertaking resource management planning that will revise and update management direction set forth in their respective current resource management plans (RMPs), including the 1992 Arcata Resource Area RMP and Environmental Impact Statement (EIS) Record of Decision (ROD), and the 1993 Redding RMP and ROD.

The planning process will result in the development of a unified RMP—titled the Northwest California Integrated Resource Management Plan (NCIP)—that will be inclusive of both field offices. The NCIP planning area encompasses almost 15 million acres in eight counties in northwestern California. The decision area is approximately 689,000 acres, with 382,000 surface acres of BLM-administered land and 307,000 additional subsurface (mineral) acres.

Public involvement is vital to the National Environmental Policy Act (NEPA) process. Receiving input from public and agency stakeholders helps to support a landscape approach to RMP development, which considers the management of the Redding and Arcata Field Offices from multiple perspectives. This report documents the results of the scoping comment period.

Public comments received during scoping will also help the BLM to refine the NCIP's purpose and need. The BLM's preliminary need is to revise the Redding Field Office and Arcata Field Office RMPs to address developments in relevant science, social trends, and federal policy. The preliminary purpose of the NCIP is to provide for management actions and land use decisions within the planning area based on up-to-date information that reflects current public input, changes in policy, resource conditions, and development trends.

1.1 DESCRIPTION OF THE PUBLIC INVOLVEMENT PROCESS

In accordance with 40 Code of Federal Regulations 1501.9, the BLM must document public involvement and determine the scope of issues related to a proposed action. The BLM solicits comments from relevant agencies and the public. Then, it organizes and analyzes all comments received. The BLM evaluates the substance of each comment and extracts the overarching issues that will be addressed during the NEPA process. These issues help define the scope of the NEPA analysis and are used to develop the project alternatives.

A previous effort to revise and combine the two existing RMPs was initiated in 2016. As part of the initial planning process for the NCIP, the BLM held a series of public envisioning meetings and public scoping meetings over 2016 and 2017. However, in 2018, the planning effort was terminated due to redirection in workload priorities related to on-the-ground remediation needs following the catastrophic Carr and Camp fires. In 2021, the planning effort resumed with a pre-NOI scoping comment period that occurred from March 29 to April 30, 2021. The results of the three previous public comment periods are summarized in three separate reports that are available on the BLM's NCIP ePlanning website: <https://eplanning.blm.gov/eplanning-ui/project/2012803/510>. The BLM is considering the information contained in these reports in this planning effort.

The NOI announcing the beginning of the public scoping process was published in the [Federal Register on April 29, 2022](#), and is available at on the ePlanning website: [EplanningUi \(blm.gov\)](#). The BLM established a virtual open house website that was available 24 hours a day, 7 days a week during the comment period. Additionally, the BLM held two in-person public meetings and four virtual public meetings (VPMs), as shown in **Table I-1**. A list of public meeting attendees is available upon request.

During the public comment period, the BLM sought information on the current management direction provided by the respective RMPs. The comment period ended on June 28, 2022. To the extent practicable, the BLM will consider the submissions received past the close of the comment period during the development of the NCIP; however, late submissions were not summarized in this report.

Table I-1: Public Meeting Summary

Meeting Date	Location	Meeting Time*	Number of Public Attendees
In-Person Public Scoping Meetings			
June 6, 2022	Redding	5:00 p.m. to 7:00 p.m.	22
June 8, 2022	Arcata	5:00 p.m. to 7:00 p.m.	15
Scoping VPMs			
June 9, 2022	Online	9:00 a.m. to 11:00 a.m.	33
June 14, 2022	Online	9:00 a.m. to 11:00 a.m.	19
June 15, 2022	Online	4:00 p.m. to 6:00 p.m.	9
June 16, 2022	Online	5:00 p.m. to 7:00 p.m.	24

*All times are in Pacific standard time.

The BLM is working to formalize agreements with relevant cooperating agencies. **Table I-2** identifies agencies and entities that the BLM has invited to participate as a cooperating agency, those who have responded, accepted, have a signed Memorandum of Understanding in place, and whether the BLM state director has agreed these agencies have the requisite jurisdiction by law or special expertise necessary to participate. In addition, the BLM invited all 23 federally recognized Tribes within the NCIP planning area to participate as cooperating agencies. The following Tribes have a Memorandum of Understanding in place: Blue Lake Rancheria, Enterprise Rancheria, Hoopa Valley Tribe, Mooretown Rancheria, Redding Rancheria, and the Wiyot Tribe.

Table I-2: Cooperating Agency Outreach, Status, and Agreement

Agency/Entity	Invited (Yes/No)	Responded (Yes/No)	Accepted (Yes/No)	Signed MOU (Y/N) ¹	State Director Agreement (Yes/No)
Butte County	Y	Y	Y	Y	Y
CALFIRE	Y	Y	Y	Y	Y
California Coastal Commission	Y	Y	N	—	—
California Conservation Corps	Y	Y	N	—	—
California Department of Conservation – Geologic Energy Management Division	Y	Y	Y	Y	Y
California Department of Fish and Wildlife	Y	Y	Y	Y	Y
California State Parks and Recreation	Y	Y	N	—	—

Agency/Entity	Invited (Yes/No)	Responded (Yes/No)	Accepted (Yes/No)	Signed MOU (Y/N)¹	State Director Agreement (Yes/No)
City of Anderson	Y	N	—	—	—
City of Arcata	Y	Y	Y	N	—
City of Blue Lake	Y	N	—	—	—
City of Chico	Y	Y	N	—	—
City of Crescent City	Y	Y	Y	N	—
City of Eureka	Y	Y	N	—	—
City of Ferndale	Y	N	—	—	—
City of Fortuna	Y	Y	N	—	—
City of Oroville	Y	Y	N	—	—
City of Red Bluff	Y	N	—	—	—
City of Redding	Y	Y	Y	Y	Y
City of Shasta Lake	Y	N	—	—	—
City of Mount Shasta	Y	N	—	—	—
City of Willits	Y	N	—	—	—
Del Norte County	Y	Y	Y	Y	Y
Humboldt County	Y	N	—	—	—
Mendocino County Resource Conservation District	Y	Y	N	—	—
National Oceanic and Atmospheric Administration	Y	Y	Y	N	—
National Park Service (NPS) – Lassen Volcanic National Park	Y	Y	Y	Y	Y
NPS – Whiskeytown National Recreation Area	Y	Y	Y	Y	Y
North Coast Regional Water Quality Control Board	Y	Y	Y	Y	Y
Shasta County	Y	N	—	—	—
Shasta County Air Quality Management District	Y	Y	Y	Y	Y
Shasta Valley Resource Conservation District	Y	Y	Y	N	—
Siskiyou County	Y	Y	Y	N	—
Siskiyou County Department of Agriculture	Y	Y	Y	N	—
Southern Humboldt Chamber of Commerce	Y	Y	N	—	—
Tehama County	Y	Y	Y	Y	Y
Town of Paradise	Y	N	—	—	—
Trinity County	Y	Y	Y	Y	Y
US Bureau of Reclamation	Y	Y	Y	Y	Y
US Environmental Protection Agency	Y	Y	Y	Y	Y
US Fish and Wildlife Service (USFWS)	Y	Y	Y	Y	Y
US Forest Service	Y	Y	Y	N	Y
Western Power Administration – Sierra Nevada Region	Y	Y	Y	Y	Y

NOTE: "—" indicates that the Agency/Entity has not reached this stage of the process yet.

! "N" in this column signifies that an MOU is in progress and/or awaiting signature.

1.2 NATURE OF COMMENTS RECEIVED AND THE COMMENT ANALYSIS PROCESS

Comment analysis is used to compile and combine similar public comments into a format that decision-makers can use to identify alternative management actions in a NEPA document. It assists the team in organizing, clarifying, and addressing technical information, in accordance with NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the NEPA process.

The process includes five main components:

- Developing a comment coding structure
- Using a comment database for comment management
- Reading and coding public comments
- Interpreting and analyzing the comments to identify issues and themes
- Preparing comment summaries

The BLM developed a comment coding structure to help sort comments into logical groups by topics and issues (see **Table 2-2**). The coding structure was designed to capture all comment content, rather than to restrict or exclude any ideas.

The BLM used the comment analysis and response application (CARA) database to manage all public comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and comments received, sorting and reporting comments by a topic or issue, and demographic information regarding the comment sources.

1.3 METHODOLOGY

In this report, a *comment submission* refers to a unique letter, email, website entry, hard-copy comment form, or verbal public comment received by the BLM during the public comment period. During the in-person public scoping meetings, the BLM requested that attendees fill out hard-copy comment forms to document their concerns. These comment forms were counted as submissions. During the virtual public meetings, if an attendee chose to provide verbal public comment, the transcript of their comment was counted as a submission.

A *comment* refers to a substantive statement identified within the comment submission. The BLM initially reviewed each submission as a whole to specifically identify the following:

- Submissions that were considered out of scope, as they did not pertain to the plan at all (for example, a submittal pertaining to another project or seeking employment opportunities).
- Submissions requiring immediate attention, such as submittals containing requests for maps, geographic information systems data, or other data; official Freedom of Information Act requests; requests for a comment period extension; or other comments that needed to be brought to the attention of the BLM immediately.
- Form letters (standardized and duplicated letters that contain identical or nearly identical text) and "form plus" submissions, which are form letters that slightly deviate from a standard form

letter by containing similar text that is not identical to a master form letter submission. Form plus submissions are tallied in the total submission count but are not counted as individual unique comments unless they contain additional substantive text.

Contact information was not gathered for out-of-scope submissions, and those submissions were not processed further. All other submissions were considered to contain some level of substantive comment and were processed further.

Once a form letter was identified, a “master” was prepared for coding. The remaining identical submissions were not processed further (that is, they were not coded to the individual comment level, since the master contained the coded comments); they were linked to the master coded form letter.

“Form plus” submissions were electronically filtered to remove all form letter text and then manually reviewed. Unique comments that were not represented by the codes in the master form letter were coded.

Most submissions included many substantive comments. Each substantive comment was assigned a code to identify its general content and to group similar comments (see **Table 2-3**). The BLM considers all substantive comments and will use them to identify issues and values to be considered in the NCIP. Comments that merely support or oppose a proposal or that only agree or disagree with BLM policy are not considered substantive. Substantive comments received during the public comment period do one or more of the following:

- Raise issues the BLM has not considered or reinforce issues the BLM has already identified.
- Present information that can be used when the BLM considers the impacts of alternatives.
- Raise concerns, with reasonable basis, regarding public land resources in the planning area.
- Question, with reasonable basis, the accuracy of information in an existing report.

The NCIP planning area includes four national conservation lands units with separate RMPs: Headwaters Forest Reserve, King Range National Conservation Area, Cascade-Siskiyou National Monument, and the California Coastal National Monument. This RMP revision will not amend decisions made in these four national conservation lands units; however, it will address the relationship of these four units with the other public lands in the planning area.

All substantive comments identified were grouped by similar issue categories. Those comments are summarized in **Chapter 3**; all substantive comments are included in **Appendix A**.

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Comment Submission Summary

The BLM received a total of 2,653 submissions during the scoping period (see **Table 2-1**). Most comment submissions were form letters, followed by 194 unique submissions.

Table 2-1: Submittal Summary by Type

Submission Type	Number of Submissions
Unique submissions	194
Form letters	2,453
“Form plus” submissions	6
TOTAL	2,653

The BLM received most comment submissions via email, followed by those submitted through CARA (**Table 2-2**). The BLM also received submissions verbally during the VPMs, via US mail, via hard-copy comment form submissions during in-person public meetings, and from online comment submissions via the NCIP virtual open house website and the NCIP ePlanning website (<https://eplanning.blm.gov/eplanning-ui/project/2012803/510>). After all submissions were collected, submissions that were not identified as form letters were uploaded to CARA. **Table 2-2** displays submission by delivery type.

Table 2-2: Comment Submissions by Delivery Type

Delivery Type	Number of Submissions
CARA	728
Email	1,792
US mail	7
Virtual open house website electronic submission	114
Hard-copy submission during in-person public meeting	3
Verbal public comment during VPM	9
Total	2,653

From the 194 unique letter submissions received, the BLM identified a total of 640 individual substantive comments. **Table 2-3** summarizes the distribution of comments and submissions by issue category.

Table 2-3: Comments and Submissions by Issue Category

Issue Category	Number of Individual Comments	Percentage of Total Comments Coded	Number of Submissions
NEPA			
Public outreach	3	0.5	3
Cooperating agency relationships	4	0.6	4
Purpose and need	2	0.3	2
Range of alternatives	12	1.9	5
Government-to-government consultation	4	0.6	3

Issue Category	Number of Individual Comments	Percentage of Total Comments Coded	Number of Submissions
Best available information and baseline data	15	2.3	13
Impact analysis	3	0.5	1
Collaboration, coordination, and partnerships	5	0.8	5
Mitigation and monitoring	2	0.3	2
Other Laws	7	1.2	8
Consistency with Federal, State, and Local Plans	29	4.5	18
Resources	—	—	—
Climate change	15	2.3	8
Air	4	0.6	2
Aquatic habitats, riparian areas, and ecosystems	11	1.7	7
Cultural resources	3	0.5	3
Fish and special status fish	8	1.3	8
Forestry	12	1.9	9
Lands with wilderness characteristics	3	2.0	8
Invasive, nonnative plants	5	0.8	5
Soils	1	0.2	1
Special status plant species	4	0.6	4
Tribal consultation and interests	15	2.3	8
Vegetation	6	0.9	6
Visual resources	10	1.6	3
Water resources	22	3.4	10
Wildland fire management	22	3.4	13
Wildlife and special status wildlife	32	5.0	12
Resource Uses	—	—	—
Comprehensive trail and travel management	12	1.9	9
Livestock grazing	10	1.6	10
Realty	—	—	—
Realty: land tenure	3	0.5	3
Realty: land acquisition	15	2.3	11
Realty: use authorizations	5	0.8	5
Minerals: general	3	0.5	3
Minerals: locatable	21	3.3	15
Minerals: mineral materials	2	0.3	2
Recreation and visitor services	122	19.1	102
Wild horses and burros	2	0.3	2
Special Designations	5	0.8	4
Areas of critical environmental concern (ACECs)	41	6.4	22
Wild and scenic rivers	99	15.5	13
Wilderness and wilderness study areas	18	2.8	7
Social and Economic Conditions	—	—	—
General	2	0.3	2
Social and economic: homelessness	1	0.2	1
Social and economic: cannabis concerns	1	0.2	1
Environmental justice	2	0.3	2
Support	—	—	—
Public health and safety	5	0.8	2
Hazardous materials	1	0.2	1
Total	640	100	N/A*

*A total number of submissions here would not be reflective of the total number of submissions received; multiple substantive comments were identified from one submission.

Summary of Public Comments

This section summarizes the resource issues and areas of concern identified in the scoping comments. Comments are summarized below in narrative form for each general resource issue (for example, water resources), as well as for portions of the planning process (for example, public outreach). Similar comments were grouped and summarized by Issue Category (see **Table 2-3**) to more efficiently highlight management issues for the BLM to consider during the planning process.

I.4 NEPA

I.4.1 Public Outreach

Issue: How will the public and agency stakeholders be involved and informed throughout the NCIP planning process?

Comment Summary

Commenters stressed the importance of public outreach to individuals, industries, organizations, and local, state, and federal agencies in the NCIP process. Some commenters expressed concern about the lack of direct stakeholder communication to mining claim owners about the scoping period; they urged for more robust public outreach efforts to stakeholders in the future.

I.4.2 Cooperating Agencies

Issue: How are cooperating agencies involved in the NCIP process?

Comment Summary

Commenters requested that the BLM consult the California Department of Wildlife and the USFWS to ensure adequate protection of special status wildlife and migratory bird species.

I.4.3 Purpose and Need

Issue: What is the NCIP's purpose and need?

Comment Summary

Commenters stated that the NCIP should identify a purpose and need statement that is objective and based on the rationale for the proposed action. The BLM should consider incorporating the Federal Land Policy and Management Act sustainable-yield mandate into the purpose and need.

I.4.4 Range of Alternatives

Issue: What are the potential alternatives that the BLM will consider?

Comment Summary

Commenters requested that the BLM formulate a reasonable range of alternatives that examine and differentiate the impacts of the no action and action alternatives on separate resources. Commenters expressed the need for alternatives that protect, restore, and enhance the environment while maximizing the need for environmental benefits and multiple uses. Commenters reiterated the need for alternatives that summarize how changes to resources follow the purpose and need. Commenters requested that the BLM identify the rationale for eliminating alternatives, and any mitigation costs associated with the action alternatives.

Commenters offered several specific suggestions for management actions that should be included in the formulation of alternatives. These included, but are not limited to, actions specific to wildland fire management, recreation, socioeconomics, wildlife, air quality, climate change, vegetation, forestry, aquatic ecosystems, and minerals.

1.4.5 Government-to-Government Consultation

Issue: How will government-to-government consultation occur, and which interested parties will be consulted during this NEPA process?

Comment Summary

Commenters emphasized that the BLM is required to conduct thorough and meaningful Tribal consultation under NEPA. The results of Tribal consultation should be summarized in the NCIP. The BLM should attempt to resolve any main concerns of the Tribes. Specifically, concerns were noted for the Cahto, Karuk, Wintun, and Yurok Nations, as well as for the people of the Round Valley Indian Tribes.

1.4.6 Best Available Information and Baseline Data

Issue: How will the BLM incorporate the best available information and baseline data in the proposed action, range of alternatives, and resources?

Comment Summary

The NCIP should be updated to incorporate the best available current science and information, including, but not limited to, the following specific topics:

- Aquatic and sensitive riparian ecosystems
- Climate change
- Wildland fire
- Livestock grazing
- Recreation
- Socioeconomics and environmental justice
- Vegetation
- Wildlife and habitat connectivity

Various commenters provided suggested best available science and information literature for the BLM to consider while preparing the NCIP.

1.4.7 Collaboration, Coordination, and Partnerships

Issue: How will the BLM incorporate input from stakeholders through collaboration, coordination, and partnerships in the RMP?

Comment Summary

Commenters requested that the BLM coordinate the NCIP planning effort with private landowners, Tribes, the NPS, the Forest Service, organizations, and counties within the planning area. Commenters recommended that the BLM use partnerships to analyze specific impacts on resources and promote effective long-term management.

1.4.8 Impact Analysis

Issue: What is the framework for the BLM’s impact analysis?

Comment Summary

A commenter recommended that the impact analysis describe the threat to resources from the resource perspective and prioritize resources that are significantly at risk or impacted by the proposed action. The NCIP should identify any past, current, and future resource and ecosystem trends that could impact each resource.

1.4.9 Mitigation and Monitoring

Issue: How will the NCIP incorporate monitoring, mitigation, and adaptive management actions for ecosystems and at-risk species?

Comment Summary

Commenters requested that the BLM implement environmental inspection and monitoring programs, particularly for ecosystems and at-risk species, to ensure compliance with all mitigation measures. They argued that the proposed action will impact a variety of resources over an extended period, so monitoring and mitigation should be required and released annually.

1.5 OTHER LAWS (FOR EXAMPLE, THE FEDERAL LAND POLICY AND MANAGEMENT ACT AND THE GENERAL MINING ACT OF 1872)

Issue: How will the NCIP ensure management actions comply with various federal laws?

Comment Summary

Commenters stated that management decisions in the NCIP must comply with the General Mining Act of 1872 and its subparts, such that the public’s rights to mineral entry and to exercise their claims are protected.

Commenters stated that the NCIP should incorporate management decisions that acknowledge and comply with the Infrastructure Investment and Jobs Act; the subsequent Department of the Interior Wildfire Risk Five-Year Monitoring, Maintenance, and Treatment Plan (2022); the Migratory Bird Treaty Act; and the Administrative Procedure Act.

1.6 CONSISTENCY WITH FEDERAL, STATE, AND LOCAL PLANS

Issue: How will the EIS discuss the NCIP’s consistency and integration with other federal, state, Tribal, and local land use plans in the planning area?

Comment Summary

Commenters stated that the NCIP should conform to the BLM’s South Fork Eel Draft River Management Plan EIS (August 1990) and Supplemental EIS (January 1993). Commenters requested that the BLM ensure that the NCIP includes management actions in compliance with its agency guidance, including when the BLM identifies special designations or protections in the planning area.

Commenters recommended that the BLM avoid compliance with any area planning documents not subject to public processes required for federal land planning, such as the private 2005 Gillham Butte Cooperative Management Plan. Commenters expressed that the BLM should rely on community-supported management plans to develop the NCIP and avoid plans that do not include community input.

Commenters stated that the BLM should coordinate with state agencies, such as the California Department of Fish and Wildlife and the North Coast Regional Water Quality Control Board, to ensure consistency with various state management plan objectives. Commenters requested that the BLM ensure that the NCIP is consistent with the Forest Service's plans, actions, and strategies in responding to wildfires.

Issue: How will the BLM ensure that the NCIP is consistent with the federal and state policies and directives to enhance climate resiliency on public lands, namely the federal and state 30x30¹ policies, reports, and directives?

Comment Summary

Commenters stated that the BLM should ensure the NCIP implements management actions that are consistent (but not limited to) the following federal executive orders, directives, and reports:

- Executive Order 14008: Tackling the Climate Crisis at Home and Abroad
- America the Beautiful Report
- Executive Order 14702: Strengthening the Nation's Forests, Communities, and Local Economies

In addition, the BLM should ensure that the NCIP implements management actions consistent with the California Pathways to 30x30.

Issue: How will the BLM ensure the NCIP is consistent with other federal agency planning efforts, particularly the Northwest Forest Plan?

Comment Summary

Commenters requested that the BLM incorporate elements of the Northwest Forest Plan into the NCIP effort to ensure the protection of various critical resources, such as northern spotted owls (*Strix occidentalis caurina*).

1.7 RESOURCES

1.7.1 Climate Change

Issue: How will the BLM review the impacts of climate change on resources and ecosystems? How will changes resulting from climate change be examined and quantified in the analysis?

Comment Summary

Commenters expressed great concern over climate change's ability to cause uncertainties in the planning area; they urged the BLM to consider and examine how climate change affects other resource areas and ecosystems when formulating the alternatives. Commenters offered various management prescriptions, monitoring, and mitigation recommendations to incorporate climate change in the analysis. Some of these recommendations included a carbon budget to increase carbon sequestration capacity, a request for the analysis to include a discussion of reasonably foreseeable climate change impacts (and a further analysis if impacts are identified), and specifically a discussion of how climate change will impact current and future resource areas and ecosystems under the range of alternatives. It was also recommended that the NCIP include long-term management actions without permanent impairment and unnecessary or undue degradation of the resources in the face of climate change.

¹ A commitment to conserve at least 30 percent of lands and waters by 2030

Commenters expressed the need to incorporate the updated baseline data to review climate change's impacts on current and future resources and ecosystem trends in the NCIP.

1.7.2 Air

Issue: How will the BLM monitor and protect air quality in the planning area?

Comment Summary

Commenters requested that the NCIP include a discussion on ambient air conditions, National Ambient Air Quality Standards and nonattainment areas, and potential air quality impacts for each alternative. Specific management actions and mitigation measures for air quality were also suggested by commenters.

1.7.3 Aquatic Habitats, Riparian Areas, and Ecosystems

Issue: How will the action alternatives impact aquatic and riparian habitats?

Comment Summary

Commenters expressed concern over the negative impacts that livestock grazing has on riparian ecosystems and requested that the BLM analyze these impacts in the NCIP. Some of these impacts could include ecosystem degradation, decreased water quality, and wildlife habitat disruption.

Commenters voiced concern about timber harvesting operations near riparian areas. The NCIP should analyze changes in the water quality and damage to riparian ecosystems resulting from timber harvesting.

Commenters requested that the BLM work with neighboring landowners to decommission and abandon roads to reduce sediment delivery to waterways and to improve the water quality in riparian areas.

Commenters asked for clarification on the desired outcomes for aquatic and riparian ecosystems. Commenters requested that the BLM evaluate how areal (acreage for wetlands) or linear extent (for streams) would be impacted and if the functions the ecosystems perform would be altered from other resource uses. Commenters requested that the BLM disclose any floodplain impacts and actions to be taken to minimize related impacts.

Commenters questioned if proposed management actions would result in the discharge of dredged or fill materials into surface waters of the United States and if they would impact aquatic and riparian areas, and if so, the NCIP should discuss Clean Water Act Section 404 permitting needs.

1.7.4 Cultural Resources

Issue: How will the BLM meet the requirements for identifying cultural resources and minimizing adverse effects on the physical integrity, accessibility, or use of cultural resources?

Comment Summary

Commenters recommended that the BLM conduct a cultural inventory survey to determine whether there are any additional cultural and sensitive sites, and to identify the significant sites in the planning area as a means of recognizing Tribal sovereignty. Commenters requested that the NCIP discuss how the BLM would minimize adverse effects on cultural sites, including traditional cultural properties, in the planning area, and also that the NCIP appropriately acknowledge any memorandum of understanding between Tribes and the BLM.

1.7.5 Fish and Special Status Fish

Issue: How will the NCIP assess the effects of the action alternatives on fish and special status species, their habitats, and natural diversity?

Comment Summary

Commenters recommended that the BLM protect all special status fish and aquatic species and habitats with comprehensive and effective plans using the best available scientific data, specifically, any areas that contain Chinook salmon (*Oncorhynchus tshawytscha*) and steelhead (*Oncorhynchus mykiss*). Commenters requested that the BLM consult with the NPS, US Bureau of Reclamation, and USFWS to review potential species that are listed for protection in the state and under the federal Endangered Species Act.

Commenters requested that the BLM include clarification in the NCIP on how “degraded riparian zones” will be defined and measured.

1.7.6 Forestry

Issue: How will the NCIP address impacts on wildlife, vegetation, and aquatic ecosystems from commercial timber harvesting? How can the BLM promote balanced use of timber harvesting while protecting sensitive ecosystems?

Comment Summary

Commenters expressed concerns about the impacts of commercial timber harvesting on terrestrial and aquatic ecosystems, water quality, wildlife, fires, and invasive species. They requested that the BLM consider these impacts and reduce commercial logging, where applicable. Commenters emphasized the value of old-growth forests and how their protection affects other resources in the planning area. Commenters requested that the BLM analyze and consider the economic benefits and opportunities of timber harvesting in the NCIP.

Issue: How will the NCIP address timber management to reduce fire and fuel loads?

Comment Summary

Commenters voiced concern over the inadequate management of timber resources and their impact on fire and fuel loads. Commenters recommended that the BLM consider and implement a range of fire techniques, fuel reductions, and forest treatments to better manage forest health and improve fire resilience.

1.7.7 Invasive, Nonnative Plants

Issue: How will the BLM manage noxious weeds and invasive weed and plant species in the NCIP?

Comment Summary

Commenters expressed concern over the pervasiveness of invasive plants in the NCIP planning area. They recommended that the BLM manage invasive and noxious weeds by using an integrated weed management approach, while partnering with local and statewide entities to inform and support successful noxious weed management programs. Further, early detection and rapid response to control new infestations, as well as ongoing monitoring and targeted treatments, should be priorities for the BLM.

I.7.8 Lands with Wilderness Characteristics

Issue: How will the NCIP management actions protect lands with wilderness characteristics?

Comment Summary

Commenters requested that the NCIP prioritize management of BLM-administered lands in the planning area to preserve their wilderness character and to preserve their scenic and wildlife values as well as those characteristics that make potential wilderness designation possible. Commenters noted that the BLM should acquire parcels adjacent to areas that are recognized as lands with wilderness characteristics as parcels become available.

Commenters requested that the BLM release the inventory findings for lands with wilderness characteristics to the public as soon as practicable after completion and before the BLM uses the data to inform management decisions. Commenters provided specific recommendations from a citizen's inventory that was completed for the NCIP planning area.

I.7.9 Soils

Issue: How will the BLM manage soils?

Comment Summary

Concern was expressed over the decline in soil compaction and the loss of nutrients resulting from high rainfall events; the BLM should identify and prioritize areas for specific management actions to prevent these impacts on soil conditions.

I.7.10 Special Status Plant Species

Issue: How will the BLM inventory, analyze, and protect special status plant species that exist in the planning area?

Comment Summary

Commenters suggested that the BLM conduct plant community surveys and inventory and map all sensitive plants and plant communities in the planning area. Commenters also requested that the BLM utilize management actions and strategies in the NCIP that require effective management, monitoring, and mitigation of resources to conserve special status plant species and habitats.

I.7.11 Tribal Consultation and Interests

Issue: How will the BLM meet the requirements for identifying cultural resources, as required by Section 106 of the National Historic Preservation Act, including an inventory of cultural resources significant to Tribes?

Comment Summary

Commenters emphasized the need to consult and coordinate with Tribes, as required by Section 106 of the National Historic Preservation Act. Commenters requested a summary of coordination with all relevant State Historic Preservation Officers, Tribal Historic Preservation Officers, and other Tribal stakeholders interested in the NCIP. Specifically, commenters recommended that the BLM consult with the Cahto, Karuk, Wintun, and Yurok Nations, and the people represented by the Round Valley Indian Tribes.

Issue: How will the NCIP address Indian Sacred Sites, as required by Executive Order 13007?

Commenters recommended that the BLM work with Tribes to determine and identify Indian Sacred Sites and spiritual sites for protection in the NCIP. Commenters requested that the BLM discuss how the action alternatives would avoid or mitigate the impacts on the physical integrity, accessibility, or use of sacred sites.

1.7.12 Vegetation***Issue: How will the NCIP address the potential impacts on vegetation, particularly in sensitive terrestrial and aquatic areas? How will the BLM monitor and reduce or mitigate impacts on vegetation?****Comment Summary*

Commenters recommended that the NCIP include mitigation measures to minimize impacts on native plants, sensitive vegetation communities (for example, riparian areas, wetlands, and old-growth forest), and rare plant species. Commenters expressed interest in prioritizing the assessment, treatment, maintenance, and restoration of vegetation in sensitive and important ecosystems. Further, commenters recommended specific areas and habitats in the planning area that should be prioritized for restoration and successful long-term maintenance.

Commenters expressed concern over impacts on vegetation resulting from recreation, livestock grazing, and renewable energy development; they requested that the NCIP include management actions that maintain the health of plant communities.

1.7.13 Visual Resources***Issue: How will the BLM address visual resources within the NCIP?****Comment Summary*

Commenters requested that the BLM update the visual resource management (VRM) classifications for all BLM-administered lands in the NCIP planning area in the context of landscape-level planning and included recommendations for specific VRM classifications for certain special designations. Commenters expressed that the NCIP must comply with federal laws and BLM regulations relating to VRM classifications. Additionally, commenters requested that the BLM incorporate management actions related to night skies into the NCIP.

1.7.14 Water Resources***Issue: How will the NCIP maintain compliance with federal, state, and local water quality standards?****Comment Summary*

Commenters noted that NCIP management actions need to maintain compliance with all applicable water quality standards.

Issue: How will the NCIP quantify the potential indirect, direct, and cumulative impacts on water resources in the analysis of alternatives? How will the BLM address the impacts on water quality in the planning area?

Comment Summary

Commenters recommended that the NCIP review the trends impacting water resources based on current and future water needs, drought conditions, and stressors from climate change. They requested that all direct, indirect, and cumulative impacts on surface water and groundwater quality and quantity from the proposed management actions be discussed, along with an updated baseline analysis.

Commenters had various suggestions about adaptive management, monitoring, and mitigation measures as they relate to specific locations within the planning area, as well as watersheds, water quality, and quantity across the planning area. Commenters raised concern over illegal uses of water and requested more details on how illegal uses impact the overall water quality and watershed health. Commenters also raised concerns about how other management actions, such as for timber management and mining, would directly impact water resources in the planning area.

1.7.15 Wildland Fire Management

Issue: How will the BLM engage with local, state, federal, and Tribal partners to implement a more effective wildland fire management strategy?

Comment Summary

Commenters asked the BLM to engage with local organizations and partnerships, particularly Tribal interests, to develop a strategy to reduce fuel loads and to mitigate potential wildfires in the NCIP planning area.

Issue: How will fire management techniques or methods (such as prescribed burns and thinning) proposed in the NCIP impact aquatic and terrestrial ecosystems' health? How will these methods affect fire treatment in special designation areas?

Comment Summary

Commenters urged the BLM to remove excess fuels to better protect aquatic and terrestrial ecosystems from future wildfires. Commenters recommended that the BLM identify areas for fuel reduction and for projects that would enhance the forest's health. Further, the BLM should develop a programmatic NEPA document to cover high-priority treatment areas. Commenters stressed the importance of prescribed burns, thinning, forest product harvest levels, and other treatments to build long-term ecosystem resilience.

Commenters expressed support for the implementation of landscape-scale fuel breaks to promote diversity and reduce wildfire impacts. However, commenters also voiced concern that early successional vegetation can become an obstacle to future management because the vegetation presents flammable features that require continual maintenance.

Commenters questioned how fuel reduction techniques or other fire management methods could effectively improve ecosystem health and function. A commenter also raised concern over the use of flame retardants and their impact on wildlife and aquatic ecosystems.

Issue: How will the NCIP analyze the impacts that postfire habitats have on recreation and visual resources?

Comment Summary

Commenters expressed concern over off-highway vehicle (OHV) use in post-wildfire habitats and questioned how areas could recover with increases in recreation and unauthorized access. Further, some commenters noted that inadequate fire management planning can further degrade the area's visual resources; they would like the BLM to address these issues in the NCIP.

1.7.16 Wildlife and Special Status Wildlife

Issue: How will the NCIP management actions address the reintroduction of certain wildlife species and protect at-risk species in the planning area?

Comment Summary

Commenters emphasized the need for the protection of at-risk species in the planning area. They requested that the BLM evaluate how the action alternatives would contribute to the at-risk species' conservation and recovery under various climate change, threat, and action scenarios. Commenters suggested several management, monitoring, and mitigation strategies and activities to achieve desired outcomes for at-risk species.

Commenters requested that certain sensitive, threatened, and endangered species be inventoried and monitored on BLM-administered lands in the NCIP planning area. They also requested that these species be managed for conservation.

Issue: How will the NCIP incorporate the use of wildlife corridors, disease control, avian migration areas, big game management, and other strategies to promote greater wildlife recovery and resilience?

Comment Summary

Commenters expressed the importance of wildlife corridors on wildlife species' connectivity, stability, recovery, and resilience. They requested that the NCIP identify wildlife migration and potential habitat corridors, including avian and big game migration corridors. Further, commenters requested that the range of alternatives identify and analyze different areas for potential habitat corridors.

1.8 RESOURCE USES

1.8.1 Travel and Transportation Management

Issue: How will the NCIP address travel management decisions, particularly when considering the protection of sensitive habitats and areas with special designations?

Comment Summary

Commenters recommended that sensitive and specially designated areas (such as, areas with sensitive resources, ACECs, and lands with wilderness characteristics) be closed to OHV uses. Commenters also asked that the BLM decommission roads in areas with special designations unless such routes are needed. Commenters requested that OHV route densities be reduced and that illegal routes be closed and rehabilitated.

Commenters asked the BLM to address OHV trail systems in specific areas of the NCIP planning area. Additionally, it was requested that the NCIP analyze opening and/or closing existing roads to either

allow greater recreational access or to protect areas from OHV impacts. Commenters recommended that the BLM enable local communities to support trail building and attempt other mitigation measures before closing trails to use. Commenters recommended that the BLM limit designation of roadless areas to ensure management needs can be met.

Commenters requested that the NCIP include management actions that address impacts to wildlife from motorized and non-motorized use.

1.8.2 Wild Horses and Burros

Issue: How will the NCIP address wild horses and burros?

Comment Summary

It was requested that the NCIP address the feral horse populations in the planning area and that the BLM should coordinate their management actions with other government agencies.

1.8.3 Livestock Grazing

Issue: How will the NCIP address the impacts from livestock grazing on other resource areas, such as fire management, vegetation, terrestrial and aquatic ecosystems, climate change, and wildlife?

Comment Summary

Commenters raised concerns about the impacts of livestock grazing on water quality, aquatic ecosystems, terrestrial ecosystems, fire management, and climate change. Commenters recommended that the BLM analyze the impacts of livestock grazing specifically on terrestrial and aquatic ecosystems and develop an ecological study to document and review potential impacts. A commenter suggested that grazing management systems and techniques should be compatible with maintaining desired levels of elk and other wildlife, as well as overall compatibility with wildlife health.

Commenters recommended that livestock grazing stop in certain areas where allotment owners have continually failed to meet or satisfy BLM rangeland health standards. They stressed that overgrazing could cause great damage and stress to ecosystems; they requested these impacts be accounted for. However, some commenters argued that livestock grazing is an effective and efficient way to reduce understory vegetation and reduce fuel loads, fire hazards, and potential fires' severity.

Issue: Will the NCIP include qualitative or quantitative standards, or both, for livestock grazing activities?

Comment Summary

It was requested that the BLM review the standards for Federal Land Permits, which may require federal agencies to comply with qualitative and quantitative standards for livestock grazing activities.

1.8.4 Realty—Land Tenure

Issue: How will the NCIP address lands made available for disposal?

Comment Summary

Commenters made recommendations about the disposal criteria that the BLM should include in the NCIP.

1.8.5 Realty—Land Acquisition

Issue: How will the NCIP address land acquisition?

Comment Summary

Commenters recommended that the BLM acquire land parcels that protect sensitive species, encourage connectivity, and promote greater ecosystem benefits. New lands along key riparian corridors and eligible wild and scenic rivers should be prioritized and acquired in large blocks to promote ecosystem health. Commenters noted that land acquisitions could also be used to create or enhance recreation opportunities in the planning area. Commenters provided specific recommendations for areas or parcels for acquisition.

1.8.6 Realty—Use Authorizations

Issue: How will the NCIP address land use authorizations?

Comment Summary

Commenters requested that the NCIP address land use authorization permits for access roads across BLM-administered lands to private lands. A commenter recommended that the BLM create right-of-way use authorizations to improve public access, where appropriate, by developing low-impact trails and access points.

Commenters noted that use authorizations, right-of-way exclusion areas, and right-of-way avoidance areas should be defined in the NCIP for this planning effort.

1.8.7 Minerals—Leasable, Locatable, Salable, and Mineral Materials

Issue: How will the NCIP management actions address existing mining claims, metal detecting, and gold panning?

Commenters requested that the BLM ensure management decisions protect the rights of miners to access their existing small-scale mining claims. Commenters also requested that the BLM maintain access to BLM-administered lands for gold panning, sluicing, and metal detecting. Commenters asked the BLM to coordinate with local prospecting and mining clubs as stakeholders for input on management actions associated with minerals.

Issue: How will the BLM ensure that management decisions for mining properly protect specially designated areas and sensitive resources?

Comment Summary

Some commenters requested that the BLM close ACECs, WSRs, or lands with wilderness characteristics to mineral leasing, while others felt that no further withdrawals of lands from mineral entry was appropriate for the NCIP. Commenters noted that the NCIP should address the interaction between prospecting and mining with degradation of cultural and archaeological sites.

1.8.8 Recreation and Visitor Services

Issue: How will the BLM provide more recreation opportunities for all users within the planning area?

Comment Summary

Commenters expressed concern about closing trails and how the closures would limit public and mineral-right access. They recommended that the BLM identify and develop additional sites and improve

road and trail rights-of-way for access to hunting, fishing, and other recreation opportunities. Some commenters had specific areas to consider for increased recreation access.

Commenters raised concerns over the lack of recreation access for individuals with disabilities. They requested that the proposed actions and alternatives account for individuals that are protected by the American with Disabilities Act and President Biden's Executive Order 13985 for advancing equity.

Commenters raised concerns regarding how homelessness, hunting, and illegal cannabis cultivation impact the safety of recreation. They requested that the BLM address these issues in the recreation section and examine them in the range of alternatives. A commenter voiced concern over the safety hazard that electric bikes pose to recreation users, especially on trails that are not equipped to handle the increased recreation numbers.

Commenters recommended that the BLM partner with government and nongovernment organizations for the long-term development of recreation opportunities.

A commenter requested that Special Recreation Management Area designations should be given to the Samoa Dunes Recreation Area, Ma-le'i Dunes Cooperative Management Area, South Spit (Mike Thompson Wildlife Area), Lacks Creek Management Area, and Little Darby Recreation Area.

Issue: How will the NCIP address trail improvements and modifications?

Comment Summary

Commenters recommended that the BLM implement better trail maintenance, management, and improvements to promote greater recreation access and opportunities. They emphasized that recreation trends will continue to grow; if the BLM does not adequately plan and prepare for future increases in access, existing recreation trails and opportunities will continue to be overused and see their important environmental, social, cultural, and economic values degraded. They noted that managing recreation effectively will promote additional tourism and economic opportunities in and around the planning area. Commenters requested that the BLM identify and analyze how any changes in trail designations would impact specific resources and ecosystems. Commenters provided several trail recommendations for development throughout the planning area.

Issue: What recreation activities will the NCIP address?

Comment Summary

Commenters noted that management actions for recreation activities, such as hunting, shooting, biking, all-terrain vehicle use, kayaking, and rafting, should be considered and expanded during the NCIP effort. Commenters emphasized the need to expand mountain and electric biking opportunities in the planning area. They expressed that these activities would continue; without proper management, recreation opportunities would not improve.

Commenters requested the continuation of hunting activities and shooting range improvements on BLM-administered lands within the planning area because they create unique recreation opportunities.

I.9 SPECIAL DESIGNATIONS

I.9.1 General

Issue: How will the BLM utilize special designations in the NCIP?

Comment Summary

Commenters expressed the need to follow all relevant regulations, standards, and management practices to ensure that the range of alternatives in the NCIP reflect the outstanding ecological, cultural, and economic values of the planning area. Commenters provided suggestions for various special designations that could be utilized by the BLM to create protections for specific resources.

I.9.2 Areas of Critical Environmental Concern

Issue: How will the BLM utilize ACECs to protect resource values?

Comment Summary

Commenters provided specific descriptions, recommendations, and rationale for why certain areas should receive an ACEC designation. Commenters noted that ACEC designations are within the BLM's authority under the Federal Land Policy and Management Act. Commenters expressed several resources to consider when analyzing ACEC designations, including wildlife, recreation, fire management, and mineral access, and requested that the range of alternatives reflect these considerations.

I.9.3 Wild and Scenic Rivers

Issue: How will the BLM protect eligible, suitable, and designated wild and scenic river segments and their corresponding outstandingly remarkable values?

Comment Summary

Commenters suggested that all river segments within the planning area be reviewed for changed circumstances for WSR eligibility and/or for updated outstandingly remarkable values, including scenery, recreational, fish, wildlife, cultural, historic, ecology, and other (research). Commenters suggested that the BLM review, identify, and provide the rationale behind the differences between the 1993–95 and 2018 wild and scenic rivers inventories for several specific rivers/river segments. Commenters identified specific rivers/river segments for eligibility and further clarification of outstandingly remarkable values.

Commenters suggested that the BLM consider not conducting suitability studies on eligible segments; suitability decisions do not contribute to the political process that secures permanent protection for a river. They suggested the BLM could provide better protections through land acquisitions along eligible WSR corridors.

Commenters suggested that the BLM include management actions which uphold natural river process and consider riparian rehabilitation projects within wild and scenic river corridors for bank stabilization and floodplain restoration.

Issue: How will the BLM maintain consistency in the management of protected rivers in the planning area?

Commenters suggested that the BLM review state-managed rivers in the planning area and federally managed rivers adjacent to the planning area and manage the rivers consistently with other agencies. Commenters suggested that the BLM create, provide access to, and update existing and out-of-date

management plans for state-administered, federally designated rivers in order to fulfill the purposes of the National Wild and Scenic Rivers Act.

1.9.4 Wilderness and Wilderness Study Areas

Issue: How will the BLM address management of designated wilderness and wilderness study areas in the NCIP?

Comment Summary

Commenters requested that the BLM designate several specific areas as wilderness, or wilderness study areas, and submitted reports and data to support their requests.

1.10 SOCIAL AND ECONOMIC CONDITIONS

1.10.1 General

Issue: Will the NCIP analyze economic impacts associated with the proposed management actions?

Comment Summary

Commenters requested that the socioeconomic analysis analyze the potential economic impacts associated with the action alternatives. They also requested that the socioeconomic analysis recognizes the importance of hunting and other recreation activities on the local economy.

1.10.2 Social and Economic—Homeless Populations

Issue: How will the NCIP address the use of BLM-administered lands by homeless populations?

Comment Summary

Concerns were raised over unauthorized camping in riparian corridors, and the impacts on public health and safety, fish, and water resources that can result.

1.10.3 Social and Economic—Cannabis Concerns

Issue: How will the NCIP address the cannabis cultivation on nearby lands??

Comment Summary

Commenters expressed concern over illegal cannabis growing and its significant water use. However, a commenter expressed skepticism over the prevalence of illegal grow operations due to changing regulations.

1.10.4 Environmental Justice

Issue: How will the NCIP address adverse effects on marginalized and low-income communities?

Comment Summary

Commenters recommended that the BLM analyze the NCIP's potential impacts on vulnerable communities and outline measures to mitigate potential impacts. They requested that the analysis reflect whether any alternative would cause any disproportionate adverse impacts on minority or low-income communities. A commenter had various suggestions for how to identify and define vulnerable communities and provided current environmental justice guidance and recommendations. Some recommendations include clearly defining a reference and affected community and consulting Executive Order 12898, the Environmental Protection Agency's environmental justice screening tool, and the most recent census data.

I.10.5 Public Health and Safety

Issue: How will the NCIP address public health and safety in general, and specifically during emergency events like wildfires?

Comment Summary

Commenters recommended several measures to reduce the fire risk in the planning area. These measures included closing old roads to prevent illegal dumping and fire risk, clearing fire evacuation routes, and removing hazard trees from utility corridors.

Commenters recommended that the BLM identify mitigation for safety hazards in areas where abandoned mine lands have been exposed due to fire.

I.10.6 Hazardous Materials

Issue: How will the NCIP address the cleanup of hazardous materials sites?

Comment Summary

Commenters requested that the BLM prioritize the cleanup of hazardous materials sites.

Future Steps

I.11 FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The BLM will review all scoping comments contained in this report for applicability to the NCIP planning process. Some comments may already be addressed by the BLM's preliminary planning criteria (for example, a comment requesting an action that is already covered by law); others may be determined to be out of the scope of the NCIP planning process (for example, a comment about a resource that is managed by another agency, or a rulemaking request more appropriately aimed at the BLM as a whole).

The BLM will develop issue statements to address those comments within the scope of the planning process that have not already been addressed for consideration. The BLM will integrate these issues into the preparation of the Draft NCIP/EIS.

The next phase of the planning process is to develop alternatives for analysis in the NCIP/EIS. The NCIP/EIS will examine a reasonable range of alternatives that meets the plan's purpose and need, including alternatives identified in all previous public outreach efforts. This ensures that the full spectrum of positions expressed by participants in the planning process, to date, has been considered, as required by NEPA. The NCIP/EIS will also describe alternatives that have been eliminated from further detailed consideration and not brought forward for formal analysis, along with the reasons for elimination.

The BLM will develop each viable alternative, using available information and by identifying additional information that needs to be obtained in order to evaluate all alternatives on an equal basis. The BLM will also meet with cooperating agencies to seek their input on the development of alternatives.

The analysis of the alternatives will be documented in the Draft NCIP/EIS. Although the BLM welcomes public input at any time during the environmental analysis process, the next official public comment period will begin when the Draft NCIP/EIS is published, which is anticipated in spring 2023. The availability of the draft document will be announced via a notice of availability in the *Federal Register*. A public comment period of at least 90 days will follow. Public meetings will be held during the Draft NCIP/EIS comment period; the BLM will advertise meetings through mailings to contacts on the project mailing list and through other notification methods.

At the conclusion of the public comment period, the BLM will review and consider all comments on the Draft NCIP/EIS that were received during the public comment period. The BLM will then revise the Draft NCIP/EIS, as appropriate, based on public comments. All substantive comments and responses will be incorporated into the Proposed RMP/Final EIS. The Proposed RMP/Final EIS will also identify the BLM's preferred alternative. The BLM will announce the availability of the Final EIS in a notice of availability in the *Federal Register*. The date that the notice appears in the *Federal Register* will begin the required 30-day waiting period before a ROD may be issued. The ROD will include the approved NCIP.

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Appendix A

Substantive Public Comments

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Appendix A. Substantive Public Comments

Comment Code Name	Last Name	First Name	Organization Name	Letter #	Input Text
Air	Gerdes	Jason	Environmental Protection Agency (EPA)	767	<p>Administrative Controls: - Coordinate with appropriate air quality agencies to identify a construction schedule that minimizes cumulative impacts from other planned projects in the region, if feasible.</p> <p>- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking.³ Suitability of control devices is based on whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.</p> <p>- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow and avoid routing truck traffic near sensitive land uses to the fullest extent feasible.</p> <p>- Locate diesel engines, motors, and equipment staging areas as far as possible from residential areas and other sensitive receptors (e.g., schools, daycare centers, hospitals, senior centers, etc.).</p> <p>- Reduce construction-related trips of workers and equipment, including trucks.</p> <p>- Identify all commitments to reduce construction emissions and quantify air quality improvements that would result from adopting specific air quality measures. - Identify where implementation of mitigation measures is rejected based on economic infeasibility.</p>
Air	Gerdes	Jason	Environmental Protection Agency (EPA)	767	<p>The DEIS should provide a discussion of ambient air conditions (baseline or existing), National Ambient Air Quality Standards and nonattainment areas, and potential air quality impacts for each alternative. In estimating criteria pollutant emissions for the analysis area, discuss the timeframe for release of these emissions for the duration of the proposed management activities.</p>
Air	Gerdes	Jason	Environmental Protection Agency (EPA)	767	<p>We recommend the following measures to mitigate construction emissions of fugitive dust, oxides of nitrogen, and volatile organic compounds and to include these measures in all construction contracts. Fugitive Dust Source Controls: - Stabilize disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both active and inactive sites during workdays, weekends, holidays, and windy conditions. - Phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions. - When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph. Mobile and Stationary Source Controls: - Reduce unnecessary idling from heavy equipment. - Prohibit engine tampering to increase horsepower, except when meeting manufacturer's recommendations. - Lease or buy newer, cleaner equipment using the best available emissions control technologies. - Use lower-emitting engines and fuels, including electric, liquified gas, hydrogen fuel cells, and/or alternative diesel formulations, if feasible. - On-Highway Vehicles - On-highway vehicles should meet, or exceed, the U.S. EPA exhaust emissions standards for model year 2010 and newer heavy-duty on-highway compression-ignition engines (e.g., drayage trucks, long haul trucks, refuse haulers, shuttle buses, etc.).¹ - Nonroad Vehicles & Equipment - Nonroad vehicles and equipment should meet, or exceed, the U.S. EPA Tier 4 exhaust emissions standards for heavy-duty nonroad compression-ignition engines (e.g., nonroad trucks, construction equipment, cargo handlers, etc.).² ¹ See https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=PI00O9ZZ.pdf. ² See https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=PI00OA05.pdf.</p>
Air	Not Provided	Not Provided	BlueRibbon Coalition	787	<p>One of the Air Resource Planning questions is, "How many miles of new roads would be created under each alternative that could result in increased potential for air pollution?" BRC believes with new technologies developing at an increased rate it is irresponsible for the BLM to believe a finite number of roads will increase air pollution and therefore set limitations that will direct the forest for many years to come. This question should be eliminated from the planning process as every single motorized user could be using an electric motor.</p>
Aquatic / riparian areas / ecosystems	Spotts	Richard	N/A	5	<p>From my past BLM work experience, I do wish to provide a cautionary warning. The EA says that the riparian corridor is fenced and that livestock grazing does not occur where the proposed action would be implemented. The reality is that fences may fall down or become degraded after storm events, or they may be cut by ranchers, vandals, or OHVs to provide access. During the hot summer months especially, bright green riparian habitats are like a huge "eat and drink here" beacon to hungry and thirsty livestock. Due to these factors, it is foreseeable that BLM will likely need to respond to one or more incidents where fence repair is delayed and prolonged harmful trespass livestock grazing occurs. Depending on its intensity and duration, such trespass grazing can destroy or degrade in weeks what it took beavers many years to help create in building healthy and diverse riparian habitats. For example, such prolonged lack of adequate fence maintenance and chronic trespass grazing has occurred for many years, and outrageously still persists, in BLM's San Pedro River Riparian NCA. In addition, many years ago, BLM's positive and expensive work to restore a spring system and riparian habitats at Pakoon Springs in the Grand Canyon Parashant National Monument was undermined by chronic broken fences and trespass grazing. Because I worked with others on the Pakoon Springs restoration, I know the deep frustration when these serious problems occur but BLM managers are unwilling to support timely solutions. In this specific present case, I hope that BLM will make clear in the final EA and FONSI/DR that BLM is fully committed to taking rapid remedial actions if fences are not properly maintained and any trespass livestock are reported in the riparian corridor.</p>
Aquatic / riparian areas / ecosystems	Not Provided	Not Provided	N/A	12	<p>Sensitive or degraded habitats should be unavailable to livestock grazing, timber cutting, and OHV recreation.</p>

Comment Code Name	Last Name	First Name	Organization Name	Letter #	Input Text
Aquatic / riparian areas / ecosystems	Simmons	Matthew	Environmental Protection Information Center	756	Timber Harvesting along riparian areas is also detrimental. Timber harvesting along riparian areas can directly introduce sediment into waterways. ²⁷ Timber harvesting along riparian areas also opens up the canopy above waterways which allows more sunlight to reach waterways which can raise the temperature of the water. ²⁸ High water temperature can negatively impact fish. ²⁹ Therefore BLM should disallow any harvesting near riparian areas. ²⁷ Burns, James W. "Some effects of logging and associated road construction on northern California streams." Transactions of the American Fisheries Society 101.1 (1972): 1-17. ²⁸ Janisch, Jack E., Steven M. Wondzell, and William J. Ehinger. "Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA." Forest Ecology and Management 270 (2012): 302-313. ²⁹ Richter, Ann, and Steven A. Kolmes. "Maximum temperature limits for Chinook, coho, and chum salmon, and steelhead trout in the Pacific Northwest." Reviews in Fisheries science 13.1 (2005): 23-49.
Aquatic / riparian areas / ecosystems	Simmons	Matthew	Environmental Protection Information Center	756	Roads are the primary threat to aquatic species on BLM lands in the planning area. ²⁶ BLM should work with neighboring land owners to decommission and abandon roads in order to reduce sediment delivery to waterways. ²⁶ Madej, Mary Ann, and Vicki Ozaki. "Persistence of effects of high sediment loading in a salmon-bearing river, northern California." Management and Restoration of Fluvial Systems with Broad Historical Changes and Human Impacts: Geological Society of America Special Paper 451 (2009): 43-55. Excessive fine sediment can reduce egg and embryo survival and juvenile salmonid development. An imbalance between fine or coarse sediment supply and transport can also adversely affect the quality and availability of salmonid habitat by changing the morphology of the stream. Excessive sediment can also increase stream temperatures by filling pools. Although today's sedimentation is directly tied to flooding, poor management (including timber harvests and road construction) are what made that flooding so detrimental.
Aquatic / riparian areas / ecosystems	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In the DEIS, describe aquatic habitats in the planning area (e.g., habitat type, plant and animal species, functional values, and integrity) and the environmental consequences of the proposed alternatives on these resources. Impacts to aquatic resources should be evaluated in terms of the areal (acreage for wetlands) or linear extent (for streams) to be impacted and by the functions they perform.
Aquatic / riparian areas / ecosystems	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In addition, disclose any floodplain impacts and actions to be taken to minimize related impacts. See CWA Section 404 and Executive Order 11988 on Floodplain Management.
Aquatic / riparian areas / ecosystems	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In addition, discuss whether the proposed activities within the planning area would result in discharge of dredged or fill materials into surface waters of the United States. If so, a CWA Section 404 permit from the U.S. Army Corps of Engineers may be required. The DEIS would need to describe this permit application process and recommended measures to protect aquatic resources from impacts resulting from the proposed activities.
Aquatic / riparian areas / ecosystems	Gutermuth	Brandt	Bureau of Reclamation	803	"Procuring Large Wood for Use in Restoration Projects Within the Trinity River Watershed and Throughout Northwestern California Frequently consider as part of your planning and include in any specific comprehensive river management plans, structured support/facilitation of vegetation management activities (e.g. thinning activities, post-fire salvage, designated harvest areas) that contribute to a continuing supply of large woody debris (LWD) for use in restoration projects and programs throughout the Northern California District. LWD can be trees (preferably with a single, intact root wad and at least one trunk and crown), treetops, branches, bush type, including willow, Cottonwood, alder, oak, ash, conifer, or other suitable tree species that is designated for placement in constructed or natural areas for fish or wildlife habitat. BLM's support will ensure that uncertainties about the availability, types, shapes, and sizes of the wood and the exact amounts of wood placement within a restoration projects boundary are minimized. BLM has a significant role in contributing resources to help TRRP meet our objective of reestablishing fluvial processes and improving the quality and quantity of habitat for anadromous fish along the Trinity River which includes reducing a significant large wood deficit. Construction of both dynamic wood structures and functionally stable log jams cannot occur without a local, dependable, and cost-effective source for materials. An ongoing commitment to managing forested areas on public land under the classification of "enhancement of other resources" should have a direct relationship to restoration of waterways."
Aquatic / riparian areas / ecosystems	Juliana	Kate	N/A	804	The protected plant species of the area should be adequate to protect Cache Creek Natural Area from entry for commercial purposes. I submit that BLM should continue to manage Cache Creek for its fragile habitat qualities rather than commercial uses, which are available elsewhere, and to keep mechanized entry to a minimum, which I acknowledge is a challenge given the current fire regime of the region. I hope that when this place is managed under a general plan, its many unique characteristics are protected, and its physical facilities are better monitored and managed than they currently are.
Aquatic / riparian areas / ecosystems	Smith	Vera	Defenders Of Wildlife	812	Desired outcomes. Desired outcomes can include specific goals and objectives related to ecosystems and species and can be established at multiple scales. For ecosystems, desired outcomes should reflect natural range of variability (or at least partial progress toward it) unless a different outcome is scientifically justified. For species, desired outcomes can be described in terms of meaningful population and occurrence data and specific ecological characteristics beyond those provided in the ecosystems in which they reside (i.e., fine filter characteristics) necessary for species' recovery.
Aquatic / riparian areas / ecosystems	Smith	Vera	Defenders Of Wildlife	812	For each ecosystem within the planning area, describe its ecological characteristics, spatial distribution generally and relative to BLM surface estate, conditions, trends, threats, and ways to address the threats. Descriptions of ecological characteristics should address abiotic and biotic factors as well as natural processes (e.g., disturbances like wildfire) and spatial factors (distribution, connectivity, patch size). They should address natural range of variability (reference conditions) and the degree to which ecosystems are within it or diverge from it and why.
Areas of critical environmental concern	Rankin	Jim	French gulch Mining District	21	In the documents for the prior planning effort it notes that the Swasey - Clear Creek Greenway, Lower and Upper Clear Creek are being considered for ACEC status. As noted in #1 above, there are many mining claims in these areas. Most of this area is heavily used for recreational gold panning and sluicing, as well as metal detecting for gold nuggets. We feel that a designation of these areas as ACEC's will infringe on the claim holders statutory rights and unduly hamper the recreational users. In short myself, The Shasta Miners and Prospectors Association, The Nor Cal Prospectors Association, the French Gulch Mining District and the East Fork Clear Creek Mining Districts oppose listing these areas as ACEC's. If consulted, I feel quite certain that other mining groups, within the affected area would oppose this as well.

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Areas of critical environmental concern	Murray	Danielle	Conservation Lands Foundation	33	BLM should consider using existing authorities to provide durable administrative protections, including: 1) Areas of Critical Environmental Concern: The Federal Land Policy and Management Act (FLPMA) contains four separate ACEC provisions. It states that BLM is to pay special attention to prioritizing and protecting ACECs during the planning process and defines ACECs as: Areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and safety from natural hazards. 7 7 43 U.S.C. Sec.1702(a). This broad definition of ACEC makes the designation one of the most versatile tools the agency can use to protect our public lands and natural resources, and it should be considered throughout the NCIP planning area
Areas of critical environmental concern	Smith	Linda	N/A	34	Places such as Swasey-Clear Creek Greenway, Willis Ridge, North Fork Eel River, Beegum Creek, and Grass Valley have been nominated as Areas of Critical Environmental Concern because they contain unique plants and wildlife, showcase geologic features, offer resiliency to climate change, and need special management. We urge the BLM to evaluate these places in the draft resource management plan and include options that will conserve their special values.
Areas of critical environmental concern	Williams	Laurel	The Pew Charitable Trusts	738	While the NCIP planning area already includes 17 designated ACEC sites, such as several RNAs and outstanding natural areas (ONAs), the BLM should consider additional ACEC designations, expanding existing ACECs, and citizen proposed ACECs. The NCIP Envisioning Report from 2016 contains numerous citizen comments about the cultural, biological, visual, physical, and wilderness values associated with different areas across the landscape. The BLM should review these comments, as well as the six ACEC nominations submitted by the California Wilderness Coalition, to help identify new or expanded ACEC designations. In particular, but not limited to, we urge BLM to review and evaluate the ACEC nominations for the following places: - Swasey-Clear Creek Greenway; - Willis Ridge; - North Fork Eel; - Beegum Creek - Grass Valley Creek; and - Eden Creek Recommendation: BLM should commit to the use of ACECs as a management tool in the NCIP and require each ACEC designation include specific management prescriptions to protect values for which the ACEC is designated.
Areas of critical environmental concern	Williams	Laurel	The Pew Charitable Trusts	738	When developing a land use plan, FLPMA mandates that BLM "give priority to the designation and protection of areas of critical environmental concern (ACEC)." 43 U.S.C. § 1712(c)(3). ACECs are areas "where special management is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes." Id. § 1702(a). With the passage of FLPMA, Congress gave clear intent to prioritizing the designation and protection of ACECs in BLM's land planning and management processes. By definition, ACECs are areas where special management is required to protect important values and resources for which the area is designated and FLPMA directs that ACECs be managed to both protect and prevent irreparable damage to these resources and values. The Arcata and Redding field offices have an opportunity with the NCIP to make better use of ACECs for conservation management as part of BLM's multiple-use, sustained yield mission. We encourage BLM to fully implement the ACEC provisions in FLPMA, including increased conservation emphasis and expanded applicability to broader landscape conservation.
Areas of critical environmental concern	Simmons	Matthew	Environmental Protection Information Center	756	BLM should designated as many areas of critical environmental concern as possible and those designations should be as large as possible. In this time of climate crisis and biodiversity crisis it is essential that we are protecting our public lands.
Areas of critical environmental concern	Jirak	Lori	N/A	758	Use the NCIP process to identify and protect Areas of Critical Environmental Concern. Please carefully consider the ACEC candidates nominated by the public.
Areas of critical environmental concern	Willis	Dave	Soda Mountain Wilderness Council	760	Existing non-Monument BLM lands and future BLM acquisitions of land from willing sellers in an expanded "Cascade-Siskiyou" acquisition area should all be part of a Cascade-Siskiyou ACEC that complements the adjacent/nearby Cascade-Siskiyou National Monument. The ACEC and acquisition area boundaries should be identical, such that acquired BLM lands automatically become part of the ACEC upon BLM receiving title. At the very least, the Jenny Creek canyon downstream from the CSNM boundary to the former/future Klamath River (pre/post-dam removal) should be given ACEC status.
Areas of critical environmental concern	Cann	Bruce	N/A	770	High valued ACEC's in the Arcata FO include Gilham Buttes and Eden Valley. The North Fork Eel River area should be an ACEC as well.
Areas of critical environmental concern	Cann	Bruce	N/A	770	Any wildfires in any of the ACEC's should be fought using "minimum impact suppression tactics (MIST).
Areas of critical environmental concern	Castro	Linda	California Wilderness Coalition	778	Six ACEC Nominations (and corresponding Appendices) (see attachments submitted on CARA)
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	Beegum Creek: The proposed Beegum Creek ACEC hosts a unique natural system consisting of rare and sensitive geological and lithological features that supports rare and endemic serpentine plant species. It further serves to facilitate natural processes essential to maintaining species diversity due to its climate resiliency and ecological intactness. The area supports a significant fish and wildlife resource, providing habitat for multiple threatened and sensitive species (i.e., Chinook salmon, steelhead, northern spotted owl, California red-legged and foothills yellow-legged frogs). The CSP report further demonstrates the regional (i.e., more than local) significance and exemplary nature of these values as compared to other places in the West and within BLM's jurisdiction. Finally, CSP's analysis highlights the Beegum Creek's vulnerability to adverse change related to the threat of mineral resource development, future water withdrawals, and the presence of sensitive soils, which may present a natural hazard due to their high erosion potential.
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	In particular, but not limited to, we urge BLM to review and evaluate the ACEC nominations for the following places: Beegum Creek, Eden Creek, Grass Valley Creek, North Fork Eel, Swasey Drive-Clear Creek Greenway, and Willis Ridge.

