



Sent via electronic mail on date shown to:

August 7, 2018

National Parks Service
South Operations Center
Attn: Leonel Arguello
PO Box 7
Orick, CA 95555

RE: Greater Prairie Creek Ecosystem Recreation Project Scoping Comments

Dear Mr. Arguello:

The following comments are submitted on behalf of the Environmental Protection Information Center (EPIC) in response to the National Parks Service July 2018 Scoping Notice for the Greater Prairie Creek Ecosystem Restoration Project (GPC Project). EPIC appreciates the opportunity to provide comments and input to the NPS at this early developmental stage.

Summary

EPIC is a regional environmental advocacy non-profit with over 40-years of experience in advocating for the protection and restoration of the forests of Northwest California.

In accordance with our stated mission, EPIC supports the NPS' stated Purpose and Need for the GPC project. EPIC provides the comments and suggestions below for consideration by the NPS in developing Proposed Actions under the Preferred Alternative and for the development of subsequent additional alternatives, should this be deemed necessary.

Environmental Assessment Contents and Development

EPIC supports the forest and landscape restoration proposed in the Preferred Alternative for the GPC project as stated in the NPS' stated-Purpose and Need due to the vast differences in the current condition of the landscape targeted to be the subject of the actions contemplated in the GPC project when compared to "reference" or "old-growth" landscape forest conditions within the GPC watershed.

EPIC encourages NPS to plainly spell-out the current condition of the areas targeted for actions proposed in the GPC project, how current conditions are impaired compared to the "reference" or "old-growth" condition, and exactly how actions carried out under the Preferred Alternative will address impairments identified. In particular, EPIC recommends being as

specific as possible about forest stand-level imbalances and impairments and how these adversely affect terrestrial and aquatic environmental values within RNSP.

EPIC understands and appreciates the need and desire for programmatic implementation of actions associated with the GPC project. However, EPIC encourages the NPS in the development of the Environmental Assessment to make as clear and specific as possible the boundaries and limitations of any silvicultural prescriptions developed, as well as those design specifications for road-re-activation and decommissioning/removal, so as to give the general public at-large a greater sense of trust and confidence in implementation and intended outcomes of Proposed Actions in the GPC project.

Finally, EPIC recommends that NPS be as clear and plain as possible about desired outcomes of proposed actions and ultimately, desired-future conditions in areas to be treated as part of the GPC project. Creating a logical causal linkage between current impaired conditions, proposed actions, intended outcomes and desired future conditions in the minds of the public at-large will be critical for the NPS in creating local space and social license to carry out the Purpose and Need of the GPC project.

Local Contracting and Materials Utilization

Redwood National and State Parks is surrounded by rural, forest-economy-dependent communities. Given the unique opportunity to at once restore and reconnect forested landscapes within the RNSP boundaries as well as to support local employment and economic viability, EPIC encourages NPS to utilize small, local contractors and employees to the extent feasible, and to transport forest material removed from restoration sites to local mills and cogeneration plants to the extent feasible. Finally, EPIC recommends plainly explaining how monies accrued from removal of forest material will be utilized and spent, where, and by whom. Most ideally, EPIC recommends that any monies accrued from the removal and sale of forest materials be utilized to offset costs of contracting and implementation of the GPC project. Demonstrating that forest and landscape restoration can be financially-self-supported is a critical aspect of driving the work forward in RNSP and elsewhere in the redwood region.

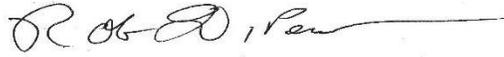
Tribal Consultation and Collaboration

EPIC encourages NPS to actively seek out consultation with the Yurok Tribe and tribal leadership, and encourages NPS to integrate native and traditional land management and restoration techniques, including prescribed burning, into the design and implementation of Proposed Actions in the GPC project to the extent feasible. Healing the degraded state of the land should rightly include integration of input, knowledge, and skills/practices of the native Yurok Tribe to the extent feasible in order to have a more holistic approach to restoration and a more holistic suite of potential tools to implement Proposed Actions.

Conclusion

EPIC appreciates the opportunity to provide input to the NPS at this early developmental stage for the GPC project and we appreciate NPS' consideration of these comments and suggestions. Please do not hesitate to contact me directly should there be any questions about our input.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob DiPerna", with a long horizontal flourish extending to the right.

Rob DiPerna

Environmental Protection Information Center (EPIC)

rob@wildcalifornia.org