



Keeping Northwest California wild since 1977

June 16, 2014

Stephen Prokop
Superintendent
Redwood National and State Parks
111 Second Street,
Crescent City, CA 95531

RE: Bald Hills Road Improvement

Dear Superintendent Prokop,

I am writing on behalf of the Environmental Protection Information Center (“EPIC”), a nonprofit organization that works to protect and restore ancient forests, watersheds, coastal estuaries, and native species in northwestern California. Consistent with this mission we are writing in concern of the Bald Hills Improvement Project. We will keep our issues brief for your consideration in planning the environmental analysis.

“Some places transcend time and national boundaries and become the common inheritance of mankind. These places are now given international recognition as World Heritage Sites or Biosphere Reserves.”
UNESCO-United Nations Educational, Scientific and Cultural Organization

The Redwood National and State Parks are listed as a World Heritage Site and an International Biosphere Reserve. UNESCO’s aim is to ensure that the World Heritage List reflects the world’s cultural and natural diversity of outstanding universal value. Biosphere reserves are internationally recognized terrestrial and coastal or marine areas where management seeks to achieve sustainable use of natural resources while ensuring conservation of the biological diversity of the areas.

The Bald Hills Archeological District, which is listed on the National Register of Historic Places and is significant both for its archeological research potential and its importance to local Native Americans, including twenty-six cultural resource sites. Please include a description of National Historic Preservation Act compliance within the EA.

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Wildlife

The negative impact that roads have on wildlife is extremely well documented. Roads displace sensitive wildlife species. They move or modify their home range as road density increases and avoid roads during daily movement activities. Roads fragment populations of many small mammals, amphibians, and reptiles by creating barriers to dispersal. Direct mortality through roadkill also affects populations of both large and small animals. Wildlife is adversely affected by habitat degradation and fragmentation due to roads. The reproductive success of interior forest bird species decreases in areas fragmented and/or disturbed due to roads. Some species are sensitive to disturbance; others suffer from increased rates of nest parasitism and nest predation. Please consider these issues.

Increased traffic would agitate and disturb wildlife within the park. Increased traffic has major implications for the future conservation of the area. Please consider and address this concern in the EA or Environmental Impact Statement (EIS).

Elk are especially sensitive to roads, especially paved roads, and are a star attraction to the beauty, heritage and culture of this place. Negative impacts from roads on elk are particularly well established. Please disclose and discuss the long-term negative effects of increased traffic and pavement on elk and other wildlife in the EA/EIS.

As you may know gray wolves are listed as endangered under the Federal Endangered Species Act. They are also currently a *candidate species* and will be listed as endangered under the California Endangered Species Act. The wolf is expected to re-inhabit its former range, which includes Redwood National and State Parks. The gray wolf's primary choice of prey is Elk. If Elk herds suffer wolf recovery will be affected.

Conservation and Connectivity

The Bald Hills area provides critical wildlife connectivity from the Trinity Alps Wilderness, Six Rivers National Forest, Hoopa and Yurok Reservations to the park. Nearly all of the Green Diamond Timberland has been and continues to be extensively clearcut, contributing to severe habitat fragmentation. Further contributing to habitat fragmentation, through the use of paved roads, is not consistent with long-term conservation of ecosystems or wildlife species.



View east of Big Lagoon 6-7-2014

The National Fish, Wildlife and Plant Climate Adaption Strategy and the California Climate Adaption Strategy for Biodiversity and Habitat # 1 goal and strategy is to create a large scale well connected landscape. The permanence of pavement is contrary to meeting this goal.

Hydrology

Roads change soil density, temperature, soil water content, light levels, surface waters, patterns of runoff and sedimentation, as well as adding heavy metals (especially lead), salts, organic molecules, ozone and nutrients to roadside environments. Paved roads act as a heat sink and alter hydrology. Please disclose the effects in the EA/EIS.

Quality of Experience



Nearly all of the images on the Internet of Bald Hills Road are of the unpaved portion.

Visitors drive the Bald Hills Road for the visual quality and park experience. People are drawn to the natural beauty. The natural beauty and integrity of the park would be extremely degraded if the road were paved. Please consider this ill affect in the EA/EIS.

