

Errata and Response to Comments
Trail and Backcountry Management Plan
Redwood National Park
Del Norte and Humboldt Counties, California
June 2009

These errata should be attached to the *Redwood National Park Trail and Backcountry Management Plan Environmental Assessment* (TBMP EA) dated April 2009. They are intended to correct or clarify statements in the EA other than typographical and minor editorial errors and to address substantive comments on these documents received during the public review period. These errata and responses to comments together with the Finding of No Significant Impact (FONSI) and the EA describe the final decision of the National Park Service for the Redwood National Park Trail and Backcountry Management Plan.

Plan Errata

In the analysis of non-impairment of air quality, the third paragraph on page 129 misidentifies Alternative C as the proposed action. The last sentence of this paragraph concludes that Alternatives B and D would not impair air quality in the park. The last sentence of the third paragraph should conclude that Alternatives B and C would not impair air quality in the parks. Alternative D is correctly identified as the proposed action on page 130 in the last paragraph of the section.

Existing maintained bicycle routes were not identified on the maps in Appendix I. These routes include Prairie Creek/Davison/Lost Man Creek bike trail between Prairie Creek Redwoods State Park, Davison Ranch, Berry Glen, and the Lost Man Creek picnic area; Streelow Creek Bike Trail between the Prairie Creek bike trail and Davison Road; Lost Man Creek-Holter Ridge bike trail; the Ossagon Trail in Prairie Creek Redwoods State Park; the Last Chance section of the historic Coastal Trail south of Crescent City from Enderts Beach to US Highway 101; and the Little Bald Hills Trail.

Responses to Comments

The NPS received 15 written comments on the TBMP EA, including a comment from the California Department of Transportation (Caltrans) and one from the Yurok Tribe. Two comments were from area residents representing local chapters of trail user organizations (Redwood Unit of Back Country Horsemen of California and Bigfoot Bicycle Club affiliated with the International Mountain Bike Association). Eleven comments were submitted by individuals.

The NPS acknowledges the need to obtain an encroachment permit from Caltrans for any work within a Caltrans highway right-of-way. The NPS will continue to consult with the Yurok Tribe, including the Tribal Heritage Preservation Office where appropriate, on the implementation of any project or activity on park lands that could affect resources or traditional activities within the Yurok Reservation or ancestral territory.

Most comments requested that more trails and visitor facilities be constructed in addition to those that will be constructed as part of the selected action. In general, construction of new visitor facilities including trails is limited by available funding. The NPS will focus on construction of the trails included in the selected action as funding becomes available.

Several commenters requested a copy of the final plan and environmental assessment. These errata sheets and the FONSI together with the original EA constitute the final plan. NPS guidelines for implementing NEPA do not allow for publication of draft and final environmental assessments, unlike the regulation requiring publication of draft and final environmental impact statements. An EA is only rewritten and reissued for an additional 30-day review if comments reveal major substantive issues that were not covered adequately in the original EA or suggest new alternatives that the NPS wishes to consider. If substantive comments have been made but these do not necessarily require a change in the text of the EA, the NPS may respond to these comments in an errata sheet, as is the case here. These guidelines are available at <http://www.nature.nps.gov/policiesguidance/procedures.cfm> under “Additional Information – Handbook to Director’s Order 12 – Handbook for Environmental Impact Analysis.”

Responses to comments on historic trail routes, trails through old growth forest, and additional horse and mountain bike trails are as follows.

Comment: There should be more horse trails.

Response: Additional horse trails are proposed in the Mill Creek watershed as described under the proposed project in the April 2009 draft General Plan Amendment conducted by the California Department of Parks and Recreation for the Mill Creek watershed addition to Del Norte Coast Redwoods State Park. There is potential to establish connections between NPS-managed areas and the Mill Creek watershed that would be suitable for horse trails. Any such connections will be analyzed as part of future trail planning conducted by the California Department of Parks and Recreation for the Mill Creek watershed.

Comment: There should be more mountain bike trails.