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Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	North Fork Eel: The proposed North Fork Eel ACEC hosts a unique natural system consisting of rare and sensitive geological and lithological features, which support rare and endemic plant species. Its climate resilience and ecological intactness further serve to facilitate natural processes, including ecological flows and species adaptation to climate change. The area offers a significant fish and wildlife resource by providing habitat for multiple threatened or sensitive species. The area contains values with regional (i.e., more than local) significance and exemplary nature as compared to other places in the West and within BLM's jurisdiction. Finally, the North Fork Eel is vulnerable to adverse change related to the threat of future water withdrawals, and the potential presence of a natural hazard due to its sensitive and erosion-prone soils.
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	We encourage BLM to fully implement the ACEC provisions in FLPMA, including increased conservation emphasis and expanded applicability to broader landscape conservation.
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	Eden Creek: The proposed Eden Creek ACEC holds a unique natural system consisting of rare and sensitive geophysical and ecological features, including rare and endemic plant species, such as Purdy's fritillary and Sargent cypress, as well as irreplaceable serpentine vegetation communities. Its climate resilience and ecological intactness further serve to facilitate natural processes, such as adaptation to climate change. The area constitutes a significant fish and wildlife resource in its provision of habitat for rare, threatened and sensitive species, including Chinook salmon, steelhead, northern spotted owl, fisher, and foothill yellow-legged frog. A CSP analysis further demonstrates the regional (i.e., more than local) significance and exemplary nature of these values as compared to other places in the West and within BLM's jurisdiction. Finally, the analysis highlights Eden Creek's vulnerability to adverse change related to the threat of future water withdrawals and the presence of soils that are highly subject to erosion and a potential natural hazard requiring special management attention.
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	Grass Valley: The proposed Grass Valley Creek ACEC sustains a unique natural system consisting of rare and sensitive geological and lithological features that hosts rare and endemic plant species. Its high climate resilience further serves to facilitate species adaptation to climate change, a crucial natural process for maintaining species diversity under future climate change. Between its high water availability compared to other areas and the presence of rare geophysical types, Grass Valley is a significant fish and wildlife resource, providing habitat for threatened and sensitive species. The regional (i.e., more than local) significance and exemplary nature of these values as compared to other places in the West and within BLM's jurisdiction. Finally, Grass Valley Creek is vulnerable to adverse change related to the threat of future mineral water withdrawals and the presence of a potential natural hazard associated with its sensitive soils, and high risk of soil erosion.
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	Swasey Drive-Clear Creek Greenway: The proposed Swasey Drive-Clear Creek Greenway ACEC holds a unique natural system consisting of rare and sensitive geophysical and ecological features that support diverse plant communities, including rare and endemic plant species. Its high climate resilience further serves to facilitate natural processes, namely species adaptation to changing climate. The area supports a significant fish and wildlife resource in that it provides habitat for rare, threatened and sensitive species. The analyses discussed in this Nomination, as well as Appendix I, further demonstrate the regional (i.e., more than local) significance and exemplary nature of these values as compared to other places in the West and within BLM's jurisdiction. Finally, the proposed ACEC is vulnerable to adverse change related to the threat of mineral resource development potential and future water withdrawals, as well as the presence of a potential natural hazard due to its sensitive soils that are highly subject to erosion.
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	While the NCIP planning area already includes 17 designated ACEC sites, such as several RNAs and outstanding natural areas (ONAs), the BLM should consider additional ACEC designations, expanding existing ACECs, and citizen proposed ACECs. The NCIP Envisioning Report from 2016 contains numerous citizen comments about the cultural, biological, visual, physical, and wilderness values associated with different areas across the landscape. The BLM should review these comments, as well as the six ACEC nominations submitted by CalWild, to help identify new or expanded ACEC designations. These nominations and their corresponding appendices were submitted for the previous NCIP planning process in June 2017, but are being resubmitted as part of this planning process. The Appendices are reports prepared by Conservation Science Partners (CSP) of Truckee, California. Conservation Science Partners assessed, mapped and summarized a number of unique indicators of ACEC relevance and importance criteria to highlight the ecological values, their significance, and their need for special management attention within each ACEC. Those nominations and respective appendices are incorporated herein by reference. BLM should also include specific management prescriptions for each ACEC that protect the values for which each is designated.
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	Willis Ridge: The proposed Willis Ridge ACEC hosts a unique natural system consisting of rare and sensitive geophysical and ecological features, including rare and endemic plant species, and irreplaceable old-growth redwood forest. Its climate resilience and ecological intactness further serve to facilitate natural processes, such as adaptation to climate change. The area constitutes a significant fish and wildlife resource in its provision of habitat for rare, threatened and sensitive species, and this is reinforced by the fact that it was designated as a Late-Successional Reserve (LSR) by the 1994 Northwest Forest Plan for the benefit of the northern spotted owl and other declining old-forest reliant species. CSP's analyses further demonstrate the regional (i.e., more than local) significance and exemplary nature of these values as compared to other places in the West and within BLM's jurisdiction. Finally, their analysis highlights the Willis Ridge's vulnerability to adverse change and the presence of a potential natural hazard associated with sensitive soils that are highly subject to erosion.
Areas of critical environmental concern	Hanceford	Phil	The Wilderness Society	781	When developing a land use plan, FLPMA mandates that BLM "give priority to the designation and protection of areas of critical environmental concern (ACEC)." 43 U.S.C. § 1712(c)(3) ACECs are areas "where special management is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes." Id. § 1702(a). With the passage of FLPMA, Congress gave clear intent to prioritizing, designating and protecting ACECs in BLM's land planning and management processes. By definition, ACECs are areas where special management is required to protect important values and resources for which the area is designated and FLPMA directs that ACECs be managed to both protect and prevent irreparable damage to these resources and values.
Areas of critical environmental concern	Rankin	James	French gulch Mining District	797	One of the other items that I had a concern about where the potential ACECs areas in the Redding vicinity. I believe you have Swasey, Clear Creek Greenway, Lower Clear Creek and Upper Clear Creek listed as potential ACECs. These areas do have active mining claims within them, and I am concerned not only about the, as I mentioned earlier the, recreational designation, but in the ACECs with a special management that, once again, there are valid mining claims within these districts that have you know very specific rights and I hope those are well considered within it.

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Areas of critical environmental concern	Juliana	Kate	N/A	804	In the meantime, I earnestly hope that BLM will continue to manage this place separately, or as an adjacent management unit within the King Range National Conservation Area plan. For the reasons stated here and below, the place we call Gilham Butte is simply so important that BLM should not roll it into a general management plan that considers it to be of equivalent social value and resource management objectives as grazed-over land in a far-distant region of the state. Nun Sun T'co is too precious to be allowed to disappear into a general plan. Recognizing the importance of Nun Sun T'co is a validation and empowerment of the people who were here before us and who still live among us.
Areas of critical environmental concern	Juliana	Kate	N/A	804	I urge you to manage Gilham Butte to protect and restore its many unique and special values. Gilham Butte contains many of the characteristics one can find in the King Range: open space with long meadows filled with native plants, a sense of remoteness, a place where Nature still holds sway; a place filled with the mystery and artifacts of indigenous culture. Gilham Butte has characteristics comparable to Headwaters Forest: an intact forest ecosystem with its treasury of plant and wildlife populations, a refuge for migrants and a home to resident species; deep forest, clear waterways; rare species in their native habitat. Gilham Butte stands between these two gems in the public land crown of coastal California. I urge you to manage Gilham Butte by once again developing a separate management plan, as you have historically done and as you do with its sister locations, the King Range and Headwaters Forest. If it is not possible to manage Gilham Butte with its own stand-alone plan, I ask you to include it as a separate management unit in the King Range Plan. I urge you to undertake an ambitious effort to further develop a cooperative management agreement with the Native people of the area, and to seriously consider and discuss the possible permanent transfer of this important and unexploited place into their management, or better yet, into their permanent ownership.
Areas of critical environmental concern	Juliana	Kate	N/A	804	Many people who were involved in developing the Community Management Plan consider that mechanized incursion into the management area a violation of the spirit and letter of the Area of Critical Environmental Concern designation and the CMP for the butte. The lack of public notice and opportunity to participate in new decisions regarding Gilham Butte are a violation of public trust. It never should have been allowed.
Areas of critical environmental concern	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We recommend managing Grass Valley as an ACEC for the protection of the Trinity River system and salmon.
Areas of critical environmental concern	Huffman	Jared	N/A	808	Finally, we ask that you to establish new Areas of Critical Environmental Concern (ACEC) through the NCIP process, including those ACECs nominated by the public. One such proposed ACEC is Eden Valley, an addition to the Yuki Wilderness in S. 1459.
Areas of critical environmental concern	Sito	Erin	Wildlands Network	809	Historic, Scenic, and Cultural Value Though Wildlands Network mainly encourages the BLM to give extra consideration to ACEC nominations based on the wildlife resource values described above, there are also areas within the NCIP that have important scenic, historic, and cultural value, satisfying another relevance factor for ACEC designation. State Route 299, an east-west state highway running across Northern California through BLM-managed lands, is home to both scenic and historical stops. In October 1991, the United States Forest Service ("USFS") designated the segment of this highway from Shasta to Arcata as the "Trinity Scenic Byway." Trinity Scenic Byway, U.S. FOREST SERV., https://www.fs.usda.gov/recarea/stnfr/recreation/recarea/?recid=6535 [hereinafter Forest Service Scenic Byway]. The route also follows the Wild and Scenic Trinity River, "known for its dramatic canyon walls and sparkling clear waters." Trinity River Scenic Byway, SHASTA CASCADE WONDERLAND ASSOCIATION, https://www.shastacascade.com/account/trinity-river-scenic-byway [hereinafter Wonderland Association Scenic Byway]. This stretch of highway also "features the cultural and historical aspects of the region, from the prehistoric Native American tribes to the gold miners and timber workers of the 20th Century." Forest Service Scenic Byway. Route 299 passes through Weaverville, which has a rich historic heritage with preserved buildings and a J.J. Jackson Museum giving insight into what life was like during the Gold Rush period. Wonderland Association Scenic Byway.
Areas of critical environmental concern	Sito	Erin	Wildlands Network	809	ii. Importance Factors There is also evidence to suggest that several areas within the nominated ACEC footprints would satisfy the importance factor required for ACEC designation. First, the BLM has stated that there are plant species endemic to vernal pools within the NCIP area. Management Situation Revision at 2-231. This is analogous to the Table Rocks ACEC, which also contains endemic plant species within its boundaries. Thus, the NCIP region likely has more than local significance. Second, the BLM also recognizes that "climate change" and more specifically, "temperature, precipitation, and sea level rise... [are] expected to change during the implementation of the NCIP." Id. at 2-6. According to the BLM, these changes will affect BLM-administered lands and resources differently throughout the planning area. Coastal areas are less likely to be impacted by temperature changes but are the only lands subjected to rising sea levels. Inland areas will be more affected by changes in temperature and perhaps extreme heat events.... [Furthermore,] due to drought and abnormally warm temperatures, wildfires in California have become more severe, with eight of the 20 largest fires in California's history occurring since 2017 and the area burned annually by wildfires in California increasing since 1950. Id. at 2-10-2-11 (citing to California Air Resource Board [CARB] 2020). Clearly, this area within the NCIP has qualities making it fragile, endangered, threatened, or vulnerable to adverse change. Appropriately, then, in addition to the special management protections warranted by the presence of endangered species, the BLM has stated that "[m]anaging for diverse, ecologically resilient landscapes and healthy forests will be central to adapting to a changing climate." Id. At several points in the Management Situation Revision, and throughout the public hearings of this NCIP process, BLM has explained that the preservation and restoration of connectivity corridors is a warranted, crucial item for this NCIP to tackle. ² Therefore, the importance and relevance factors are met here, and the BLM has authority under FLPMA to designate an ACEC for climate-related connectivity corridors as a wildlife resource. ² "The BLM should, to the extent practicable, manage with consideration of providing landscape connectivity for plant communities to expand into potential suitable habitat as informed by climate trajectories." Management Situation Revision at 2-138; "Corridors that allow for upward, downward, or trans-regional migration of species should be maintained or re-established where possible and managed for high levels of vegetation health. Development, high-impact recreation use, or other forms of fragmentation within intact, un-fragmented, high biological value areas that can also serve as plant and animal species migration corridors should be discouraged to the maximum extent practicable." Id. at 2-139. Additionally, under the "Potential New Decisions for RMP Revision" section, the BLM suggests (1) preventing "small and large-scale vegetation habitat fragmentation in order to maintain native landscapes that provide connectivity, ecological function, and resilience to disturbance, as well to support vegetation health, pollination, reproduction, gene flow, adaptation, and healthy population sizes," (2) "work[ing] to provide landscape connectivity for plant communities to expand into potential suitable habitat as informed by climate trajectories", and (3) identifying "areas of conservation emphasis where intact natural habitat areas correspond with essential corridors of connectivity in support of species migration, resilience, and diversity. Prevent further fragmentation and support natural landscape connectivity." Id. at 4-99.

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Areas of critical environmental concern	Sito	Erin	Wildlands Network	809	When creating FLPMA, Congress intended that the lands and their resource values be utilized in the combination that best meets the present and future needs of the American people, in addition to protecting important ecological and other resources on public lands. 43 U.S.C. § 1702. Thus, designating ACECs in areas with climate-related connectivity wildlife resources would fulfil congressional intent, bolster biodiversity in the NCIP area, and advance the America the Beautiful goals. As a result, we hope that the BLM strongly considers climate-related connectivity needs during its ACEC nomination analysis within this NCIP process.
Areas of critical environmental concern	Sito	Erin	Wildlands Network	809	Wildlife Resource Value There are particular areas in the NCIP that provide relevant wildlife resources to the 22 special status species managed by the Arcata field office and the 38 special status species managed by the Redding field office. BLM Special Status Animal Species by Field Office, BUREAU OF LAND MGMT., https://www.blm.gov/sites/blm.gov/files/documents/files/Programs_FishandWildlife_BLMCA%20Special%20Status%20Species.pdf . Other endangered, high-profile species like the gray wolf are also known to roam through the area from time to time. E.g., Nathan Rott, A famously far-ranging gray wolf is found dead in Southern California, NPR (Nov. 24, 2021), https://www.npr.org/2021/11/24/1059076019 . Additionally, the area is a relevant wildlife resource because it is essential for maintaining species diversity. As the NCIP Analysis of the Management Situation Revision released by BLM in 2021 states, "[t]he Klamath Mountains and Sierra Nevada ecoregions are the most biodiverse areas in the planning area [and] special consideration should be made to ensure habitat connectivity and prevention of fragmentation to support healthy ecological conditions and gene flow." Management Situation Revision at 2-139. The Coast Range is also a biodiversity hot spot and Essential Connectivity Area. W.D. Spencer et al., California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California (2010) at xi, xii, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18366&inline . Specifically, the North Coast Region's rugged mountains, large rivers, and diverse forests, encompassing Arcata and land west of Redding, are home to the rare, listed Humboldt marten, fisher, northern spotted owl, and marbled murrelet, who all depend on the continuity of these dense forests. Id. at 45. All wildlife, including the animals listed above, must move to find food, water, and genetically diverse mates. Without connectivity corridors in between their core habitat areas, it is difficult for these species to maintain genetic robustness and adapt to climate change, which eventually leads to biodiversity loss. Vitaliy Soloviy, Habitat Corridors Boost Biodiversity, A New Study Confirms, SUSTAINABILITY TIMES (Oct. 15, 2019), https://www.sustainabilitytimes.com/environmental-protection/study-habitat-corridors-help-to-boost-biodiversity/ . Because connectivity corridors are essential for maintaining species diversity, they are a wildlife resource, satisfying the relevance requirement for ACEC designation. As a result, we ask the BLM to consider climate-focused connectivity data, like the data provided in our Appendices, when considering whether to designate an ACEC as a wildlife resource.
Areas of critical environmental concern	Sito	Erin	Wildlands Network	809	The BLM Should Consider Climate and Connectivity Corridors a Crucial Wildlife Resource Within Its Analyses for Designating ACECs in the NCIP. A. Federal Authority Under the Federal Land Policy and Management Act of 1976. Under the Federal Land Policy and Management Act of 1976 ("FLPMA"), the BLM can create ACECs in areas that have significant resources for fish and wildlife. FLPMA, the BLM's organic act, calls for the protection of public lands' resources and values, mandating that: public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; [and] will provide food and habitat for fish and wildlife and domestic animals [...] 43 U.S.C. § 1701(a). FLPMA directs the BLM to establish a planning process to guide agency management decisions "and directs that the public lands be managed under multiple use-sustained yield principles." Karin P. Sheldon & Pamela Baldwin, Areas of Critical Environmental Concern: FLPMA's Unfulfilled Conservation Mandate, 28 COLO. NAT. RESOURCES, ENERGY & ENVTL. L. REV. 8 (2017), https://www.colorado.edu/law/sites/default/files/attached-files/sheldon_final_final.pdf . FLPMA also requires the Secretary of the Interior "to prevent unnecessary or undue degradation of the lands." Id. Though this principle requires the BLM to consider all competing interests in the management of our public lands, FLPMA's provision on land use plans specifically states that the Secretary shall "give priority to the designation and protection" of ACECs in developing and revising land-use plans. 43 U.S.C. § 1712(c). An area nominated for special management as an ACEC must meet certain of "relevance" and "importance" factors. BLM ACEC Manual. The BLM manual states that all areas meeting "the relevance and importance criteria must be identified as potential ACEC's [sic] and fully considered for designation and management" during the RMP process. Id. An area can be "relevant" if it has value as a fish and wildlife resource, which includes "habitat essential for maintaining species diversity." Id.; NCIP: Analysis of the Management Situation Revision, BUREAU OF LAND MGMT. (2021) at 2-227, https://eplanning.blm.gov/public_projects/2012803/200480044/20042741/250048934/Analysis%20of%20the%20Management%20Situation%20Revision%20-%20June%202021.pdf [hereinafter Management Situation Revision]. An area can also be relevant if it has historic, scenic, or cultural value. BLM ACEC Manual. An area can be "important" if it has more than locally significant qualities that give the area special meaning or worth, if it has qualities that make it "fragile... endangered, threatened, or vulnerable to adverse change," or if it has been recognized as "warranting protection in order to satisfy national priority concerns or to carry out the mandates of FLPMA." Id. An ACEC nomination need only meet one relevance and one importance factor. Id. For example, the Table Rocks ACEC in Oregon was designated as an ACEC because it contained crucial habitat for many vulnerable plant and animal species, and because it had unique geologic and scenic value. Table Rocks (ACEC) Area of Critical Environmental Concern: Land Donation Environmental Assessment, BUREAU OF LAND MGMT. (2021) at 3 [hereinafter Table Rocks Assessment]. First, the ACEC was home to several "special status plants and animal species." Id. The exceptionally rare dwarf woolly meadow foam wildflower grows on the top of the Table Rocks, but exists nowhere else on earth. Areas of Critical Environmental Concern, BUREAU OF LAND MGMT., https://www.blm.gov/programs/planning-and-nepa/planning-101/special-planning-designations/acec . The area also contained the "special status" southern Oregon buttercup and vernal pool fairy shrimp. Table Rocks Assessment at 3. As well, the larger management area that contained the ACEC was home to rare birds such as Lewis's woodpecker, western meadowlark, grasshopper sparrow, blue-gray gnatcatcher, and peregrine falcon. Id. at 7. Further, the ACEC contained unique geologic and scenic value, and provided environmental education opportunities. Id. at 3.
Areas of critical environmental concern	Sito	Erin	Wildlands Network	809	The BLM Should Give Extra Consideration to Nominated ACECs in the NCIP Area With High Connectivity and Climate Resilience Value.
Areas of critical environmental concern	Vaile	Joseph	KS Wild	811	Many of the special places on BLM lands in Northern California qualify for special administrative designation such as Areas of Critical Environmental Concern (ACEC), Wild and Scenic Rivers, and Lands with Wilderness Characteristics. Please conduct comprehensive inventories and ensure that sites important to Tribes are protected for their continued cultural significance. Please consider ACECs pursuant to 87 FR 25523.

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Areas of critical environmental concern	Smith	Vera	Defenders Of Wildlife	812	Designations should include ACECs in compliance with the Federal Land Policy and Management Act's mandate to give priority to the inventory, designation, and protection of ACECs. 43 U.S.C. 1711(a) and 43 U.S.C. 1712(c)(3). BLM should also utilize other types of administrative designations including key watersheds(6) and research natural areas. 43 CFR 8223. BLM policy is that Research Natural Areas should be established "in sufficient number and size to adequately provide for scientific study, research, and demonstration purposes." 43 CFR 8223.0-6. (6) US Forest Service, 1994. 1994 Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl. Appendix B. The concept of key watersheds stems from the Aquatic Conservation Strategy in the Northwest Forest Plan and is scientifically well-grounded. It also directly implements Objective 1.1b (along with several other goals and objectives) of the recently published BLM Aquatic Management Strategy, Conserving and Restoring Riparian, Fisheries, and Water Resources in a Changing Climate: A Five-Year Strategy for the BLM's Aquatic Resources Program (February 22, 2022). Objective 1.1b is to "Improve implementation of the land use planning process to identify and designate priority lands, waters, and habitats and area-specific use restrictions."
Areas of critical environmental concern	Smith	Vera	Defenders Of Wildlife	812	Designations should include ACECs in compliance with the Federal Land Policy and Management Act's mandate to give priority to the inventory, designation, and protection of ACECs. 43 U.S.C. 1711(a) and 43 U.S.C. 1712(c)(3). BLM should also utilize other types of administrative designations including key watersheds(6) and research natural areas. 43 CFR 8223. BLM policy is that Research Natural Areas should be established "in sufficient number and size to adequately provide for scientific study, research, and demonstration purposes." 43 CFR 8223.0-6. (6) US Forest Service, 1994. 1994 Final Supplemental Environmental Impact Statement on Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl. Appendix B.
Areas of critical environmental concern	Amsden	Liz	N/A	816	We need wildlife corridors and reparation to the existing ecology, time for the land and water to recover and to allow more resilience to drought, fire and flood issues."
Areas of critical environmental concern	Grissom	Kathy	N/A	847	"Concerned with protecting and conserving as much land as possible. Concerned with BLM working on obtaining any possible land that provides wildlife connectivity. Want as much different public access as possible if it doesn't negatively affect plant and animal life.
Areas of critical environmental concern	Law	Lance	N/A	863	I believe this island and reach of Clear Creek should be an A.C.E.C and deserves immediate attention. For years I've had game cameras out there and have observed the abundant wildlife, waterfowl, and fishery. This is a Refugia Corridor of great importance.
Areas of critical environmental concern	Ledger	David	Shasta Environmental Alliance	864	We support surveying plant and animal species in all BLM lands as money allows and setting aside special protections for areas of Critical Environmental concern where rare or uncommon species are found. Without biological surveys, rare species could fail to receive adequate protection.
Areas of critical environmental concern	Rougle	Wolfgang	N/A	891	It would be nice to have a map showing how the ACECs/ERMAs are different in the 2 alternatives. Was this not produced or can I just not find it?
Best available information - baseline data	Spotts	Richard	N/A	1	In terms of managing future recreational uses, please review the related attachment which may provide helpful information and recommendations
Best available information - baseline data	Spotts	Richard	N/A	3	The attached Recreation Report should be closely reviewed for information and recommendations on how to best manage various recreational uses on BLM lands.
Best available information - baseline data	Cartier	Emmett	N/A	9	Photos and trail locations of the Gilham Butte lands are on Flickr at: https://www.flickr.com/photos/86116246@N02/ Many of these photos are geotagged for location reference. GPS waypoint locations for a trail route, from Humboldt Redwoods State Park to Upper Thomas Road, through open forests, woodlands, and grasslands, are included there as the Gilham Butte Traverse.
Best available information - baseline data	Decker	Karie	Rocky Mountain Elk Foundation	31	Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasions of noxious weeds, juniper encroachment, lack of dependable water sources, and many others. RMEF strongly encourages use of quality research that has laid the groundwork for managing healthy elk habitat (Quigley and Wisdom 2015). More recent research on ungulate migration (Sawyer et al. 2013, Middleton et al. 2013), nutrition (Cook et al. 2013, Wisdom et al. 2018), and elk security (Wisdom et al. 2018) continue to build on this foundation. Recommended references are also provided below.
Best available information - baseline data	Decker	Karie	Rocky Mountain Elk Foundation	31	With dramatic increases in public land use, RMEF recommends inclusion of past and recent research on the potential impacts of recreation to elk and other wildlife (e.g., Marion et al. 2020, Dertien et al. 2021).
Best available information - baseline data	Simmons	Matthew	Environmental Protection Information Center	756	The focus on connectivity is very much appreciated. As the concern with how permitted uses can negatively impact native flora. Our state already contains numerous locations for off road vehicle use. Negative impacts from off-road vehicles often are far greater than originally guessed at. ⁸ We do not need to subject more sensitive habitats to this destructive form of recreation. ⁹ 8 Wilshire, Howard G. "Off-road vehicle recreation management policy for public lands in the United States: A case history." Environmental Management 7.6 (1983): 489-499. 9 Berry, Kristin H. "A review of the effects of off-road vehicles on birds and other vertebrates." Management of western forests and grasslands for nongame birds. US. Department of Agriculture, Forest Service, Ogden, UT. USA (1980): 451-467.

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Best available information - baseline data	Willis	Dave	Soda Mountain Wilderness Council	760	Scientific knowledge of the importance of ecological connectivity here has been overviewed in Frost's 2018 review/synthesis and elsewhere: https://www.academia.edu/78283151/A_Review_and_Synthesis_of_Ecological_Connectivity_Assessments_relevant_to_the_Cascade_Siskiyou_Landscape_in_Southwest_Oregon_and_Adjacent_California The RMP needs to acknowledge, recognize, and manage for ecological connectivity here, eschewing practices/impacts that disrupt and diminish connectivity - and managing to restore and enhance connectivity.
Best available information - baseline data	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The DEIS should present impacts to resources as a comparison to the existing conditions baseline using a consistent method of measuring project impacts for all alternatives. By utilizing existing environmental conditions as a baseline, future changes to environmental resources can be more accurately measured for all alternatives, including the no action alternative. We recommend that BLM consider the following when defining baseline conditions: - Verify that historical data (e.g., data five years or older) are representative of current conditions. - Include resources directly impacted by the project footprint within the geographic scope of analysis, as well as the resources indirectly (or secondarily) impacted by the project (40 CFR 1508.1(g)(1)).
Best available information - baseline data	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In BLM's preparation of the environmental justice analysis, we encourage consideration of two specific resources: 1) CEQ's Environmental Justice: Guidance Under the National Environmental Policy Act report ⁴ and 2) the Federal Interagency Working Group on Environmental Justice and NEPA Committee's Promising Practices for Environmental Justice Methodologies in NEPA Reviews report. ⁵ These documents provide information on applying environmental justice methodologies that have been established in federal NEPA practice. ⁴ See https://www.epa.gov/sites/production/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf . ⁵ See https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf .
Best available information - baseline data	Not Provided	Not Provided	BlueRibbon Coalition	787	The Executive Order on Advancing Equity also recognizes that poverty and inequality can lead to systematic discrimination against historically underserved and marginalized communities. We strongly encourage the BLM to incorporate into their planning the findings of <i>The Slums of Aspen: Immigrants vs. the Environment in America's Eden</i> by Lisa Sun-Hee Park and David Pellow and <i>Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West</i> by Justin Farrell. Both of these works document extensively how Western communities surrounded by public land are undergoing significant socioeconomic changes that result in skyrocketing housing costs, use of conservation and land-use restrictions to limit development, and displacement of the local middle and lower classes from Western Communities. Conservation policies and land-use restrictions are the primary tools that the ultra-rich use to disenfranchise the remaining American public from being able to access and enjoy the public benefits of public land. In many cases public lands become the private enclaves for the enjoyment of recreation pursuits and cultural values of the ultra wealthy.
Best available information - baseline data	Gutermuth	Brandt	Bureau of Reclamation	803	Along with the TRRP - BLM effort cite the 2000 Trinity River mainstem fishery Restoration Program ROD (Dept of Interior 2000) as a decision source and goal source.
Best available information - baseline data	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	Data on Pd/WNS in bats is only just emerging in Northern California. It is recommended that the BLM stay up to date on available regional data and monitor bat colonies and Pd presence on BLM lands.
Best available information - baseline data	Sito	Erin	Wildlands Network	809	Wildlands Network Offers Our Pacific Climate and Connectivity Mapping Tools for Use in the NCIP Process. To complete our Pacific Climate and Connectivity Map, we partnered with the University of Washington to compile peer-reviewed data and build a map showing areas in the Pacific that have high value for climate adaptation and habitat connectivity. See Appendix A (attached) for methods and works cited. We used ensemble modeling to combine the results of 75 existing connectivity maps and divided them into two groups: studies that focused on climate connectivity (meaning movement areas that will be important for allowing wildlife adaptation to climate change) and those that focused on non-climate connectivity (meaning areas currently important for facilitating wildlife movement). These two ensemble maps were then combined using a bivariate color scale to show: (1) areas that are important for allowing species to freely move in the face of climate change (identified on our map in yellow), and (2) areas in the Pacific that are important to conserve to connect core wildlife habitats (identified on our map in blue). Lands that have both high climate value and high connectivity value are identified by a magenta/purple color. See Appendix B (attached). See PDF for attached Appendix A with Climate and Non-Climate Connectivity Networks in the Far Western U.S. article. See PDF for attached Appendix B map of Critical Lands for Wildlife Connectivity in DOI Region 10. Zooming in on this map, there are many tracts of land within the NCIP lands highlighted in magenta. See Appendix C. We offer this mapping tool and our data sources as a resource for the BLM to utilize and identify areas governed by the NCIP that have both connectivity and climate resilience value (i.e., the lands on the map in magenta). We encourage the BLM to overlay this map with the areas nominated for ACECs (along with the existing ACECs that have been nominated for a reduction in size) to ensure that NCIP lands crucial for connectivity and climate resilience are given special consideration before final designation or reduction decisions, as we feel that these lands deserve special management considerations based on their value as wildlife resources under 43 U.S.C. § 1702(a). See PDF for attached Appendix C for Critical Lands for Wildlife Connectivity in DOI Region 10 figures. Figure 1.1 - DOI's Region 10 with BLM-managed lands in green and Figure 1.2 - A zoomed version of Figure 1.1, looking at the NCIP area.
Best available information - baseline data	Vaile	Joseph	KS Wild	811	Several areas on this landscape are important for regional habitat connectivity. Please see the attached A Review and Synthesis of Ecological Connectivity Assessments Relevant to the Cascade-Siskiyou Landscape in Southwest Oregon and Adjacent California located here https://www.selberginstitute.org/wp-content/uploads/Connectivity_Report_August2018.pdf (last retrieved 6/28/2022). Please ensure that you maintain and enhance habitat connectivity in this important area.
Best available information - baseline data	Smith	Vera	Defenders Of Wildlife	812	Retaining and Strengthening the Aquatic Conservation Strategy to Benefit Riparian and Aquatic Ecosystems and the At-risk Species that Depend on Them When implemented as a core element of the Northwest Forest Plan, the Aquatic Conservation Strategy (ACS) represented a new, strong, and much needed model for science-based watershed management and protection. It is firmly grounded in watershed science and the principles of conservation biology. It was designed as a coarse filter approach to protecting watersheds and their ecological characteristics (Reeves et al. 2018). We urge BLM to retain and strengthen the ACS to assure the conservation and recovery of aquatic and riparian at-risk species and the ecosystems on which they depend.

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Cannabis concerns	Cartier	Emmett	N/A	9	Presences of past cannabis cultivation should be removed along with other litter on the lands. However, cannabis cultivation is now absent or minimal, due perhaps to the increased developments of permitted grows on nearby private lands under changing regulations.
Climate change	Spotts	Richard	N/A	1	BLM's dominant management culture has generally contributed to these crises by approving harmful human land uses that encourage land degradation and the burning of more fossil fuels. For example, BLM continues to allow demonstrably harmful commercial livestock grazing on millions of acres of land that do not even meet BLM's minimum standards for rangeland health. BLM has no consistent requirements to suspend or reduce grazing pressure despite the worst reported drought in 1,200 years. BLM has no consistent regulations to ensure protection of designated ACECs, even though FLPMA makes this a BLM priority. Now over half of the grazing permits that BLM renews have no NEPA analysis or public involvement.
Climate change	Spotts	Richard	N/A	1	Without these reforms, BLM will not be capable of positively responding to the climate and extinction crises at the required scale. For the new RMP, BLM must adopt decisions that will advance sustainable solutions, including sequestering more harmful atmospheric carbon in vegetation, designating more ACECs, encouraging greater habitat connectivity and climate resilience, and increasing protection for all special status species and their habitats. Cattle should be removed from and prohibited in sensitive habitats, especially wetlands, wet meadows, and riparian corridors. Sensitive habitats should also be designated as closed to OHV uses and recreation. Mature timber stands must not be cut down or managed as fragmented blocks. Where ground disturbing activities occur and stimulate cheatgrass or other invasives, those responsible must be required to effectively kill or remove those invasives.
Climate change	Spotts	Richard	N/A	3	As President Biden and Interior Secretary Haaland have accurately described, the climate and extinction crises are real, connected, getting worse, and require bold and innovative solutions. The West is suffering under the worst drought in 1,200 years. Natural communities and native species are already under severe environmental stress. The status quo management biases and patterns of the past are no longer appropriate or sustainable. Significant reforms are urgently needed. It is imperative that BLM's new IRMP reflect the importance of these reforms and contain strong and proactive management decisions. Decisive actions are required if BLM is going to do its part in helping to solve the climate and extinction crises.
Climate change	Not Provided	Not Provided	N/A	12	A carbon budget must be developed to ensure that overall management increases the sequestration of harmful atmospheric carbon in growing trees and vegetation.
Climate change	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The EPA recommends that the DEIS include a discussion of reasonably foreseeable climate change impacts in the planning area-such as changes in precipitation patterns, hydrology, vegetation distribution in respective watersheds, and temperature-and the potential effect of these impacts on said resources. This could help inform the development of measures to improve the resilience of the NCIP. If projected changes could notably exacerbate the environmental impacts of the plan, the EPA recommends these impacts also be considered as part of the NEPA analysis.
Climate change	Hanceford	Phil	The Wilderness Society	781	In addition to the agency's duty under NEPA to take a hard look at the impacts of climate change to and from decisions in the resource management plan, the BLM must also include a range of alternatives that includes a strategy for mitigating these impacts. CEQ regulations instruct agencies to consider alternatives to their proposed action that will have less of an environmental impact, specifically stating that "[f]ederal agencies shall to the fullest extent possible: . . . Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." 40 C.F.R. § 1500.2(e) (emphasis added); see also, 40 C.F.R. §§ 1502.14, 1502.16. The impacts of climate change should be a major factor in every alternative that is created since it is an undeniable reality that will drive all land use planning decisions today and in the future. As provided in the Oregon/Washington BLM State Office guidance document IM OR-2010-012, "[r]esource management plans and other broad programmatic analyses are actions that would typically have a long enough duration that climate change could potentially alter the choice among alternatives." Further, general statements that the BLM will conduct monitoring are also not an appropriate form of climate impact mitigation. Simply monitoring for expected damage does not actually reduce or alleviate any impacts. Instead, a vigilant science-based monitoring system should be set out in the management plan in order to address unforeseeable shifts to the ecosystem. A detailed monitoring approach is also required under the BLM's planning regulations: The proposed plan shall establish intervals and standards, as appropriate, for monitoring and evaluation of the plan. Such intervals and standards shall be based on the sensitivity of the resource to the decisions involved and shall provide for evaluation to determine whether mitigation measures are satisfactory, whether there has been significant change in the related plans of other Federal agencies, State or local governments, or Indian tribes, or whether there is new data of significance to the plan. The Field Manager shall be responsible for monitoring and evaluating the plan in accordance with the established intervals and standards and at other times as appropriate to determine whether there is sufficient cause to warrant amendment or revision of the plan. See 43 C.F.R. § 1610.4-91. Such vigilant monitoring is crucial in order to create an effective adaptive management framework in the face of climate change. The NCIP planning process provides the BLM with an excellent opportunity to analyze the impacts from climate change to the planning area over the next two decades, as well as the contribution to climate change from management decisions made in the plan. This analysis should lead to the development of thoughtful management prescriptions and alternatives in the NCIP that will address how the BLM will mitigate these causes and adapt its management over the coming years to prevent permanent impairment and unnecessary or undue degradation to the resources in the face of climate change.
Climate change	Hanceford	Phil	The Wilderness Society	781	Recommended Approach to Managing Climate Change in the NCIP Under the pressures of global change, it must be acknowledged that many objects of conservation are at risk wherever they are found, and the traditional natural resource management paradigm of modifying ecosystems to increase yield must change to a new paradigm of managing wildland ecosystems to minimize loss - specifically loss of the ecosystem composition, structure, and function that yields the benefits we seek from wildlands. Natural resource management must change from a paradigm of maximum sustained yield to a paradigm of risk management. Although there is no widely-accepted method of assessing and managing risk, we recommend breaking risk down into its component parts-vulnerability, exposure, and uncertainty-as a useful way to think about risk to biodiversity and productive potential. In the TVWS report, "Recommended Risk Assessment and Management Approach for Addressing Climate Change in BLM Land Use Planning" (attached) they recommend an approach for assessing risk in the planning area as well as an approach for management of that risk for the BLM to comply with its legal obligations under NEPA and FLPMA as discussed above. The BLM should utilize the attached management framework to address and manage climate change in the NCIP.

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Climate change	Hanceford	Phil	The Wilderness Society	781	We recommend using an experimental, adaptive design known as the "portfolio approach" of management strategies (Belote et al.) ⁶¹ in the NCIP. As stated by Belote et al., "[u]ncertainty about how ecosystems and species will respond to co-occurring, interactive, and synergistic impacts of the Anthropocene precludes our ability to know which strategy will best sustain wildland values in to the future." Thus, Belote et al. concludes that land managers should use an experimental zoning approach for managing certain lands that include the following zones as management strategies: - Restoration Zones: areas that are devoted to forestalling change through the process of ecological restoration; - Innovation Zones: areas that are devoted to innovative management that anticipates climate change and guides ecological change to prepare for it; and - Observation Zones: areas that are left to change on their own time to serve as scientific "controls" and to hedge against the unintended consequences of active management elsewhere. These concepts are set out in Belote, et al. "Wilderness and Conservation Strategy in the Anthropocene." The Pinchot Letter (Spring 2014). These strategies should be used in conjunction with each other to spread the risk among the different strategies and to allow for diverse outcomes to inform rapid learning about management strategies in the future. This is the kind of deliberate yet dynamic planning process that BLM should be fostering in RMPs, including the NCIP. The BLM is especially equipped to apply this type of portfolio approach due to its wide variety of designations and management regimes. The purpose of restoration zones is to sustain existing or historical ecosystems. This type of strategy lends itself to designations such as national conservation areas, ACECs and other lands that are set aside for conservation of natural and cultural resources, but that may also be appropriate for restoration in certain areas. Due to the acknowledgement that returning to historical range of variability is an increasingly challenging concept in the study of climate change, innovation zones are also necessary. This is where the forecasting of climate change may drive greater intervention to experiment with things like anticipatorily boosting resiliency or facilitating transition to an altered future state where shifts seem inevitable. This strategy would be more appropriate for BLM-managed lands that have already sustained substantial change or where future impacts of climate change may severely disrupt the production of ecosystem goods and services. Conservation designations or allocations would typically not fall within this management strategy. The third strategy of establishing observation zones is necessary to allow for ecosystems to generally change without specific intervention, as a scientific control. This management strategy would be most appropriate for Wilderness, WSAs, and lands managed for wilderness characteristics, but would also be the default strategy for lands that could not be managed for treatment under the restoration and innovation zones due to budget and operational constraints or in lands between such designations where connectivity is desirable to facilitate movement in response to climate change. The BLM should implement a portfolio approach to land use planning that allows for diverse strategies and adaptive, dynamic planning as a climate change adaptation strategy. This involves establishing restoration, innovation and observation zones to "learn while doing" thereby enabling better management and climate change adaptation.
Climate change	Hanceford	Phil	The Wilderness Society	781	BLM has a legal duty to address the impacts of climate change from land management actions. Many management decisions in the NCIP may contribute to and exacerbate the impacts of human-induced global climate change. Therefore, the BLM must steward the many resources it manages to maximize their ability to adapt and endure in the face of climate change.
Climate change	Hanceford	Phil	The Wilderness Society	781	Adapting to Climate Change In addition to analyzing the impacts of climate change, the Department of the Interior Manual for climate change adaptation (523 DM 1) requires the BLM to plan for uncertainty and risk in the face of climate change. Among other things, this policy guidance requires BLM to: - use the best available science of climate change risks, impacts and vulnerabilities, - use the network of Landscape Conservation Cooperatives, Climate Science Centers and other partnerships to understand and respond to climate change, - use well-defined and established approaches for managing through uncertainty including vulnerability assessments, scenario planning and other risk management approaches, - promote landscape-scale, ecosystem-based management approaches to enhance the resilience and sustainability of linked human and natural systems, - Manage linked human and natural systems that help mitigate climate change impacts, such as: -protect diversity of habitat, communities and species, - protect and restore core, unfragmented habitat areas and key habitat linkages, - maintain key ecosystem services, - monitor, prevent and slow the spread of invasive species, - focus development activities in ecologically disturbed areas and avoid ecologically sensitive landscapes, culturally sensitive areas, and crucial wildlife corridors. The biggest question that land managers face today is how to respond to uncertainty due to global climate change. It is especially challenging for planners to make predictions about future ecosystem dynamics 10, 20 or 50 years from now. Adaptation to changing conditions is and will be essential. However, general statements that the BLM will plan to "be adaptive" is not planning-it is a reactive strategy only. A true plan for climate adaptation will require applying knowledge and foresight gained from a "learn as you go" approach.
Climate change	Hanceford	Phil	The Wilderness Society	781	The BLM must craft long-term management prescriptions without permanent impairment and unnecessary or undue degradation to the resources in the face of climate change. FLPMA gives the BLM the authority to manage and plan for emerging issues and changing conditions that global climate change will affect in the planning area. FLPMA mandates that when the BLM revises land use plans, it must "use and observe the principles of multiple use and sustained yield set forth in this and other applicable law" 43 U.S.C. § 1712(c). The term "multiple use" means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions. . . a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources. . . and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. Additional pertinent requirements of FLPMA that specifically apply to land use planning include using "a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences; consider[ing] relative scarcity of the values involved; and weigh[ing] long-term benefits to the public against short-term benefits. Id. FLPMA also provides that the BLM must "take any action necessary to prevent unnecessary or undue degradation to managed resources." 43 U.S.C. § 1732(b). Collectively, the provisions of FLPMA highlighted above necessitate on-the-ground implementation of climate change policies.

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Climate change	Hanceford	Phil	The Wilderness Society	781	The BLM must take a hard look at climate change impacts from management decisions in the environmental impact statement for the resource management plan. Impacts to the ecosystem from climate change include shrinking water resources; extreme flooding events; invasion of more combustible non-native plant species; soil erosion; loss of wildlife habitat; and larger, hotter wildfires. Many of these impacts have been cataloged in recent studies by federal agencies showing the impacts of climate change specifically in the United States such as the National Climate Assessment. Available at http://nca2014.globalchange.gov/ . Secretarial Order (S.O.) No. 3289 unequivocally mandates all agencies within the Department of Interior "analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department's purview." S.O. 3289, incorporating S.O. 3226 (emphasis added). This plan falls squarely under this guidance and the BLM must assess impacts from the proposed actions that may directly, indirectly, or cumulatively result in exacerbating climate change within this document. Further, NEPA regulations require that NEPA documents address not only the direct effects of federal proposals, but also "reasonably foreseeable" indirect effects. These are defined as: Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems." 40 C.F.R. § 1508.8(b) (emphasis added). Finally, BLM Instruction Memorandum 2013-094 regards management during drought. This IM requires the BLM to modify uses and management to lessen impacts from drought including activities such as grazing, recreation, lands actions and minerals activities. IM 2013-094 also states that the BLM should consider the information in the BLM's Rapid Ecoregional Assessments, when available, for assessing drought and mitigation measures and states a preference for RMPs and other plans to proactively address potential drought and its effects. The BLM is required to take a hard look at direct, indirect, and cumulative impacts to and from climate change in the planning area in the NCIP. The BLM baseline data on climate change must be sufficient to permit analysis of impacts under NEPA. Importantly, 40 C.F.R. § 1502.15 requires agencies to "describe the environment of the areas to be affected or created by the alternatives under consideration." Establishment of baseline conditions is a requirement of NEPA. In <i>Half Moon Bay Fisherman's Marketing Ass'n v. Carlucci</i> , 857 F.2d 505, 510 (9th Cir. 1988), the Ninth Circuit states that "without establishing . . . baseline conditions . . . there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA." The court further held that "[t]he concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process." The BLM's duty to evaluate reasonably foreseeable significant adverse impacts includes "impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason." 40 C.F.R. § 1502.22(b). Such impacts are especially significant in the face of climate change.
Climate change	Gutermuth	Brandt	Bureau of Reclamation	803	ADD CLIMATE CHANGE: Recommend adding specific wording. "The BLM will use Best Available Science to minimize negative impacts of Climate change on ecosystems that we manage. Broad management actions will be taken to protect watersheds against habitat loss (e.g., burning of wooded areas, groundwater depletion, and temperature increases). In addition, acquisition [sic] of lands to forestall climate change impacts (e.g., to protect migration corridors or habitat refugia) may be prioritized." BLM areas in the Southfork Trinity drainage (e.g., South Fork or Hayfork Cks) may be especially applicable. Also Browns ck and Little Brown's ck. Protect from water withdrawals.
Climate change	Evenson	Michael	N/A	813	Management criteria should consider increasing the carbon sequestration of these lands through practices that prohibit heavy equipment use.
Climate change	Amsden	Liz	N/A	816	To fight climate change and to reduce environmental degradation, California MUST address this issue and negotiate fair reparations for ceding such rights. But it needs to be done without any of the usual suspects - Big Oil, Big Ag and other corporate lobbyists - trying to steer the conversation. And it must be done sooner rather than later or we can expect to see hundreds of years of devastation such as exist near Nevada City where gold mining and processing killed the land and poisoned the water, at the Salton Sea and other riparian environments where water "theft" has destroyed whole ecosystems, in the Central Valley where high-water fruits and vegetables have trained the aquifer and potable water for downstream communities
Collaboration, coordination, and partnerships	Not Provided	Not Provided	N/A	711	The new RMP planning should include close coordination with the Forest Service, NPS, tribes, private landowners, and counties. This coordination should strive to maximize opportunities for cooperative management for landscape connectivity. BLM manages important lands but many of them occur in fragmented landscapes with multiple agencies and landowners. Ecological systems and natural communities of species do not respect arbitrary governmental boundaries or land ownerships. This is why conservation coordination is necessary at landscape scales. This coordination may also identify positive opportunities to advance the Biden administration's commendable "America the Beautiful" 30 by 30 conservation commitment.
Collaboration, coordination, and partnerships	Lehman	Paul	Redding Trail Alliance	866	would like BLM to continue to partner with government and non-government organizations (like the Redding Trail Alliance) and individuals in this development.
Collaboration, coordination, and partnerships	McMahon	Todd	N/A	875	Are you land managers looking at having 100's of volunteers commit to 1000's of hours of free labor to build trails? Then look no further than the Mountain Bike Community. People, Families, and bicycle organizations are always looking for new trails to legally ride Mt bikes, even if we have to build them ourselves. Please consider the long term benefits to your local community, businesses, restaurants and hotels, simply by having a legal Mt Bike destination. I hope you take the time to look at success stories across the country, of small towns, enticing travelers to visit, learn about the outdoors, and give ALL types of users the ability to access all corners of your land.
Collaboration, coordination, and partnerships	Waldrop	John	Redding Trail Alliance	914	I support the Community Access and Development Alternative which emphasizes the expansion of existing trail systems and allows for the development of new trail systems on BLM land. As a board member for the Redding Trail Alliance, I would like to see BLM continue to partner with organizations that have the knowledge and ability to execute trail planning and development that serve local residents but also attracts distant users to specific areas to experience high quality recreation.
Collaboration, coordination, and partnerships	Downs	John	N/A	931	I encourage BLM to work closely with CDFW local rcd and ngos to restore coastal salmon populations, use process based restoration techniques, create habitat to support beaver where appropriate and reintroduce beavers to passively manage our watersheds to retain water and be resilient to wildfire.
Comprehensive trail and travel management	Spotts	Richard	N/A	3	Areas with sensitive species and sensitive soils should be closed to OHV uses.

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Comprehensive trail and travel management	Spotts	Richard	N/A	3	OHV route densities should be reduced and illegal routes should be closed and rehabilitated.
Comprehensive trail and travel management	Not Provided	Not Provided	N/A	17	Sensitive areas should be closed to future OHV uses.
Comprehensive trail and travel management	Bartle	Tina	N/A	24	A long range plan would be to have a more well-established, connected trail system throughout the Clear Creek Greenway going into Whiskeytown NRA and on to Trinity County, the Shasta-Trinity Trail. Apparently, there are water ditches from Whiskeytown National Recreation Area into Trinity County that could be used to establish this trail and due to the recent fires, they may be easier to locate so that trail system may now be feasible.
Comprehensive trail and travel management	Bartle	Tina	N/A	24	Connecting Cloverdale to Oak Knoll with access to Whiskeytown NRA and the Swasey trail systems would be a great goal along with a scenic bridge across Clear Creek and more easily accessible and well-maintained trail access points to Clear Creek.
Comprehensive trail and travel management	Decker	Karie	Rocky Mountain Elk Foundation	31	Elk and many other wildlife species are sensitive to human travel patterns, especially motorized use. Research from the Starkey Project has done much to quantify effects of roads, trails, and associated motorized (Wisdom et al. 2005) and non-motorized traffic on elk (Wisdom et al. 2018). RMEF supports a balanced approach regarding the Recreation Opportunity Spectrum. Multi-use activities occur year-round and RMEF recommends that the BLM provide access for those seeking varied experiences (primitive and roaded). However, RMEF also recommends inclusion of plan components that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and non-motorized traffic). Timing restrictions should be based on the best available science as well as site specific factors (topography, available habitat, etc.)
Comprehensive trail and travel management	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF recommends that the RMP be intricately connected to travel management goals.
Comprehensive trail and travel management	Willis	Dave	Soda Mountain Wilderness Council	760	Neither motorized nor mechanized vehicles should be permitted off of designated open BLM roads in the proposed Cascade-Siskiyou acquisition area/ACEC.
Comprehensive trail and travel management	Not Provided	Not Provided	BlueRibbon Coalition	787	BRC also advocates for provisions that will allow groups to use state grants to maintain and build more trails. Any management solutions such as requiring portable toilets should be used before any type of closure or decommissioning occurs.
Comprehensive trail and travel management	Not Provided	Not Provided	BlueRibbon Coalition	787	BLM should acknowledge that the Categorical Exclusions that apply for construction of new roads and trails should be applicable to these classes. In many cases these exclusions are for rerouting existing routes because of erosion events, or creating roads to do vegetation treatments that reduce the risk of catastrophic fire. Roadless designations should apply only to recreation use and not create unnecessary restrictions on the Forest for adaptive and active management that relates to other uses.
Comprehensive trail and travel management	Smith	Vera	Defenders Of Wildlife	812	Complying with 43 CFR 8342 to designate off-highway vehicles to minimize impacts to resources and other users. The Analysis of the Management Situation at 2-174 shows that there are 124,400 acres within the planning area that have no travel management designations and allow cross-country motorized driving. It is projected that future technological advancements will enable off-highway vehicles to travel deeper into untracked terrain and that overall off-highway vehicle use will continue to increase. Analysis of the Management Situation at 2-175. Impacts to environmental and cultural resources and other public land users from unmanaged or inappropriately managed off-highway vehicles is well-documented (e.g., see Ouren et al. 2007; Switalski and Jones 2012) as is BLM's legal responsibilities under Executive Orders 11,644 and 11,989 and 43 CFR 8342 (see The Wilderness Society 2016). In order to avoid the risk of serious impacts, we urge BLM to conduct comprehensive travel management in the RMP or commit via an RMP implementation strategy (per BLM Manual 1626, Chapter 3.7) to complete travel management within three years of finalizing the ROD. In doing so, BLM should apply a transparent and common-sense methodology for meaningful application of the minimization criteria at 43 CFR 8342 that provides opportunities for public participation, incorporates the best available scientific information and best management practices, addresses site-specific and larger-scale impacts, and accounts for monitoring and enforcement needs and available resources. A well thought-out, comprehensive transportation plan will help minimize unnecessary damage to at-risk species and other resources and provide for a sustainable multimodal transportation system.
Comprehensive trail and travel management	Ciarrocchi	Mitch	SMPA	830	Open roads that have been closed Please consider opening new roads going into the back country or reopen closed roads that have not been maintained. This would allow people access to many more different areas. It would reduce the amount of traffic in any one particular place and spread it out over a larger area. Reopening or placing new roads would also help logistics for fire fighting which has become a growing concern.
Consistency with Federal/State/Local plans	Evans	Steven	California Wilderness Coalition	7	We have the BLM's South Fork Eel Draft River Management Plan EIS (August 1990) and Supplemental EIS (January 1993). It is unclear whether the plan was ever finalized. Published before natural restoration resulted in the establishment of the Elkhorn Ridge Wilderness, the plan should be reviewed for conformity in the NCIP, as required by Sec. 1274(d)(2). We have also discovered references to but no available copy of a Middle Fork Eel River Management Plan.214 If indeed such a plan was developed, it too should be reviewed for conformity. 214 Arcata Planning Area Proposed Resource Management Plan Amendment and Environmental Assessment, BLM Arcata Field Office, March 1995, pgs. 2-42, 2-44.
Consistency with Federal/State/Local plans	Cartier	Emmett	N/A	9	Prior non-federal 'plans' for the area lands, such as the private 2005 Gilham Butte Cooperative Management Plan, were not undertaken in a manner consistent with the public processes required for federal land planning, and do not reflect public interests. All aspects of such prior plans should be considered wholly inappropriate going forward, any prior BLM endorsements of the 'community' planning efforts notwithstanding. The prior planning created the false impression that the Gilham Butte lands were under management or regulation, such as prohibiting campfires, but no special regulations apparently exist for the area.

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Consistency with Federal/ State/Local plans	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions for elk habitat in RMPs and project design, we support and encourage continued efforts be coordinated with state wildlife agencies and that state agency goals for elk are integrated into the plan. RMEF recommends including vegetation and wildlife habitat goals that help manage wildlife populations at levels meeting California Department of Fish and Wildlife big game management plan objectives.
Consistency with Federal/ State/Local plans	Murray	Danielle	Conservation Lands Foundation	33	.Below are four directives and reports from the highest levels of our nation's government and the State of California calling on the Department of Interior to conserve and protect more public lands. 1)Executive Order 14008- Tackling the Climate Crisis at Home and Abroad: On January 27th, 2001, the President set a goal to protect 30% of our nation's lands and waters by 2030.2 The E.O. also required the Secretary of Interior to submit annual reports on the progress of achieving the 30 percent goal. 2 https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/ 2) America the Beautiful Report- As directed by E.O. 14008, the Department of Interior launched America the Beautiful, a "nationwide effort to conserve, connect and restore the lands, waters, and wildlife upon which we all depend."3 3 https://www.doi.gov/priorities/america-the-beautiful 3) Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies- On April 22, 2022, the President issued an E.O. focused on the importance of protecting our nation's forests. The E.O. states it is the policy of the Administration through the Department of Interior to conserve America's mature and old-growth forests on federal lands.4 4 https://www.whitehouse.gov/briefing-room/presidential-actions/2022/04/22/executive-order-on-strengthening-the-nations-forests-communities-and-local-economies/ 4) California: Pathways to 30x30- In October 2020, California Governor Newsom signed Executive Order dN-82-20, committing the state to the goal of conserving 30 percent of lands and waters by 2030 while expanding access to nature and strengthening tribal partnerships. 5 Following the executive order, California Natural Resources Division released a report: Pathways to 30x30 California Accelerating Conservation of California's Nature. The report recognizes that "publicly managed lands and coastal waters provide a significant opportunity to enhance conservation toward the 30x30 goal."6 5 https://www.gov.ca.gov/wp-content/uploads/2020/10/10.07.2020-EO-N-82-20-.pd 6 Pathways to 30x30: Accelerating Conservation of California's Nature, April 22, 2022, https://www.californianature.ca.gov/pages/30x30 . The above policy directives recognize the need to mitigate climate change impacts and biodiversity loss through the protection of public lands. Due to the significant public lands under the BLM's stewardship, planning within the agency has grown increasingly important. The four policy directives listed above should be considered and applied during the NCIP process.
Consistency with Federal/ State/Local plans	Murray	Danielle	Conservation Lands Foundation	33	Considering the recent policy directives, BLM's authority under FLPMA, and the ecological importance of the Arcata Redding region of northern California, we respectfully request that you consider administrative protections as part of the NCIP process.
Consistency with Federal/ State/Local plans	Williams	Laurel	The Pew Charitable Trusts	738	On January 27, 2021, President Biden signed an Executive Order, Tackling the Climate Crisis at Home and Abroad, that laid out a policy goal of protecting 30% of our nation's lands and waters by 2030. The success of this initiative will hinge on the nation's largest land manager, the BLM. The BLM manages 245 million acres of public lands, yet only 34 million acres are protected lands that fall into GAP Status Code 1 and 2 including Wilderness, wilderness study areas, national monuments, national conservation areas and wild and scenic rivers. That leaves more than 85% of BLM lands that have the potential to be conserved to advance 30x30 goals. Many of these lands remain in their natural state, provide connectivity corridors and habitat for wildlife, allow for natural storage and sequestration of carbon, and ensure clean water and air for local communities. Safeguarding BLM lands are the best opportunity to advance 30x30 goals in the U.S. in the next 3 years. The FLPMA is sufficiently flexible such that the agency has broad discretion to provide durable administrative protections through resource management planning processes with sufficient policy guidance. The BLM administrative designations and management prescriptions we reference above should count towards 30x30 goals when they meet or exceed specified conservation thresholds, and policy changes could be developed that increase the rate and prevalence in which lands meet these minimum standards. This direction would ensure that more acres are managed to maintain a primarily natural state. The BLM's existing tools and authorities can be used more widely across the agency's domain to accelerate the scope and pace of conservation to fulfill the goals of the America the Beautiful Initiative.
Consistency with Federal/ State/Local plans	Karath	Lander	National Audubon Society	755	More specifically, the BLM could engage with the state of California on rulemaking processes and through this planning process on conservation designations such as ACECs and other important public land designations so that these lands can meaningfully contribute to the 30x30 goal. When considering if a specific designated area of federal land should be considered conserved for California's 30x30 purposes, we propose the BLM consider criteria like the following. These measures, if adopted, would limit threats to biodiversity, but could allow for restoration to sustain ecosystem function and provide resilience. In all portions of designated areas where management restrictions meet or exceed each of these management thresholds, those lands could count as contributing toward the goals and objectives set out by California for 30x30. - withdrawn from mineral leasing, closed to leasing, or open to leasing subject to no surface occupancy stipulations for leasable minerals. - prohibited or limited renewable energy and/or transmission development. - limited logging and vegetation management to activities that restore historic disturbance regimes, restore ecological function, and/or improve fish and wildlife habitat. - closed to motorized use, or vehicle travel is limited to designated routes at or below a determined threshold to minimize wildlife disturbance (such as one mile per section of land), or seasonal motorized closures when wildlife are present (winter range). - administrative or permanent mineral withdrawal, recommendation for mineral withdrawal in an agency land use plan, or strict conservation requirements for the development of valid existing rights.
Consistency with Federal/ State/Local plans	Karath	Lander	National Audubon Society	755	As the BLM undertakes this planning effort, it is important that the agency identify, evaluate and put in place management actions and land use protections that would lead to the durable conservation of federal lands in California and count towards achieving 30 by 30 goals. This includes - with durable measures - Areas of Critical Environmental Concern. In particular, we encourage the BLM to consider areas important to avian migration and connectivity as part of this planning process and assessment.
Consistency with Federal/ State/Local plans	Karath	Lander	National Audubon Society	755	BLM should consider 30x30 goals and durable protections in this planning process. Crises created by declining biodiversity and increasing impacts from climate change are driving support in the United States and internationally for greater land and water conservation. This movement is focused on a goal of conserving 30% of lands and waters by 2030, as a step toward preserving biodiversity and buffering against climate change. The 30x30 movement also recognizes the rights, stewardship, and autonomy of Indigenous peoples around the world, and aims to address long-standing inequities that have prevented all people from accessing and enjoying the benefits of nature. The Biden-Harris Administration and the state of California have committed to the 30x30 goal through Executive Orders and subsequent reports and actions.1 1 Executive Order on Tackling the Climate Crisis at Home and Abroad, available at https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/ Executive Order N-82-20, available at https://www.gov.ca.gov/2020/10/07/governor-newsom-launches-innovative-strategies-to-use-california-land-to-fight-climate-change-protect-biodiversity-and-boost-climate-resilience

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Consistency with Federal/State/Local plans	Karath	Lander	National Audubon Society	755	Nearly half of the land in California is managed by public agencies, with 46 million acres under the management of the federal agencies including the Bureau of Land Management (BLM) and the US Forest Service (USFS). These lands include essential wildlife habitat, important areas for public access and recreation, and traditional homelands of Indigenous populations. Because of their scale and public values, the conservation of public lands must be a core component of the commitment to protect 30% of lands and waters by 2030. As described in the state of California's Pathways report, currently only lands in Gap Analysis Program (GAP) status codes 1 and 2 - such as wilderness areas, national monuments, or National Wildlife Refuges - are considered permanently protected and counted towards the state of California's 30x30 goal. ² This means that much of the federal lands in the state of California are outside of the state's 30x30 goal. ² Pathways to 30x30: Accelerating Conservation of California's Nature, available at https://www.californianature.ca.gov/pages/30x30#:~:text=Pathways%20to%2030x30%3A%C2%A0%20Acceleratin%20g%20Conservation%20of%20California%E2%80%99s%20Nature We believe that lands managed by the BLM can meaningfully contribute to the state and federal 30x30 goal. The Pathways report recommends that "durably protected or managed areas" within California's 30x30 initiative encompass: 1. Areas classified by governments for a designated conservation purpose 2. Areas under perpetual conservation easements for species and habitats 3. Administrative conservation designations that have gone through a formal rulemaking or other enforceable decision-making process not subject to simple reversal ³ 3 Ibid. We note that many areas managed by the BLM may meet the first criteria above but perhaps not the third. For example, Areas of Critical Environmental Concern (ACECs) are areas that BLM has identified as needing special management attention to protect important historical, cultural, and scenic values, or fish and wildlife or other natural resources. Unfortunately, ACECs are not consistently managed to protect their conservation values. We note that actions will need to be taken to advance the durability of ACECs, such as a national rulemaking, if ACECs are to count under 30x30. Federal administrative designations should count towards 30x30 goals when they provide durable conservation protections, and the BLM should work in partnership with the state of California to advance the durable conservation of federal lands in California. We underscore the following priority actions to enhance conservation on public lands that the state commits to in the Pathways to 30 by 30 report: - Partner with Federal agencies to explore where enhanced environmental conservation is beneficial and appropriate, and constructively engage in Federal land management planning to sight and implement appropriate improvements. - Work with land management agencies to change designations on public lands where appropriate to enhance conservation in targeted areas. ⁴ 4 Ibid.
Consistency with Federal/State/Local plans	Simmons	Matthew	Environmental Protection Information Center	756	Please retain the elements of the Northwest Forest plan that prioritize habitat for endangered anadromous fish and northern spotted owls. We do not need to see our forests even more opened to extractive timber interests. Also, BLM should decide how the Resource Management Plan will address the Northwest Forest Plan which is likely to be revised soon.
Consistency with Federal/State/Local plans	Simmons	Matthew	Environmental Protection Information Center	756	Both California and the Federal Government have announced ambitious goals to preserve 30% of our lands by 2030. Scientists have argued that these goals are necessary to preserve our nation's biodiversity and in order to do that, lands that currently permit extractive industry will need to no longer do so. BLM contains many such lands in Northwest California. EPIC's belief is that BLM should seriously consider what lands that are currently not protected could become protected in the near future in order to help meet 30x30 goals. Such lands would ten contribute to biodiversity, outdoor recreation, and carbon sequestration instead of merely existing as places for extractive industry.
Consistency with Federal/State/Local plans	Simmons	Matthew	Environmental Protection Information Center	756	Please retain the elements of the Northwest Forest plan that prioritize habitat for endangered anadromous fish and northern spotted owls. We do not need to see our forests even more opened to extractive timber interests.
Consistency with Federal/State/Local plans	Simmons	Matthew	Environmental Protection Information Center	756	Also, BLM should decide how the Resource Management Plan will address the Northwest Forest Plan which is likely to be revised soon.
Consistency with Federal/State/Local plans	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The EPA recommends that the DEIS discuss how the NCIP relates to, and will be integrated with, federal, state, tribal, and local land use plans in the planning area. The EPA recommends that BLM address all types of land use plans in the area, including formally adopted documents for land use planning, conservation, zoning, and related regulatory requirements, as well as plans not yet developed that have been proposed by the appropriate government body in a written form.[1] [1] See "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," #23b. https://energy.gov/sites/prod/files/G-CEQ-40Questions.pdf
Consistency with Federal/State/Local plans	Jorgenson	Devon	North Coast Regional Water Quality Control Board	768	Regional Water Board staff are currently developing the Federal Lands Permit, which we anticipate will replace the 2015 Federal Waiver prior to NCIP approval. Federal Lands Permit development includes modifying several procedural and regulatory aspects of the 2015 Federal Waiver and its associated monitoring and reporting requirements; improving the 2015 Federal Waiver's application to BLM lands; and conducting an updated and expanded environmental analysis for compliance with the California Environmental Quality Act (CEQA). The Federal Lands Permit and supporting CEQA document are anticipated to be completed and proposed for Regional Water Board adoption by summer 2023. Please visit the Federal Permitting webpage and subscribe to the federal lands email subscription list for development updates on the Federal Lands Permit.
Consistency with Federal/State/Local plans	Jorgenson	Devon	North Coast Regional Water Quality Control Board	768	The Federal Lands Permit will require federal agencies to comply with applicable guidance documents used to guide their planning and decision making, such as the proposed NCIP, other BLM Resource Management Plans, and California State Office's Best Management Practices for Water Quality. As such, Field Office compliance with the management guidelines and standards in the proposed NCIP will in part constitute compliance with the Federal Lands Permit. Regional Water Board staff will evaluate the draft NCIP and EIS for consistency with the Water Code, Basin Plan, and conceptual Federal Lands Permit requirements to ensure that it includes adequate water quality considerations and protections.