The description of the National Park Service website describes that the road as...passing through several open prairies resplendent with spring wildflowers, Roosevelt elk, and black bear.

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Lupine in bloom along Bald Hills Road (mostly unpaved). *NPS Collection*

On NPS Website

Alternative

Paving another 2.59 miles of Bald Hills Road would not improve the quality of the park and would negatively affect wildlife. We urge you to consider an alternative that uses native materials, such as small gravel, that would better meet the purpose and need of the project.

Conclusion

Redwood National Park is listed as a World Heritage Site and an International Biosphere Reserve and the Bald Hills Archeological District is listed on the National Register of Historic Places. The ecological, biological, cultural values of the Bald Hills area are internationally significant. We believe these are significant issues to address in an EA/EIS.

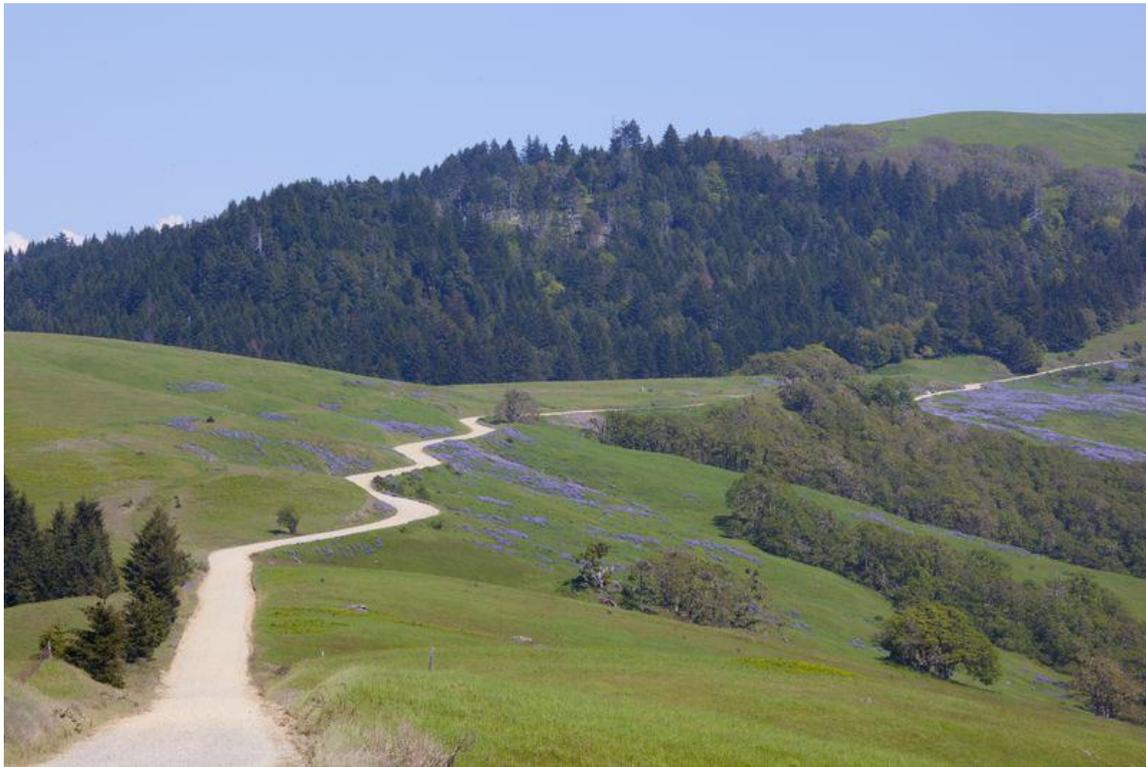
Roads, especially paved roads, are well known to have multiple adverse impacts to a multitude wildlife species. Increasing traffic also has multiple adverse impacts to wildlife. The natural beauty and integrity of the park would be ill affected by further pavement and increased traffic, which would also detract from real values of the park.

Please abate these ill effects by considering an alternative that would maintain the natural integrity and values of the park and is minimally invasive to wildlife and would meet the purpose and need of the project. Please send a hard copy of the EA/EIS to our Arcata office. Thank you.

Sincerely,

Kimberly Baker
Public Land Advocate

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