Response: Several bicycle trails were not identified on the maps in the TBMP EA. These trails are listed above under Plan Errata. Some of these routes will require designation as open to bicycles through the rulemaking process as required under 36 CFR 4.30 (a).

The action selected for implementation in the TBMP described two new bike trails totaling more than 10 miles, the B-Line bike trail (trail L) from Holter Ridge to the Highway 101 Bypass and the Coyote Creek (trail U) bike trail. Because both of these maintained bicycle routes will be on park roads which are also maintained for administrative vehicle use, designation through the rulemaking process will not be required.

In addition to these two bicycle trails, many miles of roads are open to mountain bikes under existing NPS rules and regulations. These roads were not shown or discussed in the plan because no change in their status is being proposed, because they are not maintained specifically for bicycle use, and because their status as roads may change over time as watershed restoration activities are completed and as the NPS completes a final roads plan.

Unless specifically closed to such use in the park's compendium, all park roads open to vehicles are also open to bicycles under general regulations found in 36 CFR 1.5 without the need for rule making under 36 CFR 4.30 (a). Such roads include those open to public or administrative vehicle use such as the Schoolhouse Peak Lookout Road, as well as those open to vehicle use by permit such as the Tall Trees Grove Access Road. Roads specifically closed through the park's compendium generally consist of those roads within the areas zoned in the park's General Management Plan as "Backcountry/Non-Mechanized" and as "Primitive" and lie primarily within areas of old growth redwood forests within the Redwood Creek watershed. Roads that are closed to bicycle use are or will be signed as such.

Impacts from use and maintenance of existing roads by bicycles on listed threatened species were analyzed in the biological assessments (BAs) submitted to the US Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) and their resulting biological opinions (BOs) for the trail plan. The NPS finds that there are no additional impacts on natural or cultural resources from bicycle use of roads open to and maintained for administrative motor vehicle use, and that this use is consistent with the management zoning described in the Redwood National and State Parks 1999 General Management Plan/Final Environmental Impact Statement (GMP/FEIS) and the 2000 Record Of Decision (ROD). Management zoning established through the 1999 GMP/FEIS and the 2000 ROD prohibits mechanized transport in primitive zones and backcountry/non-mechanized zones. The effects of bicycle use of these roads are the same as the effects of administrative vehicle use. Based on analyses conducted for maintenance projects for individual roads, these effects have been determined to be negligible for all resources other than listed threatened species and minor to moderate for listed species in some locations. The NPS requested, and the USFWS and NMFS have authorized, incidental take of listed species for some actions on some roads.

Comment: More trails should be constructed in old growth

Response: In consultation with the National Park Service under Section 7 of the Endangered Species Act on earlier proposals for trail construction, the USFWS determined that construction of new trails through undisturbed old growth forest has the potential for significant adverse impacts on listed threatened species from predation risk associated with human use in old growth habitat. Use of existing facilities in old growth habitat has moderate adverse effects on listed threatened species. The NPS is authorized incidental take of listed species for the use and maintenance of these facilities, including existing trails and trailheads, and has been authorized additional incidental take for construction of facilities in the selected action. No new developments in undisturbed old

growth are included in the selected action (identified as Alternative D, the proposed action, in the TBMP EA) that would result in significant adverse effects that could jeopardize survival of threatened birds. The James Irvine Trail reroute in Prairie Creek did not create a new source of predation risk (attraction of corvid predators from human use of a trail) in old growth forest—the reroute moved the source of predation risk but the level of risk remained the same.

Comment: New trails should be constructed on routes of historic trails.

Response: Several historic trail routes cross Redwood National Park. Historic trails are potentially significant historic properties. Any remnants of historic trails would be subject to adverse effects from construction and use if historic routes are upgraded to current standards for safety, accessibility, and resource protection. The selected action in the TBMP includes construction of trails on routes that have the least potential for impacts to historic properties. The NPS acknowledges the presence of historic routes but is concerned about the effect of construction and use on potentially significant historic properties. The NPS does not have sufficient funding to survey, plan, and construct new trails on historic routes.