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Consistency with Federal/ State/Local plans	Hanceford	Phil	The Wilderness Society	781	On January 27, 2021, President Biden signed an Executive Order, Tackling the Climate Crisis at Home and Abroad, that laid out a policy goal of protecting 30% of our nation's lands and waters by 2030. The success of this initiative will hinge on the nation's largest land manager, the BLM. The BLM manages 245 million acres of public lands, yet only 34 million acres are protected lands that fall into GAP Status Code 1 and 2 including Wilderness, wilderness study areas, national monuments, national conservation areas and wild and scenic rivers. That leaves more than 85% of BLM lands that have the potential to be conserved to advance 30x30 goals. Many of these lands remain in their natural state, provide connectivity corridors and habitat for wildlife, allow for natural storage and sequestration of carbon, and ensure clean water and air for local communities. Safeguarding BLM lands is the best opportunity to advance 30 x 30 goals in the U.S. in the next 3 years. The Federal Land Policy and Management Act (FLPMA) is sufficiently flexible such that the agency has broad discretion to provide durable administrative protections through resource management planning processes with sufficient policy guidance. BLM administrative protections should count towards 30x30 goals when they meet or exceed specified conservation thresholds, and policy changes could be developed that increase the rate and prevalence in which lands meet these minimum standards. This direction would ensure that more acres are managed to maintain a primarily natural state. The BLM has existing tools and authorities that can be used more widely across the agency to accelerate the scope and pace of conservation. Below is a campaign plan to encourage the agency to take bold action and use its existing tools and to establish new policy steps to direct and empower staff across the agency to begin protecting critical lands more broadly. b. Gov Newsom EO N-82-20[LW1] that committed California to the goals of conserving 30 percent of our lands and coastal waters by 2030 c. CA 30x30 Pathways doc[LW2] i. Regional Insights includes North Coast: https://canature.maps.arcgis.com/sharing/rest/content/items/58143795071f4fa4b22b35276cc38501/data
Consistency with Federal/ State/Local plans	Henson	Eyan	CalWild	796	I hope the BLM will take President Biden's late Successional and Mature Forest executive order into account, as it develops NCIP. I'm not sure exactly what that means, but I hope you can figure it out and will protect the late successional reserves that were identified and protected back in your 1994 plan
Consistency with Federal/ State/Local plans	Juliana	Kate	N/A	804	Another point is that in developing the community plans for Gilham Butte and lower Mill Creek, I worked to develop methodically-validated lists of plant, wildlife, bird and aquatic species that exist as appendices to the Community Plans. I ask that your current planning team review those appendices and include them in their process as they consider the case of Gilham Butte; they provide a baseline of information that can be used in newer surveys in the Gilham Butte area. I believe you have those appendices but if you do not, I will happily provide them. Those plans also include detailed descriptions of each of the waterways, their condition, aspect, vegetation, inhabitants and other qualities. The CMP provides a comprehensive overview of the area that gives new planners a baseline of information from which to work
Consistency with Federal/ State/Local plans	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	Coordination of fire management planning and incident response with the NPS and the U.S. Forest Service (USFS) through the Wildfire Decision Support System (WFDSS) is recommended.
Consistency with Federal/ State/Local plans	Sito	Erin	Wildlands Network	809	Establishing Climate-related Connectivity Corridors Would Also Be in Line with the Current Administration's America the Beautiful Policy. Along with the above application of science to law, Wildlands Network also notes that creating an ACEC for climate and connectivity purposes would fulfil some of the Biden Administration's America the Beautiful goals. President Biden's Executive Order 14008 "established the first-ever national conservation goal, calling for the conservation of 'at least 30 percent of U.S. lands and waters by 2030'" (the "30x30 Initiative"). Request for Information To Inform Interagency Efforts To Develop the Atlas, 60 Fed. Reg. 235-6 (Jan. 4, 2022). To achieve this goal, part of the 30x30 Initiative calls for "work[ing] with States, Tribes, local communities, and private landowners to establish and expand upon promising initiatives to conserve and restore wildlife migration corridors through incentives and local collaboration. Conserving and Restoring America the Beautiful, U.S. DEPT. OF THE INTERIOR (May 2021) at 18, https://www.doi.gov/sites/doi.gov/files/report-conserving-and-restoring-america-the-beautiful-2021.pdf . Therefore, this NCIP process provides the perfect local, collaborative platform to fulfill the Administration's goals and follow existing science and law.
Consistency with Federal/ State/Local plans	Vaile	Joseph	KS Wild	811	Please adhere to the policy of the Department of Interior to protect mature and old-growth forests. On January 27, 2021, this Administration responded to the climate crisis through President Biden's Executive Order (EO) 14008, Tackling the Climate Crisis at Home and Abroad, which included the America the Beautiful initiative to conserve thirty percent of lands and waters by 2030. It is now BLM policy to inventory and protect all mature and old growth forests and trees. About 100,000 acres of BLM lands in Northern California are a part of the Northwest Forest Plan and should continue to be integrated into that science based regional plan.
Consistency with Federal/ State/Local plans	Smith	Vera	Defenders Of Wildlife	812	BLM Manual 6840. I. E. BLM's Land Use Planning Handbook H-1601-I directs that RMPs should establish desired outcomes, strategies, restoration opportunities, use restrictions, and management actions to conserve and recover special status species. Appendix C. Section I. D. Desired outcomes can include specific goals and objectives related to ecosystems and species and can be established at multiple scales. Land use plan decisions should be clear and sufficiently detailed to enhance habitat or prevent avoidable loss of habitat pending the development and implementation of implementation-level plans. Finally, the handbook directs BLM to identify implementation level programmatic and site-specific actions needed to achieve the RMP direction. For example, BLM in the RMP might want to commit to undertaking species-specific conservation strategies, Areas of Critical Environmental Concern (ACEC) management plans, critical habitat management plans, or watershed restoration and management plans.
Consistency with Federal/ State/Local plans	Smith	Vera	Defenders Of Wildlife	812	BLM Manual 6840 (Special Status Species) reiterates Section 7(a)(1)'s mandate, stating that it "requires the BLM to use its authorities to further the purposes of the ESA by implementing programs for the conservation of threatened and endangered species and the ecosystems upon which they depend. The manual goes on to offer several ways in which BLM can meet its ESA Section 7(a)(1) obligation, including: - Developing and implementing activities that provide for the conservation and recovery of species listed pursuant to the ESA. - Undertaking actions designed to maintain the integrity of the primary constituent elements of federally designated critical habitat on BLM-administered lands. - Determining, to the extent practicable, the occurrence, distribution, population, and habitat condition of all ESA-listed species on BLM-administered lands, and evaluating the significance of BLM-administered lands in the conservation of those species. - Developing and implementing agency land use plans, implementation plans, and actions in a manner consistent with conservation and/or recovery of listed species. - Monitoring and evaluating ongoing management activities to ensure conservation objectives for listed species are being met.

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Consistency with Federal/ State/Local plans	Smith	Vera	Defenders Of Wildlife	812	Complying with Executive Order to Protect Old and Mature Forest Ecosystems and the At-risk Species that Depend on Them On April 22, 2022, President Biden issued Executive Order 14,072 on Strengthening the Nation's Forests, Communities, and Local Economies in which he established a policy to conserve America's mature and old-growth forests on federal lands and directed the Secretary of the Interior to: define, identify and complete and inventory of old and mature forests within one year; analyze the threats to mature and old growth forests; and develop policies to institutionalize conservation strategies that address the threats. The Arcata and Redding Field Offices should coordinate with the broader Bureau-wide effort to inventory and conserve old and mature forests so that the inventory and conservation direction is incorporated into the NCIP.
Consistency with Federal/ State/Local plans	Smith	Vera	Defenders Of Wildlife	812	Expand the application of the ACS to all BLM-administered lands and resources within the planning area (echoes recommendation in the Analysis of the Management Situation page 4-23). This is consistent with and advances BLM's Aquatic Management Strategy, Conserving and Restoring Riparian, Fisheries, and Water Resources in a Changing Climate: A Five-Year Strategy for the BLM's Aquatic Resources Program (February 22, 2022).
Consistency with Federal/ State/Local plans	Evenson	Michael	N/A	813	In general, there is wide public appreciation of the King Range Management Plan and its implementation. I recommend that the Gilham Butte area be managed under the same KRNCA Plan and not be managed from the Redding Office.
Consistency with Federal/ State/Local plans	Perea	Griffin	Central Valley Regional Water Quality Control Board	814	The Central Valley Water Board has the authority and responsibility to implement both the federal and state clean water laws within the region. Compliance with the clean water laws is ensured through the development of and adherence to the Central Valley Water Board's Basin Plans to help preserve, enhance, and restore the quality of California's water resources. Activities that may be guided by the Integrated Management Plan have the potential to impact waters of the state and waters of the United States. Compliance with the Porter-Cologne Act and the applicable Central Valley Water Board Basin Plan objectives should therefore be considered while preparing the new Northwest California Integrated Management Plan. The link to the Porter-Cologne Water Quality Control Act is: (https://www.waterboards.ca.gov/laws_regulations/klocs/portercologne.pdf) The link to the Water Board's Basin Planning Website is: (https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/basinplans)
Cooperating Agencies	Karath	Lander	National Audubon Society	755	The BLM must work in close consultation with the state wildlife agency and the US Fish and Wildlife Service (FWS) to ensure adequate protections for special status and migratory birds. This should include a careful evaluation of data on special status and migratory bird species distribution and occurrence, the potential impacts of proposed land uses, conservation measures, and restoration priorities.
Cooperating Agencies	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The EPA is a cooperating agency for the NCIP and has participated in several early coordination activities including attending a kick-off meeting in Redding, participating in regular calls with the BLM and other cooperating agencies, and reviewing and providing comment on documents. Additionally, EPA submitted a letter, dated February 2, 2017, responding to BLM's initial request for scoping comments for the NCIP. We value this early coordination and look forward to continuing to work with the BLM and other cooperating agencies on the NEPA phase of the NCIP.
Cooperating Agencies	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	Whiskeytown NRA requests coordination to establish trail connectivity for future trails planned along the Shasta Divide and potentially other areas.
Cooperating Agencies	Smith	Vera	Defenders Of Wildlife	812	Emphasize developing and participating in effective partnerships to protect key watersheds and aquatic corridors vital to at-risk species. Because BLM manages only a fraction of the lands within the planning area, successful recovery of at-risk aquatic and riparian species will likely depend on investing in effective watershed partnerships.
Cultural resources	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In the DEIS, discuss how BLM would avoid or minimize adverse effects on the physical integrity, accessibility, or use of cultural resources or archaeological sites, including traditional cultural properties (TCPs), throughout the planning area. Clearly discuss mitigation measures for archaeological sites and TCPs. We encourage BLM to append any Memoranda of Agreements to the DEIS, after redacting specific information about these sites that is sensitive and protected under Section 304 of NHPA.
Cultural resources	Poe	Shannon	American Mining Rights Association (AMRA)	774	We noted a reference to metal detectors and an accusation of damage to historic sites by the use of these simple handheld tools of mining. Metal detectors are an extremely valuable tool for the location of valuable mineral deposits with very little disturbance to the prospected ground. We request documentation and evidence of this as we are unaware of any damage caused by metal detecting to historic sites.
Cultural resources	Hanceford	Phil	The Wilderness Society	781	The public lands that will be considered during this process include places that are historically and culturally important for the region's many Indigenous tribes. We support efforts to properly inventory and protect archaeological sites, cultural resources and sites, historic sites, and old trails, in consultation with tribes and tribal groups, but we also recognize the sensitivity of tribes to overly intrusive BLM surveys of sensitive cultural sites and burials. We support rights to access natural, medicinal, and sacred resources or places guaranteed to all tribes. We support the management of lands with particular connection to tribes with explicit and focused attention to tribal interests. A few areas of known cultural importance managed by BLM are Cahto Peak, the Klamath, Eel, and Trinity rivers, Sacramento River Bend Area, and Little Darby among a long list of others.
Environmental justice	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" (February 16, 1994), directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations. It further directs agencies to develop a strategy for implementing environmental justice and providing minority and low-income communities access to public information and public participation. As such, BLM should address adverse environmental effects of the proposed plan on these communities and outline measures to mitigate for impacts

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Environmental justice	Gerdes	Jason	Environmental Protection Agency (EPA)	767	If it is determined that minority and low-income populations may be disproportionately impacted, describe in the DEIS the measures taken by BLM to fully analyze the environmental effects of the action on minority communities and low-income populations and identify potential mitigation measures. In the DEIS, discuss potential environmental justice concerns, such as air quality, water quality, noise, vibration, odors, etc. Include any environmental justice issues raised during scoping meetings. Clearly define the "reference community" and the "affected community." These definitions are used to determine whether there are disproportionately high and adverse human health or environmental impacts by comparing the impacts to the affected community with the impacts to the reference community. A well-defined affected community will accurately reflect the demographic characteristics of the populations likely to be adversely impacted by the proposed plan. A well-defined reference community will reflect the characteristics of the general population (e.g., municipal, regional, state).
Environmental justice	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In obtaining data for the environmental justice analysis to determine the presence of minority and low-income populations, we encourage BLM to use EPA's EJScreen6 and/or the most recent American Community Survey from the U.S. Census Bureau (i.e., Five-Year Date Profile Estimates for 2013-2019). To best illustrate the presence of a minority population, we recommend that BLM analyze block groups, the smallest geographical unit that the U.S. Census Bureau publishes data for. We caution using larger tracts in the analysis, such as counties or cities, as these may dilute the presence of minority populations. After BLM has determined if minority and low-income populations exist in the planning area, we recommend that the DEIS discuss whether these communities would be potentially affected by individual or cumulative actions of the proposed plan. We also recommend addressing whether any of the alternatives would cause any disproportionate adverse impacts, such as higher exposure to toxins; changes in existing ecological, cultural, economic, or social resources or access; cumulative or multiple adverse exposures from environmental hazards; or community disruption. 6 EJScreen is an online mapping tool that can aid the agencies in developing outreach for EJ communities. The tool is available at https://ejscreen.epa.gov/mapper/
Environmental justice	Ringgold	Paul	Save the Redwoods League	777	Suggest expanding beyond Tribal engagement to other historically marginalized and/or low-income communities. Not sure what the "input" entails?
Fish / special status species	Spotts	Richard	N/A	3	All special status species should be fully protected so they can recover.
Fish / special status species	Not Provided	Not Provided	N/A	12	Protection for special status species and sensitive riparian and other habitats must be more comprehensive and effective. Modern science must be applied including hydrology, conservation biology, and landscape ecology.
Fish / special status species	Mahan	Tom	Swingwater Fly Fishing	20	Attached is a copy of one of multiple study's used to hone in on the "over" effectiveness of indicator fishing for Steelhead and it's devastating effect with, in our case specifically on the trinity river, anglers encountering the same multiple times (see attached PDF). In effect, raising mortality to levels that are not sustainable for spawning purposes.As a basic outline of my case, if the state of Washington found this to be more then enough reason to axe indicator(bobber) fishing from a floating device with the amount of water volume flowing through the systems mentioned and also the Olympic Peninsula rivers,(I guided there multiple seasons) you can use your imagination to understand the devastation it would have on our beautiful Trinity river wild Steelhead.The Trinity, in peak fall season, when most guides are out, you could easily create an average means water volume which would come out to a fraction of the amount flowing on the rivers mentioned in this study.This is a basic summary of what I will bring to your guys attention.We must not follow the state of Washingtons path when it comes to our own rivers. We must be proactive and get out in front of this. The writing is on the wall. And it has been for a long time. We cannot ignore this problem any longer.
Fish / special status species	Jirak	Lori	N/A	758	BLM lands also include important wild and scenic rivers, plus streams that host salmon and steelhead trout. These anadromous fish are becoming scarcer due to climate change, poorly regulated logging and competing demands on the northern region's limited water supply. Salmon and steelhead are historically and culturally significant for the region's Native American tribes, people who are too often denied major roles in land planning processes.
Fish / special status species	Jorgenson	Devon	North Coast Regional Water Quality Control Board	768	The Fish and Aquatic Resources Theme states it will prioritize restoration activities in degraded riparian zones. How is "degraded" defined and measured? Will the protection of undegraded riparian zones also be prioritized?
Fish / special status species	Hanceford	Phil	The Wilderness Society	781	Water resource health affects fish, especially Chinook salmon (<i>Oncorhynchus tshawytscha</i>), and steelhead (<i>Oncorhynchus mykiss</i>), and that continued protection of waterways is critical to protect these fish. Lacks Creek and the Redwood Creek watersheds should be monitored and restored, as should the Klamath, Eel, Trinity, and Scott rivers and their many key anadromous-fish bearing tributaries. .
Fish / special status species	Juliana	Kate	N/A	804	Fisheries and aquatic species have been surveyed through citizen observations as well as through Gilham Butte and the area's inclusion in the North Coast Watershed Assessment Program (NCWAP). A number of species identified are listed for protection in the state and federal Endangered Species Act. BLM has a duty to manage lands and waterways to maintain and restore habitat values for those species, and to regularly survey for them as climate change and land use affects waterways and their inhabitants.
Fish / special status species	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We request that the BLM continue with restoration efforts along Lower Clear Creek to support anadromous fish, especially federally listed fish species (Sacramento River steelhead trout and Spring-run Chinook salmon). Management to protect these threatened taxa (e.g., gravel augmentations, floodplain restoration) should continue to be a priority through partnership with the NPS, Bureau of Reclamation, U.S. Fish and Wildlife Service, and others as part of the Clear Creek Technical Team. Within the Lower Clear Creek watershed, management activities that contribute to sedimentation should be minimized to protect Critical Habitat for these species.
Forestry	Not Provided	Not Provided	N/A	29	The new RMP should make all mature and old growth forest stands unavailable for commercial logging.
Forestry	Decker	Karie	Rocky Mountain Elk Foundation	31	Early seral forest provides important habitat for elk and other wildlife and is often achieved following disturbance such as fire and mechanical thinning. Decades of fire suppression have reduced early successional stages across BLM-managed lands. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees which provide critical forage and cover for elk and other species (Swanson et al. 2011).

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Forestry	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF supports balanced use of timber production and encourages consideration of wildlife habitat enhancement through timber production activities. Opportunities for timber production, which can provide greater flexibility in using the full array of active vegetation management activities, are more effective at meeting desired vegetative conditions.
Forestry	Simmons	Matthew	Environmental Protection Information Center	756	Commercial timber harvesting should be limited to the extent feasible. Commercial forestry damages ecosystems, creates carbon emissions, impairs water quality, introduces invasive species, and creates a fire risk. Any active management decision must be weighed against the disturbance associated with such actions. The idea that we need to "bring sunlight to the forest floor" presumably by logging seems particularly misguided given the current drought conditions and the potential for increased sunlight to exacerbate those conditions.1 Opening the canopy can create wind tunnels that make wildfires more severe.2 And fuel treatments are only effective if a fire occurs shortly after they occur.3 In fact, a studies have routinely shown that the higher level of protected status a forest enjoys, the less severe its wildfires will be.4 1 Allen, C., Macalady, A., Chenchouni, H., Bachelet, D., McDowell, N., Vennetier, M., Kitzberger, T., Rigling, A., Breshears, D., Hogg, E. H., Gonzalez, P., Fensham, R., Zhang, Z., Castro, J., Demidova, N., Lim, J.-H., Allard, G., Running, S., Semerci, A., & Cobb, N. (2010). A global overview of drought and heat-induced tree mortality reveals emerging climate change risks for forests. <i>Forest Ecology and Management</i> , 259, 660-684. https://doi.org/10.1016/j.foreco.2009.09.001 2 Banerjee, T. (2020). Impacts of Forest Thinning on Wildland Fire Behavior. <i>Forests</i> , 11(9), 918. https://doi.org/10.3390/f11090918 3 Baker, W. L. (2014). Historical forest structure and fire in Sierran mixed-conifer forests reconstructed from General Land Office survey data. <i>Ecosphere</i> , 5(7), art79. https://doi.org/10.1890/ES14-00046.1 4 Bradley, C. M., Hanson, C. T., & DellaSala, D. A. (2016). Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? <i>Ecosphere</i> , 7(10), e01492. https://doi.org/10.1002/ecs2.1492 Many species such as the northern spotted owl are just barely hanging on due to decades of overharvesting.5 5 Franklin, Alan B., et al. "Range-wide declines of northern spotted owl populations in the Pacific Northwest: A meta-analysis." <i>Biological Conservation</i> 259 (2021): 109168. Instead of using our forests for commercial timber harvest, our forests should be set aside as carbon reserves.6 Climate change is the crisis of our times. However, our forests can be part of the solution if they are allowed to sequester and store carbon without disturbance.7 6 Moomaw, W. R., Masino, S. A., & Faison, E. K. (2019). Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. <i>Frontiers in Forests and Global Change</i> , 2. https://www.frontiersin.org/article/10.3389/ffgc.2019.00027 7 Moomaw, W. R., Masino, S. A., & Faison, E. K. (2019). Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. <i>Frontiers in Forests and Global Change</i> , 2. https://www.frontiersin.org/article/10.3389/ffgc.2019.00027 Commercial timber harvest should not be allowed in late-successional forest reserves for any reason. The fact that the Community Access and Development theme proposes doing so is problematic. Those late seral reserves are necessary to the survival of the Northern Spotted Owl. Disturbances caused by timber harvesting will directly negatively affect the species.
Forestry	Simmons	Matthew	Environmental Protection Information Center	756	Our native forests and grasslands our currently our best tools for fighting climate change by allowing them to naturally sequester carbon. Instead of conducting timber harvests we should turn our forests into carbon reserves. Instead of allowing cattle to graze on non-native grasslands, we should be promoting the return of native grasslands. In addition, this means promoting native grazers like elk over non-native grazers like cattle. Doing so will increase the carbon sequestration potential of our public lands and help them contribute to our nation's climate goals. That means keeping carbon in the forests and out of the atmosphere. About 80% of the carbon in a forest is emitted to the atmosphere within a century following logging.31 The carbon debt is not made up for by storing carbon in wood product pools or planting trees given most wood products are short lived and young trees do not contain the carbon stores that older trees have built up over decades or even centuries.32 This is why many scientists are calling on governments to not only protect sinks but the carbon stocks or reservoirs.33 31 Hudiburg, T.W., et al. 2019. Meeting GHG reduction targets requires accounting for all forest sector emissions. <i>Environ. Res. Letters</i> https://doi.org/10.1088/1748-9326/ab28bb 32 Luysaert S, et al. 2008. Old-growth forests as global carbon sinks. <i>Nature</i> 455:213-215; Mildrexler, D.J. et al. 2020. Large trees dominate carbon storage in forests east of the Cascade Crest in the United States Pacific; Mackey, B, et al. 2013. Untangling the confusion around land carbon science and climate change mitigation policy. <i>Nature Climate Change</i> www.nature.com/natureclimatechange Northwest. <i>Frontiers in Forests and Global Change</i> https://www.frontiersin.org/articles/10.3389/ffgc.2020.594274/full 33 Zoltan, K, D.A. DellaSala, et al. 2020. Recognizing the importance of unmanaged forests to mitigate climate change. <i>Global Change and Biology</i> https://doi.org/10.1111/gcbb.12714
Forestry	Jorgenson	Devon	North Coast Regional Water Quality Control Board	768	Will the NCIP include management guidance relating to retention of trees contributing to streambank stability for timber harvesting or vegetation management activities?
Forestry	Ringgold	Paul	Save the Redwoods League	777	Community Access & Development Alternative Forestry - Opportunities for economic benefits of timber harvest - Ideally would consider benefits directly to local communities and Tribes and/or such workforce development opportunities - perhaps that's meant to be captured below under Social Environment? - More active management in late seral areas - Should cite the kinds of treatments that we would like to see in and around these areas: mechanical fuels reduction, prescribed fire, potential forest stand improvements to increase forest complexity and resilience. - Vegetation - Maximize socioeconomic benefits - This language is very broad. What is meant here by socioeconomic benefits? There should be more specificity here to address questions that will come up around how this would impact management of natural resources.
Forestry	Ringgold	Paul	Save the Redwoods League	777	Connectivity & Resilience Alternative - Forestry - Should consider fuels and forest improvement treatments within late seral reserve areas to improve fire resilience. - Vegetation - Connectivity corridors should include connectivity to established National Conservation Lands units, including Headwaters, King Range and the California Coastal National Monument.
Forestry	Hanceford	Phil	The Wilderness Society	781	As you know, the Northwest Forest Plan and 1995 Arcata Field Office RMP codified a system of over 72,700 acres of LSRs in the region composed of many fine stands of ancient forest. We request that the BLM continue to preserve these existing ancient forests in the LSRs and practice forestry techniques in younger stands designed to accelerate the development of more mature forests over time. We also request that the BLM consider designating new LSRs to protect any mature or late-successional stands not already included in the LSR system.
Forestry	Juliana	Kate	N/A	804	I am reassured to hear you state that the area known as Gilham Butte is not considered a significant resource for logging, because its late seral forest is one of the few remaining relatively intact native forest ecosystems in the region. I believe that one of the requirements placed by the Save-the- Redwoods League when they acquired and transferred to BLM the parcels that skirt the butte was a prohibition on transporting logs across those lands. Landowners who own the private roads adjacent to the BLM management area have expressed their opposition to allowing commercial transport of logs. Gilham Butte's forest has a higher intrinsic value as an intact ecosystem than it has at the mill.

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Forestry	Brennan	Brien	Elder Creek Oak Sanctuary	824	I have some caution around the language in the Forestry section. I really don't think there is a one-size-fits-all approach to a responsible relationship with land. It must be place-specific. So while "bringing sunlight to the forest floor to provide for the full array of habitats that sustain a broad diversity of native flora and fauna" may work in some forests, it surely won't in others. I firmly believe that it is through extended dependent relationship with land that appropriate actions for humans evolve, so yes, looking at all the information from the past is foundational, but we also have to look at the information that is present on the land but missing from journals and studies. And this seems like it happens through spending time with the place. That is a tough match for an entity like the BLM, so the Connectivity and Resilience themes are probably a good starting point. The Community Access and Development theme seems to be the norm of Federal land management for the last hundred years, and there are few (if any?) federally managed lands who have improved ecological integrity now compared to a century ago. So it is past time for an emphasis on protection and cautiously making amends for the wrongs of past mismanagement.
Forestry	De Cecco	Jorge	N/A	930	Leave any removed vegetation onsite to rebuild soil ---- don't burn it! That makes no sense. Only possible good use for burning removed vegetation is biochar - which retains carbon and can be used to rebuild soil Do not use removed trees commercially--that is just an incentive for the loggers to remove, remove, remove
Government-to-government consultation	Lienhard	John	N/A	32	This includes creating trail system connectivity to surrounding counties. Local groups and organizations have been working hard to develop new and existing recreation opportunities in Trinity County. Examples of this work can be found on both USFS and BLM lands as well as private lands in the Weaver Basin Trail System, Douglas City, and Ewing Reservoir in Hayfork. All of the effort to make these developments possible shows a tremendous amount of community support and involvement. I urge BLM to take notice of this effort and include the development of recreation facilities as a high priority in your current management plan update.
Government-to-government consultation	Williams	Laurel	The Pew Charitable Trusts	738	The landscapes that will be considered during this process include places that are important for Indigenous tribes in the region, including the Cahto, Karuk, Wintun and Yurok nations and the peoples represented by the Round Valley Indian Tribes. Input from these sovereign nations and communities will be critical during the NCIP planning process. We urge the BLM to conduct thorough and meaningful outreach and consultation to ensure the interests of both federally recognized and non-federally recognized tribes are understood and included in the planning process.
Government-to-government consultation	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In the DEIS, summarize the results of tribal consultation and identify the main concerns expressed by tribes (if any), and how those concerns were addressed. We also recommend identifying any protection, mitigation, and enhancement measures identified by tribes.
Government-to-government consultation	Gerdes	Jason	Environmental Protection Agency (EPA)	767	It is important that formal government-to-government consultation take place early in the scoping phase of the planning process to ensure that all issues are adequately addressed in the DEIS. The principles for interactions with tribal governments are outlined in the presidential "Memorandum on Government-to Government Relations with Native American Tribal Governments" (April 29, 1994) and Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments" (November 6, 2000). As a resource, we recommend the document Tribal Consultation: Best Practices in Historic Preservation ⁷ , published by the National Association of Tribal Historic Preservation Officers. EPA Region 9 has a robust tribal program. If you need assistance with consultation or updated tribal contacts, please contact John (JR) Herbst at (619) 235-4787 or herbst.john@epa.gov. ⁷ National Association of Tribal Historic Preservation Officers. May 2005. Tribal Consultation: Best Practices in Historic Preservation. Available at http://www.nathpo.org/PDF/Tribal Consultation.pdf .
Hazardous materials	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We request that BLM prioritize the cleanup of hazardous materials sites.
Houselessness	Law	Lance	N/A	863	My specific concern is the impact of the homeless population on this riparian corridor. In the eighteen years I have lived on the creek, I've been an ardent steward of this landscape. Cleaning trash, managing invasive blackberry and encouraging campers to pack up and leave the area. Last summer, 2021, a homeless couple set up camp on the island behind my house. I have to give them some credit for being good neighbor's, being quiet and keeping a low profile. That's not always the case with the un-housed population. After several requests on my part, asking them to leave, I contacted multiple agencies with complaints and no one did anything about it. During this time the trash and debris are piling up getting into the creek. Salmon start to run up the creek and the critters that are normally around for this important food source have been displaced by these campers. The weather starts to turn and I make one more appeal to them to move on, telling them that the island will flood with the first hard rain and that it will destroy their camp. I clearly state that in my opinion, they have committed a "Crime Against Nature" and will leave all this trash behind and that's what makes everyone so angry. Sure enough, it rains, camp is flooded, and the mess is left behind.
Impact Analysis	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In the DEIS, we recommend describing the threat to resources as a whole, presented from the perspective of the resource instead of from individual management activities. Identify how resources, ecosystems, and communities in the vicinity of the planning area have already been, or will be, affected by past, present, or future activities. The DEIS should also consider the combined impacts associated with these activities characterized in terms of their response to change and capacity to withstand stresses.
Impact Analysis	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In the DEIS, include and describe all connected actions (40 CFR 1501.9(e)(1)). The Council on Environmental Quality Regulations also require analysis of "reasonably foreseeable environmental trends and planned actions in the area." Analysis of impacts should also consider "effects that are later in time or farther removed in distance from the proposed action or alternatives."
Impact Analysis	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The evaluation should focus on resources of concern or resources that are "at risk" and/or are significantly impacted by the proposed planning and management activities before mitigation. Describing a suite of potential mitigation measures, under jurisdiction of BLM, project proponents, and others, can serve to alert other agencies or officials about potential protective measures that can be implemented.
Invasive, nonnative plants	Decker	Karie	Rocky Mountain Elk Foundation	31	Noxious and invasive plants are slowly replacing native forage for elk and other species. RMEF encourages the BLM to actively manage landscapes to control and reduce noxious weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Early detection and rapid response remain a critical component of effective weed management (Westbrooks 2004). Native plant communities provide the highest nutritional value for wildlife, thus RMEF encourages the use of native plant seed mixes in all restoration work.

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Invasive, nonnative plants	Willis	Dave	Soda Mountain Wilderness Council	760	Too much of the area has suffered from noxious weeds/invasive plants as a result of (at least) grazing by cattle and feral horses and off-road vehicle abuse. The RMP needs to recognize and deal with the serious issue of noxious weeds and invasive plants here.
Invasive, nonnative plants	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In DEIS, include measures that are consistent with Executive Order 13112 on Invasive Species. We suggest including any existing BLM direction for noxious weed management, a description of current conditions, and best management practices, which will be utilized to prevent, detect, and control invasives in the planning area. Discuss measures that would be implemented to reduce the likelihood of introduction and spread of invasive species within the proposed planning area. We encourage BLM to promote integrated weed management, with prioritization of management techniques that focus on non-chemical treatments first, and mitigation to avoid herbicide transport to surface or ground waters. Early recognition and control of new infestations is critical to stop the spread of the infestation and avoid wider future use of herbicides, which could correspondingly have more adverse impacts on biodiversity, water quality and fisheries.
Invasive, nonnative plants	Gutermuth	Brandt	Bureau of Reclamation	803	Invasive weeds are a problem in Trinity County and TRRP staff would appreciate the BLM working with locally effective, state-wide entities such as the California Invasive Plant Council (Cal-IPC) to inform and support successful techniques that have been used to slow the spread of invasive species throughout California (and the nation) and how these efforts have affected local conditions. When other methods are unlikely to be successful, direct application of herbicides to invasive plants (perhaps by girdling and injection, no pesticides) may be a site specific, cost -effective and appropriate tool for controlling invasive plants where needed. At a minimum change wording in opportunities for change to: "Consider site specific methods to control invasive species" after spread - Recommend adding "BLM will also use best management practices to achieve desired stands of native vegetation after disturbance (e.g., planting non-persistent species to hold disturbed ground while slower growing native plants become established."
Invasive, nonnative plants	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	Invasive plant management is recommended in burned or disturbed areas. Early detection and rapid response to control new infestations should be a priority, as well as ongoing monitoring and targeted treatments.
Land acquisition	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF recommends inclusion of plan components that seek opportunities to maintain or increase public land connectivity across BLM lands through land acquisitions, land transfers, etc. and prioritize such actions based on increasing public access, habitat connectivity, wildlife corridors, enhancement of recreational opportunities, etc.
Land acquisition	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF supports plan components recognizing that acquisition or conveyance land ownership adjustments should improve management of BLM lands by consolidating land ownership, providing public access to public lands, and conserving and enhancing resources.
Land acquisition	Simmons	Matthew	Environmental Protection Information Center	756	EPIC also supports the acquisition of parcels for purposes of protecting sensitive species and encouraging connectivity. In particular, connectivity of riparian and wildlife movement corridors should be a priority.
Land acquisition	Simmons	Matthew	Environmental Protection Information Center	756	Many BLM properties in the management area border privately held, but ecologically important areas. BLM should consider where it would be possible to purchase and protect those areas for the sake of greater ecosystem benefits. Renewal of the Land and Water Conservation Fund (LWCF) and its full funding by Congress presents the opportunity to identify and prioritize willing seller acquisitions of lands to connect existing public parcels and to preserve lands with high natural resource and public access and recreation values. Particular BLM Lands That EPIC Members Report Enjoying Recreating and viewing nature in - Cahto Peak Wilderness - Gilham Butte - Lacks Creek - Laraby and Butte Creek - Little Darby Nature Trail - Red Mountain Special Management Area - White Rock Creek - Siskiyou National Monument - Mal-el Dunes - Horseshoe Ranch Wildlife Area - Quartz Hill Local Stewardship - Jenny Creek Area of Critical Environmental Concern
Land acquisition	Willis	Dave	Soda Mountain Wilderness Council	760	In order to conserve/increase biological and recreational values, Redding BLM's 1993 RMP highlighted the need to acquire private lands from willing sellers west from the Horseshoe Ranch Wildlife Area (HRWA or "Horseshoe") to Interstate 5. However, despite at least one owner of a large acreage being a willing-seller, very few acquisitions, if any, have occurred - even though Redding BLM has disposed of hundreds (thousands?) of BLM lands in Siskiyou County. The '93 RMP "Horseshoe" priority acquisition area should be retained and enlarged to include lands south to the Klamath River and east to the Beaver Creek watershed (east of Fall Creek). The expanded acquisition area should be renamed the "Cascade-Siskiyou" acquisition area. Private lands in this area are suffering from increased development and degradation. Much of the Horseshoe acquisition area was tragically roaded and post-fire logged after the 2018 Klamathon fire - mugging the burn victim. This was/is especially tragic, given that much of the burned/logged/roaded private land was owned by a willing seller from whom BLM had not bought in years prior. Removal of Iron Gate Dam may create new opportunities for acquisitions from willing sellers - not only from private entities, but also from the public entity/entities who do now and/or will soon come to own (former) reservoir related lands.
Land acquisition	Cann	Bruce	N/A	770	Acquiring lands in the Gilham Butte area should be a priority to provide a trail and wildlife corridor from Humboldt Redwoods State Park to the King Range. Acquiring lands and/or easements to the Eden Valley area as well as the Elkhorn Ridge and South Fork Eel River Wilderness Areas should be a high priority as well.
Land acquisition	Cann	Bruce	N/A	770	Coastal tracts should be a high priority for acquisition. An example is the "Dog Ranch" on the Samoa Peninsula. The BLM has a rare opportunity of acquire and manage this unique land for resource protection as well a multiple recreation uses such as hiking, equestrian use, and overnight camping. Grant funds to complete environmental documents, development of a day use and camping area, trails, signing, and protective fencing could most likely be available through the State Coastal Conservancy. Management of the area could possibly be accomplished by a concessionaire with facility maintenance funds generated by camp fees.
Land acquisition	Ringgold	Paul	Save the Redwoods League	777	The League is also particularly interested in Corridor from the Redwoods to the Sea (area between King Range National Conservation Area and Humboldt Redwoods State Park). The League partners with BLM in this area and the administrative burden by both entities is robust and should potentially be reviewed for ways to consolidate ownership in this area. The League would be open to that proposal.
Land acquisition	Hanceford	Phil	The Wilderness Society	781	Battle Creek and Clear Creek restoration should be a priority. BLM should consider acquisition of new lands along key riparian corridors in the Trinity River, Sacramento River Bend area, and Iron Canyon area of the Sacramento River.

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Land acquisition	Hanceford	Phil	The Wilderness Society	781	The 1993 Redding and 1995 Arcata Resource Management Plans (RMPs) both include specific management direction to acquire more public lands in key areas and along eligible WSRs. Some of this direction was implemented and some was not. For example, the 1993 Redding RMP includes direction to acquire additional public lands related to the following ACECs and WSRs: - Shasta and Klamath River Canyons ACEC - Upper Klamath River - Jenny Creek ACEC - Trinity WSR - Clear Creek Greenway/Eligible WSR - Sacramento Island ACEC - Sacramento River Bend ACEC/Eligible WSR - Battle Creek Eligible WSR - Deer Creek ACEC/Eligible WSR - Forks of Butte Creek ACEC/Eligible WSR. Likewise, the 1995 Arcata RMP includes direction to acquire additional public lands related to the following ACECs and WSRs: - Lacks Creek Watershed ACEC/Eligible WSR - South Fork Eel Watershed ACEC/Eligible WSR tributaries - Red Mountain RNA/ACEC/Cedar Creek Eligible WSR - Elder Creek RNA/ACEC/Eligible WSR - Gilman Butte RNA/ACEC - laqua Butte RNA/ACEC We encourage BLM to continue this direction and expand it in the NCIP, especially given that, for the first time ever, the Land and Water Conservation Fund is fully funded by Congress.
Land acquisition	Juliana	Kate	N/A	804	In the 1990s, local conservationists envisioned a wildlife and recreational corridor that could lead from the redwoods of the lower South Fork Eel River and the Humboldt Redwoods state park lands, across the lands of Gilham Butte and down the ridge, crossing the Mattole River and entering the lands protected in the King Range National Conservation Area. That vision has not been fulfilled. Yet the existence of the idea, and the acquisition of parcels and transfer to BLM by Save-the-Redwoods League in furtherance of that vision, is another link between the BLM lands of Gilham Butte and the BLM lands of the King Range. A few short miles separate these two important management areas. Gilham Butte's natural association is with the King Range, not with lands on the other side of the Coast Range, let alone the Sierra Nevada.
Land acquisition	Karem	Richard	N/A	805	I would like to request consideration of some land, adjacent to BLM holding at Swasey Recreation Area near Redding, CA in you area for potential acquisition. This land (two 40+ acre parcels which I own) abuts the NW corner of the recreation area. The BLM actually uses a portion of this property in their confidence course for firefighters historically. Also there are numerous developed trails in the recreation area which could easily be expanded both across BLM land to the W and into NPS land on this property so there is considerable recreational potential. I had considered donating this land either during my life or in my will or swapping it for remainder land if BLM is interested in this. Including this property in your planning would facilitate this should you feel it would be desirable. The AP numbers in the County of Shasta, CA are 041-620-005 and -006.
Land acquisition	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We encourage consolidation of BLM lands into larger blocks connecting to other federal lands (NPS and USFS) to aid in wildlife habitat connectivity and to reduce the potential for additional habitat fragmentation and habitat loss due to climate change, future development, or other human activities.
Land acquisition	Evenson	Michael	N/A	813	I also recommend that key conservation areas, such as found on Rainbow Ridge, those with intact landscape features, tall nesting conifers, older hardwood patches, be purchased and managed for long-term ecological health and carbon sequestration.
Land acquisition	Ledger	David	Shasta Environmental Alliance	864	Redding Area Lands: Oregon Gulch in southwest Redding: Continue to acquire lands adjacent to this area that allow greater access to this City of Redding-owned 380 acres of natural habitat. This would be an important addition to this area.
Land tenure	Simmons	Matthew	Environmental Protection Information Center	756	We urge BLM to continue following current disposal criteria. Publicly held lands are a public good. BLM lands in the North Coast region provide important outdoor recreation, wildlife, and other benefits that would be jeopardized if those lands were disposed of. Any lands that are disposed of must maintain the same level of protection under their new ownership. However, we do encourage BLM to investigate the feasibility of returning lands to Native American Tribes.
Land tenure	Morris	Bob	S.A.F.E., and a member of the Weaverville Community Forest Steering Comm.	764	It only makes sense to reclassify the BLM lands within the WCF from 'available for disposal' to something that reflects the long term agreement we have between the BLM and the WCF.
Land tenure	Hanceford	Phil	The Wilderness Society	781	BLM lands that are ecologically important for native fish should not be disposed of
Lands with wilderness characteristics	Not Provided	Not Provided	N/A	28	As a stakeholder, I urge the Bureau of Land Management to protect all areas that meet the definition of Land with Wilderness Characteristics; Protect all streams that are eligible for Wild and Scenic River protection and improve management of existing Wild and Scenic River segments managed by the BLM; and Protect and restore all special habitats, including old-growth conifer forests, oak woodlands, native grasslands, streams with at-risk salmon and steelhead populations, and areas with rare or unique plant species.
Lands with wilderness characteristics	Williams	Laurel	The Pew Charitable Trusts	738	Parallel to the BLM's inventory, a citizen's group (California Wilderness Coalition) undertook a comprehensive inventory of LWCs across the field offices, finding nearly 49,000 acres of lands that meet the LWC definition across eight units. Closely following the protocols and criteria provided for by BLM Manual 6310, this citizen effort included numerous inventory trips over a two-year period. These citizen inventory reports were submitted to BLM and consisted of documents for each area, including maps, geotagged photos with narrative descriptions, and narrative reports for each area. We would like to incorporate California Wilderness Coalition's LWC inventory by reference in our comments. This citizen group assessment adheres to the inventory guidelines established under Federal Land Policy and Management Act and meets the minimum standard for wilderness characteristics inventory as defined by BLM manual 6310, Conducting Wilderness Characteristics Inventory on BLM Lands. This citizen inventory constitutes new information and obligates the agency to assess the citizen findings and, as appropriate, revise the agency's existing LWC inventory (see 6310.06.A.3). Recommendation: The citizen LWC inventory for the Arcata and Redding field offices meets the minimum standard defined by BLM Manual 6310; therefore, the BLM must assess and respond to this information prior to the development of the Draft RMP, including the incorporation of changes, as appropriate, to the agency's LWC inventory.

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Lands with wilderness characteristics	Williams	Laurel	The Pew Charitable Trusts	738	Manual 6320 requires BLM to consider lands with wilderness characteristics in land use planning, both in evaluating the impacts of management alternatives on lands with wilderness characteristics and in evaluating a range of alternatives that would protect those values. Examples of management prescriptions that will most effectively protect lands with wilderness characteristics in the NCIP planning area include, but are not limited to, the following: - Recommend a withdrawal from mineral entry; - Close to leasing or allow leasing only with no surface occupancy with no exceptions, waivers, or modifications; - Designate as right-of-way exclusion areas; - Close to construction of new roads; - Designate as closed to motor vehicle use, as limited to motor vehicle use on designated routes, or as limited to mechanized use on designated routes; - Close to mineral material sales; - Designate as Visual Resource Management Class I or II; - Restrict construction of new structures and facilities unrelated to the preservation or enhancement of wilderness characteristics or necessary for the management of uses allowed under the land use plan; and/or - Retain public lands in federal ownership. Recommendation: For lands the BLM identifies with wilderness characteristics in the NCIP, we urge the agency to apply appropriately strong management prescriptions that will ensure wilderness characteristics are maintained over the lifespan of this planning decision.
Lands with wilderness characteristics	Simmons	Matthew	Environmental Protection Information Center	756	EPIC strongly supports the connectivity and resilience theme. Lands with these characteristics must be preserved so that they can be designated as wilderness areas in the future. In this time of climate and biodiversity crises preserving lands for future wilderness designation is more important than ever. These lands also play an important role in connecting existing wilderness areas which they will no longer do if extraction is allowed.
Lands with wilderness characteristics	Griffin	Adrian	N/A	763	Please manage lands with wilderness characteristics to preserve their scenic and wildlife values and their natural quiet. The Eden Creek area is particularly important and has the potential to become a designated wilderness.
Lands with wilderness characteristics	Castro	Linda	California Wilderness Coalition	778	Eight LWC reports (see attachments submitted on CARA)
Lands with wilderness characteristics	Hanceford	Phil	The Wilderness Society	781	Additionally, Instruction Memorandum 2013-106 instructs that BLM field offices should finalize wilderness characteristics inventory and make findings available to the public as soon as practicable after their completion and before the inventory data is used to inform decisions.
Lands with wilderness characteristics	Hanceford	Phil	The Wilderness Society	781	BLM has the authority and obligation to inventory and protect wilderness-quality lands in land use planning processes. Under FLPMA, the Interior Department is directed to maintain current inventories of the resources it manages - including areas that qualify for wilderness designation. Under section 202 of FLPMA, once such inventories have been completed, the Department can and should designate lands as WSAs to ensure their durable conservation management. In the past, the BLM has taken the policy position that it may no longer designate new WSAs. This position is contrary to the plain language of FLPMA and decades of past practice where BLM established WSAs pursuant to section 202 across the west, including in California, and should no longer be followed. b. General authorities, inventory and management of LWCs Section 201 of FLPMA, 43 U.S.C. § 1711 (a), requires the BLM to maintain a current inventory of its resources, including regularly updating this inventory. Section 202 of FLPMA 43 U.S.C. § 1712 (a) requires the BLM to incorporate this information into developing, maintaining and updating land use plans that set out management for different tracts of land and types of resources. These resources include lands with wilderness characteristics. As the U.S. Court of Appeals for the Ninth Circuit held (Case No. 05-35931, Oregon Natural Desert Association v. Bureau of Land Management), "wilderness characteristics are among the 'resource and other values' of the public lands to be inventoried under § 1711. BLM's land use plans, which provide for the management of these resources and values are to 'rely to the extent it is available, on the inventory of the public lands, their resources, and other values.'" 43 U.S.C. § 1711 (c) (4). Instruction Memorandum (IM) 2011-154 and Manuals 6310 (Conducting Wilderness Characteristics Inventory on BLM Lands) and 6320 (Considering Lands with Wilderness Characteristics in the BLM Land Use Planning Process) further outline the requirement for and process associated with evaluating lands with wilderness characteristics. The Instruction Memorandum directs BLM to "conduct and maintain inventories regarding the presence or absence of wilderness characteristics, and to consider identified lands with wilderness characteristics in land use plans and when analyzing projects under [NEPA]." Manual 6310 requires BLM to maintain an updated inventory of lands with wilderness characteristics, prior to land use planning. Manual 6320 requires BLM to consider lands with wilderness characteristics in land use planning, both in evaluating the impacts of management alternatives on lands with wilderness characteristics and in evaluating a range of alternatives that would protect those values. As defined in BLM Manual 6310, lands with wilderness characteristics must meet three basic criteria. First, areas must be 5000 acres or more of contiguous public land without the presence of roads, as defined in the Manual. Second, they must be affected primarily by the forces of nature, and any work of human beings must be substantially unnoticeable. And third, areas must provide outstanding opportunities for solitude and/or primitive and unconfined recreation. Additionally, lands with wilderness characteristics may possess supplemental values that further enhance the area. The BLM is instructed to disclose its inventory of lands with wilderness characteristics prior to the publication of the Draft Resource Management Plan, as this inventory is intended to assist the agency and the public to inform public input regarding proposed management decisions that affect these areas.
Lands with wilderness characteristics	Hanceford	Phil	The Wilderness Society	781	Manual 6320 requires BLM to consider lands with wilderness characteristics in land use planning, both in evaluating the impacts of management alternatives on lands with wilderness characteristics and in evaluating a range of alternatives that would protect those values. Examples of management prescriptions that will most effectively protect lands with wilderness characteristics in the NCIP planning area include, but are not limited to, the following: - Recommend withdrawal from mineral entry; - Close to leasing or allow leasing only with no surface occupancy with no exceptions, waivers, or modifications; - Designate as right-of-way exclusion areas; - Close to construction of new roads; - Designate as closed to motor vehicle use, as limited to motor vehicle use on designated routes, or as limited to mechanized use on designated routes; - Close to mineral material sales; - Designate as Visual Resource Management Class I or II; - Restrict construction of new structures and facilities unrelated to the preservation or enhancement of wilderness characteristics or necessary for the management of uses allowed under the land use plan; and/or - Retain public lands in federal ownership.

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Lands with wilderness characteristics	Hanceford	Phil	The Wilderness Society	781	Parallel to the BLM's inventory, CalWild undertook a comprehensive inventory of LWCs across the field offices, finding nearly 49,000 acres of LWCs across eight units. Closely following the protocols and criteria provided for by BLM Manual 6310, this citizen effort included numerous inventory trips over a two year period. CalWild submitted these citizen inventory reports to BLM during the previous (2017) scoping period, on August 21, 2021, and are re-submitting them concurrently with these comments. The reports pertain to the following areas: Beegum Creek LWC, Bohemotash LWC, Eden Valley LWC, English Ridge LWC, Gilham Butte LWC, North Fork Eel Proposed Wilderness Additions, Salt Creek and Trinity Alps Proposed Wilderness Additions. Those inventory reports consist of documents for each area, including maps, geotagged photos with narrative descriptions, and narrative reports for each area and are incorporated herein by reference. The CalWild assessment adheres to the inventory guidelines established under FLPMA and meets the minimum standard for wilderness characteristics inventory as defined by BLM Manual 6310, Conducting Wilderness Characteristics Inventory on BLM Lands. This citizen inventory constitutes new information and obligates the agency to assess the citizen findings and, as appropriate, revise the agency's existing LWC inventory (see 6310.06.A.3).
Lands with wilderness characteristics	Hanceford	Phil	The Wilderness Society	781	We recommend that the BLM include appropriately strong management prescriptions to protect areas that the agency has identified to contain wilderness characteristics in the NCIP planning area. This will most effectively preserve the naturalness and outstanding opportunities for solitude and/or primitive recreation of those lands.
Lands with wilderness characteristics	Baker	Judith	N/A	802	Protect all areas that meet the definition of Land with Wilderness Characteristics
Lands with wilderness characteristics	Ledger	David	Shasta Environmental Alliance	864	Continue to preserve areas of Land with Wilderness Characteristics, Wilderness Protection Areas and acquire adjacent lands for further protection as they become available. The Trinity Alps is an area that still needs protection from activities such as logging on adjacent private lands and inholdings. We also recommend other areas for enhanced protection, such as Begum Creek area in Tehama County.
Livestock grazing	Spotts	Richard	N/A	3	BLM should suspend or at least greatly reduce the level of commercial livestock grazing during this extreme drought. Such grazing should be ended in allotments that have continually failed to meet BLM's minimum standards for rangeland health. Those existing allotments and grazing permits should be cancelled, and any vacant allotments remained as such to allow nature to heal.
Livestock grazing	Cartier	Emmett	N/A	9	Prescribed grazing should be planned for hazardous fuel reduction, due to Douglas fir trees encroaching rapidly on former grasslands along the hilltop in Section 4 along Upper Thomas Road. Nearby cannabis grows have increased dramatically in number, and some have incurred spontaneous combustion of waste materials, or other fire hazards such as from use of diesel fuels. Former land uses had included cattle grazing, but native grasses still predominate in open grasslands.
Livestock grazing	Not Provided	Not Provided	N/A	16	BLM RMP decisions should be up-to-date, based on the best available science, and consistent with the urgent need for reforms to effectively respond to the worsening climate and extinction crises. For example, commercial livestock grazing contributes to climate change and causes many other direct, indirect, and cumulative adverse resource impacts. BLM has traditionally been too deferential to ranchers, improper advocates for grazing, and arbitrarily dismissive of serious grazing impacts. This pattern must change. Please review the two related attachments and include them in this RMP planning and NEPA administrative record. BLM should identify allotments that should no longer be available for future livestock grazing and then close them in the revised RMP.
Livestock grazing	Decker	Karie	Rocky Mountain Elk Foundation	31	Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. RMEF encourages the BLM to employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife. In addition, RMEF recommends adding plan components to provide forage and residual cover for wildlife (especially following management activities or natural disturbances), and to adjust stocking rates in drought conditions when vegetation is slow to recover.
Livestock grazing	Simmons	Matthew	Environmental Protection Information Center	756	Livestock grazing on public lands is associated with impacts to water quality and seasonal quantity, stream channel morphology hydrology, riparian zone soils, instream and streambank vegetation, and aquatic and riparian wildlife.36 BLM should look for ways to reduce grazing on its lands in the project area. Particularly where permittees have a history of causing negative environmental impacts and in riparian areas. This is particularly important because livestock grazing along streams containing anadromous salmonids is particularly harmful to fish populations. 36 Belsky, A.J. et.al. 1999. Survey of livestock influence on stream and riparian ecosystems in the western United States. Journal of Soil and Water Conservation. Vol 54 Issue 1, p. 419.
Livestock grazing	Willis	Dave	Soda Mountain Wilderness Council	760	BLM is notorious for functionally ignoring grazing that does not meet BLM's own rangeland health standards. The RMP needs to direct a competent ecological study of grazing impacts here - conducted by qualified scientists; not just BLM range techs - and hold grazing lessees accountable for not meeting BLM's own rangeland health standards by reducing AUMs and retiring grazing allotments. Most BLM grazing allotments north of the state line in this area have been retired.
Livestock grazing	Jorgenson	Devon	North Coast Regional Water Quality Control Board	768	The Federal Lands Permit may require federal agencies to comply with certain qualitative and/or quantitative standards for livestock grazing activities. Will the NCIP include qualitative and/or quantitative standards for livestock grazing activities?
Livestock grazing	Amsden	Liz	N/A	793	And just a quick response on the grazing question. It may reduce undergrowth that may contribute to forest fires, but it is incredibly destructive to indigenous wildlife and herbs and insects
Livestock grazing	Rankin	James	French gulch Mining District	797	I do not agree with any further restrictions on the grazing rights. One they pay for that right, and that is a great source of fuel reductions. And it's kind of ironic that a lot of the group that are opposed to grazing rights are very much in support of the absolutely incredibly intensive grazing used where they pay someone to bring boats and virtually mow every living plant down to the ground, but that seems to be acceptable, but having somebody pay for lease and do a much less intensive though important fuel reduction is something that I think needs to be looked at closely.

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Livestock grazing	Rougle	Wolfgang	N/A	891	Maybe I missed it, but is there anything in here about grazing? In general, when I see a destructive activity on public land, it's most likely to be grazing. (Although I don't have specific examples of grazing damage in any of the few BLM parcels I've visited in the Redding/Arcata FO areas.) I would be eager to know if any changes are contemplated to grazing on BLM lands -- or even, if the status quo is proposed to be maintained, it would be good to see a discussion of that too.
Locatable	Zucco	Cassie	N/A	14	Will existing mining claims be allowed to continue? Will all these lands also be closed to metal detecting for gold?
Locatable	Zucco	Cassie	N/A	14	Will Small Scale Miner's still be allowed to prospect where they have been doing so since gold was first discovered here in Shasta County by Pierson B Reading?
Locatable	Zucco	Joseph	N/A	19	Any area you change into a mineral withdrawn area means that not only will miners & prospectors still use it, but it will be used by many at a time (like a group) not just by one or two miners if it is claimable. This action can devastate an area. As a miner I would rather see an area claimable, as we take care of them, paying our maintenance fees, cleaning up the area etc. If an area is in a mineral withdrawn area, none of that happens and the area can be left trashy, overworked and with no regulation. Consider mining and miners as a group like your hikers, campers, hunters, bikers etc. We spend ALOT of money locally and statewide paying our fees, taking care of our claims and the lands, unlike the bikers or hiker who pay no fees.
Locatable	Rankin	Jim	French gulch Mining District	21	"Limit or direct activities such as metal detecting that are otherwise allowed, but result in the damage and looting of historic properties." The French Gulch Mining District and the East Fork Clear Creek Mining Districts as allowed under the existing mining laws have recognized the use of metal detecting devices as an approved process for mining and prospecting. The Redding BLM was informed of this at the time the districts approved the Resolution. Metal detecting for gold is a very productive method of finding gold and indicating areas for potential claim filing. It should not be restricted. In the case of damage to historic sites, I feel that the answer is not restriction, but public outreach and education. I have provided the Redding BLM with my recent educational presentation to the Shasta Miners regarding this topic. The presentation is now included in all of our member packets. The same presentation will soon be given to the Nor Cal Prospectors. I urge you to not restrict the legitimate use of metal detectors, but to strive to provide the public with clear guidelines regarding the laws dealing with antiquities on public lands and cite the scofflaws. Many of the people detecting for antiquities do not know they are doing anything wrong. The metal detector is a tool, not an action. Looting is an action. It shows a bias when a metal detector is linked to looting. Others tools can be used to loot. It's not the tool it is the action of a person uneducated about the law.
Locatable	Rankin	Jim	French gulch Mining District	21	Reviewing the documents from the prior effort to produce this plan I note that many stakeholder groups have been consulted. I do not find where the mining claim holders or any of their associations have been consulted as stakeholders. The claim holders have a vested interest in the management of these lands. As the BLM LAND USE PLANNING HANDBOOK - H-1601-I states. "I. Locatable Minerals Land use planning decisions. For lands that are open to the location of lode, placer, and mill claims, the claimant has statutory authority under the mining laws to ingress, egress and the development of those claims. This authority means that those areas open to mineral entry for the purpose of exploration or development of locatable minerals cannot be unreasonably restricted." As you can see the miners are very involved stakeholders and continuing with the development of this plan, without consulting with any of the mining associations or mining districts within the areas being considered I feel is an important omission.
Locatable	Wyman	Richard	N/A	25	I would like to voice my support for continued access for gold panning, sluicing and detecting. There is a picture of an old gold panner on my drivers license and it would be wrong to prevent such a historically important activity.
Locatable	Cattanach	Kari	N/A	27	I am asking that the new NCIP include the right to metal detect and pan.
Locatable	Ciarrocchi	Barbra	N/A	769	Metal detecting is currently allowed in the Swasey Recreation Area, and I hope to see this activity continued there and in other areas as well. Access to "landlocked" BLM (illegible) should have access routes found for public entrance and not have (illegible) with private properties. I would hope to keep both Mule Redge + Swasey open to hiking, biking, and horses.
Locatable	Weathers	Brandon	N/A	792	I would also encourage that all forms of mining be allowed including dredging and metal detecting. Mining is the history of California and I hope it can have a place in California's future. I ask that you help in keeping thousands of miners working.
Locatable	Weathers	Brandon	N/A	792	I do not think there should be any permit or fee, and if there must be regulations they should be similar to the ones already established, and that any regulations should be based on real science done by independent companies with out bias and that you work with the miners to establish the regulations. One of my mining claims I have been blocked reasonable access to my claim that I pay real property tax on because BLM has welded the gate shut and dug giant ditches that are hard to cross even on food especially with the equipment needed to mine and that is just one example.
Locatable	Amsden	Liz	N/A	793	My most challenging ask, especially in light of early discussion, is to take subsurface mineral profiteering out of the equation entirely because, obviously, people have bought and sold these rights based on prior assumptions. However, the world and our view of man's footprint on our planet has changed significantly since the 1860s. I worked in gold country north of Nevada city a few years ago and 100 years after the fact that still looks like a lunar landscape. The extraction and processing transport, housing workers that come up with these are all incredible perspective.
Locatable	Rankin	James	French gulch Mining District	797	On the other front, the many of the mining issues, I think, need to be clearly addressed, because there is a preexisting right there and, as I believe was pointed out at the open house meeting previously. When you put an area in the mineral reserve to where there is no mining claimants there, then all of the public goes there many of them uneducated on proper practices, and you can get some pretty destructive practices. Whereas, if you have a mining claim holder there that's the sole person, you have to address and they're generally somebody that is aware of proper practices and doesn't destroy the landscape.
Locatable	Ciarrocchi	Mitch	SMPA	830	Keep in place current regulations for prospecting (panning, sluicing) Over regulating any activity does no good. The current regulations governing prospecting do a great job of protecting our wildlife and environment. Many prospectors are hunters and fishermen that are great stewards of the outdoors and want a healthy environment for everybody to enjoy. Allow High Banking High Banking is a technique to process material similar to a sluice but removed from the river or stream not allowing the processed material or silt back into the flowing waters. The discharged water can be ran into a gravel bed filtering out sand, mud and silt. This is a very clean way of processing material with little impact on the stream. Metal Detecting Again over regulating any activity does no good. The Antiquities Act of 1906 pretty much covers it."

