

United States Department of the Interior
Redwood National Park
1111 Second Street
Crescent City, California 95531

L74 (River Basin Activities)
xL6015 (Smith Wild and Scenic River)

September 23, 2015

Michael L. Barnes
Bureau of Land Management
Oregon State Office
P.O. Box 2965
Portland, Oregon 97208-2965

Dear Mr. Barnes:

We have reviewed the “Notice of Proposed Withdrawal and Notification of Public Meetings; Oregon” published in the Federal Register, FR Doc 2015-15954, Monday, June 29, 2015 and would like to offer the following comments.

The Notice describes proposed withdrawal for five years, and segregation of lands for two years, from settlement, sale, location, and entry under the public land laws, location and entry under the United States mining laws, and operation of the mineral and geothermal leasing laws of public domain and Revested Oregon California Railroad (O&C) lands managed by the Bureau of Land Management (BLM) and 95,805 acres of National Forest System (USFS) lands in southern Oregon.

The Proposed Withdrawal affects lands in the Baldface and Diamond Creek watersheds that form the headwaters of the North Fork of the Smith River. The North Fork enters California in Del Norte County, and meets with the Middle and South Forks of the Smith to form the mainstem Smith River. Approximately 3 miles downstream from the Middle Fork/South Fork confluence, the mainstem Smith River enters Jedediah Smith Redwoods State Park and Redwood National Park.

Redwood National and State Parks are composed of Redwood National Park and three California State Parks located within the Congressionally-designated boundaries of the national park in Humboldt and Del Norte Counties. Together the parks preserve not only the primeval coastal redwood forests but “the streams with which they are associated for the purposes of public inspiration and enjoyment, and to preserve all related scenic and recreational values” (General Management Plan/General Plan, Redwood National and State Parks, USDI National Park Service (April 2000) and California Department of Parks and Recreation (November 1999)).

Redwood National Park was established “to preserve significant examples of the primeval coastal redwood (*Sequoia sempervirens*) forests and the streams and seashores with which they are associated, for purposes of public inspiration, enjoyment, and scientific study” (Public Law 90-545, October 2, 1968). The national park was expanded “...to protect existing irreplaceable Redwood National Park resources from damaging upslope and upstream land uses....” (PL 95-250, March 27, 1978).

The purpose of Jedediah Smith Redwoods State Park is “to make available to people forever, for their inspiration and enjoyment, in a condition of unimpaired ecological integrity, the great forests of lower Mill Creek and of the Smith River, together with all related scenic, historic, scientific, and recreational values and resources of the area.” (July 1965 State Park and Recreation Commission Declaration of Purpose.)

As components of both the state and National Wild and Scenic Rivers Systems, the Smith and its tributaries within California provide opportunities for public enjoyment that attract visitors to the parks and to the region. The anadromous fishery is a primary Outstandingly Remarkable Value (ORV) for the Smith and its tributaries. In addition, the North Fork has been found to have outstandingly remarkable white-water boating values.

The Final Environmental Impact Statement for the Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System (USDI, Heritage Conservation and Recreation Service, December 1980) stresses that “the health of the entire Smith River system is critical to maintenance of the exceptional water quality which supports the anadromous fishery. Past history has shown the futility of governmental attempts to protect an outstanding resource value by drawing an artificial boundary around the resource and ignoring the interaction between the resource and the rest of the ecosystem. Under the National Wild and Scenic Rivers Act, all future federal actions within the watershed should be carefully designed to avoid degrading the water quality of the Smith River system, and adversely impacting the anadromous fishery. “

In addition to the legislation that established and expanded Redwood National Park, the National Park Service Organic Act of 1916 requires that all units of the National Park System be managed to “conserve the scenery ... and the wild life therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations.” 54 USC 100101(a). In the General Authorities Act of 1970, Congress further declared that “... the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established....” 54 USC 100101(b)


The anadromous fish in the Smith River include steelhead trout, Chinook salmon, and coho salmon. Coho are listed as threatened under the federal Endangered Species Act and endangered under the California Endangered Species Act.

Protection of the superb water quality, the associated anadromous fishery and recreational resources, and the scenic values along the Smith River, and the opportunities for public enjoyment of these resources and values, are mandated under the Organic Act of 1916, the General Authorities Act of 1970, the Redwood National Park enabling and expansion legislation, and the National Wild and Scenic Rivers Act, as well as the Declaration of Purpose for Jedediah Smith Redwoods State Park. The anadromous fish in the Smith River are protected under the federal Endangered Species Act and the California Endangered Species Act.

The Proposed Withdrawal of BLM and USFS lands in the headwater tributaries of the Smith River upstream of Redwood National and State Parks will reduce potential for impairment of, and provide additional protection for, these significant resources and values and the opportunity for public enjoyment of the same in Redwood National Park and Jedediah Smith Redwoods State Parks, as required under the laws for management of these parks.

Thank you for the opportunity to comment on the Proposed Withdrawal.

Sincerely,



Stephen Prokop
Superintendent

cc: (all via electronic mail; no hardcopy to follow)
Martha Lee, PWR
Stephen Bowes, PWR-RTCA
Grant Werschkull (Smith River Alliance)