



# FRIENDS OF THE EEL RIVER

*Working for the recovery of our Wild & Scenic River, its fisheries and communities.*

Thursday, February 2, 2017

NCIP Comments  
Bureau of Land Management  
via email to [NCIP\\_comments@aecom.com](mailto:NCIP_comments@aecom.com)

## **RE: Friends of the Eel River Scoping Comments on the Northwest California Integrated Resource Management Plan**

Dear BLM Staff:

Thanks for the opportunity to provide scoping comments to help shape the preparation of alternatives for the **Northwest California Integrated Resource Management Plan** that will guide the management of Bureau of Land Management (BLM) lands across Northwestern California over the next several decades. The following comments are offered on behalf of the board, staff, and supporters of Friends of the Eel River. Friends of the Eel River (FOER) is a nonprofit citizens' group which works for the protection and restoration of the Wild and Scenic Eel River, its watershed, and especially its fisheries.

First, we'd like to take a moment to thank you for taking the time to think carefully about this set of issues at a time when the newly installed presidential administration is gleefully attacking our system of public lands, our public servants like you, and the whole enterprise of fact and science-based policy making. The years immediately ahead are shaping up to be among the most challenging in our history for the resources you manage, for your agency and for the Department of the Interior itself. We thank you in advance for your patience, diligence, and commitment to uphold not only the letter, but the spirit of our public lands and wildlife laws.

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. At present, however, the three surviving salmonid species in the Eel River – steelhead, coho, and chinook – are all listed as Threatened under the federal Endangered Species Act. As well, populations of ecologically significant species like the Pacific lamprey and green sturgeon are also critically low, though the species have yet to receive formal protection.

In order to successfully recover even a significant fraction of the Eel River's pre-European productivity, it is essential to recognize the roles that overfishing, draining of the estuary, and industrial logging and development have played in the destruction and degradation of the Eel River's fisheries and habitat.

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Similarly, it is critical to recognize that the entire region is the scene of genocide against native peoples. The tribal nations which have survived the crimes committed against their ancestors, their cultures, and their lands remain absolutely critical stakeholders in any discussion of the management of public lands and public trust resources in the region. FOER strongly encourages the BLM to make every effort not only to solicit the input of tribal governments, staff, and members, but also to build collaborative relationships which can result in co-management of specific areas and resources where feasible and appropriate.

By contrast to its sister watersheds on the North Coast, the Eel River is dominated by private land ownership, with nearly 90% of the 3600 square mile watershed in private hands. This has resulted in a relative dearth of public recreational opportunities, despite the largely undeveloped character of the Eel River watershed. While there are a number of federal, state, and county parks and other areas which allow public access to the Eel River and its tributaries, there remains a real need for more and better recreational access to the river in many areas. As well, the facilities that do exist are not being well-maintained or supported by State Parks or county staff due to severe budget and staffing shortfalls.

From Friends of the Eel River's point of view, then, we would urge the BLM to focus its planning for the Eel River area at least under three overlapping general priorities:

- 1) **Protect** the best: To the extent feasible, ensure that public lands which remain wild or relatively intact natural areas are protected from resource extraction, development, excessive human impacts of all kinds, especially including climate change.
- 2) **Restore** the rest: Restore native species, functional wildlife habitat, and ecosystem processes where feasible. Promote restoration of ecosystem processes across larger landscapes, and connection between important habitat areas.
- 3) Help the public **connect** with nature: Provide opportunities for sustainable recreation, particularly on and around the Wild and Scenic Eel River and its tributaries.

We would urge the BLM apply these principles across the range of planning issues which the Northwest California Integrated Resource Management Plan must address. For example, to the extent the NCIP follows existing plans in laying out priorities for land disposal and consolidation, please consider adopting explicit policies which encourage disposal and consolidation of existing public lands only where those processes would be likely to result in a net improvement in protection, restoration, and connection. Similarly, FOER would strongly support acquisitions which would further one or more of these principles.

In applying these principles, we are keenly aware of the wide range of characteristics of the public lands managed by the BLM in our area. Some parcels are small, others quite large; some are accessible, others are landlocked; some are quite wild, others disturbed. Restoring a natural ecological process like wildfire may be completely infeasible in some places – but many of the benefits of wildfire might be accomplished with prescribed fire on some parcels, or with CCC hand labor on others. Given the wide variation between existing holdings, as well as substantial uncertainty over the future course of development in many areas, not to mention how quickly severe effects of climate change will manifest in different areas of Northwestern California, it makes little sense to adopt specific plans for every area, or general plans which cannot be appropriately adapted across the BLM's regional ownership.

We would particularly like to commend the Arcata Area BLM for its leadership and significant accomplishments in providing public recreational opportunities. Thanks to their vision and efforts, the Kings Range now has an outstanding mountain bike trail, in addition to the world-famous Lost Coast hiking trail. The Lacks Creek area is another fantastic example of a place where the BLM has created sorely needed recreational opportunities while also improving the ecological health of the managed land and habitat.

These accomplishments give us hope that the BLM will continue to step up to opportunities to manage our public lands in the Eel River watershed for the combination of protection, restoration, and recreational connection which the vast majority of Northwestern California citizens and visitors would prefer.

We would also note that the highly effective federal-state partnership in the management of Redwood National and State Parks offers a model of active collaboration which takes advantage of the relative strengths of each institution to offer visitors better opportunities, and more effective management of public trust resources, than would otherwise be possible if under exclusive federal or state management.

We would strongly encourage the BLM to carefully consider how it could more effectively collaborate with other federal agencies, as well as with state and county-level institutions, to better manage our public lands and public trust resources, particularly in the Eel River basin. And again, we strongly encourage the BLM to seek similar arrangements with tribal nations where appropriate.

As the Green Rush of marijuana-driven development continues across Northwestern California, and in seemingly every corner of the Eel River watershed, the need to maintain both water quality and adequate instream flows remains an overriding imperative if we are to maintain and restore our fisheries. FOER would thus urge the BLM to consider how best to protect water resources within, adjacent to, or downstream of our public lands.

To the extent it may be useful, necessary, or legally required to grant rights of way for water diversions across BLM lands, those diversions must be subject to transparent, enforceable limits which prevent dry-season diversions entirely, and ensure that wet-season diversions comply with Department of Fish and Wildlife regulations and guidelines as to diversion rate, mechanisms, and water storage. The default response to such requests should, however, be no, absent truly compelling human – not commercial – need.

In sum, FOER encourages the BLM to prepare and analyze an alternative which seeks to maximize the productivity, resilience, and sustainable enjoyment not only of its public lands in Northwestern California, but of the larger landscapes in which those lands are embedded.

Thank you very much for your kind consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Greacen', with a long horizontal line extending to the right.

Scott Greacen  
Executive Director