Comment Code Name	Last Name	First Name	Organization Name	Letter #	Input Text
Locatable	King	John	NorCal GPAA Gold Prospectors - Redding Chapter	856	Prospecting takes many forms. Metal detecting is one of the fastest and most environmentally friendly ways to have the least impact. Picking up trash is not looting! As miners we are often threatened with confiscation, huge unrealistic fines & jail. Saving California history is important. As a 24 year educator, I have revered and taught the respect of history. Other countries have solved this problem of what significant archeological discovery and treasure hunting is. They have a dollar value amount threshold for reporting to authorities (example over \$250 needs to be reported.)As part of this plan we suggest that BLM work with local and national prospecting clubs like Shasta Miner's & Prospector's Assoc., GPAA, AMMRA, NorCal GPAA Gold Prospectors, - Redding Chapter, New 49ers,and PLP ect. to develop this kind process for finding, reporting and saving significant archeological sites. I volunteered once with the Redding BLM & Shasta college to survey and excavate a 1849 mining site some years ago. It was limited to just a few people. This kind of activity should be implemented in this plan but on a more public and larger scale. prospecting & mining clubs should be included as significant partners with this plan.
Locatable	King	John	NorCal GPAA Gold Prospectors - Redding Chapter	856	Yet another problem with this plan is the intentional use of the term "Recreational Mining." Mining may be recreational; however federal mining does not restrict mining and prospecting to only recreation. This plan and use of the term "Recreational Mining" is a work around to restrict or outlaw mining in the North State. What safe guards are contained in this plan to ensure that miners &prospectors can find, use, & extract valuable minerals?
Locatable	King	John	NorCal GPAA Gold Prospectors - Redding Chapter	856	The other problem is the interpretation of looting of archeological sites. Prospecting takes many forms. Metal detecting is one of the fastest and most environmentally friendly ways to have the least impact. Picking up trash is not looting! As miners we are often threatened with confiscation, huge unrealistic fines & jail. Saving California history is important. As a 24 year educator, I have revered and taught the respect of history. Other countries have solved this problem of what significant archeological discovery and treasure hunting is. They have a dollar value amount threshold for reporting to authorities (example over \$250 needs to be reported.)As part of this plan we suggest that BLM work with local and national prospecting clubs like Shasta Miner's & Prospector's Assoc., GPAA, AMMRA, NorCal GPAA Gold Prospectors - Redding Chapter, New 49ers,and PLP ect. to develop this kind process for finding, reporting and saving significant archeological sites. I volunteered once with the Redding BLM & Shasta college to survey and excavate a 1849 mining site some years ago. It was limited to just a few people. This kind of activity should be implemented in this plan but on a more public and larger scale. prospecting & mining clubs should be included as significant partners with this plan.
Locatable	King	Karen	Shasta Miners& Prospectors Asociation	858	Prospecting takes many forms. Metal detecting is one of the fastest and most environmentally friendly ways to have the least impact. Picking up trash is not looting! As miners we are often threatened with confiscation, huge unrealistic fines & jail. While homeless people trash and destroy vast areas and water ways. As part of this plan we suggest that BLM work with local and national prospecting clubs like Shasta Miner's & Prospector's Assoc., GPAA, AMMRA, NorCal GPAA Gold Prospectors, - Redding Chapter, New 49ers, and PLP act. Prospecting & mining clubs should be included as significant partners with this plan.
Locatable	McCracken	David	The New 49'ers Prospecting Association	874	I do understand the concern about uncovering historically-valuable objects. There are already laws on the books that make hunting for artifacts against the law. If this is a concern, the language about metal detectors should be clear that the concern is about artifacts; but that the use for legitimate mineral prospecting should be allowed. And the same should apply to hand-prospecting that is considered "insignificant" by U.S. Forest Service regulations.
Locatable	McCracken	David	The New 49'ers Prospecting Association	874	I have been under the impression that BLM and USFS have been working on adopting the same or similar regulations having to do with mineral discovery on the public lands. Adopting a plan that would eliminate hand-mining activities, including with the use of metal detectors, would not be a step in this direction. Not to mention that the regulations would not be consistent with federal law.
Locatable	Rankin	Emily	Shasta Miners and Prospectors Association	887	It appears that a lot of the areas being looked at are areas that miners use for metal detecting for nuggets and prospecting with gold pans. These areas should include these activities. Access should not be blocked with boulders. Access should be allowed. I am the Treasurer for a local mining organization with over 200 memberships, mostly being family and senior memberships. It is imperative that we are allowed to continue doing the activities that this state was founded on. If you have concerns about metal detecting instead of closing access to areas, providing education to the public would be a better solution. Our organizations spends a lot of time educating on all areas of mining. The miner who has a legal mining claim should not be blocked from access to his claim, which is a legal right. It concerns me that bikers seem to get a higher priority and when this occurs a lot of times easy access for the miner is blocked by boulders or a longer distance from where you can park to the actual access to water. This should be avoided. Public Lands should be enjoyed by the people for many outdoor activities.
Locatable	Rankin	James	Shasta Miners/ nor cal Prospectors/ French Gulch - East Fork Clear Creek mining Districts	888	Any further withdrawal of lands from mineral entry either way through ACEC's, wild and scenic rivers or wilderness designations must include consultation with the mining groups as stakeholders. If not the withdrawals may illegitimate under the terms of FLMA. The lower clear creek withdrawal has not met this requirement and may be invalid.
Minerals	Zucco	Cassie	N/A	14	More and more land is becoming inaccessible to our older folks, veterans and our disabled. As a Mining gear store owner I hear so many stories from people who can no longer access their claims, property or hunting areas due to lands being closed. A lot of those people have had long standing family tradition to hike, hunt, fish horseback ride, mine, metal detect & camp. They feel they are being pushed aside for those of the younger, wealthier generations who have e-bikes, or motorbikes etc. From what I understand, if this plan goes thru, my business will be shut down, as I cater to the miners, both large and small scale, and the metal detectorists. My business is not the only one that will go under here in California. You will be taking away not only my income, but the money that the small scale miners also receive when they sell their gold. Do you know that many of the homeless folk around Shasta & Siskiyou Counties sell the gold they find to buy their food?
Minerals	Simmons	Matthew	Environmental Protection Information Center	756	Mineral leasing should not be allowed in proposed ACECs.

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Minerals	Hanceford	Phil	The Wilderness Society	781	Salt Creek near Redding should not be allowed to have suction dredge mining activities.
Mitigation and Monitoring	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The proposed NCIP will impact a variety of resources for an extended period of time. As a result, we recommend that the plan be designed to include an environmental inspection and monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. In the DEIS, describe the monitoring program and how it will be used as an effective feedback mechanism (i.e., adaptive management) so that any needed adjustments can be made to the NCIP to meet environmental objectives throughout the life of the plan. We also recommend that the DEIS describe a mechanism to consider and implement additional mitigation measures.
Mitigation and Monitoring	Smith	Vera	Defenders Of Wildlife	812	Monitoring requirements. These should be tied to evaluating if desired conditions are being met (or moved toward) for ecosystems and at-risk species. The monitoring program should identify indicators for evaluating ecological conditions and at-risk species and should establish thresholds that if approached or crossed trigger mandatory reconsideration or corrective actions. To make the workload manageable, BLM in the RMP can identify with scientific rationales focal(7) and at-risk species that are good indicators of ecosystem health and surrogates for multiple at-risk species. The RMP should require that monitoring data and analysis are made public annually.
Other laws	Zucco	Cassie	N/A	14	Will this plan supersede the General Mining Law of 1872, and take away even more of our rights?
Other laws	Rankin	Jim	French gulch Mining District	21	In the plan there are quite a few references to moving lands into restricted mineral entry status. This is proposed by placing areas into restricted mineral entry status, placing them in ACEC's or entry into Wild and Scenic River Status. Myself and the groups I represent oppose this. The mining laws of the United States are clear that it is a priority for the development of mineral resources on the public lands. While recreation and preservation of natural areas are beneficial, they are subordinate to mining. Again we oppose further removal of lands from being open to mineral entry. In some instances, this may result in a "taking" of a claim owners property. If this happens, the BLM should be held liable to compensate the claim holder for his losses, due to the "taking" of his property.
Other laws	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF recommends inclusion of the recent Bipartisan Infrastructure and Jobs Act and subsequent Department of the Interior Wildfire Risk Five-Year Monitoring, Maintenance, and Treatment Plan (2022) be incorporated in this RMP and future project planning.
Other laws	Karath	Lander	National Audubon Society	755	In addition to its obligations to special status species including under the Endangered Species Act, we also remind the BLM of its obligations under the Migratory Bird Treaty Act (MBTA). The MBTA provides that "it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill . . . any migratory bird, any part, nest, or egg of any such bird . . . 16 U.S.C. § 703(a). Migratory birds protected by the Act are listed in 50 C.F.R. § 10.13. The term "take" is defined in regulations as "pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to pursue, hunt, shoot, wound, kill, trap, capture, or collect." For almost 100 years, the MBTA has held entities responsible for "incidental take," where deaths may occur as a result of otherwise lawful activities. The MBTA provides a critical tool for accountability through enforcement of the law by issuing penalties in egregious cases and providing a key incentive to avoid harm to migratory birds.
Other laws	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Discuss the plan's consistency with existing laws and regulations, including the Migratory Bird Treaty Act.
Other laws	Poe	Shannon	American Mining Rights Association (AMRA)	774	RS2477, a subpart of the mining act of 1866 grants access to the public lands. This is the intent of congress and they felt so strongly about that, they made it a grant which was again recognized with the passage of FLPMA so as to not interfere with this granted right of access for any roads predating the 1976 passage. The proposal being put forth strips that access for the public, especially for the disabled, eliminates the ability to "prospect" for a new valuable mineral discovery and mining claim. Requiring someone to walk in, instead of using an existing RS2477 route is by definition an "undue burden" considering the weight of equipment one uses to prospect. We request the agencies justification and legal reasoning for closing RS2477 roads.
Other laws	Not Provided	Not Provided	BlueRibbon Coalition	787	The Administrative Procedures Act is important to a planning process such as the development of this plan, because this statute makes it clear that agency actions that are both contrary to "the constitutional right, power, privilege, or immunity;" or "in excess of statutory jurisdiction, authority, or limitations, or short of statutory right must be held unlawful." The plan should acknowledge these important statutory and constitutional provisions.
Public health and safety	Simmons	Matthew	Environmental Protection Information Center	756	Best to close rarely used roads so that people can't access them to illegally dump things. Abandoning those roads will make the forest safer.
Public health and safety	Simmons	Matthew	Environmental Protection Information Center	756	Closing areas during peak fire season is another strategy that can reduce the risk of fires being started by visitors.
Public health and safety	Simmons	Matthew	Environmental Protection Information Center	756	Keeping roads that are essential for evacuation clear is important. Efforts should focus on those roads and not roads that dead end in the forest and are not essential for evacuation.
Public health and safety	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	Hazard tree management should be prioritized along utility right-of-way corridors and for public safety in developed areas.

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Public health and safety	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	Abandoned mine lands have become exposed in the post-fire environment. We recommend mitigating these safety hazards, while ensuring the protection of historic resources and wildlife habitat.
Public outreach	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Present opportunities for affected communities to provide input into the NEPA process. In the DEIS, include information describing what was done to inform these communities about the plan and the potential impacts it will have on their communities (notices, mailings, fact sheets, briefings, presentations, translations, newsletters, reports, community interviews, surveys, canvassing, telephone hotlines, question and answer sessions, stakeholder meetings, and on-scene information), what input was received from the communities, and how that input was utilized in the decisions that were made regarding the plan.
Public outreach	Poe	Shannon	American Mining Rights Association (AMRA)	774	Mining claim owners are true stakeholders and to our knowledge and from our investigation have not been contacted about this. We certainly were not. Mining claims are "real property in every sense of the word" (USA v Shumway, Circuit) and access is "granted" by the mining acts. Mining is not recreational and in most cases and counties in the state, claim owners pay property taxes on their claims on an annual basis. So we can be clear, mining claim owners are true stakeholders and require, by law to be notified as would someone who owns their residence in the proposed plan. As the BLM, the agency could perform a simple mining claim search in their own claims database (MLRS) and notify these real property owners of the plan. We request an explanation of why these stakeholders have not been notified and what the plan is to notify them.
Public outreach	Rankin	James	French gulch Mining District	797	In the plan it does mention that there are areas that they want to consider for withdrawal from mineral development. In the BLM land use planning handbook it says that any areas that are considered for withdrawal for mineral development have to go through public review and hearings and I would like to make sure that that takes place. I was unaware of any hearings and public review on the lower Clear Creek withdrawal, which is a pretty significant withdrawal. So, I hope that if that does take place the hearings and public comments are made readily available to everyone.
Purpose and need	Spotts	Richard	N/A	1	For this NOI, I recommend that BLM use an agency purpose and need statement that includes achieving BLM's FLPMA "sustained yield" mandate and advances solutions to the worsening climate and extinction crises. This purpose should then be applied to fully analyze a reasonable range of action alternatives in the draft RMP and DEIS. As President Biden and Interior Secretary Haaland have properly indicated, the climate and extinction crises are real, connected, getting worse, and require bold and innovative solutions. These crises pose an existential threat to humanity. The status quo attitudes and management patterns of the past are no longer appropriate or sustainable.
Purpose and need	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The U.S. EPA recommends that the DEIS for the proposed plan clearly identify the underlying purpose and need (40 CFR 1502.13). The purpose and need should be a clear, objective statement of the rationale for the proposed action, as it provides the framework for identifying plan alternatives. The purpose of the proposed action is typically the specific objective(s) of the activity and is essential for defining the range of alternatives to be considered for the plan. The need for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity.
Range of alternatives	Not Provided	Not Provided	N/A	29	The new RMP should contain specific decisions that will advance reforms, be measurable, and where managers can be held accountable for conformance. Vague decisions allow too much flexibility and prevent needed accountability. Environmental conditions are changing and require proactive responses.
Range of alternatives	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The DEIS should present the environmental impacts of the proposed action and alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public (40 CFR 1502.14 (b)). Describe how each alternative was developed, how it addresses plan objectives, and how it will be implemented. Quantify the potential environmental impacts of each alternative to the greatest extent (e.g., acres of habitat impacted; change in water quality) and clearly delineate differences in impacts between alternatives analyzed. We also recommend comparing the costs and benefits of each of the alternatives, including the costs for required mitigation measures. Further, discuss reasons for eliminating alternatives to the proposed action (40 CFR 1502.14 (a)).
Range of alternatives	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Identify and quantify which species and/or critical habitat might be directly, indirectly, or cumulatively affected by each alternative and mitigate impacts to these species. Emphasis should be placed on the protection and recovery of species due to their status or potential status under the federal or state Endangered Species Act.
Range of alternatives	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The EPA recommends that BLM explore and objectively consider a full range of alternatives and evaluate in detail all reasonable alternatives that fulfill the plan's purpose and need. We encourage selection of alternatives that protect, restore, and enhance the environment, and we also support efforts to identify and select alternatives that maximize environmental benefits that avoid, minimize, and/or otherwise mitigate environmental impacts. The EPA is available to assist BLM in alternatives development, if needed.
Range of alternatives	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Summarize, or include as an appendix in the DEIS, the USFWS's biological assessment (informal consultation) or opinion (formal consultation). Demonstrate that the preferred alternative is consistent with the biological assessment or opinion.
Range of alternatives	Poe	Shannon	American Mining Rights Association (AMRA)	774	May I first state navigating through the myriad of links was a bit tenuous and the volume of acronyms used was daunting for us and we are mostly versed on them. We were required to have the acronym definition page up on one screen and the plan on the other to understand what the plan actually was and what it entailed. Given that a large portion of the people this plan affects do not have the experience dealing with "government speak", we wanted to go on record to state it is difficult to navigate and understand for nearly all whom we've spoken to about the plan. May we make a recommendation of writing these plans in plain english and typing out each acronym so as to make it easier for the proposal to be readable for those not familiar with government speak.
Range of alternatives	Not Provided	Not Provided	BlueRibbon Coalition	787	In addition to a recreation alternative, the BLM should consider developing an alternative that corrects the disturbing socioeconomic trends that are taking root in the Western communities that call the areas surrounded by the Redding and Arcata areas home.
Range of alternatives	Not Provided	Not Provided	BlueRibbon Coalition	787	OHV opportunities on coastal dunes are becoming few and far between in California. Alternatives need to recognize the recreational value that these opportunities bring and the BLM needs to manage for multiple use and not restrict these opportunities further.

Comment Code Name	Last Name	First Name	Organization Name	Letter #	Input Text
Range of alternatives	Not Provided	Not Provided	BlueRibbon Coalition	787	The importance of recreational opportunity in the planning area warrants the formation of a range of alternatives. NEPA imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives to Preliminary Proposals or preferred alternatives analyzed during a NEPA process. 40 C.F.R. § 1502.14; 40 C.F.R. § 1508.9. "[A]gencies shall rigorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14. The alternatives section is considered the "heart" of the NEPA document. 40 C.F.R. § 1502-14 (discussing requirement in EIS context). The legal duty to consider a reasonable range of alternatives applies to both EIS and EA processes. <i>Surfrider Foundation v. Dalton</i> , 989 F. Supp. 1309, 1325 (S.D. Cal. 1998) (citing <i>Bob Marshall Alliance v. Hodel</i> , 852 F.2d 1223, 1229 (9th Cir. 1988) ("Alternatives analysis is both independent of, and broader than, the EIS requirement."). A NEPA analysis must "explore and objectively evaluate all reasonable alternatives." 40 C.F.R. § 1502.14 (EIS); <i>Id.</i> at § 1508.9 (EA); <i>Bob Marshall Alliance</i> , 852 F.2d at 1225 (applying reasonable range of alternatives requirement to EA). A NEPA analysis is invalidated by "[t]he existence of a viable but unexamined alternative." <i>Resources, Ltd. v. Robertson</i> , 35 F.3d 1300, 1307 (9th Cir. 1993). We often see a "conservation alternative" there should also be a "recreation alternative" that expounds upon the current recreational opportunities. The reasonableness of the agency's choices in defining its range of alternatives is determined by the "underlying purpose and need" for the agency's action. <i>City of Carmel-by-the-Sea v. U.S. Dept. of Transportation</i> , 123 F.3d 1142, 1155 (9th Cir. 1997); <i>Methow Valley Citizens Council v. Regional Forester</i> , 833 F.2d 810, 815-816 (9th Cir. 1987), <i>rev'd on other grounds</i> , 490 U.S. 332 (1989). The entire range of alternatives presented to the public must "encompass those to be considered by the ultimate agency decision maker." 40 C.F.R. § 1502.2(e). The agency is entitled to "identify some parameters and criteria-related to Plan standards-for generating alternatives...." <i>Idaho Conservation League v. Mumma</i> , 956 F.2d 1508, 1522 (9th Cir. 1992) (italics in original). However, in defining the project limits the agency must evaluate "alternative means to accomplish the general goal of an action" and cannot "rig" "the purpose and need section" of a NEPA process to limit the range of alternatives. <i>Simmons v. U.S. Army Corps of Engineers</i> , 120 F.3d 664, 669 (7th Cir. 1997) (emphasis added).
Range of alternatives	Not Provided	Not Provided	BlueRibbon Coalition	787	If any route or area specific comments are made which identify missing routes or errors in Recreation Opportunity Spectrum maps that lead to restricted access, we support BLM addressing these comments in the development of an alternative that maximizes motorized recreation access to the planning area. We strongly advocate against a "conservation alternative".
Range of alternatives	Rougle	Wolfgang	N/A	891	It's sounding like the BLM contemplates two alternatives, with the "resilience and connectivity" option relatively hands-off/passive, whereas the "community access and development" alternative is asking the public to consider a bargain where we get more access in exchange for enduring more resource extraction. This is not a choice anyone can make in a conceptual or programmatic way; we need clear sideboards, caps, and ceilings/floors that tell us exactly how many acres of each type of development/extraction would be permitted in each FO area under each alternative, as well as hard numbers about how much more land or activities we would get access to if we decide to make this bargain. I realize the precise locations may not be knowable but actual numbers (and as much information about *estimated* location of impact as you can provide in advance) are essential.
Range of alternatives	Rougle	Wolfgang	N/A	891	1.) The alternatives are not distinguished in a way that gives the public enough information to choose between them. For example, under the connectivity and resilience alternative, "shooting areas would be designated or closed when posing a risk to public health and safety." Whereas the Community Access and Development Alternative "would continue to allow shooting in designated areas would be managed for shooting while protecting the health and safety of the public." These statements are nearly identical. Obviously BLM is not going to knowingly and deliberately do something that VIOLATES the health and safety of the public, so any shooting area that threatens the health and safety of the public will be closed under any alternative. Therefore, if one alternative proposes closing shooting areas (which it certainly should), it must be for some reason other than protecting health and safety of the public. (For example, you could choose to close shooting areas because of noise pollution and harm to wildlife, light pollution, problems with littering, etc -- all valid reasons) This is just one example. Most of the other couplets comparing the alternatives for a given resource area are equally confusing.
Recreation and visitors services	Cartier	Emmett	N/A	9	Public access is readily available from the Humboldt Redwoods State Park on the northern end, and from the east via Upper Thomas Road. The deed for lands in Section 4 at Upper Thomas Road includes a dedicated easement for access, which already includes road access readily available to the general public. Prior BLM planning publications have inappropriately indicated that the land at Gilham Butte has no safe public access due to the presence of cannabis cultivation in the area. If that odd criteria were widely applied, then little if any public land in the region would be considered suitable for recreation access and available to the public. The Gilham Butte lands already have extensive hunting under state seasons, among many other suitable recreational uses. Some visitors simply use the area without the awareness of local residents. Changes in state cannabis regulation have substantially reduced the threat to visitors on the lands in recent years. The BLM lands should be routinely patrolled and managed for public access. Any harassment of recreational visitors to the public lands should come under strict enforcements of respective federal regulations.
Recreation and visitors services	Cartier	Emmett	N/A	9	Trails should be developed through the area using open routes in forests and woodlands on ridgetops including across the summit of Gilham Butte. Connections should be made to remnant logging roads in the area.
Recreation and visitors services	Morris	Josh	N/A	11	Second, as a land owner and resident that lives along the Oak Slough property, I am very concerned about the allowed use of hunting in this relatively small strip of land. I know my neighbors are also concerned. Our properties have orchards and other high intensity agricultural enterprises on them (like rotationally grazed livestock). So people (owners and their children, farm labor, etc) are out on their properties during the various hunting seasons. Allowing hunting unavoidably puts bullets and shot going into our fields with a lethal potential. Twice I have been walking along the edge of my field to have a shot go off nearby and bird shot hit the tree leaves above my head. I wonder what would have happened if it was deer season and the hunter was using a rifle and aiming lower? The danger to people in the adjoining fields is increased because your property contains a riparian edge that hunters are shooting through towards our properties. There is also the densely populated area of Lake California across the river, that is easily within rifle range. I hope BLM will consider not allowing hunting in this little strip.
Recreation and visitors services	Rankin	Jim	French gulch Mining District	21	As the Legislation Chair for the Shasta Miners and Prospectors Association, I wish to voice concern for the closing of many secondary access roads within the area. Many are closed with large rocks placed in the roadway. Many others have been converted to bike or hiking trails. The Shasta Miners currently has about 200 memberships. These range from family memberships to senior memberships. Many of our older members are not able to walk distances to streams or other areas for recreation. Many of the families have small children. The small children and all of their required paraphernalia also require close vehicle access to these areas. While many applaud these closures as returning these areas to a more natural state, the unintended consequences is to deny many of our members and others access to our mining claims and to other open public areas.
Recreation and visitors services	Bartle	Dave	N/A	22	Develop a trail along the creek from Clear Creek Rd to Placer Rd. Some undeveloped trail already exists there

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Recreation and visitors services	Bartle	Dave	N/A	22	Develop an access trail to Clear Creek into the gorge north of Clear Creek Rd. There is already a rough access point near Horsetown. Taking the trail north towards the south lookout and up to the top of the first hill there is a drainage (great seasonal waterfall) that could provide a good place for access.
Recreation and visitors services	Bartle	Dave	N/A	22	Develop trail from old Clear Creek bridge to Oak Knoll Trailhead.
Recreation and visitors services	Bartle	Tina	N/A	24	No electric bikes on the Clear Creek Greenway, Cloverdale, Oak Knoll, Swasey and related trail systems since the trails are too narrow to accommodate them. At times it can be difficult with mixed equestrian, mountain bike and hiking activities. Electric bikes should be only used on trails that are wide enough to accommodate them along with the current trail users and on the Clear Creek Greenway, none of them are.
Recreation and visitors services	Bartle	Tina	N/A	24	Removing the large rocks from the Gold Dredge trail to the Salmon Viewing Plaza would be beneficial for dogs, bike riders, equestrians and hikers. Developing easier, clear, well-maintained access to the creek with more established beach type areas created would also be nice along with developing access and trails to the other side of Clear Creek.
Recreation and visitors services	Bartle	Tina	N/A	24	Great news on your clearing 50 feet off Cloverdale trails but Oak Knoll also needs major work with dead tree removal and regular trail management. Currently, a lot of the grass at Oak Knoll is 4-5 feet high and I have already seen two rattle snakes, one just a foot off the trail in the high grass that rattled after I passed it without seeing it. My husband and I also nearly escaped a dead tree falling on us by a few seconds last fall so clearing the trail would create a much more enjoyable, scenic and safe outdoor adventure. Ongoing, regular trail maintenance is needed on the trail system.
Recreation and visitors services	Bartle	Tina	N/A	24	The Clear Creek and Oak Knoll viewing areas with picnic tables should be cleared for better views. Hitching posts for horses should be installed away from the picnic tables and horses should not be allowed in that area since nobody wants to sit at a picnic table surrounded by horse manure and that inevitably happens when horses are allowed in those areas.
Recreation and visitors services	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF recommends inclusion of plan components that seek opportunities to improve road and trail rights-of-way for access to hunting, fishing, and other recreational opportunities.
Recreation and visitors services	Decker	Karie	Rocky Mountain Elk Foundation	31	For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver economic benefits for local communities, as well as cultural and social benefits. RMEF strongly encourages inclusion of hunting, fishing, trapping, and shooting sports as contributing to local economies and the well being and quality of life of BLM land users. The RMP should provide for the continuation of these activities as a valid and vital component of the recreation spectrum. The Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding between the U.S. Department of Agriculture, the U.S. Department of the Army, and the U.S. Department of the Interior (2011) develops and expands a framework of cooperation among the parties at all levels for planning and implementing mutually beneficial projects and activities related to hunting, fishing, trapping, and shooting sports conducted on federal land.
Recreation and visitors services	Decker	Karie	Rocky Mountain Elk Foundation	31	Identified as a significant barrier to maintaining hunting and angling participants, access to public land plays a critical role in ensuring the future of our hunting heritage (Eliason 2020). RMEF recommends consideration of public land access needs in BLM planning efforts, including close collaboration with state wildlife agencies to create or maintain access points to BLM lands that are important for managing wildlife. In addition, RMEF recommends inclusion of relevant components within Executive Order 13443 on facilitation of hunting heritage and wildlife conservation (2007), the John D. Dingell, Jr. Conservation, Management, and Recreation Act (2019), and the Great American Outdoors Act (2020).
Recreation and visitors services	Cann	Bruce	N/A	770	SRMAs should include Samoa Dunes Recreation Area, Ma-lel Dunes Cooperative Mgt. Area, South Spit (Mike Thompson Wildlife Area), Lacks Creek Management Area, and Little Darby Recreation Area as recreation management is a high priority at these sites. At Ma-lel Dunes, specific actions include designating a trail along "I-5" at the southern portion of the area for hiking and equestrian use. A few other pedestrian trails created from casual use also need to be designated. Trails need to be signed as they have Native American names. Additional signs need to be posted along the Redwood Gun Club property as this is a safety issue. At South Spit, consider allowing equestrian use on the east side of Jetty Road. At Little Darby, mountain bike use is inappropriate unless a new trail system is created for this use. Combining both user types on one trail would create unacceptable conflicts. The existing trail has numerous steps which is not conducive to mtn. bikes. At Lacks Creek, consider allowing overnight camping in all locations instead of designated locations. Construct a hiking / biking trail from end of Midslope Rd. to the west side of Lacks Creek.
Recreation and visitors services	Larramendy	Mark	N/A	772	As stated in my letters to the Redding BLM Field Office in August of 2021: There continue to be multiple campers in our area that have been there for months. They camp on the creek, stay for months longer than allowed, often completely disregard fire prevention and campfire regulations. They use the creek for toileting, bathing, and doing laundry. They leave trash everywhere and deprive the local people here of use of the area. . We have personally extinguished several camp fires that were revived by wind hours after campers have left the area. We see cigarette butts tossed out in areas overgrown with weeds and vegetation. We smell smoke and see the remains of campfires even during fire season.
Recreation and visitors services	Laughlin	Ranada	N/A	776	t would be nice to have "Hike through" opportunity from Headwaters North to Headwaters South by permit. Permitted hiking group could leave vehicles at both ends to shuttle hikers back to their vehicles; something to consider, if it falls within management guidelines.
Recreation and visitors services	Ringgold	Paul	Save the Redwoods League	777	The League is particularly interested in the area around Montgomery Woods State Natural Reserve, which currently falls under Arcata Field Office. It may be worth considering moving the Montgomery Woods area under the Ukiah Field Office due to physical distance and management location. There are several scattered BLM parcels in the area, including BLM parcels are immediately adjacent to the Reserve - many which were conveyed to BLM by the League. The League encourages BLM to consider opening trail connections over these lands to State Parks. This could be done with neighboring State Parks and League as a partner. Should these parcels be difficult for BLM to continue to manage, the BLM should consider disposing those parcels to CA State Parks which would likely be open to that proposal.
Recreation and visitors services	Ringgold	Paul	Save the Redwoods League	777	Should consider opportunities to provide/expand public access opportunities, including to the South Fork Eel River and Elkhorn Ridge Wilderness Areas - Our understanding is that these areas lack clear public access 111 Sutter Street, 11th Floor, San Francisco CA 94104 p 415 362 2352 f 415 362 7017 SaveTheRedwoods.org

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Recreation and visitors services	Not Provided	Not Provided	BlueRibbon Coalition	787	The Biden Administration's focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The BLM is therefore required by this executive order and others mandating that federal agencies consider "environmental justice" in NEPA proceedings to consider whether any route closures in the Northwest California Integrated Resource Management Plan would disproportionately harm disabled users' ability to access public lands. Any approach to management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized access on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them. It is imperative that the BLM consider the access needs of disabled users in drafting the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access. Expanding trail networks for all user groups, as well as new user groups such as ebikes, dispersed camping and overloading needs to be analyzed and incorporated into an alternative. Motorized access provides the best opportunities for those with disability access issues and the RMP is the best resource for the BLM to comply with the Equity Action Plan.
Recreation and visitors services	Not Provided	Not Provided	BlueRibbon Coalition	787	We have already seen an increase in closing dispersed camping across public lands across the nation. The desire and need for outdoor recreation has grown tremendously the past few years with no end in sight. The BLM should recognize the value that connecting with nature through dispersed camping and recreation brings. Restricting this form of recreation and limiting areas of use will only increase impact. We recommend adopting dispersed camping standards within this plan to require public input for any dispersed camping closures. Allowing dispersed camping should also be seen as a management tool for offsetting the socioeconomic inequities that are taking root as ultra-wealthy residents displace lower- and middle-income individuals and families from the Redding and Arcata areas. Instead, the BLM has indulged the elitist attitudes of local residents for the alleged "conservation benefits."
Recreation and visitors services	Not Provided	Not Provided	BlueRibbon Coalition	787	We recommend that the BLM use this planning process to finally begin to reverse its decades-long systematic discrimination against those with mobility impairment-related disabilities. In April 2022 the Department of Interior released its Equity Action Plan which states, "Public land visitation data collected from the Department's bureaus suggests that certain underserved communities are underrepresented as public land visitors, relative to their presence in the U.S. population at large." This includes persons with disabilities and limited physical access.
Recreation and visitors services	Salatti II	Frank	N/A	790	More access for hancapped people to rivers, creeks, and mining claims. Parking and access for Miners owning rights to get to the water.
Recreation and visitors services	Danials	Timothy	Redwood Coast Mountain Bike Association	791	I would like a connection between east ridge and west ridge in Lacks Creed management area. It would provide more trail connectivity and adventure opportunities.
Recreation and visitors services	Rankin	James	French gulch Mining District	797	First of my own comments is on the mountain biking trails and hiking trails I think they're absolutely wonderful. I use them all the time in the general Redding area. My one comment of concern about those is a few of those trails have taken vehicle access routes and converted them to trails and restricted access for anything but a hiker or biker to these areas. As an example, the Walker Mine trail on the east side of Sacramento River, Keswick Lake has virtually cut off all vehicular access and the trail on the West side has done the same thing. These were very popular access points for people putting in fishing boats etc. and they're now only available to bikers.
Recreation and visitors services	Sherf	Adam	Willis Area Cyclists	798	I wanted to leave a comment about a recreation area called Little Darby. It's six miles east of Willis. And there's currently about a one-mile hiking loop and picnic area wwhich is a small area of the property which is 970 acres, and this would be an excellent location for some more hiking trails and some mountain bike specific trails In an area here down in Willis where we don't have a lot of public land access.
Recreation and visitors services	Sleight	Roger	N/A	799	I'd just like to say that we would like to keep those lands open for us and maintain our access to those properties. We've already seen some instances of gates being added and other excavation work being done to block access to some of our properties which is in violation some federal mining laws.
Recreation and visitors services	Gutermuth	Brandt	Bureau of Reclamation	803	Support river management and planning to ensure that there is adequate long-term boating access to the river (for fishing and floating) via ramps that allow vehicular access to the river. As private land values have increased there appears to be decreasing access allowed to the river via private parcels. Therefore a public plan, potentially between BLM and Forest Service managed lands along the river, should clearly identify long-term access points for maintenance and other recreational oppurtunities [sic] and include interpretive signage that helps the public understand local ecology and the purpose of restoration, and also the cultural (tribal) heritage of the area.
Recreation and visitors services	Gutermuth	Brandt	Bureau of Reclamation	803	Coordinate BLM special recreation permitting of outfitters and guides providing services to anglers on the Trinity River with the appropriate state agencies. Coordinate evaluation of the effectiveness of the current quota for permits available for issuance with the appropriate state and federal agencies (e.g., CDFW and NOAA fisheries).
Recreation and visitors services	Juliana	Kate	N/A	804	The soils of the flat, near-creek area are impacted by unrestricted foot travel in the vicinity of the parking and sanitary facilities. Protecting the integrity of the surface is equivalent to protecting the rare plants of the area. I applaud BLM's broad goals of allowing dispersed recreation opportunities, but in an area that is in such close proximity to Highway 20, where the flat areas tend to hold surface water and rare plants are scattered across the flats, dispersed camping may not be the most beneficial. I hope that BLM will undertake subtle management to guide recreational users to well maintained travelways, and off the general valley floor. I advocate for developing designated camping sites to reduce impact on the larger area. I think it is really important to designate and develop horse camps and picketing sites to reduce damage to vegetation.
Recreation and visitors services	Juliana	Kate	N/A	804	I urge BLM to manage the Cache Creek area to better protect its physical attributes, possibly by developing and overseeing a designated camp ground, and by better guiding foot, bicycle and equestrian travel off the vulnerable flats at the base of the ridges. A proposed developed [sic] camp site would benefit from having a campground host to reduce bad behavior. I urge that BLM undertake cooperative surveys and manage cultural sites from a place of knowledge, and to ensure, in the event of fire events, to keep heavy equipment away from cultural sites.
Recreation and visitors services	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We encourage the BLM to incorporate accessibility into all levels of planning and that BLM lands can be utilized by all.

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Recreation and visitors services	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We request the BLM look broadly beyond administrative units and work collaboratively to build a network of trails or other recreation experiences across the landscape.
Recreation and visitors services	England	Alexis	N/A	815	Please open and or expand Little Darby in Willits
Recreation and visitors services	Bartlebaugh	Scott	N/A	817	The Little Darby area east of Willits, CA would be a good location for a designed trail system including purpose built mountain bike trails. The parcel size (~1000 acres+/-) and ~1000 foot of elevation change lend itself to purpose built mountain bike trails and hiking trails providing a variety of trail experiences. The Willits area has limited public land access and this would be a great benefit to the area residents for recreation and natural area access along with an additional economic boost through recreational tourism through a non extractive use of our federal lands. Well designed sustainable trails for the passive use of mountain biking will help conserve and protect the natural resources and provide the public a stronger connection to these lands. Willits Area Cyclists locally support trail maintenance at Brook Trails and would be eager to support trails at Little Darby. While further away the mountain bike community that provides support at Jackson State Demonstration Forest is also likely to be able to provide some trail support as well. A trail system with mountain bike oriented and specific trails would be consistent with other mountain bike oriented and mountain bike specific trails on other BLM properties.
Recreation and visitors services	Beebe	Chris	Willits area cyclists	819	As a resident of Mendocino county and Willits local, I would love to see little Darby add purpose built mountain bike trails. I am an avid cyclist and am always searching for local places to ride. I am the vice president of Willits area cyclists and a general contractor. I enjoy being in the outdoors experiencing nature with my family on bikes. I am excited to see all the possibilities that may arise within the little Darby land holding. If Mtn bike trails are created, they will be enjoyed by many. Thank you!
Recreation and visitors services	Beebe	Sequoia	Willits area cyclists	820	Little Darby would be a great place for a large trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would greatly benefit the health and economy of the Willits Valley and its residents. We hope you can put some funds and energy towards creating more access on these lands.
Recreation and visitors services	Berna	Michael	N/A	821	I am a frequent visitor to the Willits, CA area and recently heard about a possible expansion of trails in the Little Darby area. Little Darby would be a great place for a larger trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would make a huge impact. Willits is surrounded by beautiful terrain, but very little of it open to the public. Although Little Darby is not a large parcel of land, the elevation profile and contours make it a perfect spot to have trails on it so that the more of the public could utilize the area.
Recreation and visitors services	Blair	Hailey	N/A	822	Little Darby in Willits, Ca would be a great place to expand trails.
Recreation and visitors services	Burgess	Michael	N/A	825	I'd like ysee the Little Darby area (near Willits) fixed up and made more usable for hiking and biking
Recreation and visitors services	Burghardt	Laurie	N/A	826	Little Darby would be a GREAT place for a large trail network, with purpose-built mountain bike trails. I am 100% behind this idea & use of the area.
Recreation and visitors services	Burghardt	Tom	Willits area cyclists	827	Little Darby, east of downtown Willits would be a great place for a large trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would make a huge impact.
Recreation and visitors services	Cary	Brett	WAC	828	Cycling trails would be a great addition to the trail system at Little Darby and to the development of the Willits area.
Recreation and visitors services	Chandler	Cathlene	WAC	829	Please add more trails to Little Darby, It is a great place to hike/bike. Thanks
Recreation and visitors services	Clark	Heather	Ukiah Unified School District	831	Make lots of trails at Little Darby
Recreation and visitors services	Cohen	Thea	N/A	832	I often hike in this area and greatly appreciate the trails there. Please consider keeping it a well maintained pedestrian nature trail and DO NOT expand construction to include mountain biking or ATVs.
Recreation and visitors services	Coleman	Michelle	City of Willits	833	Little Darby just outside of Willits, Ca is a beautiful place I have been going for years. It has fallen in to disrepair and I haven't been out in a while. The main entry bridge was damaged and you can't safely enter the area. This is a place that would greatly benefit the community if it was expanded and brought back up to usable conditions. Our community doesn't have a lot to offer and this could bring more people to our area as well.
Recreation and visitors services	Collins	Sherry	Willits Cultural Center; Willits Chamber of Commerce	834	Little Darby located in Willits, CA - I love this little area and it would be great to see the trail network expanded so more of us could use it. We don't have many nearby trails to enjoy in our little area of paradise and we are overwhelming the Brooktrails system with our numbers. Please consider investing more effort (money) in developing Little Darby.
Recreation and visitors services	Cone	Gordon	Volunteer firefighter	835	Improved trails at little Darby in willits. They have a decent hiking trail now, but improved trails would be a huge benefit. There aren't many good hiking trails in willits, on public land. There is either Brooktrails parcourse or little Darby.
Recreation and visitors services	Daun-Widner	Rebecca	N/A	836	Willits area is prime for and in need of network trails on land like Little Darby. Thank you!
Recreation and visitors services	Dermond	Meribeth	N/A	837	Little Darby trail is a beautiful trail that could use maintenance for families to enjoy nature.

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Recreation and visitors services	Evans	Tom	The Watershed Research and Training Center	838	New recreation opportunities in the area attract and sustain tourism to the region, which in turn creates an economic driver for some of the poorest counties in the state. In addition, new recreation for this unit creates more opportunities for ecotourism, which are intended to support conservation efforts and observe wildlife. This in turn drives additional interest and funding into restoration and conservation projects. I would like to focus my comment on the development of new and existing recreation facilities on BLM lands in Trinity County. This includes creating trail system connectivity to surrounding counties. Local groups and organizations have been working hard to develop new and existing recreation opportunities in Trinity County. Examples of this work can be found on both USFS and BLM lands as well as private lands in the Weaver Basin Trail System, Douglas City, and Ewing Reservoir in Hayfork. All of the effort to make these developments possible shows a tremendous amount of community support and involvement. I urge BLM to take notice of this effort and include the development of recreation facilities as a high priority in your current management plan update. With the abundance of BLM land surrounding the following communities and areas, French Gulch, Lewiston, Trinity River, Weaverville, Junction City, Helena and Hayfork; I would like to see future planning and development of high quality trails and related amenities in these areas. Having vibrant sustainable trail systems near these communities creates a more inclusive opportunity for trail recreation which promotes healthy living for all economic levels. This not only provides more recreational opportunities for the public looking to engage responsibly with their land, but it helps create a sustainable economic stimulus for these small communities that currently have few public trail recreation opportunities."
Recreation and visitors services	Ferri-Taylor	Kathleen	N/A	839	I would love to see The Little Darby Trail in Willits get repaired! Please and thank you!!!
Recreation and visitors services	Findley	Allison	N/A	840	I grew up going to Little Darby in Willits Ca. It's such a wonderful place to hike and visit but there is so much room for growth. It would be the perfect place for additional trails such as bike trails and more. This location is perfect for growth.
Recreation and visitors services	Fuller	Janey	Cougar Creek K9	841	Cougar Creek K9 I have hiked this trail for 30 years. I wish it was larger better maintained and safer.
Recreation and visitors services	Gibson	Heather	N/A	842	Further developing the Little Darby area east of Willits would greatly benefit the community.
Recreation and visitors services	Gleisner	Earlene	Gleisner s Professional Services	843	Having Little Darby reopened in full with additional walking trails would add to the availability of safe connection with the beauty of our Willits area. A dedicated biking trail would also draw interested persons into their preferred form of exercise and keep the walking trails safer for older folks. Thanks for asking.
Recreation and visitors services	Golding	Chrissy	N/A	844	Please expand Little Darby trails in Willits
Recreation and visitors services	Gottlieb	Gary	N/A	846	I would like to see the Little Darby trail system in Willetts improved, a dedicated mountain bike trail and dedicated hiking routes would all be great. Little Darby is also in sore need of general cleanup. Thanks.
Recreation and visitors services	Hawthorne	Cate	N/A	849	"Little Darby - Please consider creating a mountain bike trail network in the Little Darby area. This would be a great benefit to mountain bikers and the local community. A small campground or dispersed camping area would be a benefit too.
Recreation and visitors services	Herman	Angela	Willits Horsemen's Association	850	Little Darby in Willits, CA has just one mile of trails within almost 1,000 acres of BLM land. There are 0 to few public trails available to Willits residents. It would be wonderful to expand the trail system for hiking and horseback riding and expand the parking area. I am concerned that this area is included in the Arcata jurisdiction and not Ukiah. Arcata is over 150 miles away and this could be why the Little Darby trails have lacked maintenance and upgrades over the years.
Recreation and visitors services	Huff	Rick	N/A	852	This would be a great are to enlarge the hiking areas and add mountain bike trails on.
Recreation and visitors services	Hurst	Jason	N/A	854	I am a Mendocino County resident and mountain bike rider and it would be great to see more trail accessibility in the county. Mountain biking is a heathy exercise and brings tourist dollars into the regions that support/build trails. Thank you.
Recreation and visitors services	Jeavons	Shawna	Thrive Yoga in Willits, Ca	855	Little Farby in Willits, Ca would be an Excellent candidate for expansion of hiking and biking trail areas
Recreation and visitors services	King	John	NorCal GPAA Gold Prospectors - Redding Chapter	856	One concern is that of access to public lands. While there are trails and very few roads to Nor Cal public lands, Many roads & trails are either fenced and gated off or are being removed. .Off-road areas like Chaffee are fantastic! The problem is that is is primarily made for extreme sports. We would like to suggest that more quad/bike/horse trails be made for "ease" of access, not just hill climbs. The plan should include the use of new technologies such as metal detecting, small electric bikes or scooters on the many river trails in this plan.
Recreation and visitors services	King	John	NorCal GPAA Gold Prospectors - Redding Chapter	856	I would like to offer an idea to improve the BLM shooting areas in this plan area. Having a safe legal place to target shoot is needed more than ever. I would suggest improving these sites by using ballistic sand backstops at 25,50,& 100 yards. Ballistic sand would allow BLM to have most of the lead and heavy metals to be recycled. This would make the shooting area more environmentally friendly and responsible. of course making more easily assessable shooting areas should be included in this plantoo.
Recreation and visitors services	King	Rebecca	N/A	857	"Hi, little Darby would make for excellent trails for our community in willits. Please consider this. We all would benefit from it greatly.

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Recreation and visitors services	Knudsen	Camille	N/A	859	"I support the expansion of existing trail systems and the development of new trail systems on BLM land. With any future trail development, I would like to see BLM continue to partner with organizations that have the knowledge and ability to execute trail planning and development to the highest quality. Where appropriate I support the continued development of existing trail systems in the greater Redding area with the inclusion of unique and exciting trail experiences for a diverse range of users and abilities. This includes but is not limited to the addition of more mountain bike optimized terrain and single use designation trails. I also support the acquisition of land and easements to ensure connectivity between existing and future trail systems. I would love to see trail development in French Gulch, Red Bluff, Lewiston, Trinity River, Weaverville, Junction City, Helena and Hayfork. Having vibrant sustainable trail systems near these communities creates a more inclusive opportunity for trail recreation which promotes healthy living for all economic levels. This not only provides more recreational opportunities for the public looking to engage responsibly with their land, but it helps create a sustainable economic stimulus for these small mountain communities that currently have little to no legal public trail recreation opportunities."
Recreation and visitors services	Krapfel	Paul	N/A	860	My main concern is trail maintenance. Many of the trails (used by walkers, horses, and bikes) feel like they were developed informally by users. A result is that many of the trails go straight up or down slopes, exposing them to erosion/gullying. I doubt that these stretches be re-engineered buy it would be great if water bars could be installed in these places.
Recreation and visitors services	Kroesen	Erica	N/A	861	I think that it would be beneficial for the citizens of Willits, and the surrounding areas, if you could add Little Darby to your list of projects. It would add a SAFE area for mountain bike enthusiasts. Also, including bicyclists would add another demographic to the Little Darby volunteer lists... hikers, naturalists, and bikers all working together to keep the area cared for and clean! Win-Win!
Recreation and visitors services	Kuhns	Luke	N/A	862	Little Darby park eat of Willits: it would be great if it were built up as a multi-use (mountain bike) network.
Recreation and visitors services	Ledger	David	Shasta Environmental Alliance	864	Recreation: Complete a trail inventory cataloging trail uses (mountain bikes, ebikes, horseback riding, and hiking) noting trails that are exclusive to only one activity and those that include multiple activities.
Recreation and visitors services	Lee	Jim	N/A	865	My comments are specifically directed at Clear Creek kayaking and rafting opportunities between the "Horsetown-Clear Creek Preserve and the Clear Creek Gorge. This is a beautiful but very dangerous section of the creek that currently does not display any warning signs at the Horsetown put in point. The get-out point does have a warning sign but it is literally right before the Gorge which is not negotiable so there is a high risk of unintentionally entering the Gorge. In addition to a more advance notice warning sign, there needs to be a get-out point well before the Gorge. On this stretch of the creek there are at least 2-3 dangerous obstacles that are nearly impossible to negotiate. Some of these obstacles are man made and seem to serve no purpose and could be removed relatively easily. Bottom line: Short and sweet, this is a gem in our backyard that is under utilized for fear of injury or death. With a bit of study, I believe this section of Clear Creek could become a recreation destination for those of us that like to kayak and raft safely close to home. I would be more than happy to discuss the situation and opportunities is greater detail.
Recreation and visitors services	Lehman	Paul	Redding Trail Alliance	866	- Greater Redding Area - continued trail development, ideally more mountain bike optimized and single use trails. In addition to development of BLM managed lands, the RTA would like the NCIP to identify connectivity with adjacent Federal, State, local and private trail networks for a more comprehensive and usable regional trail system. Notably, but not exclusively, the connectivity with City of Redding managed trails and Swasey Recreation Area. - Surrounding Communities - RTA notes the opportunity for the NCIP to include a coordinated trail system that would better provide regional connectivity as well as local economic development in and around small communities like Weaverville, Lewiston, Junction City, Douglas City, Hayfork, French Gulch and others that have been ravaged in recent years by the decline in the timber and mining industries and severe impacts of climate change and related wildfires. - BLM Management Actions - as noted above, RTA would like to see the NCIP expand recreational uses on BLM managed lands and provide improved local and regional coordination and connectivity with other State, Federal, local and private recreational facilities (trails and more).
Recreation and visitors services	Leinwetter	Christina	N/A	867	A walking trail network for Willits at Little Darby with bike access would be beneficial for our region. Thank you.
Recreation and visitors services	Lohne	Marian	N/A	868	Little Darby park would be a great place to have purposeful mountain trails for the public to use. Ecotourism is one of the only ways our area will survive economically. It would be great to have more trails to ride and hike. Thank you
Recreation and visitors services	Luscombe	Emily	N/A	869	Mendocino County has limited hiking trails open to the public and it would be great to expand the trail network at little Darby in Willits.
Recreation and visitors services	Matheson	Angus	N/A	871	Little Darby outside of Willits, CA would benefit from additional trails
Recreation and visitors services	Mattson	Karen	N/A	872	Despite being surrounded by nature there us are relatively few bike trails transferable for families. Please consider expanding bike trail at little Darby. It is a gem and would be used si much more if developed for biking.
Recreation and visitors services	McBride	Brianne	N/A	873	Would love to see some improvements made at Little Darby in Willits. Last I checked the bridge was taken down by a tree-making it difficult for many people to make it to the trail.
Recreation and visitors services	Miles	Melissa	N/A	877	would love to see Little Darby receive attention by expanding the trail network with more options for who is using those trails. Willits and Laytonville have few options for public land, and this project would open up considerable set of trails!
Recreation and visitors services	Moreno	Michael	N/A	878	Little Darby would be a great place for a large trail network, with purpose-built mountain bike trails.
Recreation and visitors services	Morrison	Sarah	N/A	879	More trail access in Willits would benefit the community.
Recreation and visitors services	Nord	Aimee	N/A	882	Little Darby in Willits would be a great place for a large trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would make a huge impact.

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Recreation and visitors services	Patton	Stacey	N/A	883	Little Darby east of Willits would be great to have maintained hiking and biking trails. Some small camp sights for tent camping, teardrops or RVs 13' or smaller- NO big motorhomes, or 5th wheels.
Recreation and visitors services	Perelstein	Rachel	N/A	884	I would love for little Darby in Willits to be upkept and uncle more bike trails for outdoor activities in Willits, CA.
Recreation and visitors services	Pimsler	Ana	N/A	885	While I am not a local resident, we spend a lot of time mountain biking in the Willits area and Mendocino County. I strongly support adding more recreational trails to the Little Darby area, to be used by mountain bikers and hikers. I know the local trail building and advocacy group (Willits Area Cyclists) will be keen to help build and maintain new trails. We have seen so many areas around the state grow (in a good way) because of outdoor recreation. I would look forward to having even more of a reason to visit Willits!
Recreation and visitors services	Quinn	James	Willits area cyclists	886	The Little Darby Park would be an ideal place for bike trails.
Recreation and visitors services	Ritchley	Yuliya	N/A	889	Please continue to develop Little Darby trail, it is a great safe place for families to enjoy outdoors
Recreation and visitors services	Rogers	Paul	Paul does it all, handyman	890	We need more trails at Little Darby in Willits. Also, better entry access and more parking.
Recreation and visitors services	Rounds	Alexandra	N/A	892	Mendocino County is big and beautiful but access to hiking and biking trails is limited. Little Darby Park in Willits needs attention and support. Mendocino needs more outdoor spaces accessible to the communities.
Recreation and visitors services	Sellers	Mike	N/A	895	Please consider adding a mountain biking/multi use trail system to Little Darby Creek. This is compatible with all the scoping goals and provides enhanced public land access in an area that does not have much. A little undeveloped camping and this area could become a Northern California destination with the wonderful Wentle Scout Camp just down the road. Thank you for considering public uses of this beautiful area instead of destructive industrial extraction uses.
Recreation and visitors services	Sharp	Greg	N/A	896	Little Darby would be a great place for a large trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would make a huge impact. (There is over 1000' of elevation from the Little Darby Peak to the entrance!) It would help to build a healthier, happier community.
Recreation and visitors services	Sheldon	Jeff	Willits area cyclists	897	Little Darby would be an ideal location for a larger trail network. I've been to this beautiful spot a couple times and wish there were more biking and hiking trails. It's a win win scenario for the BLM to get local, dedicated volunteers building fun trails in the woods that offer more opportunities for a wider population to enjoy public lands.
Recreation and visitors services	Sherf	Adam	Willits area cyclists	898	"I would like to comment on behalf of Little Darby, just east of Willits, Ca. This property has so much potential for recreation in a town with very little public open space. It is 6 miles from town, and about 7 miles from HWY 101, so is very easily accessed. The one mile hiking loop that is there is great, but encompasses just a tiny piece of the 974 acres. There is over 1000' of elevation from the parking area to Little Darby peak, which is mouth watering for mountain biking. The property is ideal for several stacked multi-use loops, with the area and terrain for 30+ miles of trail. It has the potential to rival some of the awesome BLM mountain bike destinations that I have ridden, like: Alsea Falls, Phil's World, Paradise Royale, Cedar City, and Sandy Ridge. Just across the road from Little Darby, sits Wentle Scout Reservation, with an amazing (but private) trail network as well as a great deal of knowledge and resources at their disposal. Willits Area Cyclists (WAC) is the local trail advocacy nonprofit that has been successfully building and maintaining trails in the Brooktrails Greenbelt for several years. WAC has a volunteer pool of 150, and growing. There is local enthusiasm and capacity to help plan, build, and maintain these trails.
Recreation and visitors services	Sherf	Ashley	Willits Elementary Charter	899	I would love to see a trail network established at Little Darby in Willits. This is a prime location to expand trails in an area where there is little access to public land.
Recreation and visitors services	Sierra	Stephanie	N/A	901	Willits area needs more trails!! We have no open space. Need safe spaces to walk and walk a dog. (No crazy trail bikers).
Recreation and visitors services	Simonpietri	Chantal	Mainspring Consulting	902	I'm writing to offer commentary on land management and usage of BLM lands, in particular the Little Darby acreage just outside of Willits. I strongly request that land restoration activities occur at Little Darby, including stream restoration and road decommissioning.
Recreation and visitors services	Simonpietri	Chantal	Mainspring Consulting	902	Additionally, I ask that more recreational opportunities be made available for shared use, and specifically mountain biking on the former road network.
Recreation and visitors services	Simpson	James	N/A	903	My support of turning Little Darby into a asset to the Willits community hinges on the fact it needs to be under the purview of the Ukiah District and not a public and office so disconnected to the site.
Recreation and visitors services	Simpson	James	N/A	903	I see recreational activities from nature and biking trails to picnic area expansion being greatly appreciated by me and the community, however without an agency overwatch it will fall into disrepair like it did early on leaving a burnt dump as it's only legacy
Recreation and visitors services	Smallman	Kevin	Willits area cyclists	904	I would love to see Little Darby park, outside of Willits serve a larger portion of the community as a place to promote health and physical activity. Although the Willits valley is relatively undeveloped, there is almost no public open space for recreation. As a mountain biker I would love having a place close to town to ride. I believe this would be a major asset to the community.
Recreation and visitors services	Smith	Edward	N/A	905	Little Darby would be a great place for a large trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would make a huge impact!
Recreation and visitors services	Smith	Margaret	Pathfinders	906	Little Darby in Mendocino County outside of Willits Can is a wonderful hiking spot that needs trail work. Please add this spot to your plans. Thank you.
Recreation and visitors services	Sotomayor	Julia	LFC	907	Please expand Little Darby in Willits! It's a beautiful area and our community is lacking a nice network of trails.

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Recreation and visitors services	Strnad	Jason	N/A	908	I support the Willits Area Cyclists (WAC) and their advocacy for mountain bike trails in the Little Darby area. I also encourage the BLM to consider partnering with local volunteer organizations like WAC, or hiking/equestrian/other activity focus groups to help design, build, and maintain trails within the property. I've seen first hand how community engagement and partnerships of this sort can create incredible recreation and land stewardship opportunities. The Cotoni Coast Dairies property near Santa Cruz is an example close to home. BLM's partnership with the Santa Cruz Mountain Trail Stewards (formerly Mountain Bikers of Santa Cruz) has been a key partner from the very beginning through trail construction and will be a great partner for ongoing maintenance. Such a partnership with local volunteer groups in Little Darby would be an opportunity to do similarly great things up North.
Recreation and visitors services	Taylor	Travis	N/A	909	"I would like to see a mountain bike trail network built at Little Darby park. Currently, this park only has a short nature loop that makes a tiny dent in the 900 acres. There is plenty of room to expand this network with purpose-built and directional mountain bike trails. Thank you.
Recreation and visitors services	Thiel	Karen	WAC	910	Willits and area would benefit business, families and health if there was more family things to do. A cleaned up park and enhanced biking and hiking trails would be great.
Recreation and visitors services	Thompson	Emmy	N/A	911	I believe we should be using this space for bike and hiking trails. Make more of the space we have for things individuals and their families can enjoy outdoors without spending anymore amount of money! Daily living is becoming much more expensive, give this community a safe place for adventure at zero cost!
Recreation and visitors services	Topp	Simon	N/A	912	Little Darby near Willits would make a great location for a large mountain biking trail network! That area has very little access to public land and a large trail network would be a huge resource
Recreation and visitors services	Tulley	Jiro	N/A	913	Little Darby would be a great place for a large trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would make a huge impact.
Recreation and visitors services	Waldrop	John	Redding Trail Alliance	914	Where appropriate I support the continued development of existing trail systems in the greater Redding area with the inclusion of unique and exciting trail experiences for a diverse range of users and abilities. This includes but is not limited to the addition of more mountain bike optimized terrain and single use designation trails. I also support the acquisition of land and easements to ensure connectivity between existing and future trail systems. With the abundance of BLM land surrounding the communities of French Gulch, Lewiston, Trinity River, Weaverville, Junction City, Helena and Hayfork, I would like to see future planning and development of high-quality trails and trail related amenities such as campgrounds or day use facilities in these areas. Having vibrant sustainable trail systems near these communities creates a more inclusive opportunity for trail recreation which promotes healthy living for all economic levels. This not only provides more recreational opportunities for the public looking to engage responsibly with their land, but it helps create a sustainable economic stimulus for these small mountain communities that currently have little to no legal public trail recreation opportunities.
Recreation and visitors services	Walton	Pat	N/A	915	Just 6 miles east of Willits is Little Darby. Little Darby would be a great place for a large trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would make a huge impact.
Recreation and visitors services	Wartell	Angela	County of Mendocino	916	Please spend funds on improving trails at Little Darby in Willits CA. Thank you.
Recreation and visitors services	White	Deborah	N/A	917	Please please work on little Darby in willits would love to be able to go hiking here locally and to feel safe on that trail , we need lots more hiking and biking trails locally to keep people active ?? ??
Recreation and visitors services	White	Deborah	N/A	917	Little Darby, I would be soooooo excited if this was worked on and cleaned up fit hiking I have wanted to go there so bad but I hear it's kinda dangerous because of pot growers?? ??
Recreation and visitors services	Woodhouse	Holli	Willits area cyclists	920	The Little Darby trail in Willits would be a great place for a large trail network, with purpose-built mountain bike trails. In an area with very little public land, more trails at Little Darby would make a huge impact.
Recreation and visitors services	Woodhouse	Noel	Sustainable Construction Program, Mendocino College	921	Trail maintenance and development at Little Darby! Re-opening the fire trail headed west back towards Willits and looping it back would be a great project!
Recreation and visitors services	Wood	Rachel	N/A	922	Some of the Counties in this Management Unit are the poorest in the state. By creating more recreational opportunities it potentially can lead to economic growth, ecotourism, and create more interest in restoration and conservation in the adjacent area. It also can provide populations in the area with more opportunities to recreate which can potentially create happier and healthier communities. I would like to focus my comment on creating development between existing trail systems. For example a trail system that would connect existing trails such as the Whiskeytown Lake trail system, Weaver Basin Trail System and the Hayfork Ewing Reservoir Trail system. BLM has a high concentration of land around these specific areas within the unit but it will require interagency collaboration to make a project like this possible. Trail connectivity between these areas could create a larger system which could mimic what Oakridge, Oregon has already achieved - a sustainable recreation area that created an economic driver in the community, a basecamp for outdoor adventurers, and more interest in restoration and conservation in the surrounding areas."
Recreation and visitors services	Knudsen	Nathan	Redding Trail Alliance	923	The Redding Trail Alliance would like to see continued development of recreation related uses on BLM managed lands, most notably mountain bike optimized trails and facilities, and would like BLM to continue to partner with government and non-government organizations (like RTA) and individuals in this development.
Recreation and visitors services	Huettl	Monica	N/A	932	I want to make sure that any plan for the future management of California's public lands includes access for horseback riders and mountain bikers and pet dogs. I would like to see improved campgrounds for families to use.

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Recreation and visitors services	Vandeman	Mike	N/A	934	<p>Bicycles should not be allowed in any natural area. They are inanimate objects and have no rights. There is also no right to mountain bike. That was settled in federal court in 1996: https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmjvande.info%2Ffmbt10.htm&data=05%7C01%7CBLM_CA_Redding_Arcata_NCIP%40blm.gov%7C9caaa13480c14d4d328008da54944d3a%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915293207864567%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=fIQd%2BSNOk8h9s5hPyuLWkTZtAHRZw4tODEoh4FHQ8Nw%3D&reserved=0 . It's dishonest of mountain bikers to say that they don't have access to trails closed to bikes. They have EXACTLY the same access as everyone else -- ON FOOT! Why isn't that good enough for mountain bikers? They are all capable of walking.... A favorite myth of mountain bikers is that mountain biking is no more harmful to wildlife, people, and the environment than hiking, and that science supports that view. Of course, it's not true. To settle the matter once and for all, I read all of the research they cited, and wrote a review of the research on mountain biking impacts (see https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmjvande.info%2Ffscb7.htm&data=05%7C01%7CBLM_CA_Redding_Arcata_NCIP%40blm.gov%7C9caaa13480c14d4d328008da54944d3a%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915293207864567%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=pfU6ncOjQd4rBw%2BNZYajL3aZ7KRI24YDdKrDrx176vU%3D&reserved=0). I found that of the seven studies they cited, (1) all were written by mountain bikers, and (2) in every case, the authors misinterpreted their own data, in order to come to the conclusion that they favored. They also studiously avoided mentioning another scientific study (Wisdom et al) which did not favor mountain biking, and came to the opposite conclusions. Mountain bikers also love to build new trails - legally or illegally. Of course, trail-building destroys wildlife habitat - not just in the trail bed, but in a wide swath to both sides of the trail! E.g. grizzlies can hear a human from one mile away, and smell us from 5 miles away. Thus, a 10-mile trail represents 100 square miles of destroyed or degraded habitat, that animals are inhibited from using. Mountain biking, trail building, and trail maintenance all increase the number of people in the park, thereby preventing the animals' full use of their habitat. See https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmjvande.info%2Ffscb9.htm&data=05%7C01%7CBLM_CA_Redding_Arcata_NCIP%40blm.gov%7C9caaa13480c14d4d328008da54944d3a%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915293207864567%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=bxpkGdLf3Hg8XK4ZjvwR4f5Ue2k8B4%2BCPm7G817tGmo%3D&reserved=0 for details. Mountain biking accelerates erosion, creates V-shaped ruts, kills small animals and plants on and next to the trail, drives wildlife and other trail users out of the area, and, worst of all, teaches kids that the rough treatment of nature is okay (it's NOT!). What's good about THAT? To see exactly what harm mountain biking does to the land, watch this 5-minute video: https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fvimeo.com%2F48784297&data=05%7C01%7CBLM_CA_Redding_Arcata_NCIP%40blm.gov%7C9caaa13480c14d4d328008da54944d3a%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915293207864567%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=vN5AdLb1WduLi6eAGI5zlwAbBNCxc6susgeu0o9XdMQ%3D&reserved=0 . In addition to all of this, it is extremely dangerous: https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmjvande.info%2Ffmbt_dangerous.htm&data=05%7C01%7CBLM_CA_Redding_Arcata_NCIP%40blm.gov%7C9caaa13480c14d4d328008da54944d3a%7C0693b5ba4b184d7b9341f32f400a5494%7C0%7C0%7C637915293207864567%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&data=PqiAHiOOFPFXTbjKXhcZeCf4ly0Qjcc3YDY49Okb9Q%3D&reserved=0 .</p>
Recreation and visitors services	Vandeman	Mike	N/A	934	<p>The major harm that mountain biking does it that it greatly extends the human footprint (distance that one can travel) in wildlife habitat. E-bikes multiply that footprint even more. Neither should be allowed on any unpaved trail. Wildlife, if they are to survive, MUST receive top priority!</p>
Saleable	Dunlap	James	N/A	10	<p>Hello. I think dreadging should be allowed. Bad science is rampant. Fish come back to rivers that have dreaded. Look how much money have been taken away from honest hard working people. Whole town have been affected by bad science.</p>
Saleable	Barwick	Curtis	N/A	818	<p>There are already laws prohibiting such things as disturbing and taking of artifacts and prohibiting the disturbing and changing of the environment and wildlife habitat. As with many other issues in this country, the passing of more laws only remove the rights of law abiding people and do nothing to deter the law breakers. As for me, I follow rules and laws . In the case of my gold hunting I leave things better than I find them. I haul out pounds of lead in the form of birdshot, bullets and fishing sinkers. I pick up garbage. I fill any hole I dig. What I see is illegal dumping, tons of garbage from homeless camps and destruction caused by illegal marijuana grows. Yes, already illegal. In summary, I ask that common sense will allow law abiding people such as me to continue to access and use our public lands and continue to exercise our mining rights and that those who would seek to restrict those rights would instead turn their attention to prosecuting those who are already breaking the laws.</p>
Socioeconomic	Decker	Karie	Rocky Mountain Elk Foundation	31	<p>Hunting is an integral part of North American cultures and a strong connection to the outdoors for millions of people, generating billions of dollars to local and national economies (Arnett and Southwick 2015, Chapagain and Poudyal 2020)). RMEF encourages inclusion of hunting, fishing, trapping, and shooting sports as contributing to local economies and the well-being and quality of life of BLM land users</p>
Socioeconomic	Not Provided	Not Provided	BlueRibbon Coalition	787	<p>The socioeconomic analysis should acknowledge the direct financial impact that will occur to organizations like ours if the agency were to adopt a "conservation alternative".</p>
Soils	Evenson	Michael	N/A	813	<p>Soil compaction and loss of nutrients in our high rainfall events should be prevented as a high priority.</p>

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Special designations	Baker	Judith	N/A	30	As BLM updates its Resource Management Plans (RMPs) for public lands in those counties, through its "Northwest California Integrated Resource Management Plan" or NCIP initiative, BLM must address many issues, including how BLM will: • Protect "lands with wilderness characteristics" (BLM term for the wildest and least developed tracts of land); • Conduct a robust inventory of potential Wild and Scenic Rivers to protect their water quality, free flowing character, and outstanding scenery, recreation, fish, wildlife, geology, historical, cultural, and other values; • Review boundaries, corridors, and management plans for segments of the Eel, Trinity, Klamath, and Van Duzen Wild and Scenic Rivers managed by the BLM and identify additional outstanding values for these rivers; • Identify and protect "Areas of Critical Environmental Concern" (ACECs) (lands that are prioritized for special management by the agency for conservation or other important purposes); • Plan for equitable recreational opportunities for locals and visitors; and • Conserve cultural and historic sites important to Native American tribes and others.
Special designations	Baker	Judith	N/A	30	It is vital for the health of the planet that BLM's updated NCIP: • Protect all areas that meet the definition of Land with Wilderness Characteristics; • Protect all streams that are eligible for Wild and Scenic River protection and improve management of existing Wild and Scenic River segments managed by the BLM; and • Protect and restore all special habitats, including old-growth conifer forests, oak woodlands, native grasslands, streams with at-risk salmon and steelhead populations, and areas with rare or unique plant species.
Special designations	Murray	Danielle	Conservation Lands Foundation	33	Backcountry Conservation Areas ⁹ and Wildlife Migration Corridors ¹⁰ are two additional designations the BLM can use to conserve intact wildlife habitats and enhance and improve the quality of big-game winter range and migration corridors on public lands. ⁹ https://www.trcp.org/wp-content/uploads/2020/02/BCA-FAQ_and-History.pdf ¹⁰ https://www.blm.gov/policy/im-2018-06
Special designations	Huffman	Jared	N/A	808	Please note that the NCIP planning area includes several areas and streams included in the language of our respective bills, H.R. 878, the Northwest California Wilderness, Recreation, and Working Forests Act, and S. 1459, the PUBLIC Lands Act. H.R. 878 has passed the House of Representatives twice this Congress and is currently under consideration by the Senate Energy and Natural Resources Committee as part of S. 1459. The lands and waters contained in this language and under consideration in the NCIP include: - Proposed additions to the Elkhorn Ridge, South Fork Eel River, Trinity Alps, Yolla Bolly-Middle Eel, and Yuki wilderness areas; - The proposed English Ridge Wilderness; - The existing Middle Fork Eel, South Fork Eel, and North Fork Eel Wild and Scenic Rivers that would be legislatively designated after being administratively designated in 1981); and - Several new wild and scenic river candidates, including Red Mountain Creek, Lacks Creek, Elder Creek, Cedar Creek, East Branch South Fork Eel River, Elk Creek, Eden Creek, Deep Hole Creek, Indian Creek, and Fish Creek. We ask that you protect these areas as part of the NCIP process and manage them in a manner that is consistent with the Wilderness Act and the Wild and Scenic Rivers Act, as applicable.
Special designations	Jenkins	Laurie	National Park Service	810	I was looking at EQ-22/0038, Redding and Arcata Field Offices - Northwest California Integrated Resource Management Plan (NCIP) and wanted to make you aware there is one NNL that is located in Humboldt County, Lanphere and Ma-le'i Dunes NNL. Lanphere is managed by both BLM and USFWS (with USFWS owning most of the landmark). Lanphere is one of the newest designated landmarks in the country and was designated as an NNL in 2021. At the time I was working closely with Molly Brown, Field Manager Arcata Office. I am attaching information about Lanphere (brief and boundary map) as well as a one-page document called National Natural Landmarks Program At a Glance. It would be great to get the NNL information captured in your new plan revision.
Special status plant species	Gerdes	Jason	Environmental Protection Agency (EPA)	767	We recommend that BLM work closely with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife to determine potential impacts of the plan on plant and wildlife species, especially species classified rare, threatened, or endangered on either state or federal lists
Special status plant species	Hanceford	Phil	The Wilderness Society	781	The RMP should also contain management actions and strategies that require monitoring resources, including special status plants, plant communities, and wetlands (e.g., wet meadows, vernal pools, bogs, fens, and grasslands), and implement management measures to conserve special status plant species and restore special status plant habitat and vulnerable plant communities. It would be helpful for the BLM to define conservation targets for special status plants and natural communities within the planning area, and consider designation of ACECs in areas where important California native plant species and plant communities exist. Attention should also be paid to native grasslands, which perform essential ecosystem services and are widely imperiled in California. The RMP should recommend specific grassland vegetation types to be identified and conserved.
Special status plant species	Hanceford	Phil	The Wilderness Society	781	According to the BLM's analysis, 202 special status plant species have potential to occur within the planning area, and 23 vulnerable to critically-imperiled plant community types occur within the planning area. Strategic surveys have been conducted for all survey and manage categories of species known or suspected in the Arcata Field Office area, but strategic surveys have not been documented in the Redding Field Office. In fact, the average age of records for the highest-ranked rare plants in the Redding Field Office is 20 years, making them "historic" for management purposes; 60% of records are historic for Redding, as compared to 28% for Arcata. In order to adequately address and adopt management actions for plant species and natural communities that will be covered by the RMP, the BLM should conduct special status plant and plant community surveys, and inventory and map all sensitive plants and plant communities within the planning area. Many areas of California have never been surveyed for special status plants and plant communities, or have not been surveyed recently. Conducting an updated plant inventory is essential to ensure that the management strategies and objectives in the RMP are sufficient to protect and conserve plant resources. As part of the surveying and inventory process, BLM should identify priority lands for conservation and restoration, especially riparian areas, wetlands, old growth forests, oak woodlands, chaparral, and native grasslands.
Special status plant species	Baker	Judith	N/A	802	Protect and restore all special habitats, including old-growth conifer forests, oak woodlands, native grasslands, streams with at-risk salmon and steelhead populations, and areas with rare or unique plant species
Tribal consultation / interests	Smith	Linda	N/A	34	The lands that will be considered during this process include places that are important for Indigenous tribes in the region, including the Cahto, Karuk, Wintun, and Yurok nations and the peoples represented by the Round Valley Indian Tribes. Input from these sovereign nations and communities will be critical during this process, and we urge the BLM to conduct adequate outreach and consultation to ensure that the interests of both federally recognized and nonfederally recognized tribes are understood and included.
Tribal consultation / interests	Simmons	Matthew	Environmental Protection Information Center	756	BLM should work with local tribes to develop a framework for preserving important Tribal lands, sites, and resources within BLM ownership. This includes working with Tribes to work towards co-management of their ancestral lands and sites.

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Tribal consultation / interests	Simmons	Matthew	Environmental Protection Information Center	756	We want to emphasize that BLM should work with Native American Tribes to manage public lands in a way that is consistent with their cultural values. Co-management opportunities should be studied and entered into if Tribes are interested. One of the places where EPIC would support sale or release of public lands is if those lands were being returned to their original stewards to be managed in a culturally and environmentally beneficial manner.
Tribal consultation / interests	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act. Historic properties under NHPA are properties that are included in the National Register of Historic Places or that meet the criteria for NRHP. Section 106 of NHPA requires a federal agency, upon determining that activities under its control could affect historic properties, to consult with the appropriate State Historic Preservation Office/Tribal Historic Preservation Office. Under NEPA, any impacts to tribal, cultural, or other treaty resources must be disclosed in the DEIS. Section 106 of NHPA requires that federal agencies consider the effects of their actions on cultural resources, following the regulation at 36 CFR 800.
Tribal consultation / interests	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Executive Order 13007, "Indian Sacred Sites" (May 24, 1996), requires federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian religious practitioners, and to avoid adversely affecting the physical integrity, accessibility, or use of sacred sites. It is important to note that a sacred site may not meet NRHP criteria for a historic property and that, conversely, a historic property may not meet the criteria for a sacred site. It is also important to note that sacred sites may not be identified solely in consulting with tribes located within geographic proximity of the planning area. Tribes located outside the direct area of impact may also have religiously significant ties to lands within the planning area and should be included in the consultation process. In the DEIS, address the existence of Indian sacred sites in the planning area that may be considered spiritual sites by regional tribal nations. Discuss how BLM would ensure that the proposed action would avoid or mitigate for the impacts to the physical integrity, accessibility, or use of sacred sites.
Tribal consultation / interests	Gerdes	Jason	Environmental Protection Agency (EPA)	767	We also recommend providing a summary of all coordination with tribes and with the SHPO/THPOs, including identification of NRHP eligible sites and development of a Cultural Resource Management Plan.
Tribal consultation / interests	Ringgold	Paul	Save the Redwoods League	777	Under the Cultural Resources section of this alternative, we suggest that Tribal engagement should include proactive and collaborative cultivation of opportunities in general, not just management of issues/concerns. We also wonder whether you are referring to additional education and interpretation in general in this section. We have content and curriculum we can provide. Such amenities and programs deeply enhance visitor experiences and communities.
Tribal consultation / interests	Not Provided	Not Provided	BlueRibbon Coalition	787	It should also be acknowledged that it is also entirely possible that many of the tribal members who wish to access sacred and cultural sites within the planning area currently or will at some point suffer from mobility impairment disabilities. Since the elimination of motorized access from the planning area would prevent disabled tribal members from accessing sacred and cultural sites, the motorized restrictions in an Alternative would likely be contrary to EO 13007, EO 13985, and AIRFA.
Tribal consultation / interests	Gutermuth	Brandt	Bureau of Reclamation	803	BLM will prioritize management that supports traditional tribal uses and harvest of tribal trust resources. Activities [sic] might include allowing access to areas or allowing resource management to support proper functioning conditions that will in turn support resources such as native fish or plants that the tribal entities may harvest.
Tribal consultation / interests	Juliana	Kate	N/A	804	BLM has an incredible opportunity to work with local indigenous people at the butte. The number of different cultures' prehistoric co-occupation of these lands makes the surveying and protecting the cultural and spiritual values of this holy site its highest priority. Simply put, working together to protect Gilham Butte can change the relationship of the agency and local Native people
Tribal consultation / interests	Juliana	Kate	N/A	804	I can envision a transfer of this land to the ownership of the people from whom it was taken, to be managed for their exclusive use and benefit, much in the way that the lands of the Sinkyone Intertribal lands are owned and managed. That is an increasing popular redemptive action for the agency to take.
Tribal consultation / interests	Juliana	Kate	N/A	804	The creek itself and its immediate environs have been a magnet for human use since time out of mind. I do not know whether BLM has actively engaged with the indigenous Native people of the area to conduct surveys of historic and prehistoric sites in the boundaries of Cache Creek Natural Area (or Wilderness), but I think it is of primary importance to do so, particularly as the occurrence of fire now means the entry of large mechanical equipment. It would be better to allow an area to burn than to destroy a cultural treasure by bulldozing it.
Tribal consultation / interests	Juliana	Kate	N/A	804	The cultural importance of the butte and its surrounding lands provides BLM with an opportunity to engage with local indigenous people who are teaching their traditional management-by-fire techniques.
Tribal consultation / interests	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	-We encourage the BLM to seek tribal input, protect historic and archaeological values, and provide heritage resource interpretation where appropriate.
Tribal consultation / interests	Ayala	Jared	N/A	929	I recommend that the land be returned to the Native Peoples and be placed under their management. The BLM should employ and provide wages to native peoples willing to partake in conserving and restoring the land. This equitable act of environmental justice is what is best for the land and those meant to steward it.
Use authorizations	Cartier	Emmett	N/A	9	Access roads across BLM lands to private lands, such as in Section 4 off Upper Thomas Road, should have strict permit requirements for land use authorizations, rather than being grandfathered.

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Use authorizations	Simmons	Matthew	Environmental Protection Information Center	756	Many BLM lands are inaccessible to the public because they are surrounded by private lands. Working with private landowners to create ROWs that allow public access where appropriate would allow the public the ability to access their lands easier. This does not mean building more roads, but rather developing low impact trails and access points.
Use authorizations	Juliana	Kate	N/A	804	Gilham Butte is a landlocked management area, surrounded by recovering industrial forest land, state park land, ranchland, and residential homestead parcels. There is no public access to the area by road. The residential landowners control access across their private roads, and former industrial logging roads' use was restricted as a term of transfer of title, when those former logging parcels were acquired and turned over to BLM. I propose that BLM live with that; negotiate with the park and local landowners to gain access for survey purposes.
Use authorizations	Brennan	Brien	Elder Creek Oak Sanctuary	824	I'd also like to see the BLM support, through funding or direct assistance, all local efforts at stopping illegal uses on their lands, from poaching and water extraction to off-road riding and pot farms.
Use authorizations	Rougle	Wolfgang	N/A	891	It's not clear to me what a "right-of-way exclusion area is" or "right-of-way avoidance" (how are they different) or how it affects the public's rights/experience of BLM lands- maybe this term of art could be defined in the "acronyms, terms and definitions."
Vegetation	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	Biologists have discovered numerous rare plant populations in the post-fire environment across Whiskeytown NRA, and many of these species have the potential to occur on BLM properties in the region. The BLM should evaluate impacts of proposed management actions and ensure mitigations to protect rare plant species and sensitive vegetation communities (e.g. riparian, wetland, old growth forest, etc.) are in place.
Vegetation	Brennan	Brien	Elder Creek Oak Sanctuary	824	In the Vegetation section, I'm glad to see that previous commenters have voiced opposition to recreational activities that undermine plant community health. I want to echo the suggestion that the BLM prioritizes preservation and restoration, especially riparian, old growth forests, oak woodlands, chaparral, and native grasslands. I'd like to add that the "loss of native vegetative species and habitats, as well as associated wildlife, due to noxious, non-native and invasive species" is also due to the extraction of water in mountain streams on both private and public land, especially for illegal cannabis cultivation. This has been a state-wide problem for at least a decade, and it seems most if not all watersheds are affected.
Vegetation	Rougle	Wolfgang	N/A	891	The juniper woodland that extends around Hog Lake/Iron Mountain trailhead should be left the way it is. I only say this (not knowing what plans there may be for the area) because I see a lot of juniper removal around the West and it does not seem ecologically justified. This stand of California juniper near Red Bluff is valuable and cherished as a unique recreational, aesthetic, and food resource so close to town. It deserves respect.
Vegetation	Decker	Karie	Rocky Mountain Elk Foundation	932	Coastal Range and Cascade meadow habitat has declined significantly due to lack of management. These historic meadows provide critical forage and open habitat for a myriad of species. RMEF encourages assessment, treatment, and maintenance of these open meadows to restore a once diverse community.
Vegetation	Hanceford	Phil	The Wilderness Society	934	The RMP should also document threats to native plants and plant communities, such as impacts from livestock grazing, renewable energy development, and other management activities, so that those impacts can be appropriately analyzed and mitigated.
Vegetation	Juliana	Kate	N/A	934	Gilham Butte stands with one side facing the moist redwood forests of the Eel River basin and one side facing the coastal plain. Rising above the surrounding ridges, the butte is home to a wealth of plants and unique plant associations as well as wildlife habitats. The current Community Management Plan calls for surveys of these populations. BLM has not conducted such surveys. I urge you to prioritize the gathering of this information.
Visual resources	Bartle	Tina	N/A	24	The graffiti needs to be managed on a regular basis. Last year due to many of the homeless people buying cars along with the extremely hot weather the creek was busy with people who did not respect the natural beauty of the area and left trash as well as graffiti everywhere. When we helped with a BLM clean up a few were removed with chemicals. Using chemicals near the creek doesn't sit well with me especially since we live in the Clear Creek water district. I would suggest that perhaps they could be spray painted over with a rock-colored paint that looks natural until they can all be removed in a more environmental way. If the graffiti is consistently removed on an ongoing basis, I believe people will be discouraged from leaving their mark when it is removed quickly and proves to be a waste of time and money for them. The watershed is critical and needs to be protected for plants and animals, as well as people.
Visual resources	Hanceford	Phil	The Wilderness Society	781	ACECs and other special management designations and prescriptions should be used to protect scenic landscapes and lookout points within the resource area with stipulations specifically addressing and managing human development impacts, including VRM Class I to "preserve the existing character of the landscape" or VRM Class II to "retain the existing character of the landscape" as appropriate.
Visual resources	Hanceford	Phil	The Wilderness Society	781	The BLM must update VRM classifications for all of the public lands in the NCIP area. Specially-managed areas with high conservation values, such as lands with wilderness characteristics, backcountry recreation areas and ACECs, should be managed as VRM I and II to protect scenic values. The plan must make clear that compliance with VRM classes is not discretionary.
Visual resources	Hanceford	Phil	The Wilderness Society	781	It is the BLM policy that visual resource management (VRM) classes are assigned to all public lands as part of the Record of Decision for RMPs. The objective of this policy is to "manage public lands in a manner which will protect the quality of the scenic (visual) values of these lands." BLM Manual MS-8400.02. Under the authority of FLPMA, the BLM must prepare and maintain on a continuing basis an inventory of visual values for each planning effort. 43 U.S.C. § 1711; BLM Manual MS-8400.06. In addition, the visual resources present in the NCIP area are notably diverse, including ocean landscapes, dunes, forests, rolling hills, mountains, snow-covered peaks, flat valleys, oak savannah, numerous rivers - including designated wild and scenic rivers - and reservoirs. These visual resources are highly valued by area residents and visitors. To ensure that the BLM preserves these visual resources, the agency must update its visual resources inventory for the NCIP planning area and reclassify lands where necessary. The NCIP area should be re-inventoried and classified in the context of landscape level planning, which may impact visual resources at a broader level.

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Visual resources	Hanceford	Phil	The Wilderness Society	781	NEPA requires that measures be taken to "assure for all Americans . . . aesthetically pleasing surroundings." Once established, VRM objectives are as binding as any other resource objectives, and no action may be taken unless the VRM objectives can be met. See IBLA 98-144, 98-168, 98- 207 (1998). The NCIP must make clear that compliance with VRM classes is not discretionary. Since neither the existing 1993 Redding RMP or the 1992 Arcata RMP include visual resource values collected from a comprehensive inventory process, the NCIP must conduct a full inventory of visual resource values within the planning area.
Visual resources	Hanceford	Phil	The Wilderness Society	781	All Wilderness Study Areas must be rated as VRM Class I per BLM policy guidance. Instruction Memorandum No. 2000-096 (2009).
Visual resources	Hanceford	Phil	The Wilderness Society	781	In addition, the NCIP must include comprehensive VRM management classes to set the standards for how the inventoried visual values will be managed. See NCIP AMS, at 2-178. As the NCIP AMS noted, residents are becoming increasingly more interested in the scenic qualities of the landscape and are placing higher values on them as a way of attracting visitors to the area. See NCIP AMS, at 2-179.
Visual resources	Hanceford	Phil	The Wilderness Society	781	Lands managed to preserve their natural values, such as primitive recreation areas and lands with wilderness characteristics, should be managed as Class I to "preserve the existing character of the landscape." BLM Manual 6320 affirms that VRM Class I may be appropriate to protect lands with wilderness characteristics. BLM Manual 6320 at 06(A)(2)(d).
Visual resources	Hanceford	Phil	The Wilderness Society	781	Lands within popular and easily accessible vantage points should be managed for visual resources, such as VRM Class II to "retain the existing character of the landscape," including clear provisions dealing with oil and gas development, renewable energy infrastructure, and other human disturbance.
Visual resources	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We encourage the BLM to incorporate Night Skies and Visual Resources into this plan.
Water resources	Spotts	Richard	N/A	3	All streams on BLM lands should meet California water quality standards including to avoid E coli contamination from cattle.
Water resources	Not Provided	Not Provided	N/A	17	Reserved federal water rights should be sought and upheld to protect critical water sources and instream flows during this mega drought.
Water resources	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Demonstrate how the action and no action alternatives will be consistent with EPA-approved water quality standards for the State of California.
Water resources	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Discuss adaptive management monitoring programs that will be implemented before and after proposed actions to determine potential impacts on water quality and beneficial uses.
Water resources	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Evaluate (and quantify if feasible) potential mitigation measures and their effectiveness at mitigating water quality and quantity impacts, discuss any limitations or drawbacks of these mitigation measures, and address how their effectiveness will be monitored. We recommend inclusion of a detailed mitigation plan that describes in detail proposed mitigation measures and identifies responsible parties and funding. We recommend providing clear commitments to carry out proposed mitigation measures in the DEIS, where this is known.
Water resources	Gerdes	Jason	Environmental Protection Agency (EPA)	767	In assessing the current and future water needs in respective basins in the planning area, consider all stressors on the system, including surface water withdrawal and groundwater pumping
Water resources	Gerdes	Jason	Environmental Protection Agency (EPA)	767	The DEIS should provide a complete hydrologic characterization of the planning area. We recommend that BLM require a baseline analysis of water quality, as discussed above, including collection of dissolved oxygen, temperature, and other parameters that are considered naturally occurring. Water quality monitoring data should be collected at enough frequency and duration to capture natural fluctuations due to seasonal changes in hydrology. These data may be used for comparison to changes in water quality as a result of implementation of management activities.
Water resources	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Discuss all direct, indirect, and cumulative impacts to surface water and groundwater quality and quantity from the proposed management activities.
Water resources	Hanceford	Phil	The Wilderness Society	781	BLM should support ongoing efforts associated with removal of the Klamath Hydroelectric Project (four dams) from the Klamath River and support future restoration efforts within the footprint of the existing dams, as well as future restoration efforts in the mainstem Klamath River above and below the footprint of the dams.
Water resources	Hanceford	Phil	The Wilderness Society	781	Butte Creek has one of the largest Chinook salmon runs and breeding areas in the state, and should be prioritized for fish management. In the Van Duzen River watershed, Butte Creek and the South Fork Van Duzen River temperature data show they are also functioning as cold water refugia.
Water resources	Hanceford	Phil	The Wilderness Society	781	BLM should withdraw all spawning streams from mineral entry under the mining law, allowing only recreational mineral collection methods that minimize impacts. Riparian areas essential for salmonids and other species should be protected from livestock grazing using administrative rest and closure of allotments.
Water resources	Hanceford	Phil	The Wilderness Society	781	Develop and implement best management practices or other innovative approaches to ensure adequate groundwater recharge, stream baseflow, water temperature, and water quality for native fish and wildlife in light of climate change and other land management practices (cannabis cultivation, logging, and livestock grazing) that cause adverse impacts to groundwater and surface water.
Water resources	Hanceford	Phil	The Wilderness Society	781	Many tributaries to the Eel River are being depleted of flow and even becoming seasonally dry or disconnected when they were formerly perennial. There is an apparent connection to cannabis cultivation, related rural development, and altered hydrology related to altered upland fire regimes.

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Water resources	Hanceford	Phil	The Wilderness Society	781	The Eel River presents the best opportunity on the Pacific Coast to restore a watershed's capacity to produce ecologically significant populations of salmon and steelhead. All BLM parcels in the Eel River watersheds should be managed for steelhead, Coho salmon (<i>Oncorhynchus kisutch</i>), and Chinook salmon, as well as for ecologically significant species like the Pacific lamprey (<i>Entosphenus tridentatus</i>) and green sturgeon (<i>Acipenser medirostris</i>). Consider designating the North Fork Eel parcels as an ACEC because of the North Fork Eel's clean cold water and strong fish runs.
Water resources	Hanceford	Phil	The Wilderness Society	781	BLM should provide a current baseline of vital springs, seeps, and stream resources, and their current condition, water availability, water quality, degree of impairment from development, ecological condition, areas important to rare and sensitive aquatic biota, and areas important to recreational uses and enjoyment. Grazing, mining aquifer drawdown, irrigation aquifer drawdown, livestock facility development, water alteration and depletion, geothermal energy or other energy or development impacts on surface expression of waters and ecological conditions should all be addressed. Stresses impact small streams, including those inhabited by salmonids, frogs, springsnails, or other rare species.
Water resources	Smith	James	N/A	800	I was around when BLM did there earlier RMP in the 90s and I felt they did a very good job of identifying very sensitive or important resources to focus on and those were in Clear Creek particularly and along the Sacramento River anadromous fish. And I think it was very successful, especially in Clear Creek where we went from the anadromous fish a lack of anadromous fish in that watershed to now where we have well for all fall run and spring run and salmon returning. I think it's going to be, Clear Creek especially is, going to be continuing to be a very important watershed to focus on for an anadromous fish and there's been a lot of work and a lot of improvement done in that watershed and I believe it's going to need to continue given climate change and our continuing droughts
Water resources	Gutermuth	Brandt	Bureau of Reclamation	803	Deadwood Creek watershed needs extensive reforestation and rehabilitation resulting from historic land uses and impacts from the 2018 Carr fire. However, the Trinity River is fine sediment deficient and coarse gravels are added to the mainstem to mitigate for the dams withholding sediment from upstream sources so work to reduce the sediment supply from a tributary immediately downstream from Lewiston Dam that could now help alleviate these deficits within the Trinity River is unwarranted.
Water resources	Vaile	Joseph	KS Wild	811	These BLM lands are important for water quality and quantity, especially in light of the drought conditions that will only be exacerbated by climate change. Some of these lands are also important for domestic drinking water and Endangered Species Act listed aquatic species. Please ensure that you protect all water sources in the planning area through adequate stream buffers, standards and guidelines, wetland delineations, and other aquatic conservation strategies.
Water resources	Smith	Vera	Defenders Of Wildlife	812	Evaluate the sufficiency of the key watershed network (especially in light of climate change expanding fires) and expand and strengthen the network to provide protection to all at-risk species. This is consistent with observations and recommendations offered in Reeves et al (2018) at 498-499(8) and 536.(9) (8) "Key watersheds were originally selected based on the professional judgment of the scientists involved with the development of the ACS, in consultation with fish and aquatic biologists and hydrologists from the national forests and BLM districts covered by the NWFP. Also, they were tightly aligned with late-successional/old-growth reserves, based in part on the assumption that streams in old-growth forests would be most favorable for fish (FEMAT 1993). New techniques (e.g., NetMap, Benda et al. 2007) and understanding of aquatic ecosystems now provide a different perspective on aquatic ecosystems and how they operate in space and time. New concepts such as intrinsic potential of fish habitat (Burnett et al. 2007), projections of climate change, and new questions as to whether stream conditions in old-growth forests are actually most favorable for native salmonids (Bisson et al. 2009, Reeves and Bisson 2009, Reeves et al. 1995) are pivotal concepts that reframe our understanding of aquatic ecology and ecosystems. No formal evaluation of the potential effectiveness of the network of key watersheds was conducted during development of the NWFP, or has been undertaken since it was implemented. Fish populations in need of attention are clearly identified now, and it would be useful to investigate whether the current system is beneficial to those fish in terms of the overall distribution and the suitability of individual watersheds. Additionally, the distribution of other sensitive aquatic-riparian species (e.g., ESA-listed or petitioned herpetofauna) could contribute to this assessment." (9) "A review of the key watershed network and the criteria for selecting watersheds would be useful and timely" and "There is emerging evidence that the key watersheds do not have the capacity to support and provide favorable habitat for ESA-listed fish to the extent that was originally assumed."
Water resources	Smith	Vera	Defenders Of Wildlife	812	Prioritize watersheds for developing watershed analyses and watershed restoration plans.
Water resources	Amsden	Liz	N/A	816	Obviously water management in the continuing drought is a major concern. Misuse of California water by federal, state and local agencies over the past 100 years is no excuse not to move to more sustainable and resilient models. This includes not providing water for inappropriate agricultural practices in the Central Valley just because they have drained their aquifer to grow crops that demand more water than California's climate provides.
Water resources	Brennan	Brien	Elder Creek Oak Sanctuary	824	Specifically, in the Elder Creek watershed in Tehama County, data supports the fact that water extraction during cannabis growing season causes the cessation of water flow for months at a time. The evidence being that a healthy flow has returned and persisted at lower elevations in the autumn (post-harvest) with little or no rainfall. I have USGS and RAWs data and personal records of observations dating back 15 years that I can provide. The BLM owns a parcel that contains or is just below the headwaters of the Middle Fork of Elder Creek. Satellite imagery shows that this parcel has a bulldozed road running to the creek that comes from a private parcel. BLM also owns two sections containing significant portions of the much larger South Fork of Elder Creek. The upper section also contains a road leading to the creek, again emanating from a private parcel. All three of these sections need a steady presence of BLM staff to dissuade and stop the illegal extraction of water from these creeks. Alternatively, the BLM could sell at a discount or donate these lands to a restoration non-profit like Ecosystem Restoration Camps, who would have regular restoration outings at these locations. One camp a month during the first three months of cannabis growing season would be highly effective at stopping the extraction and downstream deaths caused by dry creek beds. Our non-profit has reached out to Ecosystem Restoration Camps and will be joining their network soon, so we are very interested in communicating with the BLM with regards to these lands with significant riparian components."
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	16 USC Section 1274(d)(2) and Existing WSRs in the NCIP Region The NCIP Resource Management Plan (RMP) update should review existing WSRs in the northwest California region as required by 16 USC Section 1274(d)(2) of the National Wild and Scenic Rivers Act (NWSRA). The BLM manages 53.3 miles of federally designated segments of the Klamath, Eel, Trinity, and Van Duzen WSRs in the planning region. The BLM manages extensive public lands along protected segments of the Middle Eel (12.3 miles), South Fork Eel (6.9 miles), North Fork Eel (4.6 miles), main stem Eel (4.9 miles), Klamath (4.3 miles), and main stem Trinity River (19.3 miles), as well as shorter segments on the North Fork Trinity (.8 miles) and Van Duzen (.2 miles).202 202 Table 2-58, pg. 2-280, BLM NCIP Analysis of the Management Situation (AMS), Nov. 2016.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Additional Outstandingly Remarkable Values of the Klamath River Culture ORV - All the Native American tribes in the Klamath watershed depended and continue to depend on the river's fisheries for cultural and ceremonial traditions, as well as for subsistence and commercial purposes.²⁸³ All of the native people residing in the Klamath River environment have spiritual beliefs and traditional practices that are inseparable from the river and surrounding homeland environments.²⁸⁴ The connection of the tribes with the river is so strong that the Yurok Tribe has granted personhood to the river, giving the waterway the right to exist, flourish, naturally evolve, and to have a clean and healthy environment free from pollutants.²⁸⁵ As with other tribes, the Yurok have a strong relationship with the Klamath River. In its 2019 proclamation establishing the rights of the Klamath River, the Yurok Tribe noted that since time immemorial, Yurok culture, ceremonies, religion, fisheries, subsistence, economics, residence, and all other lifeways are intertwined with the health of the river, its ecosystem, and the multiple species reliant on a thriving Klamath River ecosystem.²⁸⁶ Even though the BLM manages scattered tracts of public land on and adjacent to the Klamath River south of Hornbrook and west of the Klamath National Forest boundary, this segment possesses outstandingly remarkable cultural values. The BLM's Klamath Management Area, which includes the confluence of the Klamath and Shasta Rivers, has extensive cultural resources. BLM cultural surveys have identified 55 prehistory/history sites on the public lands in the Klamath Management Area. This includes at least 16 Native American locations that possess possible cultural significance.²⁸⁷ The 1983 NRI identified a potential outstandingly remarkable cultural value for the Klamath River. A 2004 intertribal assessment concluded that the Klamath "Riverscape" is eligible for National Register of Historic Places as a traditional cultural property important to Native American tribes.²⁸⁸ 283 Klamath Facilities Removal Final EIS/EIR, December 2012, Vol. 1, pg. 1-10. 284 https://sites.coloradocollege.edu/indigenoustraditions/sacred-lands/salmon-as-a-sacred-resource-in-the-klamath-river/ 285 https://www.npr.org/2019/09/29/765480451/tribe-gives-personhood-to-klamath-river 286 http://files.harmonywithnatureun.org/uploads/upload833.pdf 287 Proposed Redding Resource Management Plan and FEIS, BLM Redding Field Office, July 1992, pg. 2-7. 288 First Salmon: The Klamath Cultural Riverscape and The Klamath River Hydroelectric Project, Thomas F. King, Klamath River Intertribal Fish and Water Commission, March 25, 2004, pg. 56. Ecology ORV - The Yurok Tribe recognizes their aboriginal territory encompassing the Klamath River watershed to be one of the most wild, biodiverse, and ecologically unique places on the planet.²⁸⁹ The Klamath River Basin, which includes the river in California as well as its source watershed in Oregon, is home to 430 wildlife species, including 263 bird species. Several of these species have been listed or are considered at risk by biologists as threatened or endangered.²⁹⁰ The Klamath-Siskiyou region, through which the Klamath River flows, has been identified as a Critical Biodiversity Area with an extraordinary concentration of endemic species.²⁹¹ The river is also an important wildlife habitat corridor, known for its raptors and large populations of black bear and deer.²⁹² The river from the Oregon border to its confluence with Beaver Creek flows through a Natural Landscape Block and Essential Connectivity Area, and is considered a Potential Riparian Connection providing important wildlife connectivity.²⁹³ The river upstream of Copco Reservoir flows through an Area of Unprotected Biodiversity Importance.²⁹⁴ 289 https://www.congress.gov/116/meeting/house/110110/witnesses/HMTG-116-CN00-Wstate-MyersF-20191022.pdf 290 https://oregonwild.org/waters/klamath/the-klamath-river 291 https://foreststewardsguild.org/klamath-siskiyou/ 292 https://www.blm.gov/programs/national-conservation-lands/california/klamath-wsr 293 California Habitat Connectivity Project, CalTrans/CDFW, February 2010. 294 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. Recreation ORV - The Klamath is California's longest whitewater river, with 184 runnable miles offering a variety of excellent one-day and overnight trips, and a unique combination of moderate rapids, warm water, easy access, superb scenery, abundant wildlife, excellent camping, and fairly light use. It's one of the state's best floats and for whitewater boaters the Klamath remains one of California's finest and most reliable rivers.²⁹⁵ 295 Western Whitewater from the Rockies to the Pacific: A River Guide for Raft, Kayak, and Canoe, Jim Cassady et al, North Fork Press 1994, pgs. 381-382.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Additional Outstandingly Remarkable Values of the Main Stem Eel BLM manages scattered public lands parcels on the main stem Eel WSR between Hearst and Island Mountain. In addition to its outstanding anadromous fisheries, this segment of the main stem Eel possesses these additional outstandingly remarkable values: Scenery & Recreation ORVs - According to the 1983 NRI, the upper reaches of the main stem Eel flow through canyons bordered by oak-grassland in a pristine setting, offering a popular floating run and providing long trips on moving water for camping, swimming, and fishing. California Whitewater describes the main stem Eel as "the biggest and most diverse of California's North Coast Rivers."263 Holbek and Stanley found that although the main stem is not as remote as the Middle Eel, it still gives boaters a feeling of being in semi-wilderness.264 Easy Waters of California describes the main stem run downstream of Dos Rios as "Great for solitude, almost no other people, no roads, just you and your group."265 One of the most recent whitewater guides to Northern California notes that this seldom-run river has great rapids and beautiful scenery, offering one of the best wilderness river trips in the state considering the ease of access, lack of required permits, and small number of users.266 The BLM manages the popular Dos Rios put-in for rafters and kayakers making the four-day run through the famous Eel River canyon to Alderpoint. Boaters running the main stem upstream of Dos Rios float past the proposed English Ridge Wilderness, which was recommended for wilderness designation by the Obama Administration in 2011. Considered to be one of BLM's "crown jewels", the area supports old growth forests that provide habitat for the Northern spotted owl. Several trails access the Middle Eel, and the highest public use is by summer swimmers downstream near the Eel River Work Center and Campground.267 State legislation enacted in 2021 calls for the transition of the Northern Pacific Railroad right of way that parallels much of the main stem Eel River into the 320-mile Great Redwood Trail, which will eventually connect San Francisco Bay with Humboldt Bay. 263 Western Whitewater from the Rockies to the Pacific: A River Guide for Raft, Kayak, and Canoe, Jim Cassidy et al, North Fork Press 1994, pgs. 551. 264 A Guide to the Best Whitewater in the State of California, by Lars Holbek and Chuck Stanley, Friends of the River Books, 1988 2nd Edition, Pg. 14. 265 Easy Waters of California, Ann Dwyer, 2000, pg. 100. 266 The New School Guide to Northern California Whitewater, Dan Menten, New School Publications, 2016, pg. 200. 267 https://www.blm.gov/programs/national-conservation-lands/california/eel-wsr Ecology ORV - From its confluence with the Middle Eel downstream to Alder Point, the main stem Eel WSR flows through a large Natural Landscape Block and is considered a Potential Riparian Connection providing important connectivity between the Coast Range, Eel River basin, and the coast.268 A portion of the same segment from its Bell Springs Creek confluence to Alder Point is an Area of Unprotected Biodiversity Importance.269 268 California Habitat Connectivity Project, CalTrans/CDFW, February 2010. 269 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. Cultural ORV - According to the NRI, the Wiyot, Lassik, Yuki, and Huchonom Indians lived along the main Eel, although few sites have been inventoried. However, a few petroglyph sites on and adjacent to the main stem Eel (upstream of Island Mountain) indicate hundreds of years of habitation along the river. Most recently, an outstanding petroglyph and antiquities site known as Slakaiya Rock has been studied. This remarkable site is in nearly pristine condition, with two petroglyph panels displaying multiple styles, some of which are superimposed on others. Some inscriptions may be 4,000 years old.270 270 Slakaiya Rock (CA-TRI-1): A Rediscovered Petroglyph Sites Near the Eel River, Trinity County, California, by Daniel G. Foster and John W. Fosters, Essays in California Archaeology, No. 60, UC Berkeley Archaeological Research Facility (no date); Ancient Indian Carvings Rediscovered, by Carl Nolte, San Francisco Chronicle, Dec. 1993.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Additional Outstandingly Remarkable Values of the South Fork Eel The BLM's South Fork Eel segment clearly possesses more outstandingly remarkable values than just the outstanding anadromous fishery value identified in 1981. These additional values include: Scenery ORV - The BLM already manages the South Fork Eel WSR corridor to protect its high scenic quality, which is rated as Visual Resource Management (VRM) Class I (pristine).²⁴⁰ Whitewater kayakers who challenge the wilderness run on the South Fork describe the scenery as "...stupendous, with second growth redwoods, deep mossy canyons, and green water."²⁴¹ The class IV-V whitewater in the Elkhorn Ridge Wilderness segments has a beauty described as "overwhelming," with a surprising "solid bedrock gorge" that awaits paddlers.²⁴² Another whitewater boater described the South Fork Eel below its confluence with Ten Mile Creek as "one of the most beautiful river gorges you will ever see in this state. For a class IV boater, I do not know of any other run that can offer this good of scenery, only the North Fork of the Smith comes to mind..."²⁴³ The National Park Service's 1983 Nationwide Rivers Inventory identified scenery as a "potential" outstandingly remarkable value for the South Fork Eel. ²⁴⁰ Ibid. Page. 37. ²⁴¹ CAcreeks.com, Eel River South Fork above Leggett. ²⁴² The New School Guide to Northern California Whitewater page 199, Dan Menten, New School Publications, 2016. ²⁴³ http://www.awetstate.com/SEelTMC.html Recreation ORV - The BLM segment of the South Fork also provides diverse recreation opportunities, from primitive wilderness-style recreation in a truly remote and wild setting to summer youth programs associated with Camp St. Michael, which is located on the South Fork. In addition, the BLM already recognizes the South Fork's outstanding whitewater boating experience.²⁴⁴ CAcreeks.com considers the South Fork the "classic run in the Eel drainage" that "cannot be recommended highly enough."²⁴⁵ Holbek and Stanley declared the South Fork's wilderness run to be "...the standard class IV winter run on the Eel drainage, and it's very good in terms of both whitewater and scenery."²⁴⁶ Popular with San Francisco Bay Area boaters, the length and isolation of the BLM's South Fork Eel segment and its limited availability only during the rainy season, make the segment an "experts-only" run.²⁴⁷ The National Park Service's 1983 Nationwide Rivers Inventory (NRI) identified recreation as a "potential" outstandingly remarkable value for the South Fork Eel. ²⁴³ http://www.awetstate.com/SEelTMC.html ²⁴⁴ Ibid. Page 38. ²⁴⁵ CAcreeks.com, Eel River South Fork above Leggett. ²⁴⁶ A Guide to the Best Whitewater in the State of California, by Lars Holbek and Chuck Stanley, Friends of the River Books, 1988 2nd Edition, Pg. 19. ²⁴⁷ Western Whitewater from the Rockies to the Pacific: A River Guide for Raft, Kayak, and Canoe, Jim Cassady et al, North Fork Press 1994, pg. 552. Wildlife ORV - Peregrine falcon and bald eagle, two federally protected species, use the South Fork Eel for feeding. In addition, the South Fork "provides an important, long-term nucleus of habitat for maintaining spotted owl distribution and dispersal." In the aggregate, this constitutes an outstandingly remarkable wildlife value. The National Park Service's 1983 Nationwide Rivers Inventory identified wildlife as a "potential" outstandingly remarkable value for the South Fork Eel. Cultural ORV - Comprehensive cultural surveys have not been completed for the BLM segment of the South Fork Eel, although most of the South Fork's upper drainage has been identified "as areas of special significance." There are areas along the South Fork currently used by the Cahto Tribe for ceremonial and religious purposes.²⁴⁸ This likely constitutes an outstandingly remarkable cultural value. ²⁴⁸ South Fork Eel Wild and Scenic River Management Plan and DEIS, BLM, August 1990, page 40. Other (Ecology, Botany) ORV - The South Fork Eel flows through the California Coast Range Biosphere Reserve and giant old-growth Douglas fir in the adjacent to the Elder Creek National Natural Landmark. The 1983 NRI identified botany as a "potential" outstandingly remarkable value for the South Fork Eel. All of the SF Eel WSR and much of the river between Branscomb and Benbow is a Potential Riparian Connector flowing through Natural Habitat Block and Essential Connectivity Area essential for wildlife connectivity.²⁴⁹ ²⁴⁹ California Habitat Connectivity Project, CalTrans/CDFW, February 2010. Other (Science, Research) ORV - The University of California manages the Angelo Coast Range Reserve for research linking landscapes, ecosystems, atmosphere, and coastal oceans, as well as for teaching and public outreach. The BLM lands downstream of the Angelo Reserve contribute to this research. For example, the "Eyes on the Eel" project is an ongoing survey of the state of the river and tributary ecosystems that involves survey transects on the South Fork Eel in the Reserve and the downstream BLM segment, as well as further downstream to the main stem Eel. Scientific research conducted on Reserve and BLM lands along the South Fork Eel WSR constitute an outstandingly remarkable value.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Additional Outstandingly Remarkable Values of the Trinity (main stem and North Fork) In addition to its outstanding anadromous fisheries, the segment of the main stem Trinity and the North Fork Trinity managed by the BLM possesses these additional outstandingly remarkable values: Scenery ORV - The 1983 NRI identified a potential outstandingly remarkable scenery value for the main stem Trinity River and its confluence with the North Fork. According to the NRI, the Trinity flows through a steep sided canyon lined with dense forests. Intermittent alluvial flats offer good views of the surround terrain, including some spectacular views of the Trinity Alps. Excellent vistas of the river and its canyon area available from Highway 299, a state-designated scenic highway that parallels the river.271 271 https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways Recreation ORV - The 1983 NRI identified a potential outstandingly remarkable recreation value for the main stem Trinity River and its confluence with the North Fork. According to the NRI, the Trinity is a highly accessible river providing a major source of long, uninterrupted travel for river touring activities such as canoeing, kayaking, rafting, and drift boat fishing. More than one hundred miles of river are available for river-based recreation, with several boating access sites, picnic areas, campgrounds, and private resorts sited along the waterway. The BLM's Trinity River segment is located upstream of the more well know class III-V Pigeon Point and Burnt Range Gorge whitewater runs. However, the BLM segment between Lewiston Dam and the confluence of the North Fork Trinity offers more than 30 miles of easy class I-II paddling and readily accessible river recreation for beginning boaters and those who enjoy a less rambunctious river experience. The BLM segment is described as "a favorite for many who want a friendly river, warm water, good weather, and scenery...providing a fun outing for a long day or an easy overnight trip..."272 CACreeks.com describes the main stem Trinity segment as "one of the most scenic beginner runs in California...(that) would be more popular if it were closer to population centers."273 Holbek and Stanley describe the class IV-V North Fork Trinity run as "...probably the steepest and most difficult run in the north coast mountains."274 Western Whitewater describes the BLM's upper Trinity segment as providing 37 miles of class I- II floating downstream of Lewiston.275 The most recent guide to Northern California whitewater describes the BLM's class II segment downstream of Lewiston as a "great float for families and those seeking something mellow to enjoy on a summer weekend." It further notes that downstream of Douglas City, the river leaves the highway and cuts through a beautiful "off the beaten path" canyon with very little river traffic.276 Fishing for steelhead is also a popular recreational activity on the BLM segment. The BLM segment from Lewiston to Pigeon Point is a "...clear, cold section of the river world famous for its fly fishing." The BLM manages up to 100 commercial fishing guide permits on the Trinity.277 Permitted guides offer drift boat fishing trips to visitors from beyond the region. Multi-day boating runs and fishing trips on this segment of the Trinity is facilitated by four campgrounds and seven river access points managed by the BLM. 272 Easy Waters of California, Ann Dwyer, 2000, pg. 140. 273 https://cacreeks.com/trin-djc.htm 274 A Guide to the Best Whitewater in the State of California, by Lars Holbek and Chuck Stanley, Friends of the River Books, 1988 2nd Edition, Pg. 32. 275 Western Whitewater from the Rockies to the Pacific: A River Guide for Raft, Kayak, and Canoe, Jim Cassady et al, North Fork Press 1994, pgs. 371. 276 The New School Guide to Northern California Whitewater, by Dan Menten, New School Publications, 2016, pgs. 149, 151. 277 https://www.blm.gov/visit/trinity Culture/History ORV - The 1983 NRI identified "potential" outstandingly remarkable culture and history values for the Trinity River. Members of the Hoopa and Yurok Tribes depend on the river's fishery for sustenance and cultural purposes. Trapper/explorer Jedediah Smith recorded his travels along the Trinity in 1828. Major Pierson B. Reading discovered gold near Douglas City in 1848, prompting the expansion of California's gold rush into northwestern California. The gold rush resulted in the establishment of Weaverville as a thriving community. With "civilization", came crime - the famous outlaw Black Bart robbed stage coaches and banks in the area.278 Placed on the National Register of Historic Places in 1984, the historic ghost town of Helena is located on the North Fork near its confluence with the Trinity.279 The BLM also manages and protects a National Register-eligible prehistory site at Helena that may exceed 5,000 years in age.280 Douglas City was named after the nationally famous politician and orator, Stephen A. Douglas, who is perhaps best known for his debates over slavery with Abraham Lincoln.281 278 https://www.trrp.net/program-structure/background/ 279 https://en.wikipedia.org/wiki/Helena,_California 280 Proposed Redding Resource Management Plan and FEIS, BLM Redding Field Office, July 1992, pg. 2-8. 281 https://icldodge.net/about/history-of-the-area/ Ecology ORV - Much of the Trinity River, as well as the North Fork Trinity, flow through Natural Habitat Blocks and Essential Connectivity Areas, and is considered a Potential Riparian Connector providing essential wildlife connectivity.282 282 California Habitat Connectivity Project, CalTrans/CDFW, February 2010. Science/Research ORV - This segment has been the focus of several fish habitat restoration projects intended to remediate the damage caused by the Trinity River Project's diversion of much of the river's flow into the Sacramento River drainage, providing an excellent example of large- scale river habitat and fisheries restoration.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Bear Creek - The 1993 inventory identified a 5.7-mile eligible segment, of which 4 miles flowed through public lands managed by the BLM. The 2018 inventory identified 3.7 eligible miles on BLM lands in four disjunct segments. The identified ORV was the same in both inventories - Bear Creek canyon is secluded and undeveloped, providing excellent opportunities for primitive and unconfined types of recreation. A component of this primitive recreation value not mentioned in either inventory is the 9.5-mile class IV (with some class V-VI portages) whitewater kayak run.84 Since the 1993 inventory, Bear Creek has been designated critical habitat for the threatened Central Valley steelhead.85 This may be more than a remnant run - 2016 monitoring by CDFW counted more steelhead migrating up Bear Creek than much more well-known Sacramento River tributaries, including Deer, Mill, and Antelope Creeks.86 84 https://cacreeks.com/bearlsac.htm 85 Designation of Critical Habitat for Seven Evolutionarily Significant Unites of Pacific Salmon and Steelhead in California, NOAA Fisheries, Fed. Reg. Vo. 70, No. 170, Sep. 2, 2005. 86 https://www.psmfc.org/steelhead/2018/CliffordT_MonitoringDistribution.pdf Recommendations: Find the entire 5.7-mile segment identified in 1993 eligible. Add a fish ORV associated with Bear Creek's threatened Central Valley steelhead population. Include whitewater kayaking as part of the creek's OR primitive recreation value.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Bell Springs Creek - The 1995 inventory identified a 7-mile eligible segment, of which 4 miles flow through BLM-managed public lands. ORVs were fish and wildlife (suitable habitat for indigenous salmonids and an endangered species nesting site). The 2018 inventory identified a .8-mile eligible segment of the main stem with ecology and scenery (rare old growth forest in riparian community providing unique scenery) ORVs and .4 miles of an unnamed tributary with ecology/scenic ORVs. Determined eligible in 1995, the upper main stem Bell Springs Creek in sections 4, 5, and 6, T24N, R15W is not delineated as eligible in the 2018 inventory. No specific fish and wildlife value is mentioned in the 2018 inventory. Bell Springs Creek appears to be designated critical habitat for coho salmon and northern California steelhead. A CDFW temperature study in 1977 found several fingerlings and in 1975, rainbow trout up to nine inches in length were observed. Surveyors concluded that "...this stream provides valuable habitat for spawning steelhead." 163 Bell Springs Creek is located in a Natural Landscape Block and Essential Connectivity Area identified by state agencies as providing crucial connectivity between the main Eel River, the SF Eel River, and the Lost Coast/Sinkyone Wilderness State Park. 164 Lower Bell Creek is located in an Area of Unprotected Biodiversity Importance. 165 163 Steelhead/Rainbow Trout Resources of the Eel River Watershed, California, G.S. Becker & I.J. Reining, CEMAR, July 2009, pg. 186. 164 California Habitat Connectivity Project, CalTrans/CDFW, February 2010. 165 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. Recommendations: The entire 7-mile eligible segment identified in 1995 should be reinstated and fish, ecology, and scenery ORVs documented. The Ecology ORV should be expanded to include crucial habitat connectivity.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Big Chico Creek - The 1993 inventory identified an 8.5-mile eligible segment of Big Chico Creek, with 1.7 miles of public land management by the BLM, beginning at Big Chico Creek's confluence with Campbell Creek and ending approximately two miles upstream of the Big Chico Creek Ecological Reserve boundary. The 2018 inventory identified only 1.5 miles of the creek to be eligible in five disjunct segments. Approximately two miles downstream of the 1993 eligible segment, the stream flows into CSU Chico's Big Chico Creek Ecological Reserve (established in 1999), which continues downstream to the City of Chico's Bidwell Park. This presents an opportunity for the BLM to partner with CSU Chico and the City of Chico to acquire, protect, and manage a continuous river corridor ranging from the yellow-pine belt in the western Sierra Nevada to the Sacramento River confluence in the Sacramento Valley. Both inventories identified a recreation ORV for the eligible segments. In addition, Big Chico Creek in the downstream Preserve is described thusly: The Big Chico Creek Ecological Reserve includes about 4000 acres ranging in elevation from 700 feet to 2,044 feet and including three major geologic formations, a trout stream, numerous perennial and intermittent tributaries, springs, seeps, riparian areas, forests, woodlands, chaparral, grasslands, and rock cliffs. These diverse habitats support more than 600 plant species and 140 wildlife species, including a number that are listed or require large tracts of undisturbed habitat. The wide variety of habitats and organisms makes the BCCER an excellent site for fieldtrips and research. 87 87 https://www.csuchico.edu/bccer/natural-resources/index.shtml Given the proximity of the BLM eligible segment upstream of the Reserve, this suggests that in addition to its recreation ORV, Big Chico Creek possesses botany/ecology, wildlife, and scientific research (other) ORVs. In addition, Big Chico Creek is a well-documented wildlife migration corridor - the stream drains an "Essential Connectivity Area" that connects Natural Landscape Blocks to the north, south, east, and west. 88 88 California Habitat Connectivity Project, CalTrans/CDFW February 2010, pg. C-38. Recommendations: Determine Big Chico Creek from its Campbell Creek confluence to the Big Chico Creek Ecological Preserve to be eligible, due to its recreation, wildlife, and botany/ecology ORVs. Include management direction to work in collaboration with CSU Chico and the City of Chico to acquire available unimproved lands in the stream corridor, with an emphasis on connecting the BLM segment with the Reserve segment. Update the resource information to identify Big Chico Creek as providing essential habitat connectivity.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	BLM policy for state administered, federally designated rivers under NWSRA Section 1273(a)(ii) is that no federal river plan is required. But the policy specifically states that the BLM's land use plans should include all direction necessary to protect and enhance the free-flowing condition, water quality, and outstandingly remarkable values of segments that enjoy state and federal protection under Section 1273(a)(ii). 215 The BLM Manual recognizes that the CRMP will establish a positive trajectory for any value that was in a degraded condition on or after the date of the river's designation. We therefore urge the BLM to identify existing WSR segments in the NCIP region where an existing and out of date plan requires updating or where a new plan is needed to fulfill the purposes of the NWSRA. 215 BLM Manual 6400-Wild and Scenic Rivers-Policy and Program Direction for Identification, Evaluation, Planning, and Management (Public), July 13, 2012, pg. 7-3.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Canyon Creek - The Forest Service found all of Canyon Creek, from its headwaters to its confluence with the Trinity River, to be eligible and suitable in 1995. 114 This includes the 3 miles of stream flowing through public lands managed by the BLM in the lower creek. The Forest Service recognized ORV is scenery, which was recognized in the BLM's 2018 inventory, but with the addition of a fish ORV (federally listed threatened coho salmon, spring Chinook salmon, and summer steelhead). It's worth noting that the State of California has determined that state listing of the Upper Klamath-Trinity Rivers spring Chinook salmon (which includes the spring Chinook that spawn in Canyon Creek) as an endangered species is warranted. 115 Canyon Creek offers multiple whitewater kayaking runs. The lower four miles flowing through BLM land is part of an 8.5-mile class III-IV run that should be included in any whitewater tour of the Trinity River tributaries. 116 114 Shasta-Trinity National Forests LRMP FEIS Record of Decision, April 1995, pg. 8. 115 California Fish and Game Commission, Notice of Findings, Upper Klamath-Trinity River Spring Chinook Salmon Listing Petition, June 16, 2021. 116 Guide to the Best Whitewater in the State of California, Lars Holbek & Chuck Stanley, FOR Books, 2nd Edition, 1988. Recommendation: Add a recreation ORV (whitewater kayaking) and a fish ORV.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Casoose Creek - The 1995 inventory found 4 miles of Casoose Creek upstream of the Hulls Creek confluence to be eligible due to fish and wildlife ORVs (Suitable habitat available for salmon and steelhead, threatened northern spotted owl has been detected in the river segment.). Casoose Creek is not mentioned in the 2018 inventory and no explanation is provided as to why it was excluded. Casoose Creek is acknowledged occupied habitat for Northern California steelhead but it was excluded from designated critical habitat. A 1977 BLM survey observed resident rainbow trout in Casoose Creek and noted that the creek near its Hulls Creek confluence was accessible to steelhead. The report also noted that the segment of Casoose Creek downstream of the 40-foot-high waterfall below the Antone Creek confluence was the only section of the stream with enough water to sustain any fishery. A 1995 CDFW survey numerous steelhead in the lower one mile of Casoose Creek. 182 182 Ibid, pg. 204. Recommendation: Reinstate Casoose Creek as an eligible stream from its confluence with Hulls Creek upstream to the waterfall below Antone Creek, with fish and wildlife ORVs.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Charlton & Chamise Creeks - The 1995 inventory identified 3 miles of Charlton Creek and its tributaries to be eligible, of which 2 miles flow through BLM-managed public lands. The identified ORVs were wildlife and ecological (nearly 600 acres of old growth Douglas fir forest providing habitat for the northern spotted owl). The 2018 inventory identified 1.9 miles of Charlton Creek and 2.5 miles of its tributaries to be eligible due to their ecology and scenery ORVs. Charlton Creek is a tributary of Chamise Creek, of which .6 miles was also determined eligible in the 2018 inventory due to ecology and scenery ORVs. The 2018 inventory narrative fails to note that Charlton Creek is a tributary of Chamise Creek, which underscores the need for a systems approach to identify study rivers per BLM guidance. In addition to not recognizing the relationship between Charlton and Chamise Creeks, there is not explanation as to why the 2018 inventory fails to consider segments of Chamise Creek to the north in Humboldt County that flow through BLM and state land. According to a 1983 CDFW survey, approximately nine miles of Chamise Creek is accessible to steelhead. ¹⁶¹ Due to the inadequate 2018 inventory maps, it is difficult to determine whether the nine miles of accessible habitat includes any part of the BLM and state lands in the upper Chamise/Charlton watershed. ¹⁶¹ Steelhead/Rainbow Trout Resources of the Eel River Watershed, California, G.S. Becker & I.J. Reining, CEMAR July 2009, pg. 186. Recommendations: The eligibility narratives for Chamise and Charlton Creeks should be combined. The Ecology ORV should be expanded to note that Charlton and Chamise Creeks flow through a Natural Landscape Block and Essential Connectivity Area providing crucial connectivity between the main Eel River, SF Eel River, and the King Range/Lost Coast/Sinkyone Wilderness State Park. ¹⁶² The BLM should determine whether any portion of these creeks provide anadromous fish habitat, which could constitute a fish ORV. ¹⁶² California Habitat Connectivity Project, CalTrans/CDFW, February, 2010.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Deep Hole Creek - The 1995 inventory determined 6.5 miles eligible, of which 3 miles flow through BLM-managed public lands. The 2018 inventory does not mention Deep Hole Creek. The 1995 inventory identified fish (suitable habitat for indigenous salmonids) and wildlife (spotted owl habitat) ORVs. Deep Hole Creek is eligible to be designated critical habitat for the California Coastal Chinook Salmon and Northern California Steelhead, but was excluded from the designation for economic reasons. ¹⁸⁸ In 1990, the BLM described Deep Hole Creek as a "productive, small stream, primarily for steelhead and resident rainbow trout." ¹⁸⁹ ¹⁸⁸ Designation of Critical Habitat for Seven Evolutionarily Significant Unites of Pacific Salmon and Steelhead in California, NOAA Fisheries, Fed. Reg. Vo. 70, No. 170, pg. 52529, Sep. 2, 2005. ¹⁸⁹ California Statewide Wilderness Study Report, Eden Valley Wilderness Study Area, Part 4, Vol. 2, BLM California, 1990. Recommendations: Reinstate the 1995 eligibility finding for 6.5 miles of Deep Hole Creek, with fish and wildlife ORVs.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Deer Creek - The Nationwide Rivers Inventory identified 41 miles of Deer Creek from its source near Butt Mountain to its confluence with the Sacramento River to be a potential WSR with scenery, fish, wildlife, geology, history, and cultural ORVs. The BLM's 1993 inventory identified as eligible an 8.1-mile segment of the creek due to its scenery, recreation, wildlife, geology, and cultural ORVs (but oddly, no fish ORV, even though this lower segment of Deer Creek provides crucial migratory habitat for threatened spring-run Chinook salmon and winter steelhead). This eligible segment of Deer Creek was not included in the 2018 inventory, perhaps because BLM land may be located within the corridor but may not include the stream itself. The 1993 RMP included direction to conduct a cadastral survey and acquire additional public lands along Deer Creek. The Forest Service found 30 miles of Deer Creek upstream of the BLM segment to be eligible and suitable for WSR protection due to its scenery, fish, wildlife, and historical/cultural ORVs. Conservation lands and/or easements owned by The Nature Conservancy appear to connect the upstream National Forest eligible/recommended segment with the BLM's 1993 eligible segment on lower Deer Creek. Fish ORV - Deer Creek supports one of the few remaining runs of wild spring chinook salmon and winter steelhead in the Central Valley. According to the Forest Service, the anadromous fish habitats in the Deer-Mill-Antelope watersheds (along with Butte and Battle Creeks) "are probably the best remaining habitat above the Central Valley...and serve as important anchors for their (salmon, steelhead) for their recovery." Unlike most tributary streams of the Sacramento and San Joaquin Rivers which have major water storage facilities that inundate or block hundreds of miles of historical anadromous spawning habitat, headwater stream habitat in Mill, Deer, and Antelope Creeks is still available for utilization by anadromous fish. ⁵³ Deer, Mill, and Antelope Creeks are "considered essential to the recovery and perpetuation of the wild stocks of spring-run Chinook salmon and/or winter-run steelhead in the Central Valley in part because of their current conditions and available habitat." ⁵⁴ Both species have been listed as threatened under federal and state law, and Deer Creek was designated as critical habitat. ⁵⁵ In addition to recognizing its important spring Chinook salmon fishery, a stream survey conducted by the National Park Service and California Department of Water Resources in 1986- 87 found Deer Creek to maintain fairly intact native fish assemblages for most of its length - unusual for most inland California streams of similar size. ⁵⁶ More recently, the Forest Service confirmed that while few streams in California support their native fish assemblages that were present prior to European settlement, Deer Creek (as well as Mill and Antelope Creeks) still supports the majority of their original fish assemblages. ⁵⁷ In 2010, Deer Creek was identified as part of the Sacramento River Stronghold for spring Chinook salmon and winter steelhead. ⁵⁸ In 2011, The Nature Conservancy identified Deer Creek as among the top 2% of watersheds in California that should be prioritized to protect and restore salmonid diversity. ⁵⁹ ⁵³ Watershed Analysis for Mill, Deer, and Antelope Creeks, Forest Service (no date provided), pgs. 4, E-1 ⁵⁴ Ibid, pg. 14. ⁵⁵ Designation of Critical Habitat for Seven Evolutionarily Significant Unites of Pacific Salmon and Steelhead in California, NOAA Fisheries, Fed. Reg. Vo. 70, No. 170, Sep. 2, 2005. ⁵⁶ Stream Surveys of Deer Creek and Mill Creek, Tehama County, CA, 1986 and 1987, by Georgina M. Sato and Peter B. Moyle, sponsored by USDI National Park Service, California Department of Water Resources. ⁵⁷ Watershed Analysis for Mill, Deer, and Antelope Creeks, Forest Service (no date provided), pg. 14. ⁵⁸ The California Salmon Stronghold Initiative, California Department of Fish and Wildlife, March 2012. ⁵⁹ SalmonScape: Priorities for Conserving California's Salmon and Steelhead Diversity, The Nature Conservancy, August 2011, v. 1.1. Ecology ORV - An evaluation of biological health of one hundred Sierra Nevada watersheds found Deer Creek to possess the second highest level of biotic integrity in the entire mountain range (second only to Mill Creek). ⁶⁰ Deer Creek from its source in the Lassen Forest to its confluence with the Sacramento River has been identified by state agencies as a Potential Riparian Connection flowing through Natural Landscape Blocks and Essential Connectivity Areas providing essential habitat and ecological connectivity. ⁶¹ The National Forest and BLM segments appear to be connected by conservation lands managed by The Nature Conservancy, enhancing landscape scale conservation and ecological connectivity. ⁶² ⁶⁰ Biotic Integrity of Watersheds, Sierra Nevada Ecosystem Project (SNEP) Final Report to Congress, Vol. II, UC Davis, 1996. ⁶¹ California Habitat Connectivity Project, CalTrans/CDFW February 2010, pg. C-38. ⁶² https://www.researchgate.net/figure/In-color-online-Tehama-County-and-The-Nature-Conservancys-TNCs-Lassen-Foothills_fig1_249994143 Wildlife ORV - Deer Creek provides excellent nesting areas for several species of raptors, including peregrine falcon, prairie falcon, golden eagle, and others - the 1993 RMP identified this as a wildlife ORV. ⁶³ Nesting peregrine falcons have been documented in the Deer Creek, Mill Creek, and Antelope Creek watersheds, with Deer Creek hosting the greatest concentration of eyries. Deer Creek and the adjacent Mill and Antelope Creeks are high value watersheds for the conservation of amphibians, because of the presence of three herptile species of special concern: the Cascades frog, foothill yellow-legged frog, and the western pond turtle. In addition, the three watersheds encompass a large portion of summer and winter range habitat for the Eastern Tehama Deer Herd, the largest migratory herd in California.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Hulls Creek - The 1995 inventory identified a 16-mile eligible segment, of which 6 miles flow through public lands managed by the BLM. The 2018 inventory identified a two-mile eligible segment. The 1995 ORVs included fish and wildlife (suitable habitat available for salmon and steelhead and threatened northern spotted owl has been detected in the river segment.). The 2018 ORV was only fish (Important producer of winter-run steelhead trout and federally listed threated Chinook salmon). No explanation is provided as to why only 2 miles of Hulls Creek were found eligible in 2018 and why the wildlife ORV was dropped. Nor is there any mention that a Hulls Creek tributary, Casoose Creek, was found eligible in 1995. Hulls Creek is acknowledged occupied habitat for Northern California steelhead but it was excluded from designated critical habitat. A 1938 survey found steelhead to be common in Hulls Creek, which has good spawning areas, pools and shelter, and abundant food. A 1972 found steelhead to be scare due to high water temperatures. In 1995, CDFW found juvenile and YOY steelhead in the first 6.5 miles of Hulls Creek.181 This lower segment flows through BLM land. 181 Steelhead/Rainbow Trout Resources of the Eel River Watershed, California, G.S. Becker & I.J. Reining, CEMAR July 2009, pg. 204. Recommendation: All six miles of Hulls Creek be reinstated with fish and wildlife ORVs.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Jenny Creek - Jenny Creek is a tributary of the Klamath River. At present, the creek flows into Copco Reservoir, but plans to remove the Copco Dams may result in Jenny Creek flowing freely into a restored Klamath River. The 2018 inventory identifies a scenery ORV associated with the stream's high geological and biological diversity and associated vegetation and landforms. The upper 17.6 miles of Jenny Creek in Oregon were designated a Wild and Scenic River in 2019 in recognition of the stream's exceptionally high biodiversity (its watershed represents the geographic intersection of the High Cascade, Cascade Foothills, and Klamath Mountain ecoregions). The Medford BLM Field Office reportedly found Jenny Creek to possess fish and history ORVs in a section 5(d)(1) study that appears to be no longer available to the public on the internet. Additional ORVs include: Recreation ORV - The creek provides a variety of outdoor recreation, including fishing, camping, hiking, and kayaking. Despite difficult access, the California segment of Jenny Creek has also experienced increased recreation use, particularly since the Monument designation. Whitewater kayakers enjoy its class IV-V whitewater.105 Anglers are attracted by its relatively large redband trout. Scenic Jenny Creek Falls is increasingly visited by hikers, despite a lack of trails.106 105 http://www.riverfacts.com/rivers/12659.html 106 https://vanmarmot.org/2018/04/24/jenny-creek-falls-california-24-apr-2018/ Cultural ORV - The area is rich in cultural history and long traditions of human use.107 107 https://www.rivers.gov/rivers/jenny.php Geology/Ecology ORV - In addition to contributing to the scenery ORV acknowledged by the 2018 inventory, the high geological and biological diversity should be considered an ecology ORV. The California segment of Jenny Creek flows through a Natural Landscape Block and a Essential Habitat Connectivity Area, providing connectivity between Oregon and the Klamath River to the south.108 108 California Habitat Connectivity Project, CalTrans/CDFW February 2010. Fish ORV - Endemic to the watershed, the Jenny Creek redband trout and Jenny Creek sucker are found in the creek upstream of Jenny Creek Falls. Both species were federal candidates for listing (prior to the Bush Administration eliminating this category) and the upper watershed is a designated key watershed established for the conservation of at-risk fish species.109 The presence of the Jenny Creek redband trout is one of the reasons cited for President Obama's expansion of the Cascade-Siskiyou National Monument in January 2017 (the expansion included the WSR eligible segment of Jenny Creek in California).110 Jenny Creek Falls has acted as a genetically-isolating barrier, resulting in the Jenny Creek sucker possessing morphological characteristics distinct from the Klamath smallcale sucker, including a dwarf form.111 Low adult numbers of the Jenny Creek sucker in the early 2000s raise the possibility that the population may be declining, possibly due to chronic drought conditions.112 The Jenny Creek ACEC was established by the Medford and Redding BLM Field Offices to protect the sucker and nesting bald eagles.113 109 Medford BLM RMP 1995, pgs. 22, 49. 110 https://www.toledoblade.com/MattMarkey/2017/01/22/Rare-trout-gains-sanctuary-with-an-11th-hour-directive.html 111 Jenny Creek Proposed Wild and Scenic River, Andy Kerr, Larch Company, 2010. 112 Population Characteristics of Jenny Creek Suckers, BLM Ashland Field Office, Jeannine M. Rossa and Michael S. Parker, 2007. 113 Proposed Redding BLM RMP/FEIS, Appendix C, pg. C-4. Recommendations: In addition to its scenery ORV, expand the Jenny Creek ORVs to include recreation, fish, and botany/ecology (other). Include direction to acquire available unimproved lands in the corridor and ACEC.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Mad River - The 1995 inventory identified a 2.5-mile eligible segment, of which 1.3 miles flowed through BLM-managed public lands. The 2018 inventory identified .9 miles of eligible stream in four disjunct segments. The identified ORV in both inventories is fish (important producer of summer and winter-run steelhead trout and federally listed threatened Chinook salmon). Located on the river, the Mad River Fish Hatchery produces 150,000 juvenile steelhead trout each spring, as well as triploid (sterile) Chinook salmon and rainbow trout for stocking in the Mad River and other waterways. As a result, the Mad River is a popular destination for local and out of region anglers fishing for steelhead.198 The indigenous native people, the Wiyot, Whilkut, Nongatl, and Lassik, were the original inhabitants along the river. The Wiyot people survived and thrived along the lower Mad River, but other tribal groups were nearly annihilated by white settlers during the 1860's. The Wiyot call the Mad River Baduwa't.199 The Mad River has been identified by state agencies as a Potential Riparian Connection flowing from and through Natural Landscape Blocks and Essential Connectivity Areas that provide critical connectivity for fish and wildlife migration.200 The eligible segment(s) identified by the BLM includes the class V (V+) "Grand Canyon" whitewater kayak run. With changes in boat design, skills and the mentality of class V kayakers, the Grand Canyon of the Mad now makes for expedition-style whitewater kayaking in California and belongs at the top of any experienced boater's list.201 Upstream of the eligible BLM segment(s), the Mad River flows through public lands in the Six Rivers National Forest. 198 https://www.madriverunion.com/articles/steelhead-season-is-here-and-the-mad-river-is-the-place-to-be/ ; https://thecaliforniaoutdoors.com/mad-river-steelhead-fishing-techniques/amp/ 199 https://madriveralliance.org/about-the-mad-river 200 California Habitat Connectivity Project, CalTrans/CDFW, February 2010. 201 The New School Guide to Northern California Whitewater page 199, Dan Menten, New School Publications, 2016. Recommendations: Include the entire 2.5-mile eligible segment identified in the 1995 inventory. Add fishing and whitewater recreation as OR recreation values, Native American cultural heritage should be considered an OR cultural value, and the Mad River's essential role providing fish and wildlife connectivity should be considered an OR ecology value. The BLM should invite the Forest Service to collaborate on an eligibility assessment of the Mad River.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Main Stem Eel River Salmonid Refuge The third largest river system in California, the Eel River basin once possessed significant populations of at least five distinct kinds of anadromous salmonids, including fall-run Chinook salmon, coho salmon, winter and summer steelhead, and coastal cutthroat trout. All these fish populations have declined since the 1950s. Threatened coho salmon, Chinook salmon, and steelhead transit the lower main stem Eel River corridor to reach holding and spawning areas upstream. Coho salmon historically spawned in the main Eel as far up as Indian Creek and Tomki Creek, and presently are found as high up as Outlet Creek. The reach of the Eel between Van Arsdale Dam and Scott Dam was formerly considered one of the most productive stream sections in California and was heavily populated by steelhead.¹⁵² The upper main Eel's current low salmon productivity is due to dams (Van Arsdale, Scott) blocking fish passage.¹⁵³ Bradbury et al identified the upper Eel watershed as a high restoration priority. Removal of Scott Dam would allow recolonization of the upper Eel basin by Chinook salmon and steelhead, which could access several healthy forks rising from the slopes of 7,055-foot-high Snow Mountain.¹⁵⁴ The upper Eel and its tributaries upstream of Scott Dam/Pillsbury Reservoir possess suitable habitat for salmonids. Genetic studies of resident rainbow trout upstream of Pillsbury Reservoir have confirmed that summer-run steelhead inhabited the upper Eel prior to the construction of Scott Dam.¹⁵⁵ ¹⁵² Historical Review of Eel River Anadromous Salmonids, With Emphasis On Chinook Salmon, Coho Salmon, and Steelhead, R.M. Yoshiyama & P.B. Moyle, UC Davis Center for Watershed Sciences, Feb. 2010. ¹⁵³ Prioritization Emphasizing Protection and Restoration of Pacific Salmon Species in the California North Coast Region, Bradury et al., 1995. ¹⁵⁴ Ibid. ¹⁵⁵ On the Ecology and Distribution of Steelhead (<i>Oncorhynchus mykiss</i>) in California's Eel River, Samantha Kannry et al, American Genetic Association Journal of Heredity, Oct. 2020. There are only scattered parcels of BLM-managed public lands on the main stem Eel River, the most significant of which encompasses about three miles of public river frontage at the base of English Ridge. Main stem tributaries that flow through public lands managed by the BLM and that share and complement similar outstanding values include Coleman Creek, Pipe Creek, Charleton Creek, Bell Springs Creek, Shell Creek, White Rock Creek, Woodman Creek, Indian Creek, Fish Creek, and Tomki Creek. The main stem Eel WSR, between the Bell Springs Creek confluence and Alder Point flows through an Area of Unprotected Biodiversity Importance.¹⁵⁶ ¹⁵⁶ Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. Coleman Creek - The 1995 inventory identified a 4.3 -mile eligible segment, of which 1.3 miles flows through BLM-managed public lands. ORVs include fish (suitable spawning and/or rearing habitat for salmon and steelhead) and cultural (several ethnographic sites). The 2018 inventory does not list Coleman Creek, nor provide an explanation why it was not determined eligible. Coleman Creek appears to be designated critical habitat for Northern California steelhead and coho salmon. Fish sampling in 1989-90 found steelhead in Coleman Creek and a 1999 CDFW survey observed juvenile salmonids.¹⁵⁷ Coleman Creek is located in a Natural Landscape Block and Essential Connectivity Area identified by state agencies as providing crucial east-west connectivity between the Coast Range and the King Range/Lost Coast.¹⁵⁸ ¹⁵⁷ Steelhead/Rainbow Trout Resources of the Eel River Watershed, California, G.S. Becker & I.J. Reining, CEMAR July 2009, pg. 180. ¹⁵⁸ California Habitat Connectivity Project, CalTrans/CDFW, February 2010. Recommendations: Coleman Creek should be reinstated as an eligible stream with fish, cultural and ecology ORVs, or an explanation provided as to why the BLM feels the stream is no longer eligible. The Ecology ORV is associated with Coleman Creek providing crucial connectivity between the main Eel River, SF Eel River, and Mattole River drainages, as well as between the Coast Range and the King Range.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Mill Creek - The 1981 Nationwide Rivers Inventory identified 49 miles of Mill Creek from its source in Lassen Volcanic National Park to the irrigation diversion dam in the Sacramento Valley to be potential WSR with scenery, fish, wildlife, geology, history, and cultural values. The Forest Service found eligible and recommended WSR protection for 32 miles of Mill Creek from the Lassen Volcanic National Park boundary to the Lassen National Forest boundary, due to its scenery, fish, wildlife, and cultural ORVs. The BLM's 1993 WSR inventory identified a 13.7-mile eligible segment directly downstream of the Lassen National Forest boundary to be eligible due to its scenery, wildlife, geology, and cultural ORVs. The 2018 inventory shortened the eligible segment to just .2 miles (just the stream segment with BLM lands) and identified scenery, geology, and cultural ORVs. The 1993 wildlife ORV is associated with diverse raptor species that nest and forage in the Mill Creek Canyon's lava rock formations. The following additional ORVs should be documented: Recreation ORV - According to CACreeks.com, Mill Creek offers an unusually scenic class V kayak run, "...which should be boated more often than it is." A visitor from Oregon (beyond the region of comparison) shared this description of Mill Creek: We all agreed, Mill Creek was definitely the highlight of our California trip: a superb run with numerous classic class IV and V drops, most of which can be boat scouted. There are many, many gorges, some of which pinch down to less than a boat width wide in places, and this dramatically increases the thrill factor. The scenery is fantastic!! It all adds up to a classic run. Mill makes it into my top five best creeks ever, behind the Little White Salmon and Clear Fork Cowlitz. - Jason Rackley, Oregon Kayaking webmaster67 67 https://www.cacreeks.com/mill.htm Ecology ORV - Mill Creek possesses the highest level of biotic integrity of the top 100 watersheds in the Sierra Nevada.68 Mill Creek from its source in Lassen Volcanic National Park to its confluence with the Sacramento River is a Potential Riparian Connection flowing Natural Landscape Blocks and Essential Connectivity Areas identified by state agencies as providing essential habitat connectivity.69 The National Forest and BLM segments appear to be connected by state conservation lands in the Dye Creek Preserve (managed by The Nature Conservancy), which enhance landscape scale conservation and ecological connectivity.70 These constitute an ecology ORV. 68 Biotic Integrity of Watersheds, Sierra Nevada Ecosystem Project (SNEP) Final Report to Congress, Vol. II, UC Davis, 1996. 69 California Habitat Connectivity Project, CalTrans/CDFW February 2010, pgs. C-38, C-40. 70 https://www.researchgate.net/figure/In-color-online-Tehama-County-and-The-Nature-Conservancys-TNCs-Lassen-Foothills_fig1_249994143 Fish ORV - Mill Creek also maintains fairly intact native fish assemblages for most of its length (unusual for most inland California streams of similar size).71 In 2010, Mill Creek was identified as part of the Sacramento River Stronghold for spring Chinook salmon and winter steelhead.72 In 2011, The Nature Conservancy identified Mill Creek as among the top 2% of watersheds in California that should be prioritized to protect and restore salmonid diversity.73 The entire creek is designated critical habitat for the threatened spring Chinook salmon and winter steelhead.74 71 Stream Surveys of Deer Creek and Mill Creek, Tehama County, CA, 1986 and 1987, by Georgina M. Sato and Peter B. Moyle, sponsored by USDI National Park Service, California Department of Water Resources. 72 The California Salmon Stronghold Initiative, California Department of Fish and Wildlife, March 2012. 73 SalmonScope: Priorities for Conserving California's Salmon and Steelhead Diversity, The Nature Conservancy, August 2011, v. 1.1. 74 Designation of Critical Habitat for Seven Evolutionarily Significant Unites of Pacific Salmon and Steelhead in California, NOAA Fisheries, Fed. Reg. Vo. 70, No. 170, Sep. 2, 2005 Wildlife ORV - Mill Creek provides excellent nesting areas for several species of raptors, including peregrine falcon, prairie falcon, golden eagle, and others.75 Nesting peregrine falcons have been documented in the Mill Creek watershed. Mill Creek and the adjacent Deer and Antelope Creeks are high value watersheds for the conservation of amphibians, because of the presence of three herptile species of special concern: the Cascades frog, foothill yellow-legged frog, and the western pond turtle. In addition, the three watersheds encompass a large portion of summer and winter range habitat for the Eastern Tehama Deer Herd, the largest migratory herd in California. Together, these comprise a wildlife ORV.76 75 Redding Proposed RMP/FEIS, Appendix A - Wild and Scenic River Eligibility, BLM 1992, pg. A-15. 76 Watershed Analysis for Mill, Deer, and Antelope Creeks, Lassen National Forest, USDA Forest Service, no date. Recommendations: Find Mill Creek from its source in Lassen Park to the irrigation dam to be eligible. At the minimum, reinstate the 13.7-mile eligible BLM segment, reinstate the wildlife ORV identified in 1993, add fish, wildlife, and ecology ORVs, and include NCIP direction to acquire additional public lands within the stream corridor. Update the resource information identifying Mill Creek as providing essential habitat connectivity.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>North Fork Battle Creek - No eligible segment on the North Fork Battle Creek was identified in the 1993 inventory. The 2018 inventory identifies .9-mile of the North Fork to be eligible due to its fish ORV. Map A19 displays the .9 miles of eligible stream in two disjunct segments - a larger segment in section 10 upstream of the North Fork's confluence with Bailey Creek, and a smaller segment downstream in section 29 near Spring Gardens. There is no mention of the section 29 segment in the North Fork description on page 3-33. The fish ORV description should be expanded with information about the Battle Creek Restoration Project and the importance of the North Fork in providing a second population of endangered winter-run Chinook salmon.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>North Fork Cottonwood Creek - The 1993 inventory identified a 7.7-mile eligible segment encompassing 2.4 miles of stream flowing through public lands managed by the BLM. The 2018 inventory identified a 2.1-mile eligible segment within the larger segment identified in 1993. Identified ORVs are the same (scenery, recreation). State agencies identified Cottonwood Creek and its forks as flowing through Natural Landscape Blocks providing essential connectivity between the Coast Range, Sacramento Valley, and Modoc Plateau. Recommendations: Find the larger 7.7-mile segment from the Middlebeck (Rainbow Lake) Dam to Platina Road to be eligible. Update resource information to identify the North Fork Cottonwood Creek as providing essential habitat connectivity.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Paynes Creek - The eligible segment length identified in 1993 and 2018 is nearly identical. The 1993 ORVs were scenery and vegetation (riparian habitat) and the 2018 ORVs are scenery, fish, and cultural. The Vegetation ORV identified in 1993 is Payne Creek's extensive dense riparian growth, which constitutes a key remnant of critical habitat for wildlife species in the Sacramento Valley. There is no explanation provided in the 2018 inventory as to why the Vegetation ORV identified in the 1993 inventory was dropped. Most other Sacramento River tributaries in the Sacramento River Bend area were identified in the 2018 inventory with this identical value (now labeled an Ecological ORV), including Sevenmile Creek, Turtle Creek, Massacre Creek, Sacramento River Bend tributaries 1A-B and 2, Inks Creek, and the Inks Creek tributary. Recommendation: Add an Ecology ORV for Paynes Creek in the NCIP inventory. Ecology ORV - Extensive dense riparian growth exists along four to five miles of stream bottom. This constitutes a key remnant of critical habitat for wildlife species in the Sacramento Valley that are dependent on dense cover.36 This stream segment supports imperiled Great Valley Mixed Riparian Forest and Great Valley Cottonwood Riparian Forest. Paynes Creek flows through a large Natural Landscape Block identified by state agencies (which also includes the Sacramento River, Battle Creek, and other Sacramento River tributaries) that provides essential habitat connectivity between the Modoc and Great Valley Ecoregions.37 A portion of the creek is located in an Area of Unprotected Biodiversity Importance.38 36 Redding Proposed RMP/FEIS, Appendix A - Wild and Scenic River Eligibility, BLM 1992, pg. A-16. 37 California Habitat Connectivity Project, CalTrans/CDFW February 2010. 38 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Pipe Creek - The 1995 inventory identified a 4.5-mile segment of Pipe Creek to be eligible, of which .5 miles flowed through public lands managed by the BLM. The identified ORV was fish (suitable spawning/rearing habitat for indigenous salmon and steelhead.). The 2018 inventory did not mention Pipe Creek. Pipe Creek appears to be designated critical habitat for coho salmon and Northern California steelhead. A CDFW stream inventory of Pipe Creek in 1997 identified steelhead in the creek.159 159 Steelhead/Rainbow Trout Resources of the Eel River Watershed, California, G.S. Becker & I.J. Reining, CEMAR July 2009, pg. 185. Recommendations: The 2018 inventory should be revised to include Pipe Creek as an eligible stream or provide an explanation as to why the BLM feels it is ineligible. An Ecology ORV should be added as Pipe Creek appears to be located in a Natural Landscape Block providing essential connectivity between the Eel River, SF Eel River, and the King Range/Lost Coast/Sinkyone Wilderness State Park.160 160 California Habitat Connectivity Project, CalTrans/CDFW, February 2010.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Rattlesnake Creek - The 1995 inventory identified an .8-mile eligible segment, of which .3 miles were on public land managed by the BLM. The 2018 inventory identified a .6-mile eligible segment on public land. The identified ORV in both inventories is fish. We recommend the following revision for the Fish ORV and recommend adding Recreation and Ecology ORVs. Fish ORV - Rattlesnake Creek provides designated critical habitat and is an important producer of federally-listed threatened Southern Oregon/Northern California coasts coho salmon, California coastal Chinook salmon, and Northern California steelhead. A 1968 CDFW survey determined that Rattlesnake Creek "...offers excellent water for migratory fish as a good flow is maintained throughout." A 1993 CDFW survey noted steelhead of various ages in the creek.135 135 Ibid. Ecology ORV - Rattlesnake Creek is located in an Essential Connectivity Area identified by state agencies are providing critical connectivity in the SF Eel River drainage.136 136 California Habitat Connectivity Project, CalTrans/CDFW February 2010. Recreation ORV - American Whitewater identifies a 3.9-mile class V kayak run (others rate it as class IV-V) on lower Rattlesnake Creek upstream of its confluence from the South Fork Eel.137 Holbek and Stanley describes the class IV-V run on Rattlesnake Creek "...an enjoyable rock dodging run, through very pleasant wooded scenery."138 Menten describes the creek thusly, "Rattlesnake Creek changes its face around every corner. From man-made structures, beautiful gorges, fun and manky rapids to the tunnel blasted through a cliff, Rattlesnake Creek is a truly unique run." 139 Another kayaker stated, "But even though Rattlesnake Creek has been reshaped from its original form, the intrinsic beauty of a free-flowing river remains."140 With easy access from Highway 101, the segment of Rattlesnake Creek upstream of the South Fork confluence also provides swimming holes favored by locals and travelers.141 137 https://www.americanwhitewater.org/content/River/view/river-detail/268/main 138 A Guide to the Best Whitewater in the State of California, by Lars Holbek, Chuck Stanley, FOR Books 2nd Edition 1988, pg. 23. 139 The New School Guide to Northern California Whitewater, by Dan Menten, New School Publications 2016, pg. 198. 140 https://www.northcoastjournal.com/humboldt/rattlesnake-creek/Content?oid=2126688 141 https://gayhighwaymen.com/2010/07/21/dog-fetches-rock-cannonball-boy-other-sights-seen-at-mendocinos-rattlesnake-creek-hole-in-the-wall-site/ Recommendations: Expand the fish ORV description to include the updated listing status of at- risk salmonids, add an ecology ORV associated with the river providing critical connectivity, and add a recreation ORV associated with whitewater boating and summer swimming.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Sevenmile Creek - The 2018 inventory identified a .4-mile segment of Sevenmile Creek to be eligible due to its cultural and ecological ORVs, but the creek was not included in the 1993 inventory. The eligible segment begins at the confluence of Sevenmile Creek and an unnamed tributary and the eligible segment is entirely located in section 25, T28N, R3W. But a review of the BLM's 2015 Red Bluff surface management map found the eligible segment appears in section 30, T28N, R3W (perhaps due to an adjusted land survey). No explanation is provided as the why the Sevenmile Creek segment upstream of the unnamed tributary confluence, and the unnamed tributary itself, were not determined eligible. Nor is there any explanation provided as to why the upper-most source of Sevenmile Creek flowing from BLM managed public lands in section 20, T28N, R2W is not eligible. A portion of the creek is located in an Area of Unprotected Biodiversity Importance.39 39 Ibid. Recommendations: Add to and expand the ORVs as noted above. Determine all of Sevenmile Creek to be eligible, including its unnamed tributary and the segment of the creek and down to its confluence with the Sacramento River (on private land downstream of the currently eligible segment). Most of the creek (including its unnamed tributary) is located in the Sacramento River Bend Area ACEC and Outstanding Natural Area, which includes management direction to acquire from willing sellers additional public lands within the ACEC boundary. This management direction should continue in the NCIP.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Shasta River - The 1993 inventory identified 10.3 eligible miles, with 3.3 miles flowing through public lands managed by the BLM. The 2018 inventory identifies two segments totaling 3.4 eligible miles, although the map shows six disjunct segments. 1993 ORVs include scenery and fish (most important salmon spawning tributary of the Klamath River). 2018 ORVs include scenery, fish, and cultural. Much of the eligible segment identified by BLM is located in an Area of Unprotected Biodiversity Importance.103 The Shasta River offers a class II-III whitewater experience, that would be more available if upstream agricultural diversions didn't reduce flows much of the year.104 Here is a You Tube video of the Shasta River kayak run: https://www.youtube.com/watch?v=6OkeuB4F1LY . 103 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. 104 https://www.americanwhitewater.org/content/River/view/river-detail/296/main Recommendations: Reinstate the 10.3-mile eligible segment. Add a recreation ORV (whitewater kayaking). Note that the Shasta River flows through an Area of Unprotected Biodiversity in the resource information.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Some of the most troubling changes between the 1993-95 inventories and the 2018 inventory include: * An 8.2-mile eligible segment of lower Deer Creek identified in the 1993 Redding RMP was not included in the 2018 inventory. The 1993 eligibility finding adds 8.2 miles to an adjacent upstream 30-mile segment of the creek on the Lassen Forest found eligible and recommended as suitable for WSR protection by the Forest Service. Deer Creek is one of the last refuges in the Central Valley for wild stocks of threatened spring chinook salmon and steelhead. It also possesses outstanding Native American cultural, wildlife, geology, recreation, and scenery values. There is no explanation provided as to why Deer Creek was eliminated as an eligible stream. * Eel River tributaries Fish Creek, Indian Creek, and Deep Hole Creek were originally determined eligible in the 1995 Arcata RMP but are not included in the 2018 inventory. All three streams provide important habitat for salmon and steelhead at risk of extinction and contribute to the survival of at-risk salmonids in the main stem Eel River and the Middle Eel River. The three streams flow through Wilderness Study Areas providing outstanding opportunities for solitude and primitive recreation. In addition, these three streams are proposed WSRs in legislation that has passed the House of Representatives several times and is currently pending in the Senate. There is no explanation provided in the 2018 report as to why these streams are apparently no longer considered eligible by the BLM. * Several other Arcata region streams, including Casoose Creek, Coleman Creek, Bridge Creek, Jewett Creek, Pipe Creek, and Woodman Creek previously determined eligible in the 1995 RMP amendment due to their outstanding anadromous fish value were also dropped from the 2018 eligibility report. Casoose Creek was also previously found to possess a wildlife ORV (old growth forest habitat for the spotted owl) and Coleman Creek to possess a cultural ORV. Shell Rock Creek, a stream previously determined eligible due to its outstanding geology value, was also dropped. There is no explanation provided in the 2018 report as to why these streams are apparently no longer considered eligible by the BLM. * A substantial 98-mile reduction in eligible mileage for streams in the Redding area, including the Sacramento River (-9.2 miles), Battle Creek (-28.5 miles), Mill Creek (-13.8 miles), Big Chico Creek (-7.3 miles), Butte Creek (-9.3 miles), and the NF, MF, and SF Cottonwood Creek (-29.7 miles). The remaining .2-mile segment of Mill Creek in the new inventory is now disconnected from the 32-mile upstream segment of Mill Creek on the Lassen Forest found eligible and recommend by the Forest Service. Mill Creek is one of the last refuges in the Central Valley for wild stocks of threatened spring chinook salmon and steelhead. It also has outstanding Native American cultural, wildlife, geology, and scenery values. No information is provided as to why the eligible segments were shortened. * Similar reductions in eligible miles occurred on Arcata area streams between the 1995 and 2018 inventories, including the EBSF Eel River (-7 miles), Hulls Creek (-9.1 miles), Tomki Creek (-7.8 miles), Butte Creek (-4.3 miles), and Cedar Creek (-4.2 miles). Segments of the EBSF Eel River and Cedar Creek found eligible in 1995 are proposed WSRs in legislation that has passed the House of Representatives several times and is currently pending in the Senate. But the lower segment of Cedar Creek determined eligible in 1995 and included in the legislation is not in the 2018 inventory. No information is provided as to why the eligible segments were shortened between 1995 and 2018.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	South Fork Battle Creek - The 1993 inventory found all of the South Fork from a point downstream of its confluence with Panther Creek to its confluence with the North Fork to be eligible due to the same ORVs identified for the main stem; scenery, recreation, fish, wildlife, vegetation (ecology/botany), and history values. The 2018 inventory narrative identifies 4.5 miles of the South Fork to be eligible in seven disjunct segments. The ORVs should be expanded (see earlier narrative about the main stem Battle Creek) and the ecology/botany ORV should recognize that the South Fork Battle Creek flows through Natural Landscape Blocks and Essential Connectivity Areas identified by state agencies as providing essential habitat connectivity between the Lassen Park high country and the Sacramento Valley. ⁵² NCIP should include management direction to acquire more public lands along the South Fork to enhance ecological connectivity. ⁵² California Habitat Connectivity Project, CalTrans/CDFW February 2010.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Thatcher Creek - Not identified in the 1995 inventory, the 2018 inventory found eligible 1.6 miles of Thatcher Creek, with a fish ORV (important producer of federally-listed threatened Chinook salmon and winter-run steelhead trout). Thatcher Creek is one of the few Middle Eel tributaries downstream of the Black Butte River that contain salmonid nursery areas of any consequence. Steelhead have been observed throughout the creek in surveys conducted by Forest Service staff (implying that anadromous fish migrate into Thatcher Creek's upper segment on the Mendocino National Forest). ¹⁹⁰ A systems approach should recognize and acknowledge the upstream segments of Thatcher Creek managed by the State of California (sec. 16, R11W, T21N) and the Mendocino National Forest. ¹⁹⁰ Steelhead/Rainbow Trout Resources of the Eel River Watershed, California. Gordon Becker et al, Center for Ecosystem Management, July 2009, pg. 227. Recommendations: Find all of Thatcher Creek on BLM-managed public lands to be eligible. Ask the State of California and the Mendocino National Forest to consider their segments to be eligible as well.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The BLM is to be commended for recognizing that new information and circumstances warrant reconsideration of the original WSR inventories conducted in 1993 for the Redding RMP and in 1995 for the Arcata RMP. In addition, the identification of additional eligible streams not originally included in the 1993/95 inventories is greatly appreciated. However, the 2018 report has a glaring flaw - eligible segments identified in the previous inventories have been significantly shortened and other streams previously determined eligible have disappeared altogether - with no explanation provided to the public. The 1993-95 Redding/Arcata WSR inventories identified as eligible about 40 streams totaling more than 322.75 miles. The combined NCIP May 2018 inventory identifies more eligible streams - 63 altogether - but only totaling 172.6 miles. The eligible mileage identified in the 2018 inventory is 43% less than the eligible mileage identified in the 1993-95 Redding/Arcata RMP inventories, even though additional new stream segments were identified in the 2018 inventory. This is primarily due to the reduction in eligible mileage for several streams, as well as elimination of 12 previously eligible segments
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The BLM's estimate of existing WSR mileage it manages in the NCIP area varies by document. The NCIP 2018 Wild and Scenic River Eligibility Report claims the BLM manages 50.5 miles of existing WSRs in the planning area (including 1.5 miles of the Klamath, 17 miles of the Trinity and certain tributaries, and 32 miles of the Eel and certain tributaries). These differences should be reconciled. The discrepancy may be the BLM's existing WSR mileage on the Klamath, which is stated as 1.5 miles in the 2018 Eligibility Report and 4.3 miles in the 2016 AMS. The 2019 list of NWSRs in the US indicates 1.5 miles of the Klamath WSR managed by the BLM, but this may not be correct. ²⁰³ But the 2016 AMS also provides slightly different mileages for the main stem Trinity and the various forks and tributaries of the Eel that are different from the mileages in the 2018 Eligibility Report. ²⁰³ River Mileage Classifications for Components of the National Wild and Scenic Rivers System, April 2019, pg. 8, https://www.rivers.gov/documents/rivers-table.pdf .
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The existing state-federal WSRs in the NCIP area should also be reviewed to determine whether new information and changed circumstances since 1981 require the identification of new additional outstandingly remarkable values since the existing WSRs were administratively designated in 1981. Federal agencies have adjusted outstandingly remarkable values documentation in the CRMP process. The National Park Service "described and refined" the outstandingly remarkable values of the Merced WSR in Yosemite National Park in response to public comments and litigation. ²⁰⁹ There is nothing in the land and resource management process prohibiting consideration of additional values based on new information and changed circumstances for existing WSRs. ²⁰⁹ Merced Wild and Scenic River Final Comprehensive Management Plan, National Park Service 2014, pg. 5-2.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The following revised ORV descriptions should be adopted: Fish ORV - The EBSF Eel provides suitable and designated critical habitat for threatened indigenous salmon and steelhead, including the Southern Oregon/Northern California Coasts Coho salmon, California coastal Chinook salmon, and Northern California steelhead. In the 1930s, CDFW characterized the EBSF Eel "as one of the best trout streams in this section (SF Eel watershed). Electrofishing in 1993 confirmed that threatened steelhead are still found in the EBSF Eel. Wildlife ORV - The EBSF Eel supports nesting and foraging habitat for peregrine falcon and Northern spotted owl. Ecology ORV - The EBSF Eel and its tributaries flow through Natural Landscape Blocks and an Essential Connectivity Area identified by state agencies as providing critical connectivity between the Coast Range and the Pacific Ocean. EBSF Eel tributaries contribute significantly to the river's fish ORV. Tom Long Creek was not identified as eligible in the 1995 inventory, but it was in the 2018 inventory due to its Scenery and Ecology ORVs. Tom Long Creek, Cruso Cabin Creek, and Elkhorn Creek also provide designated critical habitat for federally-listed threatened Southern Oregon/Northern California coasts coho salmon, California coastal Chinook salmon, and Northern California steelhead. Rainbow trout and "sufficient gravel to support spawning populations" were observed by a 1975 BLM stream survey of Tom Long Creek. A CDFW survey noted that the creek "...would appear to be excellent steelhead spawning stream." Steelhead have been observed about 2.9 miles upstream of the EBSF Eel confluence (a portion of the creek that flows through public lands managed by the BLM). A 1993 CDFW survey of the EBSF Eel noted salmonids upstream of the Cruso Cabin and Elkhorn Creeks confluence (where the EBSF Eel begins). 129 Segments of Tom Long Creek, Cruso Cabin Creek, and Elkhorn Creek are proposed for Wild and Scenic designation in legislation that has passed the House and is pending in the Senate. 129 Steelhead/Rainbow Trout Resources of the South Fork Eel River, CEMAR, no date, https://www.tu.org/wp-content/uploads/2020/01/Report-South-Fork-ER.pdf Recommendations - Find the EBSF Eel River eligible from the Cruso Cabin-Elkhorn confluence to the Rays Creek confluence (about 1.5 miles downstream of the Tom Long Creek confluence). Include the Cruso Cabin, Elkhorn, and Tom Long Creek tributaries. Identify an Anadromous fish ORV for all four streams. Since the tributaries are located in areas identified for establishment of an Essential Connectivity Area and Natural Landscapes, apply the Ecology ORV to the tributaries as well. Coordinate with CDFW to include the EBSF Eel segment flowing through the Little Butte Ecological Reserve. Include NCIP management direction to acquire private lands from willing sellers within and adjacent to the eligible WSR corridor and its tributaries.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The mandated conformity review under Sec. 1274(d)(1) also applies to existing WSR plans, such as the South Fork Eel WSR management plan, which was completed in draft form by the BLM in 1990.210 A joint BLM/USFS management plan was also apparently produced for the Middle Eel WSR, but no copies are available from the relevant agencies or on the internet. 210 South Fork Eel Wild and Scenic River Management Plan and DEIS, BLM, August 1990. It is unclear whether this plan was ever finalized.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The National Wild and Scenic Rivers Act (NWSRA) has two mandates pertinent to the BLM's NCIP that involve existing and potential future WSRs. The mandates are: * 16 USC Section 1276(d)(1) of the NWSRA - Requires the BLM to consider potential national wild, scenic, and recreational river areas in all planning for the use and development of water and related land resources and in planning reports by all federal agencies as potential alternative uses of the water and related land resources involved. * 16 USC Section 1274(d)(2) of the NWSRA - Requires the BLM to review for conformity boundaries, classifications, and plans for existing WSRs designated prior to 1986. This mandate applies to the segments of existing WSRs managed by the BLM in the NCIP region, including segments of the Klamath, Trinity, Van Duzen, and Eel WSRs.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The NCIP 2018 WSR Eligibility Report provides no specific reasons or explanations why some previously eligible streams were dropped completely and why the mileage on other eligible streams was significantly reduced. Nor does the report provide any reasons why other streams were determined ineligible. This ignores BLM planning direction, which requires section 5(d) study reports to document the finding of ineligibility or eligibility and to specifically include ineligibility findings as part of the inventory record.3 Without the documentation, the public cannot determine why some streams and segments (including those previously determined eligible) were not included in 2018 report. 3 BLM Manual 6400-Wild and Scenic Rivers-Policy and Program Direction for Identification, Evaluation, Planning, and Management (Public), July 13, 2012, sec. 3.2.2 pg. 3-5 and sec. 4.1 pg. 4-1.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The NWSRA requires federal agencies to review for conformity "all boundaries, classifications, and plans" through "regular agency planning processes" for rivers designated before January 1, 1986.204 This conformity review requirement applies to river segments managed by the BLM in the NCIP Region that were state designated WSRs administratively added to the federal system in 1981 under 16 U.S.C. Sec. 1273(a)(ii). 204 16 U.S.C. Sec. 1274(d)(2). Sec. 1273(a)(ii) provides for Governors to petition the Interior Secretary to administratively add state protected rivers to the national system without legislative approval by Congress or the California Legislature. However, state rivers federally protected under 16 U.S.C. Sec. 1273(a)(ii) are to be "permanently administered as wild, scenic, or recreational rivers by an agency or political subdivision of the state..." This creates jurisdictional uncertainty for the management of rivers flowing through federal lands, because state agencies, with a few limited exceptions, have little jurisdiction over the management of federal lands.205 205 Section 1284(a-d) of the NWSRA guarantees continued state authority to regulate water rights and fish and wildlife management. Although not mentioned in the NWSRA, the state also has continued authority under the Clean Water Act to regulate federal activities on federal lands that may impact water quality. State management of these federal rivers is also problematic because the California Wild and Scenic Rivers Act was substantially amended in 1982 in response to the federal designation of these state rivers. The amendments limited WSR protection to just the river in its bed up to the first line of permanent riparian vegetation, which is considerably less than the 320-acre average per mile federally protected river corridor mandated by the National Wild and Scenic Rivers Act (NWSRA). The state amendments also removed the requirement for a state management plan. The amendments considerably reduced active state management of state-designated rivers, prompting experts to describe the state rivers system in California as a "self-administering." Section 1273(a)(ii) provides no guidance on how the state can manage federal lands along the river segments that now enjoy both state and federal protection. Only federal land management agencies have the authority to manage the federal lands along WSRs to fulfill the purposes of the NWSRA and protect each river's free flowing character, outstandingly remarkable values, and maximum segment classification. Federal agency management of the state-federal rivers in Northwest California ensures that the wider federal river corridor is managed to protect the rivers' free flowing condition and outstandingly remarkable anadromous fishery (and potentially other values), and for the appropriate Recreational, Scenic, and/or Wild classification.206 206 As a practical matter, restricting protection of the river up to the first line of permanent riparian vegetation largely makes moot the classification and management of segments as Wild, Scenic, or Recreational, since management by classification applies primarily to the "immediate environments" encompassed by the established federal river corridor that averages 320 acres per mile. The BLM and the Forest Service both have acknowledged that they have a role in the management of these WSRs despite the provision of 16 U.S.C. Sec. 1273(a)(ii) requiring the state to administer the rivers. For example, both agencies established federal WSR corridors for their WSR segments and some segments apparently have had management plans developed in the past. Regardless of the state administration provision of 16 U.S.C. Sec. 1273(a)(ii), the BLM and other federal land management agencies have an important duty to manage and protect 16 U.S.C. Sec. 1273(a)(ii) rivers where they flow through federal lands.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The state's existing classifications were adopted when these rivers were added to the federal system in 1981. These classifications should be reviewed - not only for conformity but also for clarity. The segment of the South Fork Eel WSR within the Elkhorn Ridge Wilderness was classified as Scenic by the state and in the 1981 FEIS. But the draft 1990 South Fork Eel WSR Management Plan indicates that the segment within the Elkhorn Ridge Wilderness is classified as Wild. 213 Since it is within the wilderness, the segment is more appropriately classified as Wild. 213 Ibid. Pages 4, 8. The 10-mile segment of the Middle Eel WSR flowing through BLM lands roughly between the Black Butte River confluence and a few miles downstream of the Elk Creek confluence is mostly undeveloped. A good portion of this segment is located within the Yuki Wilderness and the undesignated portion of the Thatcher Ridge Wilderness Study Area. And yet, this segment is classified as Scenic and Recreational. Given the largely undeveloped nature of this segment, it is more appropriately classified as Wild. Much of the existing development along the BLM segment of the Trinity River between the Grass Valley Creek confluence and Junction City is largely not viewable from the WSR. This segment may be more appropriately classified as Scenic and not Recreational.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Tomki Creek - The 1995 inventory identified a 10.3-mile eligible segment. The ORV identified in Table 2 of the 1995 inventory was other/ecological but the description in Table 3 was "Suitable spawning and/or rearing habitat exists for indigenous salmon and steelhead that are known to migrate through this river segment." The 2018 inventory identifies 2.5 miles to be eligible in five disjunct segments and confirmed the fish ORV. Tomki Creek is designated critical habitat for Northern California steelhead and coastal Chinook salmon, and possibly coho salmon. A 1964 CDFW survey of Tomki Creek found steelhead throughout and concluded that the creek's "greatest value" was to provide steelhead passage to "higher tributaries" in the watershed. 176 176 Steelhead/Rainbow Trout Resources of the Eel River Watershed, California, G.S. Becker & I.J. Reining, CEMAR July 2009, pgs. 288-289. Recommendation: The 10.3-mile eligible segment identified in 1995 should be reinstated with a Fish ORV.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	West Weaver Creek & Tributary & Grub Gulch - These are new eligible segments identified in the 2018 inventory, including a 1.5-mile eligible segment of West Weaver Creek and an unnamed tributary, and a .5-mile eligible segment of Grub Gulch (a West Weaver Creek tributary). The identified ORV is cultural. However, West Weaver Creek also supports steelhead that are considered part of the Klamath Mountains province distinct population segment, which is a candidate for state and federal listing. 117 From a systems perspective, all tributaries in the Trinity and Klamath system that support at-risk salmonids are critical to the protection and recovery of this population. West Weaver Creek is targeted for steelhead habitat restoration by the Trinity County Resource Conservation District. The eligible segments of West Weaver Creek and Grub Gulch flow through the Weaverville Community Forest (WCF), which was established on National Forest and BLM lands surrounding the Weaverville community to maintain a healthy, resilient and productive forest and provide accessible community and cultural use. The WCF includes an extensive public trail system, including a 1.6-mile trail that parallels West Weaver Creek between Mill Street and Oregon Street. The eligible segment of West Weaver Creek is located upstream Oregon Street and presents an opportunity to extend the West Weaver Creek Trail further upstream. 118 This recreation value should be documented in the inventory. In addition, there is an opportunity to coordinate with the Forest Service on a joint eligibility determination since the upper segments of West Weaver Creek are located on the Shasta-Trinity National Forest. 117 West Weaver Creek Salmonid Habitat Rehabilitation Project, Trinity County Resource Conservation District, June 2017. 118 https://tcrd.net/wcf/ Recommendations: Add an OR fish value associated with at-risk steelhead habitat for West Weaver Creek and an OR recreation value associated with future extension of the West Weaver Creek Trail into the eligible segment. Coordinate with the Forest Service on determining eligibility of West Weaver Creek.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	White Rock Creek - The 1993 inventory identified a 6-mile eligible segment, with 5 miles flowing through public lands managed by the BLM. The eligible segment ends at White Rock Creek's confluence with Woodman Creek, which was also found eligible. ORVs included ecological (old growth Douglas fir habitat for northern spotted owl). The 2018 inventory identifies a 2.5-mile eligible segment, along with two tributaries that total 1.2 miles. ORVs are ecological and scenery. White Rock Creek appears to be designated critical habitat for threatened Northern California steelhead, California coastal Chinook salmon, and coho salmon. A BLM survey in 1975 observed resident rainbow trout and ample quantities of spawning gravel, food, and cover upstream of the Woodman Creek confluence. 167 167 Ibid, pg. 188. Recommendations: The 2018 inventory should be revised to include the longer eligible segment identified in 1993, add a fish ORV, and note that another eligible stream, Woodman Creek, is a tributary to White Rock Creek.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Woodman Creek - The 1993 inventory identified a 5-mile eligible segment, with 1 mile flowing through public lands managed by the BLM. Its ORV was identified in the 1993 inventory in Table 2 as other/ecological, but in Table 3, it was described as a fish ORV - "Suitable spawning and/or rearing habitat for indigenous salmon and steelhead..." The 2018 inventory does not include Woodman Creek. The creek appears to include designated critical habitat for Northern California steelhead and coastal Chinook salmon. A large rock barrier near the mouth of the creek was removed to allow for fish migration in 1985. Subsequent surveys found steelhead in Woodman Creek up to its confluence with White Rock Creek. 168 168 Ibid, pg. 188-189 Recommendation: The 5-mile eligible segment identified in the 1993 inventory should be reinstated with a fish ORV.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	2018 Inventory Maps Are Inadequate The 2018 inventory maps fail to show other public lands. Various eligible segments on BLM lands are adjacent to public lands managed by other federal and state agencies and NGO- managed conservation lands. Many of these lands possess identical outstanding natural values as the BLM segments and provide opportunities to expand the eligible segments in coordination with these other agencies. The maps should be revised to show non-BLM public lands, as well as conservation lands acquired and managed by NGOs, such as The Nature Conservancy.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Changed Circumstances Warrants Consideration of Additional ORVs Since the initial WSR inventories were completed in 1993 in the Redding area and in 1995 in the Arcata area, considerable new information is available about the fish, wildlife, and ecological resources of the rivers and streams in the NCIP planning area. This includes listing under the state and federal Endangered Species Acts of various populations of salmon and steelhead and designation of critical habitat and adoption of recovery plans identifying core recovery areas. It also includes the development of the California Essential Habitat Connectivity Plan: A Strategy for Conserving a Connected California. Many other studies and reports have been published since the initial inventories that provide more than enough new information and changed circumstances to reconsider and add additional ORVs to those already inventoried as eligible and for designated WSRs as well. New circumstances that warrant reconsideration have been cited throughout these comments.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Inadequate Descriptions of ORVs The 2018 inventory generally has only brief descriptions of ORVs. Many of these descriptions are inadequate and fail to fully capture the importance of the ORVs. For example, all three eligible segments of Battle Creek (A-C) and short eligible segments of its North and South Forks were identified with a fish ORV as "an important producer of spring-run Chinook salmon and winter-run steelhead trout." Battle Creek anadromous fish resources are far more important than this simple description suggests. Below is a more extensive description of Battle Creek's outstandingly remarkable anadromous fish value gleaned from various sources: Early fisheries workers recognized Battle Creek as one of the most significant salmon producing streams in the Central Valley. This is confirmed by the U.S. Bureau of Reclamation, which characterizes Battle Creek as "one of the most important anadromous fish spawning streams in the Sacramento Valley." ⁴ It is one of the only streams in the Sacramento River basin capable of supporting all four runs of chinook salmon (winter, spring, fall, and late fall Chinook), as well as winter steelhead. Because of its volcanic origin and year-round, cold, and plentiful stream flows, Battle Creek represents a critical opportunity for restoring stream habitats like those of the upper Sacramento River that were blocked by Shasta Dam. Government agencies and NGOs are implementing a multimillion- dollar project to restore more than 42 miles of anadromous fish habitat in Battle Creek, particularly for the endangered winter-run Chinook salmon. Battle Creek may be the only place in the Sacramento River watershed where a second population of winter-run Chinook can be established and protected, as a backstop to the only extant population that spawns downstream of Shasta Dam in the Sacramento River. ⁵ Salmon and steelhead migrate up and spawn in the main stem of Battle Creek (segments A-C) and the creek is designated critical habitat for the threatened spring-run Chinook salmon and winter steelhead. ⁶ Threatened spring Chinook salmon and winter steelhead spawn in both the North and South Forks Battle Creek, and the North Fork has been identified as a crucial spawning area for the endangered winter-run Chinook salmon. ⁴ https://www.usbr.gov/mp/battlecreek/ ⁵ Battle Creek Salmon and Steelhead Restoration Plan, Battle Creek Working Group, Jan. 1999. ⁶ Designation of Critical Habitat or Seven Evolutionary Significant Units of Pacific Salmon and Steelhead in California, NOAA Fisheries, Sep. 2, 2005. Without this complete description of the ORV, it may be difficult to assess and avoid potential impacts of future management activities on the eligible WSR segments and their fish ORV. Existing ORV descriptions in the 2018 inventory should be reviewed and expanded where needed to fully document the outstanding resources and values involved.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The report identifies as eligible 28 streams and stream segments totaling approximately 35 miles not previously identified in the 1993-95 inventories. Notable eligible additions include a 3.3-mile segment of lower Clear Creek previously considered ineligible, a new eligible segment of the Sacramento River (Foster Island downstream of Red Bluff) and some new tributaries, and new segments of the Mattole River.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Additional Outstandingly Remarkable Values of the Middle Eel The BLM's Middle Eel WSR segment possesses other outstandingly remarkable values in addition to its anadromous fisheries. These additional outstandingly remarkable values include: Recreation ORV - The 1981 FEIS that facilitated the federal designation of these segments under Sec. 1273(a)(ii) identified an outstandingly remarkable whitewater recreation value for the Middle Eel. According to the 1983 NRI (which found the Middle Eel to possess a potential outstandingly remarkable recreation value), the lower 30 miles of the Middle Eel is an excellent whitewater river run with rapids up to Class V. Swimming and fishing is also popular. In 1988, Holbek and Stanley noted the "Few other rivers in the state give the same feeling of remoteness." ²⁵⁰ Downstream of its confluence with the Black Butte River, the Middle Eel is considered "one of the best wilderness (whitewater boating) runs in California: 30 miles of outstanding scenery and challenging whitewater that can be run alone or combined with the Dos Rios section of the main Eel." ²⁵¹ A more recent assessment of the Middle Eel's whitewater recreation value in the class II-V Black Butte River to Dos Rios segment notes that "The Middle Fork Eel is an amazing stretch of river that no paddler should miss. The scenery is top-notch and the river maintains an excellent pace throughout. An abundance of wildlife, excellent camping spots and a remote character define this run." ²⁵² The Middle Eel upstream of the Black Butte River also offers various class III-V paddling on its National Forest segments. The BLM also recognizes that outdoor recreation use is primarily river-based and focused in the Middle Eel River corridor. ²⁵³ ²⁵⁰ A Guide to the Best Whitewater in the State of California, by Lars Holbek and Chuck Stanley, Friends of the River Books, 1988 2nd Edition, Pg. 17. ²⁵¹ Western Whitewater from the Rockies to the Pacific: A River Guide for Raft, Kayak, and Canoe, Jim Cassidy et al, North Fork Press 1994, pg. 552. ²⁵² The New School Guide to Northern California Whitewater page 199, Dan Menten, New School Publications, 2016, pg. 208. ²⁵³ FEIS, Preliminary Wilderness Recommendations for the Arcata Resources Area, Eden Valley WSA and Thatcher Ridge WSA, Arcata BLM Field Office, no apparent date. Wildlife ORV - The BLM lands through which the Middle Eel flows provide important habitat for federally protected raptors (bald eagle, golden eagle, osprey, and peregrine falcon) and excellent riparian habitat supporting 219 species of wildlife. The National Park Service's 1983 Nationwide Rivers Inventory identified wildlife as a "potential" outstandingly remarkable value for the Middle Eel. Scenery ORV - The 1983 NRI identified scenery as a "potential" outstandingly remarkable value for the Middle Eel. According to the NRI, most of the Middle Eel is contained in deep river canyons with numerous large pools and with occasional views of mountain peaks and the surrounding highly pristine countryside. Cultural ORV - The 1983 NRI identified archeological/cultural as a "potential" outstandingly remarkable value for the Middle Eel. According to the NRI, the Middle Eel hosts significantly high densities of prehistoric sites known to exist adjacent to the river and within 2.25 miles of the Eel River bridge. Ecology ORV - The entire length of the Middle Eel WSR, from its source in the Yolla Bolly- Middle Eel Wilderness to nearly its confluence with the main stem Eel WSR, flows through a large Natural Landscape Block, and the river itself is a Potential Riparian Connection providing important connectivity between the Coast Range and the Eel River basin. ²⁵⁴ ²⁵⁴ California Habitat Connectivity Project, CalTrans/CDFW, February 2010.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Additional Outstandingly Remarkable Values of the North Fork Eel The BLM's NF Eel WSR segment possesses other outstandingly remarkable values in addition to its anadromous fisheries. These additional outstandingly remarkable values include: Recreation ORV - According to the NRI, the NF Eel is popular for class III-IV runs and provides opportunities for camping and fishing with limited access. The 1983 NRI declared the North Fork to possess "potential" outstandingly remarkable recreation values. The Western Whitewater Guide described the NF Eel as "This little known branch (of the Eel) drains a beautiful portion of the Coast Range between Round Valley and the Six Rivers National Forest. Adventurers occasionally enjoy a scenic eight-mile Class III run from Hulls Creek to Mina Road."255 One of the most recently published whitewater guides describes the North Fork's wilderness run (Salt Creek to Mina Road) as a "high quality section of whitewater that has been overlooked for some time now."256 These segments of the North Fork flow through scattered BLM lands. 255 Western Whitewater from the Rockies to the Pacific: A River Guide for Raft, Kayak, and Canoe, Jim Cassidy et al, North Fork Press 1994, pgs. 551-552. 256 The New School Guide to Northern California Whitewater page 199, Dan Menten, New School Publications, 2016, pg. 204. Scenery ORV - The most recent whitewater guidebook for northern California notes that "The remote and beautiful North Fork Wilderness scenery dominates the first half of this section (North Fork Eel Wilderness Run) with many amazing sandstone spires along the left bank."257 The 1983 NRI declared the North Fork to possess "potential" outstandingly remarkable scenery values. 257 Ibid. Pg. 204. Wildlife ORV - Bald eagle and peregrine falcon are known to frequent the undesignated upper segment of the NF Eel.258 Adjacent to the existing North Fork Eel Wilderness, the Salt Creek roadless area provides habitat for Pacific fisher, Northern spotted owl, peregrine falcon, and Northern goshawk.259 It seems likely that the North Fork Eel River corridor shares similar values. 258 1995 Six Rivers National Forest Land and Resources Management Plan FEIS, Appendix D: Description and Analysis of Wild and Scenic River Candidates, Pg. D-5. 259 Ibid. FEIS Appendix C: Roadless Area Descriptions and Evaluations, pg. C-7. Cultural ORV - The 1983 NRI notes that "Although complete inventories have not been conducted, the river is considered to have significant Indian relicts...and the fishery plays a significant role to the culture of the resident tribes." A seven-mile segment of Red Mountain Creek, a tributary of the NF Eel that flows from the Yolla Bolly-Middle Eel Wilderness, was found eligible for WSR protection due to its cumulation of notable features, including fishery, recreation, wildlife, and cultural values.260 It seems likely that at least the segment of the North Fork Eel near the Red Mountain Creek confluence (just downstream of the North Fork Eel Wilderness boundary) shares these outstandingly remarkable values. 260 Ibid. FEIS Appendix D: Description and Analysis of Wild and Scenic River Candidates, Pg. D-16. Ecological ORV - The North Fork Eel WSR and much of its undesignated upper segment is located in a large Natural Landscape Block providing important connectivity between the Coast Range and Eel River basin.261 Much of the lower North Fork Eel WSR flowing through BLM lands is located in an Area of Unprotected Biodiversity Importance.262 261 California Habitat Connectivity Project, CalTrans/CDFW, February 2010. 262 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Additional Outstandingly Remarkable Values of the Van Duzen River Recreation ORV - Public land managed by the BLM on the Van Duzen WSR is limited to a small section at Goat Rock, downstream of Bridgeville. Despite the limited amount of public land at Goat Rock, it is a popular destination for many different forms of recreation. It offers a class IV- V whitewater run for expert kayakers. Goat Rock Falls is described as "...a half-mile long section of rapids containing some excellent moves."296 The entrance drop into Goat Rock is the most critical move and has the biggest hydraulics due to the steep constriction along the massive river left wall.297 A video of the Goat Rock run can be enjoyed at https://vimeo.com/38062357. Goat Rock is also a popular rock-climbing destination, offering "...something a little different than other Humboldt climbing areas. The boulders are comprised of several different types of rock including sandstone, chert, and graywacke. Many of the boulders are water polished making for subtle and challenging moves. Technique, rather than power is necessary to solve many of the problems."298 During low summer flows, Goat Rock provides a favorite swimming hole for locals. In higher seasonal flows, it is also a "badass spot" to watch winter steelhead runs.299 The Goat Rock area of the Van Duzen is probably the best-known fishing area on the river, offering large rocks that form deep holding pools for steelhead.300 The Goat Rock area is also a popular summer swimming destination for locals and travelers on Highway 36.301 The 1983 NRI confirms recreation on the Van Duzen WSR, including swimming, wading, tubing, camping, biking, and picnicking, to be a notable feature. Grizzly Creek Redwoods State Park and Humboldt County Parks on the river attract visitors from outside the region. Overall, recreation is moderate to heavy during the summer season. 296 The New School Guide to Northern California Whitewater, Dan Menten, New School Publications 2016, pg. 185. 297 http://dmenten.blogspot.com/2012/03/six-rivers-source-to-sea-expedition-van.html 298 https://www.mountainproject.com/area/105877367/goat-rocks 299 https://nooksand.wordpress.com/tag/goat-rock-humboldt-county/ 300 http://www.northcoastweb.com/fishing/rivers/vandie/SPOT_van.HTM 301 http://swimmingholesofcalifornia.blogspot.com/2011/07/goat-rock-humboldt-county-van-duzen.html Scenery ORV - The 1983 Nationwide Rivers Inventory identified the Van Duzen's scenery to be a potential outstandingly remarkable value. The river flows through a moderate V-shaped canyon in the upper and mid reaches. Large boulders and pools characterize the river channel. Wildlife ORV - Federally protected bald eagle and peregrine falcon are known to frequent the river, which also supports a wide variety of more typical wildlife species, including black-tailed deer, mountain lion, black bear, and various species of waterfowl. Ecological ORV - Most of the Van Duzen WSR and much of its upper undesignated segment flows through Natural Habitat Blocks and Essential Connectivity Areas, and is considered a Potential Riparian Connection providing essential connectivity for wildlife.302 302 California Habitat Connectivity Project, CalTrans/CDFW, February 2010.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Antelope Creek - Although not as large as Deer or Mill Creeks, Antelope Creek also provides designated critical habitat for threatened spring chinook salmon and winter steelhead. Neither the 1993 nor 2018 BLM inventories found the creek to be eligible, possibly because BLM lands appear to be located within the hypothetical WSR corridor but not incorporating the creek itself. The Forest Service found 14 miles of the main stem Antelope Creek and its North and South Fork to be eligible and suitable due to its fish and historical/cultural ORVs. Downstream of the National Forest boundary, approximately 12 miles of Antelope Creek flows through the State's Tehama Wildlife Area, from whence it flows into the potentially eligible BLM segment downstream. The following ORVs should be documented: Ecology ORV - In addition to its outstanding anadromous fish value, Antelope Creek possesses the third highest biological integrity (after Mill and Deer Creek) of 100 Sierra Nevada watersheds, which constitutes an ecological ORV.⁷⁷ Conservation lands and easements owned by The Nature Conservancy appear to connect the potentially eligible BLM segment to the upstream public land segments in the Tehama Wildlife Area and Lassen Forest, enhancing conservation at the landscape scale and ecological connectivity.⁷⁸ Lower Antelope Creek in the Lassen foothills and the Sacramento Valley flows through Natural Landscape Blocks and Essential Connectivity Areas identified by state agencies as providing essential habitat connectivity.⁷⁹ ⁷⁷ Biotic Integrity of Watersheds, Sierra Nevada Ecosystem Project (SNEP) Final Report to Congress, Vol. II, UC Davis, 1996. ⁷⁸ https://www.researchgate.net/figure/In-color-online-Tehama-County-and-The-Nature-Conservancys-TNCs-Lassen-Foothills_fig1_249994143 ⁷⁹ California Habitat Connectivity Project, CalTrans/CDFW February 2010. Fish ORV - In 2010, Antelope Creek was identified as part of the Sacramento River Stronghold for spring Chinook salmon and winter steelhead.⁸⁰ In 2011, The Nature Conservancy identified Antelope Creek as among the top 2% of watersheds in California that should be prioritized to protect and restore salmonid diversity.⁸¹ The entire creek is designated critical habitat for the threatened spring Chinook salmon and winter steelhead.⁸² ⁸⁰ The California Salmon Stronghold Initiative, California Department of Fish and Wildlife, March 2012. ⁸¹ SalmonScape: Priorities for Conserving California's Salmon and Steelhead Diversity, The Nature Conservancy, August 2011, v. I.I. ⁸² Designation of Critical Habitat for Seven Evolutionarily Significant Unites of Pacific Salmon and Steelhead in California, NOAA Fisheries, Fed. Reg. Vol. 70, No. 170, Sep. 2, 2005. Wildlife ORV - Antelope Creek downstream of the National Forest boundary provides critical winter range for the Tehama black-tailed deer herd - the deer, wild pigs, and turkeys found along the creek attract hunters. Antelope Creek also is home to raptors, including bald and golden eagle, prairie and peregrine falcon, and other birds of prey.⁸³ The state Tehama Wildlife Area was established to preserve wildlife habitat and provide hunting opportunities. This constitutes a wildlife ORV. ⁸³ https://wildlife.ca.gov/Lands/Places-to-Visit/Tehama-WA Recommendations: Given the outstanding ecological, anadromous fishery, and wildlife values of Antelope Creek, coordinate with the CDFW to find eligible Antelope Creek within the Tehama Wildlife Area and the downstream BLM segment, due to fish, wildlife, cultural, and ecological ORVs and include NCIP direction to acquire additional public lands within the corridor. Update the resource information identifying Antelope Creek as providing essential habitat connectivity.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Battle Creek Segments A-C - The Nationwide Rivers Inventory identified 35 miles of the South Fork Battle Creek from the Ponderosa Way bridge to its confluence with the North Fork, and the main stem Battle Creek from the North and South Forks confluence to its confluence with the Sacramento as an eligible WSR with scenery, recreation, fish, wildlife, history, and other ORVs. The BLM's 1993 inventory identified a nearly identical 34.8-mile segment of the SF Battle Creek and main stem Battle Creek to be eligible, beginning at a point downstream of the South Fork's confluence with Panther Creek to the South Fork/main stem confluence, and the main stem Battle Creek from the South Fork confluence to the main stem's confluence with the Sacramento River. The 2018 inventory identifies only 5.8 miles of the main stem Battle Creek to be eligible in three disjunct segments. Given the NRI determination, the longer eligible and connected segments identified in 1993 make more sense since the RMP included management direction to "Acquire available unimproved lands within the (WSR eligible) corridor."⁴⁰ Most of Battle Creek downstream of the North/South Forks confluence is located within the Sacramento River Bend ACEC/Outstanding Natural Area (ONA). CalWild recommends that the management direction to acquire additional lands continue in the NCIP. The 2018 inventory also determines seven disjunct segments of the South Fork Battle Creek to be eligible, totaling 4.5 miles, as well as a short .9-mile segment of the North Fork Battle creek. ⁴⁰ Redding Proposed RMP/FEIS, Appendix A - Wild and Scenic River Eligibility, BLM 1992, pg. 51. Due to the nature of scattered BLM lands in the NCIP region, identifying only those stream segments flowing through public lands can also lead to apparent mistakes. For example, the 2018 inventory Map A2 inexplicably leaves out a segment of the main stem Battle Creek upstream of the Coleman Fish Hatchery where the creek flows through BLM managed public lands in section 34, R2W, T30N, even though segments upstream and downstream of this section were identified as eligible. ORVs identified in both the 1993 and 2018 inventories included scenery, recreation, and fish. The 1993 inventory also identified a Vegetation ORV - "...lush riparian vegetation fills the bottom of this narrow canyon..."⁴¹ This is identical to the Ecological ORV (imperiled Great Valley Mixed Riparian Forest and Great Valley Cottonwood Riparian Forest) identified for other Sacramento River tributaries in the Sacramento River Bend area. ⁴¹ Ibid, Appendix A - Wild and Scenic River Eligibility, BLM 1992, pg. A-5. There is no explanation as to why the vegetation/botany/ecology ORV identified in 1993 was dropped in the 2018 inventory. ORV descriptions should be updated as follows: Fish ORV - Early fisheries workers recognized Battle Creek as one of the most significant salmon producing streams in the Central Valley and this has been affirmed by the U.S. Bureau of Reclamation, which characterizes Battle Creek as "one of the most important anadromous fish spawning streams in the Sacramento Valley."⁴² It is one of the only streams in the Sacramento River basin capable of supporting all four runs of chinook salmon (winter, spring, fall, and late fall Chinook), as well as winter steelhead. Because of its volcanic origin and year-round, cold, and plentiful stream flows, Battle Creek represents a critical opportunity for restoring stream habitats like those of the upper Sacramento River that were blocked by Shasta Dam. ⁴² https://www.usbr.gov/mp/battlecreek/ Government agencies and NGOs are implementing a multi-million-dollar project to restore more than 42 miles of anadromous fish habitat in Battle Creek, particularly for the endangered winter-run Chinook salmon. Battle Creek may be the only place in the Sacramento River watershed where a second population of winter-run Chinook can be established and sustained, as a backstop to the only extant population that spawns downstream of Shasta Dam in the Sacramento River.⁴³ Salmon and steelhead migrate up the main stem of Battle Creek (segments A-C) and the creek is designated critical habitat for the threatened spring-run Chinook salmon and winter steelhead.⁴⁴ Threatened spring Chinook salmon and winter steelhead spawn in both the North and South Forks Battle Creek, and the North Fork has been identified as a crucial spawning area for the endangered winter-run Chinook salmon. ⁴³ Battle Creek Salmon and Steelhead Restoration Plan, Battle Creek Working Group, Jan. 1999. ⁴⁴ Designation of Critical Habitat or Seven Evolutionary Significant Units of Pacific Salmon and Steelhead in California, NOAA Fisheries, Sep. 2, 2005. Ecology/Botany ORV - The lower 6 miles of Battle Creek supports lush riparian vegetation which increases to a classic old-growth riparian ecosystem as it flows downstream to the Sacramento River confluence. This stream segment supports imperiled Great Valley Mixed Riparian Forest and Great Valley Cottonwood Riparian Forest. Battle Creek in the Lassen foothills and the Sacramento Valley flows through Natural Landscape Blocks and Essential Connectivity Areas identified by state agencies as providing crucial habitat connectivity.⁴⁵ Lower Battle Creek represents a mix of conservation landowners managed by the BLM, USFWS, CDFW, and The Nature Conservancy. Conservancy properties appear to connect the public lands along lower Battle Creek with the Sacramento River Outstanding Natural Area to the south, enhancing landscape scale conservation and ecological connectivity.⁴⁶ Portions of Battle Creek between the Manton Road and its Sacramento River confluence are located in Areas of Unprotected Biodiversity Importance.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Beegum Creek - The 1993 inventory identified 4.4 eligible miles and the 2018 inventory found 4.7 eligible miles. ORVs included scenery and "natural primitive" recreation in 1993. The 2018 inventory added a fish ORV (threatened Central Valley spring chinook salmon and winter steelhead). Kayakers made the first descent of this segment of Beegum Creek in 1996. It's described as a "classic wilderness run" (which ties into the existing primitive outdoor experience considered a recreation ORV), with two arduous portages and a limited season, but the scenery is good and rapids are excellent.¹⁰² The recreation ORV should be expanded to include whitewater kayaking. ¹⁰² https://www.cacreeks.com/beegum.htm Recommendation: Expand the recreation ORV to include whitewater recreation.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Butte Creek - The 1993 inventory identified 14.1 miles of the creek to be eligible, with 4.9 miles on public lands managed by the BLM. The eligibility finding was accompanied by management direction establishing the Forks of Butte Creek ACEC/ONA. The management direction also called for the acquisition of "available unimproved land to protect scenic quality and enhance the recreational experience."⁸⁹ The 2018 inventory identifies as eligible only the 4.9-mile portion on public lands in seven disjunct segments. The 2018 inventory also ignores a short segment of Butte Creek that flows through a small parcel of public land managed by the BLM at section 36, T22N, R2E. Eligibility should be extended downstream to include this small segment or it should be identified as eligible as a disjunct segment. In addition, downstream of the BLM segments, Butte Creek flows into CDFW's 287-acre Butte Creek Canyon Ecological Reserve (upstream of the Highway 99 bridge). ORVs identified in the two inventories appear identical, except the 2018 inventory incorrectly describes Butte Creek's Fish ORV as "...an important producer of federally-listed Threatened coho salmon and winter-run steelhead trout."⁹⁰ In fact, Butte Creek is an important producer of threatened Central Valley spring-run Chinook salmon and winter-run steelhead trout. ⁸⁹ Redding RMP ROD, June 1993, pg. 51 ⁹⁰ NCIP 2018 Inventory, pg. 3-8. This is an obvious "cut and paste" error associated with the Butte Creek in the Arcata FO. The following ORVs should be revised and/or added: Fish ORV - Butte Creek is one of only three tributaries to the Sacramento River that continues to harbor a sustaining population of the state and federally listed spring-run Chinook salmon.⁹¹ Spring-run Chinook salmon returns to Butte Creek in recent years have been the highest on record. In 2013, roughly 16,000 salmon were estimated to have returned to Butte Creek, which constitutes about 70% of all Central Valley spring-run Chinook.⁹² Butte Creek also supports threatened Central Valley winter-run steelhead. ⁹¹ Butte Creek Vision, CDFW Anadromous Fish Restoration and CALFED Programs, Nov. 2005. ⁹² https://fishbio.com/field-notes/the-fish-report/celebrating-spring-migration Ecology ORV - Butte Creek flows through an Essential Connectivity Area in the Sierra foothills identified by state agencies as providing essential habitat connectivity and the creek is also identified as a "Potential Riparian Corridor" from its source to the Butte Basin and the Sacramento River.⁹³ Butte Creek supports important riparian community types, including Great Valley Oak and Great Valley Cottonwood Riparian Forests. Wildlife species utilizing this habitat include wintering bald eagles, western pond turtle, red-legged frog, deer, coyote, bobcat, beaver, ash-throated flycatcher, yellow warbler, and western bluebird.⁹⁴ ⁹³ California Habitat Connectivity Project, CalTrans/CDFW February 2010, pg. C-38, C-40. ⁹⁴ https://wildlife.ca.gov/Lands/Places-to-Visit/Butte-Creek-Canyon-ER. Recreation ORV -- This stream provides diverse and high-quality recreation opportunities that include fishing, swimming, sunning, hiking, tubing, picnicking, and limited whitewater boating. Butte Creek is the backyard kayak run for most paddlers in Chico. From Centerville down, this a great run for beginning paddlers. California is awash in challenging class V whitewater. Class II- III runs like Butte Creek's are hard to find. Paddlers from all over the region come to Butte Creek in the spring because it is one of the best around. Locals love the surf wave at the Centerville Powerhouse.⁹⁵ ⁹⁵ Chico Enterprise Record, https://www.chicoer.com/2014/08/11/my-top-10-best-whitewater-paddling-rivers-in-the-north-state/ Recommendations: Maintain the eligibility finding for the greater 14.1-mile segment identified in the 1993 inventory, find the short segment in section 36 to be eligible, and continue the management direction to acquire available unimproved lands in the ONA/ACEC, eligible stream corridor, and Essential Connectivity Area. Coordinate with CDFW on determining eligibility for stream segments in the Butte Creek Canyon Ecological Reserve. Add an Ecology ORV in recognition of Butte Creek's riparian habitat, diverse wildlife species, and essential connectivity role, and expand the Fish ORV and Recreation ORV descriptions.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>CalWild submits the attached comments concerning the effective implementation of 16 USC Section 1276(d)(1) and 16 USC Section 1274(d)(2) of the NWSRA. We respectfully request that the BLM consider these detailed comments and recommendations and take appropriate action in the NCIP process to ensure full protection of the BLM's existing WSR segments and a systematic and comprehensive assessment of potentially eligible WSRs. The WSR inventory should be revised updated in response to these comments and included in the draft NCIP for public comment.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Cedar Creek - The 1995 inventory identified 8 miles of Cedar Creek and its North Fork and two unnamed tributaries flowing north from Red Mountain, to be eligible, with about 3.5 miles flowing on public land managed by the BLM. The 2018 inventory identified 6.3 miles of Cedar Creek and four unnamed tributaries to be eligible, along with a 1-mile segment of the North Fork Cedar Creek, in four disjunct segments. The 2018 inventory leaves out segments of Cedar Creek and its North Fork flowing through CDFW's Little Red Mountain Ecological Reserve. ORVs identified in 1995 include Fish, Geology, and Ecology, while the 2018 identified the same but also included a Scenery ORV. We recommend that the longer 8-mile eligible segment of Cedar Creek be adopted (including the largely private land segment between the South Fork Eel Wilderness boundary and the SF Eel confluence) and include all tributaries identified in the 1995/2018 inventories be included. Portions of Cedar Creek and its North Fork are located in an Area of Unprotected Biodiversity Importance.130 Cedar Creek is proposed for Wild and Scenic designation in legislation that has passed the House and is pending in the Senate.131 130 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. 131 H.R. 803 passed the House of Representatives and was referred to the Senate in Feb. 2021. ORVs should be revised as follows: Scenery ORV - Rare old growth forest in the riparian corridor provides unique scenery. Terrain is generally steep, consisting of rugged drainages dropping abruptly into Cedar Creek Canyon. The inner gorge of Cedar Creek Canyon and the old-growth Douglas fir forest are essentially pristine in appearance.132 132 California Statewide Wilderness Study Report, Part 4, Vol. 2, BLM 1990, Red Mountain WSA CA-050-132. Fish ORV - Cedar Creek provides designated critical habitat and is an important producer of federally-listed threatened Southern Oregon/Northern California coasts coho salmon, California coastal Chinook salmon, and Northern California steelhead. In a 1968 report, CDFW described Cedar Creek as "...an excellent creek for migrating and/or non migrating fish." A 1975 BLM observed steelhead and estimated that Cedar Creek provides three miles of excellent habitat for resident rainbow trout and spawning anadromous fish." CDFW surveys in 1941 and 1978 observed "young-of-the-year trout" described as "naturally propagating" in Cedar Creek and found steelhead fry and fish in the North Fork Cedar Creek to be "in good supply."133 133 Steelhead/Rainbow Trout Resources of the South Fork Eel River, CEMAR, no date, https://www.tu.org/wp-content/uploads/2020/01/Report-South-Fork-ER.pdf Geology - The stream flows through unique red serpentine soils that support unique plant communities and several rare plants. Ecology/Botany - Rare old growth forest community is in the riparian corridor. A zone of reddish soil, comprising 60% of the Wilderness Study Area (now Wilderness), occupies the central part of the area and contrasts sharply with the surrounding landscape. These unusual soils have resulted in a unique vegetation cover of several species of pine and cypress trees, intermixed with a low brush understory. Rare and endangered plant species occupy the landscape covered by these ultrabasic (ultramafic) soils.134 Cedar Creek is located in a Natural Landscape Block identified by state agencies are providing critical connectivity in the SF Eel River drainage. Portions of Cedar Creek and its North Fork are located in an Area of Unprotected Biodiversity Importance. 134 South Fork Eel River Wilderness Description, https://wilderness.net/visit-wilderness/?ID=686 Recommendations: Reinstate the 8-mile eligible segment identified in 1995 along with the newly identified tributaries 1 and 2. Coordinate with CDFW on the eligibility of Cedar Creek and the NF Cedar Creek segments flowing through the Little Red Mountain Ecological Reserve. The lower 3 miles of the creek on private land (as inventoried in 1995) should be classified as Recreational or Scenic due to existing development and Highway 101 crossings (old and new). Expand the ORV descriptions.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Clear Creek - Clear Creek is one of the few eligible streams that gained eligible mileage between the 1993 and 2018 inventories, due to BLM acquisitions to establish the Clear Creek Greenway. The 1993 inventory identified a 5.3-mile upper segment as eligible, encompassing .5 miles of public land managed by the BLM. A lower 8.3-mile segment was not found eligible. The 2018 inventory determined 8.6 miles of Clear Creek to be eligible in five disjunct segments. The 2018 finding includes portions of the upper segment found eligible in 1993, as well as a good portion of the lower segment determined ineligible in 1993. This finding was made more feasible through extensive acquisition of lands in the lower segment since 1993. ORVs identified in 1993 include recreation and scenery, while 2018 ORVs include recreation, fish, geology, and cultural. The Clear Creek corridor has been identified by state agencies as a Potential Riparian Connection between Natural Landscape Blocks and Essential Habitat Connectivity Areas. Portions of Clear Creek have been identified by scientists as Areas of Unprotected Biodiversity Importance (AUBI). The first three miles of Clear Creek below Whiskeytown Dam flows through public lands managed by the National Park Service as part of the Whiskeytown National Recreation Area. There is no indication in either the 1993 or 2018 inventories that BLM contacted the Park Service to propose a joint sec. 5(d)(1) study of Clear Creek, although the 1993 inventory notes that the NPS Whiskeytown NRA Management Plan designated Clear Creek upstream of the Stony Gulch confluence as an Outstanding Natural Area. Recreation ORV - From Whiskeytown Dam to Centerville Road, Clear Creek offers 7.5 miles of class IV whitewater - a wonderful year-round training run for those looking to step up from class III to class IV, where all rapids can be portaged, and through a scenic canyon.96 Downstream of Centerville Road, Clear Creek is heavily used during the warmer months for swimming, picnicking, tubing, hiking, and gold panning. Clear Creek has parking areas for river access and creek-side trails containing river-related interpretive materials. 96 https://www.americanwhitewater.org/content/River/view/river-detail/3704/main Fish ORV - Clear Creek provides designated critical habitat for the threatened Central Valley spring-run Chinook salmon and winter steelhead, and the creek also supports fall-run Chinook. Government agencies and NGOs have spent considerable effort and money to remove the Saeltzer Dam on Clear Creek to restore salmon and steelhead to upstream spawning grounds. The threatened spring-run Chinook spawn in upper Clear Creek (upstream of Centerville Road), the fall run Chinook spawn downstream of Centerville Road, and threatened steelhead spawn throughout the creek.97 97 Clear Creek Habitat Synthesis Report, USFWS, Jan. 2015. Ecology ORV - From Whiskeytown Lake to the Sacramento River, Clear Creek represents a Potential Riparian Connection flowing through a Natural Landscape Block and Essential Connectivity Area identified by state agencies as providing essential habitat connectivity.98 98 Ibid. Recommendations: Coordinate with the NPS about the Whiskeytown segment of Clear Creek to determine all of the creek to be eligible from Whiskeytown Dam to the end of segment A identified in the 2018 inventory. Include all ORVs identified in the 1993 and 2018 inventories, expand the recreation and fish ORVs with new information, and recognize an Ecology ORV - Clear Creek provides essential habitat connectivity.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Eden Creek - The 1995 inventory identified a 6-mile eligible segment, of which 2.5 miles flows through BLM-managed public lands. The 2018 inventory identified 5.7 eligible miles, including two disjunct segments of Eden Creek and two unnamed tributaries. 1995 ORVs are wildlife and cultural and 2018 ORVs are fish and cultural. A 1983 CDFW report noted that 1.2 miles of Eden Creek is accessible to steelhead, which includes the lower disjunct segment identified as eligible by BLM.187 In addition, Eden Creek is a link in a chain of anadromy that connects the Pacific Ocean with the main stem Eel River, to the Middle Eel River, to Elk Creek and Eden Valley Creek, so the fish ORV is appropriate. The wildlife ORV is a "nearby" endangered species nesting site (likely either peregrine falcon or bald eagle). No explanation is provided as to why the wildlife ORV was dropped. Both bald eagle and peregrine falcon migrate through the area and there is a known peregrine falcon nest site just to the north of the Eden Valley WSA (through which flows Deep Hole Creek). 187 Steelhead/Rainbow Trout Resources of the Eel River Watershed, California. Gordon Becker et al, Center for Ecosystem Management, July 2009, pg. 224 Recommendations: Recognize the fish, wildlife, and cultural values of Eden Creek and find the entire creek from its confluence with Pigtail Creek to its confluence with Elk Creek.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Elder Creek - The 1995 inventory identified 4 miles of Elder Creek and its tributary (Paralyze Canyon) to be eligible, with 3 miles flowing through public land managed by the BLM. The 2018 inventory identified 7.5 miles eligible, including Paralyze Canyon, Misery Creek and other unnamed tributaries, all on public land managed by the BLM in the upper Elder Creek watershed. Lower Elder Creek flows through the Angelo Coast Range Reserve - state lands managed for scientific research by UC Berkeley. The 1995 inventory identified Fish, Wildlife, and Ecology ORVs while the 2018 inventory identified Scenery, Ecology, and Research ORVs. Located partially in the South Fork Eel Wilderness (Cahto Unit), most of the creek would be appropriately classified as Wild, except for the last mile upstream of the SF Eel confluence, where there is a small existing water diversion for local domestic use. Elder Creek is proposed for Wild and Scenic designation in legislation that has passed the House and is pending in the Senate.145 145 H.R. 803 passed the House of Representatives and was referred to the Senate in Feb. 2021. ORVs should be revised as follows: Scenery ORV - Rare old growth forest in the riparian community provides unique scenery. Elder Creek flows through the BLM Area of Critical Environmental Concern (ACEC) incorporated into the Northern California Coast Range Preserve, which is managed by the BLM as VRM Class II, scenic quality Class A.146 146 South Fork Eel Wild and Scenic River, DRAFT River Management Plan and EIS, Arcata BLM Aug. 1990, pg. 15. Fish ORV - Elder Creek provides designated critical habitat and is an important producer of federally-listed threatened Southern Oregon/Northern California Coasts coho salmon and Northern California steelhead. Ecology ORV - Elder Creek is part of the California Coast Ranges Biosphere Reserve established in 1983 by UNESCO.147 The Biosphere Reserve includes a highly diverse complex of evergreen sclerophyllous woodland, and coastal, estuary, and marine ecosystems. Elder Creek flows from pristine Douglas fir forested watersheds in the South Fork Eel Wilderness, which is also encompassed in the Biosphere Reserve.148 Elder Creek is also an National Natural Landmark designated by the National Park Service to protect the creek's largely undisturbed watershed and large stands of old growth Douglas fir, broadleaf evergreens, and deciduous trees.149 Elder 147 https://en.wikipedia.org/wiki/California_Coast_Ranges_Biosphere_Reserve 148 https://wilderness.net/visit-wilderness/?ID=686 149 https://en.wikipedia.org/wiki/List_of_National_Natural_Landmarks_in_California Creek is located in a Natural Landscape Block identified by state agencies to provide crucial connectivity in the SF Eel River drainage.150 150 California Habitat Connectivity Project, CalTrans/CDFW February 2010. Research/Science ORV - Elder Creek is in a Hydrologic Benchmark watershed, established to provide a hydrology baseline for scientific research. The stream also drains a BLM-established Area of Critical Environmental Concern (ACEC), to be managed in conjunction with the adjacent UC Angelo Northern California Coast Range Reserve to facilitate university-level teaching and research. The Angelo Reserve and BLM ACEC together comprise one of the largest continuous tracts of undeveloped coast conifer forest remaining in California.151 151 https://angelo.berkeley.edu Recommendations: All the eligible segments of Elder Creek identified in 1995 should be determined eligible (from its source to its confluence with the SF Eel). Coordinate with UC Berkeley to include as eligible the lower section of the creek in the Angelo Reserve. This could add 2.25 miles to the eligible segment and help facilitate the creek's scientific research role (embodied in the Northern California Coast Range Preserve ACEC).
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Elk Creek - The 1995 inventory identified an 8-mile eligible segment, of which 2.5 miles flowed through BLM-managed public lands. The 2018 inventory identified 3.3 eligible miles in three disjunct segments. The ORVs identified in 1995 were fish, wildlife, and cultural, but the 2018 inventory only identified fish and cultural ORVs. The 1995 wildlife ORV is a "concentration" of bald eagles within the river segment. In addition to bald eagle, peregrine falcon migrate through the area and there is/was an active peregrine falcon nest in the area (which includes the Elk Creek corridor) west of the former Thatcher Ridge WSA (now a part of the Yuki Wilderness). The lower elevation areas along Elk Creek are also winter range for deer.186 From a river systems perspective, there is an opportunity to include upper Elk Creek on the Mendocino National Forest. In addition, Elk Creek is a link in a chain of anadromy that stretches from the Pacific Ocean, to the main stem Eel River, to the Middle Eel River, to Elk Creek and its tributaries, including Eden Creek and Deep Hole Creek. 186 California Statewide Wilderness Study Report, Thatcher Ridge Wilderness Study Area, Part 4, Vol. 2, BLM California, 1990. Recommendations: Include all 8 miles of Elk Creek from the Mendocino National Forest boundary to its confluence with the Middle Eel as eligible. Reinstate the wildlife ORV.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Fish Creek - The 1995 inventory identified 5.5 miles of the main stem and two tributaries as eligible, of which 3.2 miles flows through public lands managed by the BLM. The listed ORV in Table 2 was Other/Ecological but the description in Table 3 was "Suitable spawning and/or rearing habitat for indigenous salmon and steelhead. The threatened northern spotted owl has been detected in the vicinity of the river segment." Fish Creek appears to be designated critical habitat for the threatened Northern California steelhead. Surveys 1965, 1974, 1989, and 1990 found "numerous salmonids...most likely steelhead" in the creek, which was reported to have "dependable summer flow."173 The 2018 inventory does not include Fish Creek. Fish Creek is located in a Natural Landscape Block identified by state agencies as providing crucial habitat connectivity between the Coast Range and main Eel River.174 The owner of the adjacent private land through which the creek flows supports protection of the creek. Fish Creek is proposed as a Wild and Scenic River and it drains a roadless area proposed as the English Ridge Wilderness in legislation that has passed the House of Representatives and is currently pending in the U.S. Senate.175 173 Steelhead/Rainbow Trout Resources of the Eel River Watershed, California, G.S. Becker & I.J. Reining, CEMAR July 2009, pg. 286. 174 California Habitat Connectivity Project, CalTrans/CDFW, February 2010. 175 H.R. 803/S.1495. Recommendation: The 5.5-mile eligible segment identified in 1995 should be reinstated with a Fish ORV, as well as an Ecology ORV associated with crucial habitat connectivity.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Horse Canyon & Brin Canyon Creeks - These tributaries of Hulls Creek were not included in either the 1995 or 2018 inventories. They appear to be acknowledged occupied habitat for Northern California steelhead but they were excluded from designated critical habitat. A 1996 CDFW survey bound juvenile and YOY steelhead below a waterfall that was .8 miles upstream from the creek mouth and native rainbow trout were observed upstream of the falls. The same survey observed YOY steelhead in Brin Canyon below a 40-foot waterfall about .5 miles upstream of the creek mouth.183 183 Ibid, pgs. 205-206. Recommendation: The anadromy reach of both streams flow through public lands managed by the BLM. Horse Canyon and Brin Canyon Creeks should be included as eligible tributaries of Hulls Creek, due to their Fish ORV.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Indian Creek - Not identified in 1993, the 2018 inventory identified 5.4 miles of Indian Creek (a Trinity River tributary) to be eligible in five disjunct segments. The identified ORVs are fish (important producer of federally-listed threatened coho and Chinook salmon, and steelhead) and cultural (historic mining sites eligible for the National Register). Indian Creek also offers a class IV whitewater kayak run considered by expert boaters to be "a hidden gem" offering "fun bedrock micro-creekin".119 119 The New School Guide to Northern California Whitewater, by Dan Menten, New School Publications 2016, pg. 150. Recommendations: Add a recreation ORV associated with the creek's whitewater boating opportunities. Expand the eligible segment to connect all the disjunct segments.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Indian Creek - The 1995 inventory identified a 5.7-mile eligible segment of this Eel River tributary, with 3.2 miles flowing through public lands managed by the BLM. The listed ORV in Table 2 was Other/Ecological but the description in Table 3 was "Suitable spawning and/or rearing habitat for indigenous salmon and steelhead." The Indian Creek that is a tributary of the Eel River was not included in the 2018 inventory (another Indian Creek in Trinity County was included). Surveys conducted in 1965 and 1981 found steelhead, including juveniles, and the stream was described as having "excellent prospects as a steelhead spawning stream."169 Indian Creek also formerly support coho salmon.170 The owner of the adjacent private land through which the creek flows supports protection of the creek. Indian Creek is located in a Natural Landscape Block identified by state agencies as providing crucial habitat connectivity between the Coast Range and main Eel River.171 Indian Creek is proposed as a Wild and Scenic River and it drains a roadless area proposed as the English Ridge Wilderness in legislation that has passed the House of Representatives and is currently pending in the U.S. Senate.172 169 Ibid, pg. 286. 170 Historical Review of Eel River Anadromous Salmonids, With Emphasis On Chinook Salmon, Coho Salmon, and Steelhead, R.M. Yoshiyama & P.B. Moyle, UC Davis, February 2010, pg. 25. 171 California Habitat Connectivity Project, CalTrans/CDFW, February 2010. 172 H.R. 803 passed the House of Representatives and was referred to the Senate in Feb. 2021. Recommendation: The 5.7-mile eligible segment identified in 1995 should be reinstated with a fish ORV, as well as an Ecology ORV associated with crucial habitat connectivity.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	It is unclear what the corridor boundaries are for the BLM segments of the South Fork Eel, Middle Eel, and Trinity River. The 1990 South Fork Eel WSR Management Plan indicates the segment of the South Fork Eel primarily within the Elkhorn Ridge Wilderness has a larger than standard width corridor that averages 426 acres per mile. The Recreational segment upstream of this segment has no federal corridor because it is all private or state (UC Reserve System) land. The Recreation segment downstream of the wilderness has a standard 320 acre per mile corridor.212 212 Ibid, pages 6-11. The question is whether these different corridor boundaries were adopted in a final river management plan. The BLM's 2013 Covelo Surface Management Status map shows a standard 320 acre per mile corridor for the South Fork Eel WSR and the Middle Eel WSR. The BLM Hayfork Surface Management Status map shows a variable width corridor for the BLM segment of the Trinity WSR. The BLM should use the NCIP to review the corridor boundaries for these WSRs to ensure full protection of the river's free-flowing character, outstanding values, and segment classification.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Mattole River - Various segments of the Mattole River were determined eligible in the 1995 inventory, the 2005 King Range RMP, and the 2018 inventory. The 1995 inventory identified a .75-mile eligible segment in sec. 6, T5S, R2E (west of Thorn Junction and the BLM's King Range office and fire station), but none of the eligible segment was apparently on public land managed by the BLM.196 ORVs included fish and cultural. This specific segment was not included in the 2018 inventory, which did identify two disjunct eligible segments (A & B) of the Mattole totaling 2.1 miles and possessing a fish ORV (federally listed threatened coho salmon, Chinook salmon, and steelhead). The 2018 eligible segments are considerably downstream of the eligible segment originally identified in the 1995 inventory. The 1995 Garberville and 2014 Cape Mendocino BLM Surface Management maps, as well as the BLM's 2015 King Range National Conservation Area map, show two segments of the Mattole flowing through BLM-managed public land in sec. 31, T4S, R2E (a segment that includes the Mattole's confluence with Nooning Creek) and just downstream, in sec. 30, T4S, R2E (a segment that includes the Mattole's confluence with Eubank Creek). The segments also provide habitat for threatened coho salmon, Chinook salmon, and steelhead but for reasons unknown, were not identified by the BLM as eligible. The 2005 King Range RMP also identified a 4-mile eligible segment of the Mattole River estuary. In addition, various Mattole River tributaries were also found eligible due to their fish ORVs, including Jewett Creek and Bridge Creek in the 1995 inventory, as well as Sholes, Grindstone, and Fourmile Creeks in the 2018 inventory. In addition to its at-risk fisheries, the Mattole also offers two outstanding whitewater boating runs ranging from class II to IV, with clear water and A-rated scenery.197 196 Arcata Planning Area Proposed RMP/EA, BLM Arcata Field Office, Wild and Scenic River Eligibility and Classification Report, Appendix A, Tables 2 & 3, March 1995. 197 https://www.cacreeks.com/mattole.htm Recommendations: Given that it has already been identified in the Nationwide Rivers Inventory as a potential WSR, we recommend that the BLM find the entire Mattole River to be eligible, regardless of where the BLM-managed public lands are located. At the minimum, all segments on public land should be identified as eligible due to its fish ORV, along with the tributaries previously identified (Jewett, Bridge, Sholes, Grindstone, and Fourmile Creeks). A systems approach should also note the segments and tributaries found eligible and suitable in the King Range RMP. Add a whitewater boating recreation ORV.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Middle Fork Cottonwood Creek - The 1993 inventory identified a 12.4-mile eligible segment that included 5.5 miles on public lands managed by the BLM, with recreation and scenery ORVs. The 2018 inventory identified a 4.6-mile segment within the larger segment identified in 1993, with recreation and scenery ORVs. Identified ORVs are identical (scenery, recreation). The upper portion of the Middle Fork is located on the Shasta-Trinity National Forests managed by the U.S. Forest Service. State agencies identified Cottonwood Creek and its forks as flowing through Natural Landscape Blocks providing essential connectivity between the Coast Range, Sacramento Valley, and Modoc Plateau. In 2005, the upper segment of the MF Cottonwood Creek identified as eligible by the BLM was designated critical habitat for the federally-listed threatened Central Valley steelhead.⁹⁹ The Middle Fork also provides more than 23 miles of class III+ whitewater between Platina and the North Fork confluence, as well as a class III-IV run that starts on Beegum Creek at the Hwy 36 bridge (below the BLM eligible segment) down through the Middle Fork to its North Fork confluence. Boating clubs do these runs frequently and they offer class A scenery and excellent wildlife and bird viewing.¹⁰⁰ The upper eligible segment identified by the BLM from the Knob Gulch confluence downstream of Platina to the Platina Road (County Road A16) bridge is described as a challenging and technical wilderness- type run in thick riparian canopy that advanced kayakers would like best.¹⁰¹ 99 Designation of Critical Habitat for Seven Evolutionarily Significant Unites of Pacific Salmon and Steelhead in California, NOAA Fisheries, Fed. Reg. Vo. 70, No. 170, Sep. 2, 2005, pg. 52620. 100 https://www.cacreeks.com/coton-mf.htm 101 https://www.cacreeks.com/coton-mu.htm Recommendations: Coordinate with the Forest Service on studying the upper segment with the downstream BLM segment. At the minimum, find the larger 12.4-mile BLM segment from the Rainbow Lake Dam to Platina Road to be eligible. A systems approach should include recognizing the Middle Fork's critical habitat designation for threatened Central Valley steelhead as a fish ORV. Revise the recreation ORV to include the whitewater kayaking value. Update resource information to identify the Middle Fork Cottonwood Creek as providing essential habitat connectivity.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Review Existing and Potentially New Outstandingly Remarkable Values Although not specifically cited in the conformity review required by Sec. 1274(d)(2), the BLM should use the NCIP process to review and update outstandingly remarkable values of all its river segments in the NCIP region. This is important not only because of the state's limited list of protected extraordinary values (scenery, recreation, fish, and wildlife) but also because of changed circumstances and new information available since the state rivers were added to the federal system in 1981. The federal FEIS that analyzed and documented the Interior Secretary's decision to respond positively to the Governor's petition to add California's state-protected rivers to the federal system acknowledged the extraordinary anadromous fishery of the rivers and declared that anadromous fisheries were also the federally protected outstandingly remarkable value of the rivers. In addition, the FEIS identified an outstandingly remarkable whitewater boating value for the Middle Eel River.²¹⁶ Since the 1981 FEIS, there has been no attempt by the BLM or the Forest Service to identify other outstandingly remarkable values of the rivers, including values not considered in the state system (geology, cultural, historical, and other values, including botany, ecology, and hydrology). The National Park Service's 1983 Nationwide Rivers Inventory identified potential outstandingly remarkable values for these state-federal river segments, in addition to their anadromous fisheries. The state-federal river segments undeniably possess additional outstanding values that should be identified in the conformity review and formally protected. ²¹⁶ Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System, FEIS Volume I, Dec. 1980, USDI Heritage Conservation and Recreation Service, pgs. P-3, P-4. The conformity review should address the current status of the outstandingly remarkable anadromous fish values of the BLM segments that were federally designated in 1981. Anadromous fish values made all the BLM segments eligible for state protection in 1972 and federal protection in 1981. The Klamath-Trinity River system (including the BLM segments on the main stem Klamath and Trinity Rivers, and the North Fork Trinity) was identified as the most important producer of silver (coho) salmon and steelhead trout in California - second only to the Sacramento River in king (chinook) salmon production. The Eel River system (including the BLM segments on the Middle Eel, South Fork and North Fork, as well as the Van Duzen) supported a varied anadromous fishery ranking second in California in the production of silver (coho) salmon and steelhead behind the combined Klamath-Trinity system.²¹⁷ ²¹⁷ Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System, FEIS Volume I, Dec. 1980, USDI Heritage Conservation and Recreation Service, pg. III-47. Since their federal designation in 1981, virtually all species of anadromous fish in the BLM segments have continued to decline. This prompted the federal and state governments to list multiple stocks of salmonids in the NCIP region as threatened species and to designate critical habitat in the BLM segments. Listing as threatened or endangered of fish stocks is an important criterion used by BLM to identify outstandingly remarkable fish values. Rivers that are a nationally or regionally important producer of anadromous fish species and that provide exceptionally high-quality habitat for listed species and/or wild stocks are considered to possess outstandingly remarkable fish values.²¹⁸ ²¹⁸ BLM Manual 6400-Wild and Scenic Rivers-Policy and Program Direction for Identification, Evaluation, Planning, and Management (Public), July 13, 2012, pgs. 3-3, 3-4. [SEE ATTACHMENT FOR TABLE: SALMONID LISTINGS AND CRITICAL HABITAT DESIGNATIONS IN BLM WSR SEGMENTS SINCE 1981]</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Sacramento River - The Nationwide Rivers Inventory identified 135 miles of the Sacramento River from the I-5 bridge near Anderson to Arnold Bend upstream of Colusa as a potential WSR with scenery, recreation, fish, wildlife, cultural, and other values. While BLM is the largest public lands manager on the river downstream of Shasta Dam (managing more than 18,000 acres, primarily managed as the Sacramento River Bend ACEC and Outstanding Natural Area), the agency also manages one small parcel downstream of Red Bluff at Foster Island. The river downstream of Red Bluff also has significant federal and state public lands, including the 30- unit Sacramento River National Wildlife Refuge (totaling 10,353 acres) managed by the USFWS, the Red Bluff Recreation Area managed by the Forest Service (totaling 488 acres), four state parks managed by the California Department of Parks and Recreation (Ide Adobe State Park, Woodson Bridge State Recreation Area, Bidwell-Sacramento River State Park, and Colusa- Sacramento River State Recreation Area, totaling 844 acres), and the 13 unit Sacramento River Wildlife Area managed by the California Department of Fish and Wildlife (totaling 3,900 acres). The BLM's 1993 inventory identified a 25-mile segment of the Sacramento River from Balls Ferry to the river gage downstream of the Sevenmile Creek confluence to be eligible due to its scenery, recreation, fish, cultural and botanic/ecology ORVs. Only about 7.1 miles of the 25- mile-long eligible segment touched public lands managed by the BLM, but public mileage has increased since 1993 due to land acquisitions. Despite the presence of private lands, the 25- mile eligible segment makes sense given that the 1993 ROD includes direction to "Acquire available unimproved lands..." in the Bend area.²⁸ 28 Redding RMP ROD, June 1993, pg. 49. The 2018 inventory identified 15.8 miles of the Sacramento River to be eligible in five disjunct segments (A-D) beginning downstream of the Battle Creek confluence and ending slightly downstream of the Sevenmile Creek confluence and the river gage. Inexplicably, the 2018 inventory does not identify the short segment of the Sacramento that flows adjacent to BLM lands that comprise the Sacramento River Island ACEC/Research Natural Area (RNA). This area contains the largest unaltered fragment of native riparian forest on the river in Shasta County.²⁹ 29 Ibid, Appendix C, pg. C-6. For the eligible segments of the Sacramento River, the 2018 ORVs appear identical to the 1993 ORVs. The Sacramento River between Balls Ferry and the Interstate 5 bridge is a Potential Riparian Connection flowing through Natural Landscape Blocks and Essential Connectivity Areas identified by state agencies as providing essential habitat connectivity.³⁰ Most of the river between Shasta Dam and Red Bluff has been identified as an Area of Unprotected Biodiversity Importance.³¹ 30 California Habitat Connectivity Project, CalTrans/CDFW February 2010, pgs. C-37, C-38, C-40. 31 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. CalWild recommends that the ORV descriptions be revised and added as follows (additions and revisions in italics): Recreation ORV - The river is popular for boat and shoreline fishing, paddling (rafts, canoes, and kayaks), swimming, sightseeing, wildlife viewing, and hunting. There are developed recreation sites along the corridor for boat access, camping, target shooting (prohibited in the river corridor), and picnicking. The Sacramento River is ideal for single or multi-day trips with canoes or kayaks, with plenty of places to camp.³² The Sacramento between Redding and Red Bluff is one of the most pristine stretches of the river, with a published boating trail guide to assist visitors in planning a safe and enjoyable visit through this unique river area. The 33-mile stretch between Balls Ferry and Red Bluff is breath-taking.³³ 32 Chico Enterprise Record, https://www.chicoer.com/2014/08/11/my-top-10-best-whitewater-paddling-rivers-in-the-north-state/ 33 A Boating Trail Guide to the Sacramento River from Redding to Red Bluff, https://dbw.parks.ca.gov/?page_id=29490 Ecology ORV - This stream segment supports the imperiled Great Valley Mixed Riparian Forest and Great Valley Cottonwood Riparian Forest. Three major ecoregions of California meet at the Sacramento River near Bend, including the North Coast, Modoc Plateau, and Great Central Valley Ecoregions. The Sacramento River Bend Area provides crucial east-west connectivity, with a Natural Landscape Block, Essential Connectivity Area, and Potential Riparian Connections between the three Ecoregions.³⁴ Much of the river between Shasta Dam and Red Bluff, including the segments with public lands managed by the BLM, is located in an Area of Unprotected Biodiversity Importance.³⁵ 34 California Habitat Connectivity Project, CalTrans/CDFW February 2010. 35 Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. Recommendations: Revise ORV descriptions as suggested. Collaborate with the USFWS, California Department of Parks and Recreation, and California Department of Fish and Wildlife to identify all 135 miles of the Sacramento River from the I-5 bridge in Anderson to Colusa to be eligible. At the minimum, the NCIP should restore the eligibility of the entire 25-mile segment of the Sacramento River from Balls Ferry to the Sevenmile Creek previously identified in the 1993 inventory. In addition, the short segment of the Sacramento River directly adjacent to the Sacramento River Island ACEC/RNA should be considered eligible, with ecological (riparian habitat) and scientific research ORVs.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Section 1274(d)(2) of the NWSRA requires that "For rivers designated before January 1, 1986, all boundaries, classifications, and plans shall be reviewed for conformity within the requirements of this subsection within 10 years through regular agency planning processes." Since they were federally designated in 1981, this section applies to all state-federal river segments managed by the BLM, including the South Fork Eel, Middle Eel, North Fork Eel, main stem Trinity, North Fork Trinity, and the Klamath. As the NCIP is a "regular agency planning process," the BLM should review its Middle Eel and Trinity WSR segments for boundary and classification conformity in coordination with the Forest Service which manages adjacent segments of these rivers.</p>
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	<p>Shell Rock Creek - The 1993 inventory identified a 5.5-mile eligible segment, with 3.5 miles flowing through public lands managed by the BLM. ORVs included geological (Shell Rock is a unique geological formation) and scenery (Scenic Quality A landscape). In addition, BLM and CDFW surveys have found rainbow trout and juvenile steelhead in Shell Rock Creek, but there was no apparent consideration of a possible fish ORV in the 1993 inventory.¹⁶⁶ The 2018 inventory didn't include Shell Rock Creek. No explanation is provided as to why BLM believes Shell Rock Creek is no longer eligible. ¹⁶⁶ Steelhead/Rainbow Trout Resources of the Eel River Watershed, California, G.S. Becker & I.J. Reining, CEMAR July 2009, pg. 187 Recommendations: The 2018 inventory should be revised to include Shell Rock Creek as an eligible stream and determine whether it possesses a fish ORV. Alternatively, an explanation should be provided as to why the BLM feels it is ineligible.</p>

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	South Fork Cottonwood Creek - The 1993 inventory identified a 14.3-mile eligible segment that included 3.1 miles of public lands managed by the BLM. The 2018 inventory identified just the 3.1-miles on BLM lands in seven disjunct segments. ORVs identified in 1993 are scenery, recreation, and geology, while 2018 ORVs include scenery, recreation, fish, and cultural ORVs. The upper portion of the South Fork is managed by the U.S. Forest Service in the Yolla Bolly- Middle Eel Wilderness on the Shasta-Trinity National Forests. State agencies identified that Cottonwood Creek and its forks as flowing through Natural Landscape Blocks, and the South Fork and main stem of Cottonwood Creek are Potential Riparian Connections, providing essential connectivity between the Coast Range, Sacramento Valley, and Modoc Plateau. In 2005, the South Fork was designated as critical habitat for the federally listed threatened Central Valley steelhead. In addition, the same document acknowledged that the BLM eligible segment represented habitat occupied by the threatened spring run chinook salmon, but (for reasons unknown) it was not designated critical habitat. Recommendations: Coordinate with the Forest Service on studying the upper segment with the downstream BLM segment. At the minimum, find the larger 14.3-mile BLM segment from the National Forest boundary to Cooks Flat to be eligible. A systems approach should include recognizing the South Fork's critical habitat designation for threatened Central Valley steelhead as a fish ORV. Providing essential habitat connectivity should be considered an Ecological ORV for the South Fork Cottonwood Creek.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Tenmile Creek - The 1995 inventory identified a 3.3-mile eligible segment of Tenmile Creek down to its confluence with the SF Eel, with .3 miles flowing on public lands managed by the BLM. The 2018 inventory identifies just a .4-mile eligible segment on public lands. A Fish ORV is identified in both inventories, while the 1995 inventory also identifies a Wildlife ORV (endangered species nesting site occurs nearby). The Fish ORV should be revised as follows, and a Recreation ORV be added. Fish ORV - Tenmile Creek provides designated critical habitat and is an important producer of federally-listed threatened Southern Oregon/Northern California coho salmon, California coastal Chinook salmon, and Northern California steelhead. The most recent CDFW inventory found steelhead of various ages in the creek. Recreation ORV - American Whitewater identifies a 6.9-mile class III-IV kayak run on Tenmile Creek ending at its confluence with the SF Eel.142 According to Menten, the Tenmile Creek run leads to the more challenging class IV-V South Fork Eel Wilderness Gorge run. The Tenmile Creek is described as "...a great run that shouldn't be overlooked..." leading to a "solid bedrock gorge" where "big rapids start right away" and continue all the way to take-out.143 142 https://www.americanwhitewater.org/content/River/view/river-detail/311/main 143 The New School Guide to Northern California Whitewater, by Dan Menten, New School Publications 2016, pg. 198. Ecology ORV - Tenmile Creek flows through a Natural Landscape Block and Essential Connectivity Area identified to provide crucial connectivity within the SF Eel drainage.144 144 California Habitat Connectivity Project, CalTrans/CDFW February 2010. Recommendations: The longer 3.3-mile eligible segment identified in 1995 should be retained. In addition, the inventory analysis should explain why the Wildlife ORV was dropped.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The BLM Manual encourages a systems approach to section 5(d) studies. For establishing study river termini and area boundaries, the Manual states: "To identify the beginning and ending points of the study river, consider the entire river system including the interrelationship between tributaries and the mainstem and their associated ecosystems. establishing river termini and boundaries."16 16 Ibid sec. 2.2, pg. 2-2. In addition, one of the factors to consider for suitability is "The contribution to river system or basin integrity. This factor reflects the benefits of a 'systems' approach (e.g., expanding the designated portion of a river in the National System or developing a legislative proposal for an entire river system-headwaters to mouth-or watershed). Numerous benefits may result from managing an entire river or watershed, including the ability to design a holistic protection strategy in partnership with other agencies and the public."17 17 Ibid sec. 3.4(A)(1), pg. 3-7. This is particularly important when addressing an outstandingly remarkable value that is transient in nature, such as anadromous fisheries. Anadromous fish may include multiple species, subspecies, and life stages, all of which may have different migration periods, holding and spawning habitat requirements. In a large river system like the Eel, different parts of the river provide migration, holding, and spawning habitat for adults and juveniles, and these habitats may be used at different times of the year. Particularly with climate change, upper watersheds and tributaries have become crucial to providing cold water refugia, including holding and spawning areas with suitable flows and temperatures. Simply protecting one or two of these vital habitats cannot guarantee survival of salmonids - all key habitats need protection. A systems approach is particularly important when an outstandingly remarkable value is found throughout a river system, as opposed to being located permanently at a discrete spot on the river. At-risk anadromous fish species represent a major value found in many of the eligible stream segments identified in 1993-95 and 2018 inventories. This is a system-wide value. The spawning habitat provided by a short public land segment of a small stream contributes to the anadromous fishery and habitat found throughout the river system. Since anadromous fish is a ubiquitous outstanding value when addressing rivers and streams in the NCIP area, it is crucial to identify the upper watersheds and tributaries that provide critical refugia for various anadromous species, subspecies, and life stages. Maintaining habitats required by salmonids during all life stages, assuring connectivity and functional corridors linking high-quality habitats, and maintaining a well-dispersed network of high-quality refugia to serve as centers of population expansion are key ecological goals of salmonid conservation.18 18 An Ecosystem Approach to Salmonid Conservation, Brian C. Spence et al, NOAA Fisheries, Dec. 1996. For example, threatened salmon and steelhead migrate up the main Eel River and the Middle Eel River to spawn. Since these stream segments are designated Wild and Scenic Rivers, one of the existing management goals of the BLM and other land management and regulatory agencies is to ensure that the rivers provide the migrating, holding, and spawning habitat needed for the survival of at-risk salmonids. But simply protecting the migration habitat in the existing Wild and Scenic Rivers doesn't fully protect the at-risk fish populations. Key tributaries that act as coldwater refugia and provide critical holding and spawning habitat must be protected as well. The NCIP Wild and Scenic River Inventory can help achieve this goal. In the case of the Middle Eel anadromous fisheries, this would include finding the Middle Eel's tributaries on BLM lands, such as Elk Creek and its tributaries, Deep Hole Creek and Eden Valley Creek, eligible for Wild and Scenic protection as well. A systems approach recognizes the outstandingly remarkable fisheries value contributed by Elk, Eden Valley, and Deep Hold Creeks to the Middle Eel River fishery. The tendency of the 2018 inventory to identify short eligible segments fails to adequately support this crucial systems approach, particularly for the many streams that support outstandingly remarkable anadromous fisheries.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	The BLM's current rule for Resource Management Planning also requires the agency assess existing WSRs and WSR study rivers.1 Public scoping comments recommended that the NCIP address protection of existing WSR segments managed by the BLM, as well as identifying new eligible segments. This public input was acknowledged in the BLM's NCIP Scoping Report (April 2017). However, the scoping report failed to cite the pertinent sections and specific requirements of the NWSRA that apply to these management actions. 1 46 CFR Sec. 1610.4(d)(5)(v) and (vii), BLM Final Rule, Dec. 12, 2016.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Working closely with members of Congress, conservationists have successfully developed and implemented legislative campaigns that added select BLM eligible stream segments to the NWSR System, without the benefit of an agency suitability recommendation/draft legislative proposal. This includes eligible segments of the Amargosa River, Surprise Canyon, Cottonwood Creek, and the Whitewater River. The BLM did not complete the suitability assessment for these streams or submit a legislative proposal to Congress. Based on this record, a suitability decision for an eligible stream is clearly not needed. Requiring the BLM to make suitability decisions does not meaningfully contribute to the political process that secures permanent protection for a river. Developing and maintaining a political consensus or majority in support of a designation typically takes many years of community outreach, and largely depends on the ever-shifting make-up of congressional, state, and county delegations and narrow political windows of opportunity. It is a complex dynamic process involving considerable effort and public outreach. Because of this, it is unlikely the BLM can negotiate and secure broad political support for a suitability recommendation in the planning process.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Although not required under the NWSRA, the BLM has the option to development Comprehensive River Management Plans (CRMP) in conjunction with the state to ensure protection of the rivers' free flowing condition and outstandingly remarkable values. The purpose of the CRMP is to protect and enhance river values while providing for the public use and enjoyment of the designated river.207 Protection and enhancement of river values is crucial to the Act's intent regardless of whether the river was designated prior to or after Jan. 1, 1986 (the date that determines whether a CRMP is required or not under 16 U.S.C. Sec. 1274[d][2]). 207 Although 16 U.S.C. Sec. 1274(d)(1) requires comprehensive management plans for rivers designated after January 1, 1986, it does not prohibit the development of a comprehensive management plans for rivers federally designated before that date.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Elimination or Reduced Mileage of 1993-95 Eligible Segments No explanation is provided as to why some eligible segments identified in 1993-95 are not included in the 2018 inventory. We are concerned that some previously eligible streams and other streams considered but ultimately determined ineligible due to their short segments on public land may have been eliminated because BLM doubts the feasibility of managing these short segments as WSRs. This is a suitability consideration that should not affect determination of eligibility. BLM guidance on this matter is clear: "Jurisdictional and management constraints are not considered when determining a river's eligibility for designation as a WSR. These types of issues are addressed in the suitability phase of WSR studies."14 14 BLM Manual 6400-Wild and Scenic Rivers-Policy and Program Direction for Identification, Evaluation, Planning, and Management (Public), July 13, 2012, pg. 3-1. The same section of the BLM Manual states that "The BLM does not have the authority to evaluate the presence, absence, or quality of values that occur on private lands. However, the boundary of that river may include private lands. In such cases, eligibility determinations should only consider the presence of values on BLM-administered lands and related waters."15 15 Ibid pg. 3-1. This may have led to BLM eliminating previously eligible segments like Deer Creek. We don't believe that Deer Creek should be eliminated as non-eligible given that existing management direction for the previously eligible segment included establishment of an ACEC, acquisition of additional public lands, and a cadastral survey to determine whether BLM public lands within the corridor include a part of the stream. Many eligible streams that suffered significant mileage reduction in the 2018 inventory are located in ACECs, where current plan direction includes acquisition of private lands from willing sellers or land trades. This includes the Sacramento River, Battle Creek, Paynes Creek, Butte Creek, and the Shasta River in the Redding region. CalWild urges that non-eligibility be reconsidered for many of the rivers and streams identified as eligible in 1993-95 that were eliminated in the 2018 report or suffered reduced mileage. The table below shows rivers and streams determined eligible in the 1990s that suffered reduced mileage or were eliminated altogether from 2018 report.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Organize Eligible Tributaries by Refugia to Emphasize Fish Connections A simple finding that a small tributary of one of the existing Wild and Scenic Rivers in northwest California possesses outstanding anadromous fishery values fails to address the role the tributary may play in sustaining the larger river's protected remarkable anadromous fishery. A true systems approach would identify all the stream segments administered by BLM that could provide critical refugia for at-risk fish. To emphasize the connection between fisheries in tributaries and the main forks and stems in the NCIP region, we recommend that the results of the eligibility inventory be organized by main river refugia for anadromous fish. For example: [SEE ATTACHMENT FOR TABLE: ANADROMOUS FISH REFUGIA STREAMS FLOWING THROUGH BLM LANDS IN THE NCIP REGION] At minimum, the descriptions of eligible streams with anadromous fish ORVs should mention that the eligible tributary contributes to the anadromous fish ORV of the existing WSR. Given the anadromous fishery connection between the main stem and forks of a larger river with its tributaries, it would also be useful to organize non-designated rivers with the fish- sustaining tributaries, including Redwood Creek (Lacks Creek), Mad River (non-BLM tributaries such as Pilot Creek on the Six Rivers National Forest), and the Mattole River (Jewett Creek, Bridge Creek, Grindstone Creek). This applies to tributaries of the Sacramento River as well.
Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Scattered Public Lands Results in Many Short Eligible Segments Much of the public land managed by the BLM in the NCIP region consists of relatively small, scattered, and often unconnected parcels. As a result, 25 of the 104 eligible segments identified in the 2018 report are less than 1 mile long and several are measured in tenths of a mile. Even where longer segments were determined eligible in the 2018 report - such as the 15.9 miles of the Sacramento River - these eligible miles are broken into at least six unconnected segments. Battle Creek and its North and South Forks also suffered significant reduction in mileage, from 34.8 miles in 1993 to 4.9 miles in 2018. The scattered nature of the many relatively small public land parcels managed by the BLM in the Redding and Arcata areas significantly influenced the past and current WSR inventories. Many of the public land parcels are difficult to reach and may lack any legal public access, even for BLM managers. Nevertheless, public ownership of formerly private lands adjacent to these scattered short segments of eligible streams has increased in response to direction that was provided in the 1993-95 Redding and Arcata RMPs. The 1993-95 RMPs included direction to acquire private lands to protect and improve management of old growth forest habitat, riparian habitat, and other habitat that support at- risk fish and wildlife species, as well as provide additional outdoor recreation opportunities. Eligible streams identified in the Arcata RMP located in areas targeted for additional public land acquisition include Lacks Creek, Butte Creek, Charlton Creek, Bell Springs Creek, Cedar Creek, Tenmile Creek, and Elder Creek. Eligible streams identified in the Redding RMP located in areas targeted for public land acquisition include the Upper Klamath River, Jenny Creek, Clear Creek, Sacramento River, Battle Creek, Deer Creek, and Butte Creek (Forks of Butte segment). Successful implementation of this direction includes BLM's acquisition of lands in the Lacks Creek area, along lower Clear Creek, and in the Sacramento River Bend Area. The management direction to acquire more public lands along these eligible streams and in the areas through which these they flow addresses the problem of small scattered public land parcels on short segments of eligible streams. We believe that the direction to acquire more public lands in key areas and along eligible streams should be continued and expanded in the NCIP. Implementation of this direction will be greatly aided by Congress' recent reauthorization and full funding for the first time in decades of the Land and Water Conservation Fund.

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Wild and scenic rivers	Evans	Steven	California Wilderness Coalition	7	Section-Specific Comments Section 1.2 (pgs. 1-2 through 2): The summary response to the question, "What is a Wild and Scenic River?" fails to mention the establishment of a river corridor averaging 320 acres/mile, the classification and management of river segments as Wild, Scenic, and Recreational based on existing development, and the mandate for federal agencies to protect and enhance the specific outstandingly remarkable values of rivers. These critically important protection provisions should be mentioned in the summary. 1.3.2 Tentative Classification (pg. 1-3): The first paragraph of this section claims that establishing tentative classification "is to ensure appropriate protection of the values supporting eligibility and classification determinations." We recommend that this statement be revised to state "help ensure." Management by classification alone does not ensure protection of outstanding values, which is why section 10(a) of the NWSRA specifically requires managing federal agencies to protect and enhance river values. 1.5 Existing Inventories and Designations (pgs. 1-4): As previously noted, section shows that BLM manages 32 miles of the Eel WSR (including main stem Eel, Middle Eel, NF Eel, and SF Eel), 17 miles of the Trinity WSR, and 1.5 miles of the Klamath - a total of 50.3 river miles. But the 2016 NCIP Analysis of the Management Situation lists 53.3 miles of BLM managed existing WSRs in the NCIP area (Table 2-58, pg. 2-280). These different estimates should be reconciled. 2.1.1 Geographic Information Systems (pg. 2-1): This section states that "...all rivers and stream segments classified as perennial or intermittent in the US Geological Survey's National Hydrography Dataset that intersect with BLM-administered lands were considered during the eligibility review." But section 2.2.2 on page 2-2 states that "...stream segments were determined to be free-flowing if they are not recognized as 'perennial' or 'intermittent' in the" USGS Dataset (italics added for emphasis). To reconcile this statement with the statement on pg. 2-1, the word "not" should be removed. 2.1.3 Informational Sources (pg. 2-2): This section states that the BLM reviewed existing WSR eligibility and suitability findings within the planning area and specifically mentions eligibility and suitability findings for Beegum Creek and Canyon Creek by the Forest Service on the Shasta-Trinity National Forest. There are other existing WSR eligibility/suitability findings that intersect with the BLM WSR Eligibility Report for the NCIP region, as well as many upstream and downstream segments managed by the Forest Service that have not been assessed for eligibility (but likely will be in upcoming Forest Plan revisions). Following the BLM guidance to consider entire river systems, including tributaries, it is important to consider upstream and downstream segments of streams managed by other agencies such as the Forest Service and public lands managed by the State of California. In addition to Beegum and Canyon Creeks, multi-jurisdictional streams where the entire river system should be considered include Deer Creek, Mill Creek, NF and SF Battle Creek, Butte Creek, and Big Chico Creek on the Lassen National Forest; the upper MF and SF Cottonwood Creek, and West Weaver Creek on the Shasta-Trinity National Forest; Thatcher and Elk Creeks on the Mendocino National Forest; units of the Sacramento River National Wildlife Refuge downstream of Red Bluff managed by the U.S. Fish and Wildlife Service (USFWS), Clear Creek in the Whiskeytown National Recreation Area managed by the National Park Service; and Elder Creek in the Angelo Reserve (managed by UC Berkeley and owned by the State of California).
Wild and scenic rivers	Morris	Josh	N/A	11	First, in 2017, when we had an abundance of rain the Bureau of Rec. let out a ton of water from Shasta Dam and ran high flows down the Sacramento River for a long period of time. A big section of of your property along the river was washed out. You lost 20 feet deep of bank along the whole river bend. In some places willows have started to regrow, but in most places the river bank remains virtually bare and unprotected. I think it would be a good idea if your planning addressed this issue. Perhaps you could replant the bank, maybe take other measures to deal with erosion loss (like rip rap or downed trees?), and maybe you could talk to your sister bureau about not running such a high quantity of water, but instead running a lower quantity for a longer time period (when and if we ever have rain again).
Wild and scenic rivers	Morris	Josh	N/A	11	One last comment about the part of your property between the slough and the river. This is on the north end of the river bend. In this area there a some amazing and beautiful flowering plants. I don't know how many areas in the world share this habitat or in how many other places these plants grow, but I encourage you to do what you can to protect them.
Wild and scenic rivers	Williams	Laurel	The Pew Charitable Trusts	738	The National Wild and Scenic Rivers Act (16 USC Section 1276(d)(1)) requires the BLM to consider potential national wild, scenic, and recreational river areas in all planning for the use and development of water and related land resources and in planning reports by all federal agencies as potential alternative uses of the water and related land resources involved. Additionally, 16 USC Section 1274(d)(2) of the NWSRA requires the BLM to review for conformity boundaries, classifications, and plans for existing WSRs designated prior to 1986. These requirements apply to the segments of existing WSRs managed by the BLM in the NCIP region, including segments of the Klamath, Trinity, Van Duzen, and Eel WSRs. During this planning process, BLM can identify and protect these rivers' additional outstanding values, including scenery, recreation, wildlife, geology, historical, cultural, ecological, and botanical values. The California Wilderness Coalition has submitted additional comments on wild and scenic rivers, and we incorporate those comments by reference here. We recommend that the BLM consider CalWild's comments and take appropriate action within the NCIP planning process to ensure full protection of the BLM's existing WSR segments as well as a systematic and comprehensive assessment of potentially eligible WSRs. Finally, we request that the BLM update their WSR inventory in response to comments and include the inventory in the NCIP draft environmental impact statement for public comment.
Wild and scenic rivers	Simmons	Matthew	Environmental Protection Information Center	756	BLM should also consider protecting additional segments of these and other rivers in the planning area.
Wild and scenic rivers	Simmons	Matthew	Environmental Protection Information Center	756	The BLM management area includes segments of five National Wild and Scenic Rivers managed and protected by BLM. This includes segments of the Klamath, Trinity, Middle Eel, North Fork Eel, and South Fork Eel Rivers. Originally state rivers, these river segments added to the federal system in 1981 to preserve their outstanding fisheries. In this planning process, BLM has the opportunity to identify and protect these rivers' additional outstanding values, including scenery, recreation, wildlife, geology, historical/cultural, ecological, and botanical values
Wild and scenic rivers	Jirak	Lori	N/A	758	Protect the recreational and scenic values and ecological integrity of all streams that are eligible for wild and scenic river status
Wild and scenic rivers	Chichester	Ginny	N/A	762	The Elk Creek, which flows to the Middle Fork Eel River must be preserved and protected until such time as Congress acts to include it in the Yuki Wilderness.

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Wild and scenic rivers	Cann	Bruce	N/A	770	MIST should be used to fight wildfires within designated wild & scenic rivers that are classified as either "wild" or "scenic". Keep all eligible river segments "as is". No need to go through the suitability process. Re-evaluate existing eligible river segments for additional outstandingly remarkable values (ORV's). Increase monitoring of rivers (both designated and eligible) using helicopter flights and/or drones, and river rafting trips. Designated rivers classified "wild" should be evaluated for restoration potential. Many of these segments have man-made features such as logging roads that should be restored to a natural appearing condition. A good example is the North Fork Eel River. Re-write the river management plan for the Middle Fork Eel River as it is out-of-date. Write a river management plan for the South Fork Eel River. Any water resource project within the bed or banks of a designated wild and scenic river needs a Section 7 evaluation completed and approved.
Wild and scenic rivers	Hanceford	Phil	The Wilderness Society	781	Finally, unless the BLM intends to complete legislative proposals for review by Congress, we recommend that the BLM not make a determination of suitability of eligible WSR segments. Because of the scattered nature of BLM lands in the NCIP area, many eligible segments may not be suitable due to management and access issues. It is best if the BLM avoids suitability and instead focuses on acquisition of additional public lands along eligible WSRs to make its management and future protection more feasible.
Wild and scenic rivers	Hanceford	Phil	The Wilderness Society	781	In its review of existing WSR segments in the NCIP region, the BLM should also identify additional outstandingly remarkable values (ORV) for the designated river segments of the Klamath, Trinity, Van Duzen, and Eel WSRs. Because of how these rivers were administratively added to the federal system in 1981 under 16 U.S.C. Sec. 1273(a)(ii), and not through the usual course of legislation, the BLM has not considered which additional ORVs these protected segments possess beyond the existing anadromous fish ORV.
Wild and scenic rivers	Hanceford	Phil	The Wilderness Society	781	The National Wild and Scenic Rivers Act (16 USC Section 1276(d)(1)) requires the BLM to consider potential national wild, scenic, and recreational river areas in all planning for the use and development of water and related land resources and in planning reports by all federal agencies as potential alternative uses of the water and related land resources involved. Additionally, 16 USC Section 1274(d)(2) of the NWSRA requires the BLM to review for conformity the boundaries, classifications, and plans for existing WSRs designated prior to 1986. These requirements apply to the segments of existing WSRs managed by the BLM in the NCIP region, including segments of the Klamath, Trinity, Van Duzen, and Eel WSRs. During this planning process, BLM can identify and protect these rivers' additional outstanding values, including scenery, recreation, wildlife, geology, historical/cultural, ecological, and botanical values.
Wild and scenic rivers	Hanceford	Phil	The Wilderness Society	781	CalWild submitted additional comments on Wild and Scenic rivers to BLM on May 15, 2022, and we incorporate those comments by reference here. In summary, those comments state that the 2018 WSR Inventory fails to include some streams determined eligible in the 1993-95 RMPs and fewer eligible miles were identified in the 2018 inventory than in the 1993-95 RMPs. Because the NCIP process was put on hold, the 2018 WSR inventory was not subject to full public review. Based on public comments in the new NCIP process (see CalWild's detailed comments dated May 14, 2022), we request that the inventory be revised and expanded.
Wild and scenic rivers	Hanceford	Phil	The Wilderness Society	781	We recommend that the BLM consider CalWild's comments and take appropriate action within the NCIP planning process to ensure full protection of the BLM's existing WSR segments as well as a systematic and comprehensive assessment of potentially eligible WSRs. We request that the BLM update their WSR inventory in response to comments and include the inventory in the NCIP draft environmental impact statement for public comment.
Wild and scenic rivers	Baker	Judith	N/A	802	Conduct a robust inventory of potential Wild and Scenic Rivers to protect their water quality, free flowing character, and outstanding scenery, recreation, fish, wildlife, geology, historical, cultural, and other values
Wild and scenic rivers	Baker	Judith	N/A	802	Review boundaries, corridors, and management plans for segments of the Eel, Trinity, Klamath, and Van Duzen Wild and Scenic Rivers managed by the BLM and identify additional outstanding values for these rivers
Wild and scenic rivers	Gutermuth	Brandt	Bureau of Reclamation	803	In your planning please support/facilitate activities which uphold natural river processes. These activities might have short-term impacts on the wild and scenic corridor but will benefit long-term river function. For example, the TRRP supports: 1) site specific excavation and removal of vegetation to lower floodplains to elevations where they more frequently inundate and interact with the river. These activity areas and channel rehabilitation areas may create self-sustaining riparian habitats. 2) Removal of historic mining material (e.g., tailing deposits) from the floodplain so that areas of functioning riparian habitat may be enhanced and flood elevations may be reduced.
Wild and scenic rivers	Huffman	Jared	N/A	808	Additionally, as part of this process, we urge you to protect other areas that are identified as having wilderness characteristics or as being eligible for wild and scenic river status. As part of the NCIP process, the BLM can protect wilderness-quality lands by designating them as wilderness study areas (WSA). While portions of the Yolla Bolly-Middle Eel Wilderness additions and Yuki Wilderness additions are already designated as WSAs, the English Ridge Proposed Wilderness and the Elkhorn Ridge, South Fork Eel River, and Trinity Alps Proposed Wilderness Additions are not.
Wild and scenic rivers	Grissom	Kathy	N/A	847	Would like to see as much of the Sacramento River through Bend designated Wild and Scenic River as possible."
Wild and scenic rivers	Ledger	David	Shasta Environmental Alliance	864	Clean and unpolluted water is important for our endangered and threatened salmon and steelhead trout, as well as for all species in rivers and streams. We encourage continued protection of these waterways; designate any that qualify as Wild and Scenic. We support continued restoration and protection of BLM lands in the Clear Creek Greenway, Sacramento River Bend Area, the Trinity River Corridor, and other BLM lands with streams and rivers.
Wild and scenic rivers			California Wilderness Coalition	7	Together, these comprise a wildlife ORV. ⁶⁴ 63 Redding Proposed RMP/FEIS, Appendix A - Wild and Scenic River Eligibility, BLM 1992, pg. A-15. 64 Watershed Analysis for Mill, Deer, and Antelope Creeks, Lassen National Forest, USDA Forest Service, no date. Recreation ORV - Deer Creek below the Lassen Forest boundary offers a unique multi-day wilderness kayak run. According to Lars Holbek, the author of California's first statewide guide to whitewater kayaking, "...Deer Creek canyon is one of the finest in California. Rarely can one experience a river of such high quality for such a long distance (35 miles until flatwater sets in)." ⁶⁵ Here's a 2018 video of Deer Creek's class IV-V kayak run: https://www.youtube.com/watch?v=8IbNQIZay3c . 65 https://cacreeks.com/deer.htm Scenery ORV - In addition to the BLM recognized class A scenic quality, kayakers have noted that the scenery of Deer Creek improves downstream of the National Forest boundary. The segment downstream of the powerlines crossing is described as "...probably the most scenic section along the lower run..." with "...unusually beautiful rock formations and class II-III rapids." ⁶⁶ 66 Ibid. Recommendations: Given its recognition in the NRI, find all 41 miles of Deer Creek to be eligible. At the minimum, reinstate the 8.1-mile eligible segment of lower Deer Creek identified in the BLM's 1993 inventory, with recreation, scenery, fish, wildlife, cultural and ecology ORVs. The NCIP should also include direction to conduct a cadastral survey and to acquire additional public lands along the lower creek segment in the Deer Creek ACEC. Update the resource information identifying Deer Creek as providing essential habitat connectivity.

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Wild and scenic rivers			California Wilderness Coalition	7	47 45 California Habitat Connectivity Project, CalTrans/CDFW February 2010. 46 https://www.researchgate.net/figure/In-color-online-Tehama-County-and-The-Nature-Conservancys-TNCs-Lassen-Foothills_fig1_249994143 47 I. Increasing taxonomic diversity and spatial resolution clarifies opportunities for protecting US imperiled species, Healy Hamilton et al, NatureServe, Ecological Applications, Ecological Society of America, July 2021. Wildlife ORV - The federally protected bald eagle nests and forages along lower Battle Creek. Bald eagle and other raptor species are attracted by the creek's phenomenal salmon runs. The mixture of healthy riparian habitat and wetlands along lower Battle Creek also attract a variety of other avian wildlife, including wood duck, Virginia rail, sora, thrasher, and Phainopepla. The Wintu Audubon Society considers lower Battle Creek to be an important bird area, supporting 89 bird species.48 48 https://www.wintuadubon.org/tag/battle-creek-state-wildlife-area/ Recreation ORV -Battle Creek offers kayaking/floating and wildlife viewing opportunities. Lower Battle Creek is a popular destination for float tubing, due to its class I-II rating, easy access, and naturally maintained flows. Class I-II kayakers may float down lower Battle Creek between the Fish Hatchery and the Sacramento River confluence. The lower creek provides a rare opportunity to float a small Central Valley stream through lush riparian habitat. The upstream class III-IV kayak run begins at the Manton Road crossing on the South Fork and ends on the main stem at a point just upstream of the Coleman Fish Hatchery. This class III-IV run is growing in popularity and is superior to similar valley/foothill runs on Cache Creek and Stony Creek. Rapids are numerous, water quality is good, play spots are plentiful, and the season is long.49 The mixture of public lands on lower Battle Creek (managed by the BLM, USFWS, and CDFW) offers a wide variety of recreational opportunities recognized statewide. CDFW manages it lands along Battle Creek for wildlife and wildlife viewing.50 Visitors may view salmon at the fish hatchery managed by the USFWS and hike two miles downstream on the Battle Creek Salmon Trail to enjoy the creek and its lush riparian habitat. 51 The Hatchery also hosts an annual "Return of the Salmon Festival," which was featured on an episode of Huell Howser's California's Golden Parks series. BLM manages public lands that provide a scenic backdrop along the south side of this creek segment. Recreational opportunities on lower Battle Creek are featured on several web sites, including American Whitewater, California Native Plant Society, Wintu Audubon Society, Shasta-Cascade Wonderland Association, and California Watchable Wildlife. 49 https://www.americanwhitewater.org/content/River/view/river-detail/3307/main 50 https://wildlife.ca.gov/Lands/Places-to-Visit/Battle-Creek-WA 51 https://www.fws.gov/coleman/trail.html , https://healthyshasta.org/trail/battle-creek-salmon-trail/ Recommendations: Revise ORVs and expand descriptions as suggested. Coordinate with other land managers (USFWS, CDFW, The Nature Conservancy) on eligibility. Follow the "systems" approach and find eligible all 34.8 miles of the South Fork Battle Creek and the main stem downstream to the Sacramento River confluence, as well as the short .9-mile segment of the North Fork. At the minimum, include as eligible the public lands segment not identified on Map A2 in section 34, R2W, T30N. ORVs for the eligible segments of Battle Creek and its North and South Forks should include scenery, recreation, fish, wildlife, cultural, and ecology. Maintain management direction to acquire available unimproved lands in the corridor, management area, and Essential Connectivity Area.
Wild and scenic rivers			California Wilderness Coalition	7	Continue the management direction to acquire more public lands along the river and its tributaries in this management area. Given that both the 1993 and 2018 inventories identify eligible tributaries to the Sacramento River in the Bend area, we strongly recommend that the BLM follow the "systems" approach suggested in its own guidelines to include all 25 miles of the river between Balls Ferry and the Sevenmile Creek gage, as well as its eligible tributaries. The NCIP and WSR inventory should also include resource information to identify the Sacramento River and its tributaries as providing essential habitat connectivity.
Wild horses and burros	Decker	Karie	Rocky Mountain Elk Foundation	31	As a member of the National Horse & Burro Rangeland Management Coalition, RMEF expresses continued concern related to the increasing number of wild horses and burros on public land. Vital native wildlife habitat continues to degrade due to overpopulated herds. RMEF encourages close coordination across the RMP and the Red Rock Lakes Herd Management Area Plan and expanded conservation of the sagebrush habitat used by big game for winter range
Wild horses and burros	Willis	Dave	Soda Mountain Wilderness Council	760	It is no secret that feral horses are proliferating here - compacting soil, breaking down stream banks, fouling springs, further exacerbating the area's metastasizing noxious weed problems, and even creating traffic hazards. Feral horses chronically trespass into the HRWA and CSNM where not even cattle grazing is authorized. Where cattle grazing is authorized, that grazing is seasonal and at least nominally "managed" by BLM. But the proliferating unmanaged feral horses hammer the land all year long. The RMP needs to address the feral horse problem head-on, coordinating with other government agencies as needed to eliminate feral horses here asap.
Wilderness and wilderness study area	Cartier	Emmett	N/A	9	Please designate and manage the public lands within the Gilham Butte area as wilderness, as part of the Northwest California Integrated Resource Management Plan . The Gilham Butte area offers the unusual setting for dispersing recreational uses in a safe and rewarding environment. Wildlife species present include bobcats, bears, blacktailed deer, and spotted owls.
Wilderness and wilderness study area	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF supports active management on our public lands to benefit wildlife habitat and manage fire risk. Wilderness designation restricts various active management activities. Given the current condition of many of our forests, RMEF supports planning and policies that limit additional Wilderness acreages
Wilderness and wilderness study area	Murray	Danielle	Conservation Lands Foundation	33	Sec. 202 Wilderness Study Areas (WSAs): Sections 201 and 202 of FLPMA provide the authority for BLM to designate WSAs. Section 201 requires the BLM to continually update and maintain its inventory of the public lands. Section 202 requires BLM to develop and update land-use plans, including designating WSAs and managing them under the non impairment standard.8 This designation ensures wilderness character is maintained on public lands protecting the agency's wildest places, irreplaceable cultural resources, native species, and world-class recreation. To truly address the climate and biodiversity crisis and protect our water resources, the BLM must embrace and use this tool to protect more public lands. We encourage the BLM to designate Lands with Wilderness Characteristics in the NCIP planning area Wilderness Study Areas and inventory the area for additional 202 WSAs. 8 See Memorandum from Solicitor to Secretary Re: Jack Morrow Hills Coordinated Activity Plan (December 22, 2000) ("[T]he BLM may designate new WSAs in accordance with section 202.. . . [T]he BLM may not refuse to consider credible new information which suggests that the WSA boundaries identified in the late 1970s do not include all public lands within the planning area that have wilderness characteristics and are suitable for management as wilderness."); Memorandum from Associate Solicitor, Energy and Resources, to Director, Bureau of Land Management, Re: Wilderness Review of Lands Placed Under Bureau of Land Management Administration After October 21, 1976 (August 30, 1985) ("[T]he fact that wilderness review of certain categories of public lands is not mandated by section 603(a) does not preclude the Secretary from choosing to do so. Section 302 of FLPMA [requiring multiple use management], as underscored by section 202 of the statute, gives the Secretary that choice."

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Wilderness and wilderness study area	Williams	Laurel	The Pew Charitable Trusts	738	BLM has the authority and obligation to inventory and protect wilderness-quality lands in land use planning processes. Under the Federal Land Policy and Management Act (FLPMA), the Interior Department is directed to maintain current inventories of the resources it manages-including areas that qualify for wilderness designation. Under section 202 of FLPMA, once such inventories have been completed, the Department can and should designate lands as Wilderness Study Areas to ensure their durable conservation management. We urge the BLM to consider the designation of new Wilderness Study Areas (WSAs) within the NCIP planning process as a key tool for BLM to protect wilderness-quality and undisturbed public lands through collaborative land use planning processes. Wilderness Study Areas are BLM's most durable and important administrative designation to maintain wilderness character on certain high value public lands. These wild and undisturbed BLM-managed lands harbor important wildlife habitat and enhance species connectivity between other protected lands, provide backcountry recreation experiences, and serve as climate refugia for species adapting to a changing planet. These lands also sequester significant amounts of carbon, help conserve scarce water resources and safeguard cultural landscapes and artifacts. If we are going to meet the ambitious conservation goals we have set for our state and the nation, pursuant to conserving 30% of the nation's lands and waters by 2030, BLM must consider these areas for durable administrative protection as WSAs. Importantly, Wilderness Study Areas are designated administratively through land use planning processes subject to the National Environmental Policy Act (NEPA). These NEPA processes offer ample opportunities for public input, collaboration with local communities, and transparent decision-making. The Northwest California Integrated Plan is one of these processes. Through these collaborative opportunities for public engagement, sportsmen, ranchers, recreationists and many other public land users have joined together to provide community-based feedback to federal land managers. Recommendation: BLM should consider specific lands with wilderness characteristics within the NCIP planning area for designation as wilderness study areas.
Wilderness and wilderness study area	Simmons	Matthew	Environmental Protection Information Center	756	Lands with these characteristics must be preserved so that they can be designated as wilderness areas in the future. In this time of climate and biodiversity crises preserving lands for future wilderness designation is more important than ever. These lands also play an important role in connecting existing wilderness areas which they will no longer do if extraction is allowed.
Wilderness and wilderness study area	Simmons	Matthew	Environmental Protection Information Center	756	We encourage BLM to consider revoking grazing rights even in areas where grazing occurred prior to designation.
Wilderness and wilderness study area	Simmons	Matthew	Environmental Protection Information Center	756	EPIC supports BLM's plan for wilderness areas within the plan area. We encourage BLM to consider revoking grazing rights even in areas where grazing occurred prior to designation.
Wilderness and wilderness study area	Cann	Bruce	N/A	770	Construction of dozer lines using heavy equipment should be on a case-by-case basis as authorized by the State Director. If multiple dozer lines are recommended in one authorization, each dozer line should be specified by its location and dozer line width unless the State Director decides otherwise. If wilderness legislation allows, wilderness areas should be restored to a natural appearing condition to the maximum extent feasible. Wilderness character should be a higher priority than provisions for increased public access and use. Mineral extraction should not be administratively allowed if the work would violate the Endangered Species Act or other laws meant to protect resource values. This should be up to the courts to decide.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	Eden Creek: The Eden Creek proposed ACEC is just slightly under the 5,000-acre threshold for wilderness consideration. However, we believe that it is still manageable as wilderness because it is adjacent to conserved private lands on its eastern side. The Eden Valley WSA is immediately to the south, across a little-used road that is only open to private landowners. The area is proposed as an addition to the Yuki Wilderness in Representative Jared Huffman's Northwest California Wilderness, Recreation, and Working Forests Act and Senator Alex Padilla's Protecting Unique and Beautiful Lands by Investing in California (PUBLIC) Lands Act (S. 1459). The legislation passed the House twice in 2022 and is currently before the Senate Energy and Natural Resources Committee. As is described in more detail below, the area is proposed for ACEC status in part because of its globally unique botanical values.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	Elkhorn Ridge Wilderness Additions: These proposed additions to the Elkhorn Ridge Wilderness are located in the Arcata Field Office. They are BLM inventory units CA-330-01 and CA-330-04 (Camp St. Michael Subunit #3, #4 and Cahto Peak Subunit #1) and consist of 76 and 314 acres respectively. We believe BLM should manage these areas in a manner that is consistent with the management of the adjacent Elkhorn Ridge Wilderness. Some portions of these lands are included in S. 1459 the introduction of which predated the identification of the LWC units.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	English Ridge LWC: The English Ridge LWC is in the BLM's Arcata Field Office and is 5,525 acres in size. This is the same area that the BLM inventoried and described in the LWC report CA-330-07/Brushy Mountain. Most of the BLM lands at English Ridge are adjoined by private lands that are managed under the provisions of a strict conservation easement. The area also has extremely limited public access (only by boat via the Eel River) due to adjacent private lands. As such, management of this area to protect its wilderness characteristics would likely not be difficult. We request that the BLM strive to improve public access to the area. We also request that the BLM manage the area in such a way as to maintain its wilderness character. The area is also proposed as the English Ridge Wilderness in S. 1459 and that in 2011 then-Secretary Ken Salazar urged Congress to protect the area in the Preliminary Report on BLM Lands Deserving Protection as National Conservation Areas, Wilderness or Other Conservation Designation.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	Gilham Butte LWC: The Gilham Butte LWC is in the Arcata Field Office and is 5,894 acres in size. The area has extremely limited public access due to adjacent private lands. We request that the BLM strive to improve public access to the area through the adjacent Humboldt Redwoods State Park or by acquiring an easement. We also request that the BLM manage the area in such a way as to maintain its wilderness character.

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Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	Salt Creek LWC: These 237 acres of BLM holdings are contiguous to 10,024 acres of wilderness-eligible lands in the SRNF known as the Salt Creek IRA. We therefore request that the BLM manage the parcels in such a way as to maintain their wilderness characteristics. We also request that the BLM work to increase its holdings in the North Fork Eel watershed for the purposes of improving public access and protecting and restoring water quality and wildlife habitat. Note that the Salt Creek area is proposed as an addition to the North Fork Eel River Wilderness in S. 1459.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	Trinity Alps LWC: The Trinity Alps LWC is in the BLM's Redding Field Office in Trinity County and is composed of 2,086 acres of BLM land and 7,797 acres of land in the STNF. The roadless BLM and STNF parcels are unprotected possible additions to the adjacent Trinity Alps Wilderness. Indeed, these combined USFS and BLM wild lands would be added to the Trinity Alps Wilderness by S. 1459.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	Beegum Creek LWC: The Beegum Creek LWC is in the Redding Field Office and comprises a block of 9,095 acres of contiguous federal land. Although the BLM lands consist of only 2,824 acres, the agency should and could manage these lands to protect their wilderness characteristics due to the fact that they abut U.S. Forest Service (USFS) lands that are also roadless (the USFS lands are part of the Beegum Inventoried Roadless Area, or IRA) and are managed as "semi-primitive, non-motorized" under the 1995 Shasta-Trinity National Forest (STNF) Land and Resource Management Plan. We urge the BLM to take a more holistic and commonsense approach by looking at the federal lands as one wild unit and by managing these lands to protect their wilderness characteristics. CalWild also nominated Beegum for Area of Critical Environmental Concern (ACEC) status because of its superlative natural values, especially its scenic gorge and anadromous fish populations.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	North Fork Proposed Wilderness Additions: The North Fork Proposed Wilderness Additions is in the BLM's Arcata Field Office and is 480 acres in size. The BLM lands are contiguous with 1,816 wilderness-eligible Six Rivers National Forest (SRNF) lands which in turn are contiguous to the existing North Fork Wilderness. While less than 5,000 acres in size, the BLM parcels should still be managed to protect wilderness characteristics because they are an integral part of a de facto wilderness extending south from the existing North Fork Wilderness. We also request that the BLM work to increase its holdings in the North Fork Eel watershed for the purposes of improving public access and protecting and restoring water quality and wildlife habitat. These parcels are also proposed as additions to the North Fork Wilderness in S. 1459, and that the legislation will also rename the North Fork Wilderness the "North Fork Eel River Wilderness" to better recognize the Wild and Scenic North Fork Eel River's many unique cultural, ecological, recreational, and other values.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	South Fork Eel Proposed Wilderness Additions (Cahto Peak and Red Mountain): These proposed additions to the South Fork Eel Wilderness consist of 319 acres. We request that they be managed in a manner that is consistent with the stewardship of the adjacent South Fork Eel River Wilderness.
Wilderness and wilderness study area	Hanceford	Phil	The Wilderness Society	781	We urge the BLM to consider the designation of new Wilderness Study Areas (WSAs) as a key tool for BLM to protect wilderness-quality and undisturbed public lands through collaborative land use planning processes. WSAs are BLM's most durable and important administrative designation to maintain wilderness character on certain high value public lands. These wild and undisturbed BLM-managed lands harbor important wildlife habitat and enhance species connectivity between other protected lands, provide backcountry recreation experiences, and serve as climate refugia for species adapting to a changing planet. These lands also sequester significant amounts of carbon, help conserve scarce water resources and safeguard cultural landscapes and artifacts. If we are going to meet the ambitious conservation goals we have set for our state and the nation, BLM must consider these areas for durable administrative protection as WSAs.
Wildland fire management	Evenson	Michael	N/A	6	We need to do lots of small things that maintain the land with as little dry woody material as possible. Lots and lots of us have to be engaged in this. It's not a duty of the government to wait til there's a big project with generous funding. We need to get people out there reducing fuel loads, one berry vine at a time (figuratively). If you have many people doing this, each person can act when the time is right for where they are and the results will be good.
Wildland fire management	Not Provided	Not Provided	N/A	12	Excessive fuels must be removed so that natural fire ecology can be restored. Cattle grazing must not be allowed to undermine fire rehab success.
Wildland fire management	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Executing active forest management techniques such as prescribed burns, thinning, and other treatments helps prevent catastrophic wildfires and assists in long-term ecosystem resilience (Prichard et al. 2020, Schultz and Moseley 2019). In addition, managing natural ignitions can help achieve fuels and vegetation goals.
Wildland fire management	Decker	Karie	Rocky Mountain Elk Foundation	31	RMEF recommends forest product harvest levels that maximize opportunities to achieve fuels reduction, vegetation management, and wildlife habitat goals.
Wildland fire management	Simmons	Matthew	Environmental Protection Information Center	756	In order to do this, we should turn to traditional ecological knowledge held by the indigenous peoples of Northwest California. BLM should work with tribes to restore low intensity surface fires to fire-adapted grasslands, oak woodlands, shrublands, and forests within their management area. ²⁰ Historic fire exclusion has had negative impacts on both the environment and Tribal peoples. ²¹ Our hope is that BLM will work with tribal peoples to bring fire back onto our landscape in a safe and manageable way moving forward. ²⁰ Marks-Block, Tony Alex. Karuk and Yurok Prescribed Cultural Fire Revitalization in California's Klamath Basin: Socio-ecological Dynamics and Political Ecology of Indigenous Burning and Resource Management. Diss. Stanford University, 2020; Huntsinger, Lynn, and Sarah McCaffrey. "A forest for the trees: forest management and the Yurok environment, 1850 to 1994." American Indian Culture and Research Journal 19.4 (1995): 155-192. ²¹ Sugihara, Neil G., Jan W. Van Wagendonk, and Joann Fites-Kaufman. "Fire as an ecological process." Fire in California's ecosystems (2006): 58-74; Norgaard, Kari Marie. "The Politics of Fire and the Social Impacts of Fire Exclusion on the Klamath." Humboldt Journal of Social Relations 36.1 (2014). This also means allowing wildfires to burn when they don't threaten property or lives. Every year, billions of dollars are spent unsuccessfully fighting wildfires on public lands. This firefighting has both an economic as well as ecological cost. Common wildland firefighting techniques including the construction of fuel breaks, dozer lines, deployment of PFAS containing fire retardant, and emergency logging all produce considerable ecological damage.

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Wildland fire management	Simmons	Matthew	Environmental Protection Information Center	756	Scientists began raising concerns decades ago about the toxicity of retardants for wildlife. Sometimes pilots accidentally release retardant over restricted areas like endangered species habitat and waterways in highly concentrated doses. Once it enters streams, ponds, and rivers, retardant - particularly in concentrated quantities - can spur harmful algae blooms, and potentially kill fish, amphibians, and other aquatic organisms. In 2019, a NMFS biological opinion concluded that while the use of wildland fire retardants was not likely to destroy critical habitat nor jeopardize the existence of threatened and endangered salmon, chum, and steelhead trout, it would "adversely affect" the majority of these species. ²⁴ ²⁴ https://repository.library.noaa.gov/view/noaa/22589 Part of the problem is that we still do not fully understand the impacts of these chemicals on fish species. Most of the tests have only considered one species, rainbow trout. However, a study by the NMFS looked at how two types of Chinook salmon at different stages in their life cycle fared after exposure to one of several formulations of Phos-Chek used by the Forest Service and state firefighting agencies like CalFire. Even when heavily diluted, the retardant formulas were capable of killing the salmon in the laboratory experiments. ²⁵ ²⁵ https://pubmed.ncbi.nlm.nih.gov/24880550/ As long as a fire is occurring far from people's homes, there is no need to employ these costly and damaging techniques. It is far better to simply let the fire burn naturally.
Wildland fire management	Jorgenson	Devon	North Coast Regional Water Quality Control Board	768	Will the NCIP include planning and management standards and best management practices for post-fire recovery activities?
Wildland fire management	Larramendy	Mark	N/A	772	I have contacted our BLM Field Office many times to request help in resolving these issues. Our field office manager is always understanding of the situation and quick to respond to my requests. However, the bottom line in solving these problems appears to be a lack of resources-personnel, rangers/law enforcement people, budget constraints, and authority to make changes at the local level. We have asked BLM management to seriously restrict activities during fire season in areas where there is high risk for wildfire. Areas that cannot be regularly patrolled, should be closed or activities should be severely restricted. Possibilities might include outright closure, closed to overnight camping, closed to vehicle traffic, or camping limited to designated patrolled areas. To date none of this has happened. We are hopeful that as fire danger increases, BLM will work to hire more rangers and law enforcement personnel and identify high risk areas for heightened enforcement of laws, rules and regulations. This could substantially reduce the criminal/undesirable element .
Wildland fire management	Not Provided	Not Provided	BlueRibbon Coalition	787	Vegetation treatments that reduce wildfire risk might compromise the current scenery integrity or non motorized recreation opportunity, but if a wildfire happens the impact of the fire will likely cause a greater impact to both of these values. Decision makers should be able to make balance-of-harm or benefit determinations for these resource management activities instead of being required to meet arbitrary objectives. The BLM should be using non-fire techniques such as mechanical thinning as often as possible to keep the forest healthy and thriving. These techniques are the most effective in preserving wildlife, trails and cultural sites. We prefer proactive management within the forest to avoid closures. Any area managed as Wilderness is a great threat to wildlife and habitat as many vegetation treatments cannot move forward based off of these designations and wildfire can completely destroy ecosystems and habitat.
Wildland fire management	Gutermuth	Brandt	Bureau of Reclamation	803	The TRRP supports the use of controlled burning and thinning as methods to reduce fuels loading and to protect the watershed from catastrophic losses to fire.
Wildland fire management	Gutermuth	Brandt	Bureau of Reclamation	803	Include procurement of wood for restoration with fuels reduction planning. Develop programmatic NEPA to cover WUI or other high priority fuels treatment areas. -- "Include obtaining wood/trees for restoration objectives in this NEPA"
Wildland fire management	Gutermuth	Brandt	Bureau of Reclamation	803	vegetation management for catastrophic fire reduction - Identify area where fuels reduction and efforts to enhance forest health may be combined with obtaining trees for use in river restoration projects. Develop these "wood acquisition [sic] areas" so that they support the on-site vegetative community and so that they may provide trees required for ecosystem processes and habitat in the Trinity River and its watershed.
Wildland fire management	Juliana	Kate	N/A	804	Recent industrial incursions into the lands of the Gilham Butte within or adjacent to the ACEC in the name of fire hazard reduction were doubtless well intentioned, but the impacts of that "shaded fuel break" include the removal of vegetation that is of cultural importance, use of heavy equipment without surveying for cultural sites or wildlife occupation, and a relatively large-scale opening of lands by heavy equipment. The nonprofit that undertook that project was a fiscal sponsor of the Community Management Plan currently in place, but the vision and development of the plan were none of their doing. They stepped in as a fiscal sponsor when the project and grant were already in place. They provided some administrative support and a small amount of subsidiary work on the plan, including mapping and graphic design, and organizing a scientific peer review team for the plan. Despite current claims to the contrary, they didn't originate a vision for the area, nor did they play a leading role in the planning process. They did not advocate for its protection and don't own the feeling for place required to manage this sensitive area. Gilham Butte is at the very edge of the region of operations and the organization has had a minimal role in work to protect or manage it. My point here is not to bash a nonprofit, but simply to say that Gilham Butte is too important a place to open it to grant-driven projects that benefit only the party receiving a paycheck, and do harm to the place as a result of the project. A chance for income is just a bad reason to plan a project, particularly in a place where the proposed worker doesn't have a sense for its history, ecological importance, its protected status as an ACEC, or even the goals and objectives of the CMP. Please don't let industrial management, even with good intentions, back into the management area.
Wildland fire management	Juliana	Kate	N/A	804	But BLM can remedy that incursion by engaging with Native fire management teams to reduce fuels, and at the same time establish a side-by-side long-term survey to determine rates of recovery and recolonization by native flora and fauna. How does mechanized entry stack up to management by fire? I ask you to keep machinery off the Gilham Butte area; use nature's own devices, guided by traditional knowledge in this special place. I urge you to eliminate any renewed proposals for mechanical fuels reduction, and instead implement fuels reduction work through control burns led by Natives utilizing and teaching traditional methodology.
Wildland fire management	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We encourage the development of landscape scale fuel breaks, including shaded fuel breaks to promote diversity.

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Wildland fire management	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	We recommend that the BLM examine the colocation of management actions where it makes sense (i.e. fuel breaks could become trails).
Wildland fire management	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	Coordination and collaboration with adjacent land managers on active fuel management (e.g., prescribed burning, mechanical thinning, etc.) is important, particularly in the fire prone landscape of the BLM properties that surround Whiskeytown NRA. The scope and timing of these activities with nesting birds, other breeding wildlife, native vegetation phenology, and other sensitive natural and cultural resources should also be carefully considered.
Wildland fire management	Evenson	Michael	N/A	813	Fire trails and fire breaks should not be carved into this intact landscape. They are an understandable, but short-sighted reaction to catastrophic wildfire. Early successional vegetation that result from these trails become an obstacle to future management as they present flammable features that require continual maintenance. It is much preferred to treat the whole landscape. I recommend incorporating tribal involvement and neighboring landowners in any plan development.
Wildland fire management	Evenson	Michael	N/A	813	Re-introduction of fire must commence so that "fire-safe practices" are conducted for indigenous cultural enhancement. That is, practices must not be a reaction to fear of wildfire, but instead be implemented to enhance biodiversity and lead to regular burning and enhancement of plant communities essential to indigenous communities in the area. Too many lands that were stably managed have been stolen and degraded through exploitation of single-use or single-specie removal. Lands in public ownership that have been spared these disturbances must be managed in accord with traditional uses - at least until such time as privately owned lands recover the ecological vitality that existed prior to 1850. That will likely not occur within the next 50 years if conditions and practices are put into place to achieve these goals. Existing old landscape features must be held in trust for future generations.
Wildland fire management	Brennan	Brien	Elder Creek Oak Sanctuary	824	In the Fire section, as in the Forest section, the noted comments seem to endorse too global an approach and a bias toward "fuels reduction." I side with the California Chaparral Institute's positions on fire, that the focus needs to be human communities that already exist amidst naturally dense vegetation, and we need to leave the wild areas un-thinned, as the evolved intelligence of the community of life in each intact or semi-intact piece of land is far wiser than a human-centric management plan could ever be. I don't like the use of the word "catastrophic" as that sensationalizes a natural component of all large fires, that some spots burn with a higher intensity than others. The avoidance of high-severity fires right next to existing towns makes sense while "fuel reduction" far from towns is a waste of money and degrades ecological integrity including natural water and soil cycles. Again, wise actions are all place-dependent. So under your Conceptual Themes section, I see it as a fine goal to try to enhance land health while protecting human communities, but these are often at odds of course. If the BLM has any sway at all on local governments, I'd love to see you urge them to stop all development of wild and semi-wild lands. That'd be the best solution for a future with hotter, windier conditions here in California.
Wildland fire management	Brennan	Brien	Elder Creek Oak Sanctuary	824	Their greatest threat is off-road vehicle use and CalFire's ridge-clearing approach to fighting fires far from towns. If BLM has any sway on CalFire, I'd like to see a reduction in these wide swaths on ridges that encourage off-road riding and grant easier access to remote spots for illegal marijuana growers. The damage of bulldozers is unprecedented from an evolutionary angle, so the recovery times on these seems greater, probably due to the loss of so much soil on these ridges.
Wildland fire management	Rougle	Wolfgang	N/A	891	It's good to see that both alternatives propose increased investment in fire modelling and fuel modifications to bring BLM lands into better alignment with natural fire returns and bring these fire-adapted lands closer to resilience. I would like to see the BLM invest even more in prescribed fire (I do realize this is out of FO hands and in many ways probably a national call), especially with more of the work getting done by/with partners like tribes and community-based burn associations. It does look like there's a lot of interest and creative thinking on this score on the part of the BLM, or at least many of its staff, so I'm optimistic; on this one I just wanted to voice my support and say thanks.
Wildlife / special status wildlife	Spotts	Richard	N/A	5	If you are not already doing so, please consider supporting the reintroduction of beavers on public lands where they historically occurred but are now extirpated. Bringing back beavers in the West is a positive step in improving land health, restoring diverse riparian systems, and recovering ESA listed and other special status species. These outcomes are especially important with the West in the midst of the worst reported drought in over 1,200 years.
Wildlife / special status wildlife	Not Provided	Not Provided	N/A	17	Beavers should be reintroduced wherever possible
Wildlife / special status wildlife	Not Provided	Not Provided	N/A	17	There should be an increase in connectivity and resilience for natural communities of native species.
Wildlife / special status wildlife	Not Provided	Not Provided	N/A	17	Wolves should be allowed to return and predator persecution stopped.
Wildlife / special status wildlife	Not Provided	Not Provided	N/A	29	It should likewise make all special status species habitats and degraded rangelands unavailable for commercial livestock grazing.
Wildlife / special status wildlife	Decker	Karie	Rocky Mountain Elk Foundation	31	Wildlife connectivity is increasingly threatened by habitat loss and degradation as well as development activities. RMEF recommends RMP components that recognize the importance of big game migration corridors and winter range and include management direction for conserving corridors across BLM-managed and neighboring lands.
Wildlife / special status wildlife	Decker	Karie	Rocky Mountain Elk Foundation	31	Healthy, free-roaming elk herds contribute to and are intermingled with the social well being, ecological integrity, cultural, and economic goals of BLM lands. Elk and other big game serve 'distinct roles and contributions' to multiple user types (viewing, hunting, etc.) and the RMP plays an important role in supporting future big game populations. RMEF recommends recognition of elk as an important species for their economic and cultural value.

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Wildlife / special status wildlife	Karath	Lander	National Audubon Society	755	Avian migration can range from local to hemispheric. While the mapping of big game corridors has rightfully captured public attention and resources, birds also migrate and use some of the same ecologically intact areas for habitat during migration, breeding and wintering. We also have a considerable amount of data including mapping of avian migration. National Audubon Society has numerous science layers that we think could help to inform this scoping effort and illuminate areas important to birds, avian migration and climate resilience. In particular: - Climate Strongholds: Climate Strongholds are areas Audubon identified as priorities for conserving bird habitat in the face of climate change. These are a network of areas across the U.S. that are predicted to have high climate suitability and low human modification for birds at present and under a business-as-usual climate-change scenario. - Full Annual Cycle: Audubon's Migratory Bird Initiative identified priority areas for migratory birds of the Western Hemisphere during all stages of the annual cycle (i.e., breeding, non-breeding, migration) by integrating tracking, banding, migratory connectivity, and bird distribution data. (Please note that due to data sharing agreements, our full annual cycle data cannot be shared at this time but we look forward to discussing this information as it becomes available. Our full annual cycle data and maps are undergoing a peer-review process that should be complete in the coming months.) - Important Bird Areas: Important Bird Areas (IBAs) are places of global, continental, or regional significance for the conservation of birds and other biodiversity. As the U.S. partner for BirdLife International, Audubon spearheads an ambitious effort to identify, monitor, and protect IBAs and the science team maintains a national database of sites and communicates with the global program. There are 177 IBAs in California. Using the data described above, Audubon's science paints a clear picture of the most important landscapes and corridors for birds in California. In support of this scoping effort, we have attached some maps using currently available Audubon data to highlight areas important to birds now and in the future within the planning area and welcome further discussion of the data that we could contribute to this effort. Please see attachments for an overlay of Climate Strongholds and Important Birds Areas with the planning area.
Wildlife / special status wildlife	Simmons	Matthew	Environmental Protection Information Center	756	BLM lands in the planning area are vital for our native species given that the surrounding areas have a long history of mining, logging, and road construction.. Maintaining BLM's scattered, small parcels despite manageability concerns, is necessary because they can provide wildlife habitat and open space in an increasingly subdivided landscape. Refugia are one of the best ways to anchor conservation and ensure that species, populations, and meta-populations will persist in the face of climate change. ³⁴ Morelli, Toni Lyn, et al. "Managing climate change refugia for climate adaptation." PLoS One 11.8 (2016): e0159909. Along with being important refugia, BLM lands are also essential to creating habitat pathways to promote interconnectivity as described above. BLM should work with neighboring land owners to corridors with no extractive industry, roads, or development that species can use to travel. Interconnectivity and species mobility is essential to restoring our native species. ³⁵ Beier, Paul, and Reed F. Noss. "Do habitat corridors provide connectivity?." Conservation biology 12.6 (1998): 1241-1252. BLM's scattered lands are also disproportionately in the headwaters of streams. Thus, protecting them helps provide cool, clear water to our streams and our states Threatened salmon.
Wildlife / special status wildlife	Simmons	Matthew	Environmental Protection Information Center	756	Research has shown that habitat connectivity and refugia will be essential to preventing catastrophic species loss due to climate change. ³⁰ Because BLM manages a large amount of land throughout NW California, BLM's land use decisions have a large overall impact on the amount of habitat connectivity for important species such as the northern spotted owl. BLM should make habitat connectivity an essential goal of the updated IRMP and implement policies that promote it. This means not introducing new and taking out roads, reintroducing native species, and creating large continuous areas that do not permit extractive industry. Promoting habitat connectivity for native species also means addressing the spread of non-native invasive species. ³⁰ Morelli, Toni Lyn, et al. "Climate change refugia and habitat connectivity promote species persistence." Climate Change Responses 4.1 (2017): 1-12.
Wildlife / special status wildlife	Gerdes	Jason	Environmental Protection Agency (EPA)	767	Discuss mitigation measures to minimize impacts to special status species, describe the effectiveness of such measures to protect wildlife, and indicate how they would be implemented and enforced.
Wildlife / special status wildlife	Hanceford	Phil	The Wilderness Society	781	A partial list of sensitive species and threatened and endangered species that should be inventoried and monitored on BLM parcels, and managed for conservation, include: - Hooded lancetooth (<i>Ancotrema voyanum</i>) - Oregon shoulderband snail (<i>Helminthoglypta hertleini</i>) - Trinity shoulderband snail (<i>Helminthoglypta talmadgei</i>) - Big Bar hesperian snail (<i>Vespericola pressleyi</i>) - Siskiyou shoulderband snail (<i>Monadenia chaceana</i>) - Tehama chaparral snail (<i>Trilobopsis tehamana</i>) - Central Valley spring-run Chinook salmon (<i>Oncorhynchus tshawytscha</i> ESU spring-run) - Sacramento River winter-run Chinook salmon (<i>Oncorhynchus tshawytscha</i> ESU winter-run) - Coho salmon - central California coast (<i>Oncorhynchus kisutch</i>) - Pacific lamprey (<i>Entosphenus tridentatus</i>) - Lost River sucker (<i>Deltistes luxatus</i>) - Shortnose sucker (<i>Chasmistes brevirostris</i>) - Rough sculpin (<i>Cottus asperimus</i>) - Foothill yellow-legged frog (<i>Rana boylei</i>) - Elder Creek has some of the few healthy populations. - Shasta salamander (<i>Hydromantes shastae</i>) - Western spadefoot toad (<i>Spea hammondi</i>) - Pacific giant salamander (<i>Dicamptodon tenebrosus</i>) - should be added to the NCIP list for special management. - Northwestern Pond Turtle (<i>Actinemys marmorata marmorata</i>) -- this species should be added to the sensitive species list for the NCIP. - California mountain kingsnake (<i>Lampropeltis zonata</i>) - Coast horned lizard (<i>Phrynosoma blainvillii</i>) - Western snowy plover (<i>Charadrius alexandrinus nivosus</i>) - should be added to the NCIP list for special management. Restrict OHV access to the Mike Thompson Wildlife Area and sensitive areas of the South Spit of Humboldt Bay. The Western Snowy Plover nests on the South Spit and is a threatened species. BLM should protect the South Spit as much as possible because of this. - Northern spotted owl (<i>Strix occidentalis caurina</i>) -- should be added to the NCIP list for special management of riparian areas. - California spotted owl (<i>Strix occidentalis occidentalis</i>) - Burrowing owl (<i>Athene cunicularia</i>) - California black rail (<i>Laterallus jamaicensis coturniculus</i>) - Greater sandhill crane (<i>Grus canadensis tabida</i>) - Bald eagle (<i>Haliaeetus leucocephalus</i>) - populations in fall and winter at Battle Creek feeding on salmon should be protected. - Golden eagle (<i>Aquila chrysaetos</i>) - Northern goshawk (<i>Accipiter gentilis</i>) - White-tailed kite (<i>Elanus leucurus</i>) - Swainson's hawk (<i>Buteo swainsoni</i>) - Yellow warbler (<i>Setophaga petechia</i>) -- should be added to the NCIP list for special management of riparian areas. - Willow flycatcher (<i>Empidonax traillii</i>) - should be added to the NCIP list for special management. Manage willow riparian areas free from cattle grazing to allow for recovery of lower thickets, and manage small streams to allow natural flood events in the floodplain. - Tri-colored blackbirds (<i>Agelaius tricolor</i>) - present at Battle Creek. - Western yellow-billed cuckoo (<i>Coccyzus americanus occidentalis</i>) - on April 21, 2021 US Fish and Wildlife Service designated Critical Habitat in the Sacramento River.[1] BLM should assay how this designation interacts with BLM lands, if at all, and manage properties to maintain viability of this habitat. - Bank swallow (<i>Riparia riparia</i>) - Fork-tailed storm-petrel (<i>Oceanodroma furcata</i>) - Marbled murrelet (<i>Brachyramphus marmoratus</i>) -- should be added to the NCIP list for special management. - Ruffed grouse (<i>Bonasa umbellus</i>) -- should be added to the NCIP list for special management. Populations may be declining.

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Wildlife / special status wildlife	Hanceford	Phil	The Wilderness Society	781	Through resource management plans, the BLM plans for the management of its lands at the landscape level, which gives the agency the ability to designate and protect naturally-occurring wildlife corridors. The BLM has the legal authority to implement protective management of wildlife corridors, and also the legal obligation to address threats to wildlife and wildlife habitat as stewards of the western public lands. Protecting wildlife corridors through administrative designations is consistent with the BLM's obligations under FLPMA, 42 U.S.C. § 1701, et seq., and NEPA, 42 U.S.C. § 4321, et seq. 46 See, http://www.westgov.org/index.php?option=com_content&view=article&id=123&Itemid=68 . 47 Wilcove et al. 1998. Quantifying Threats to Imperiled Species in the United States. BioScience, Vol. 48, No. 8, at 607-615.
Wildlife / special status wildlife	Hanceford	Phil	The Wilderness Society	781	We recommend identifying wildlife movement corridors at the broader landscape level within the NCIP planning area. Obtaining this information now will better inform the designation of wildlife corridors and include their consideration through the planning process in accordance with Secretarial Order 3362 and consistent with the BLM's planning obligations under FLPMA. Some of the areas worth examining in this regard are: - Beegum Creek which links the Central Valley to the Klamath Mountains - The Eel, Klamath, and Trinity river corridors that provide critical pathways for fish, birds, and other wildlife - Key LSRs for species that depend upon mature and old-growth forest such as English Ridge and Willis Ridge. - Gilham Butte as a well-documented part of the "Redwoods to the Sea" initiative to protect the existing connections between the King Range National Conservation Area and Humboldt Redwoods State Park - Lacks Creek which was acquired in part to enhance connectivity between BLM lands upstream and Redwood National Park - Little Grass Valley Creek which provides a key habitat linkage on the Trinity Divide, which is itself a known wildlife corridor
Wildlife / special status wildlife	Hanceford	Phil	The Wilderness Society	781	Please note that wolves such as "OR-7" are known to have spent significant time in the Sacramento River Bend Area over the last few years, with multiple visits by wolves documented through the use of tracking devices. The Bend Area is a key connection between the Central Valley and Cascades where the Lassen Pack has been recognized by the California Department of Fish and Wildlife. The Lassen Pack has produced litters each year since 2017. The NCIP planning area once was wolf country and given this reproductive success, is clearly the domain of <i>Canis lupus</i> again. BLM should consider the positive impacts of healthy predator systems on native grazing ungulate populations that help maintain natural forest and grassland systems. Management measures should be clearly outlined and followed to minimize overlap between wolves and livestock on the landscape through voluntary retirement of any grazing allotments that may present a higher likelihood of wolf-livestock conflicts, including allotments that contain or are in close proximity to known wolf dens or rendezvous sites. We ask that the BLM promote the co-existence of wolves with livestock while this species makes its return to the northern California landscape after being absent for nearly a century. Specific measures may include specialized electric fencing with fladry, randomized strobe lighting (Foxlights), increasing human presence through the use of range riders, and prompt removal of predator attractants including sick and injured livestock and carcasses. Later turnout dates for livestock in allotments that have wolf dens and meeting sites can also be useful.
Wildlife / special status wildlife	Hanceford	Phil	The Wilderness Society	781	The NCIP planning area contains rich old growth forests, vernal pools, healthy rivers, and more. A large portion of the planning area is home to diverse wildlife and their habitat, including endangered anadromous fish, gray wolves, northern spotted owls, bald eagles, willow flycatchers, and other endangered and threatened species. Consequently, the BLM should identify and protect critical wildlife corridors, such as Gilham Butte, in the NCIP planning area to ensure that usable habitat and migration pathways will remain under the new landscape-level NCIP.
Wildlife / special status wildlife	Juliana	Kate	N/A	804	Standing as it does along the Pacific Flyway, situated between major ecosystems and influenced by interior, ocean and coastal zones, Gilham Butte provides habitat for dozens of resident and migratory bird species. Please see the wildlife appendix to the Community Management Plan to review species that have been identified in this area. Managing Gilham Butte for its continued values for birds is important, particularly as climate change and industrialization impact avian habitat values worldwide. Once again, I stress the importance of conducting seasonal surveys to thoroughly ascertain species and habitats on Gilham Butte and its surrounding area, and to manage the area to benefit them.
Wildlife / special status wildlife	Juliana	Kate	N/A	804	Recently, the release of California condor to the skies of Northern California have revived my long-held dream that the Gilham Butte area may once again host condor populations. Gilham Butte, remote, wild, undeveloped, is perfect condor habitat. I ask you to manage the area to promote recolonization by this magnificent bird, as called for in the Community Management Plan.
Wildlife / special status wildlife	Juliana	Kate	N/A	804	Strong anecdotal evidence exists that attests to the presence of Humboldt marten and American fisher, among other rare and listed species. At the time that the Community Management Plan was being developed, BLM had not conducted surveys and indeed believed that these species were locally extirpated. In the years since, surveys in the region have determined that both marten and fisher are indeed still present in the ecosystem. I ask that BLM undertake surveys to verify the presence of these and other sensitive species, and to manage the area to protect and restore their habitat values.
Wildlife / special status wildlife	Hoines	Josh	National Park Service at Whiskeytown National Recreation Area	807	-The fungus that causes White-nosed Syndrome (WNS) in bats, <i>Pseudogymnoascus destructans</i> (Pd), has been detected at several bat colonies in Northern California in recent years. As part of routine spring surveillance conducted by the NPS, biologists collected samples from bats in Ahjumawi Lava Springs State Park, Whiskeytown NRA, and a private property in Chester, California. DNA from the fungus may be present in very low amounts on seven bat species from these sites, including two species not previously known to carry Pd. Results from additional sampling efforts in 2022 are currently pending. -WNS is a serious concern for wildlife managers across North America, as it has caused colony collapse and significant population declines in several susceptible bat species. Bats become infected during hibernation through physical contact with other bats or a contaminated roost surface, enabling the disease to spread quickly through a colony. The disease is not known to pose a direct health risk to people, pets, or wildlife other than bats. -It is recommended that BLM prioritize bat monitoring and management in areas of suitable bat habitat, which include various structures, mine sites, caves, and other areas. The potential for human activities to spread Pd should be carefully evaluated and mitigated where necessary. People can protect bats and help slow the spread of the fungus by honoring closures in caves, old mine adits and other areas used by bats. Additionally, people can help slow the spread of WNS by decontaminating caving and climbing gear and other equipment used in areas where bats live and avoiding the transport of this equipment to other locations used by bats.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	Finally, BLM should provide an estimate of the annual and total cost of meeting its species recovery obligations under the revised RMP. This information is really helpful for DC-based and line decision-makers and for BLM partners who often are integral to successful recovery initiatives and contribute funding and resources.

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Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	For each at-risk species and to the degree information is available, describe conservation status; critical habitat designation if one exists; population, range, and occurrence data; population trends; description of ecological requirements throughout its lifecycle; current recovery efforts, recovery plan objectives and actions relevant to BLM; threats; and ways to address the threats.(5) (5) For a recent example of where this exercise was carried out in the context of a land use plan revision, generally see US Forest Service, 2018. Grand Mesa, Uncompahgre, and Gunnison National Forests, Revised Draft Forest Assessments. Also see: Terrestrial Species Overviews, Aquatic Species Overviews, and Identifying and Assessing At-Risk Species.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	For each ecosystem, describe the at-risk species that depend on the ecosystems for all or part of their lifecycle and the specific ecological characteristics that support their conservation.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	The Impact Analysis section is where BLM analyzes and describes the effect of each alternative on 1) ecosystem integrity and 2) at-risk species populations and habitats, and describes the degree to which each alternative will contribute to the recovery of at-risk species (i.e., by mitigating threats, restoring degraded habitat, and/or protecting essential habitats for these species). BLM should use the most current population, occurrence, range and trend data in its analysis, and must take into account current and anticipated stressors such as climate change, adjacent land development, increasing recreational use, etc. consistent with NEPA's hard look mandate.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	The ROD should include a finding that the RMP will enable BLM to meet its substantive obligation to conserve and recover at-risk species. Further the ROD should commit BLM to the monitoring program outlined in the RMP and to annual monitoring reports that provide data, analysis, and recommended course corrections presented in a way that the public can easily understand.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	Enforceable constraints on activities to provide necessary protections for at-risk species and their habitats.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	Strategies and activities for achieving the desired outcomes for ecosystems and at-risk species. Examples include: on-the-ground restorative activities (e.g., establishing livestock exclosures in watersheds/sites with rare plant populations; restoring natural fire to ecosystems); developing partnerships; acquiring land, water and valid existing rights; carrying out educational activities or research; monitoring; developing species/ecosystem conservation strategies where they do not exist and updating them where they do; developing management plans for priority conservation areas such as ACECs and priority watersheds; and integrating at-risk species requirements into fire management plans.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	We recommend that BLM utilize scenario planning to evaluate the likelihood and degree to which each alternative will contribute to ecosystem integrity and at-risk species conservation and recovery under various climate change, threat, and action scenarios. Consistent with NEPA's aim of informing decision-making, products should include easy-to-digest charts or dashboards that the public and BLM decision-makers can easily understand and use to guide decision-making. The US Fish and Wildlife Service incorporates this type of scenario planning into their Species Status Assessment (SSA) Reports (for example, see the SSA of the Gunnison Sage-Grouse in which scenario planning starts on page 55-84). States developing State Wildlife Action Plans are also engaging in a version of scenario planning - for instance, see Pocerwicz et al. 2014.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	Designated conservation areas to assure protection, restoration, and maintenance of important ecological elements and processes, and at-risk species' occurrences, suitable habitat and specific habitat needs. Designations should be large enough to allow natural processes at appropriate scales to function (e.g., entire watersheds or connected watersheds). Ideally, designated areas should capture multiple sub-areas to increase redundancy and resilience and enable research.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	Specific direction for maintaining the primary constituent elements of federally designated critical habitat.
Wildlife / special status wildlife	Smith	Vera	Defenders Of Wildlife	812	The Forest Service defines focal species as "a small subset of species whose status permits inference to the integrity of the larger ecological system to which it belongs and provides meaningful information regarding the effectiveness of the plan in maintaining or restoring the ecological conditions to maintain the diversity of plant and animal communities in the plan area." 36 CFR 219.9. BLM can only assure it is meeting its substantive obligations for at-risk species if it carries out effective monitoring and takes corrective actions when monitoring shows that thresholds are being approached or crossed.
Wildlife / special status wildlife	Brennan	Brien	Elder Creek Oak Sanctuary	824	On all BLM lands, I'd like to see an emphasis on actions that offer more or better habitat for insects, as they are foundational to the well-being of most native plants and other animals.
Wildlife / special status wildlife			The Wilderness Society	781	Mountain quail (<i>Oreortyx pictus</i>) -- should be added to the NCIP list for special management. Populations have been declining. - California condor (<i>Gymnogyps californianus</i>) -- should be added to the NCIP list for special management. Consider mitigations necessary to accommodate the reintroduction of the California condor to northern California. BLM should inventory holdings with the potential for lead-based paint on structures, and limit the use of lead bullets. Conduct activities to reduce microtrash, such as bottle caps, nuts, screws, glass shards, etc. Consumption of these items is a leading cause of death for immature condors. Support the effort to reintroduce the California Condor to Northern California, as being undertaken by Redwood National Park and the Yurok Tribe. - Fringed myotis (<i>Myotis thysanodes</i>) - Long-eared myotis (<i>Myotis evotis</i>) - Pallid bat (<i>Antrozous pallidus</i>) - Townsend's big-eared bat (<i>Corynorhinus townsendii</i>) - Yuma myotis (<i>Myotis yumanensis</i>) - Spotted bat (<i>Euderma maculatum</i>) - Western mastiff-bat (<i>Eumops perotis californicus</i>) - San Joaquin pocket mouse (<i>Perognathus inornatus</i>) - Pacific Fisher (<i>Martes pennanti [pacific] DPS</i>) - Humboldt marten (<i>Martes americana humboldtensis</i>) -- should be added to the NCIP list for special management. - Roosevelt elk and tule elk (<i>Cervus canadensis roosevelti</i> and <i>C. c. nannodes</i>) -- both should be added to the NCIP list for special management. Despite being hunted through most of California, these native elk subspecies have high value for helping to restore coastal prairies, valley grasslands, oak woodlands, and other native habitats, and management conservation measures should be developed to help elk populations expand into former habitat and maintain genetic diversity. Migratory corridors should be identified and maintained for elk, and the return of natural wolf predation planned for. - Wolf (<i>Canis lupus</i>) - should be added to the NCIP list for special management. See section below.E24I