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Ms. Susan Weale
Shasta Coalition for the Preservation of Public Land
9837 Swasey Drive
Redding, CA 96001

Dear Susan:

I appreciate the opportunity to provide comment to your organization relative to impacts to recreation resource values potentially affected by the Bureau of Land Management (BLM) proposed Salmon Creek Resources Land Exchange.

I have reviewed the extensive documentation relating to the proposed exchange and the historical and recent planning and decision documents and how they affect the relative recreation values on both parcels. Clearly, there is considerable interest in the exchange proposal and controversy concerning its potential impacts.

A number of national studies over the past 20 years have pointed to the value of trails and related recreation activities in meeting the need for outdoor recreation and improving the health of communities. The need for close-in recreational opportunities for adjacent urban centers is repeatedly addressed by these studies and research and surveys conducted by agencies and the private sector. Trail resources adjacent to urban areas are the most common to be developed, both formally and informally, in providing critically important outdoor recreation opportunities. The trail resources within the Federal lands proposed for divestment in the exchange (commonly referred to as Area 51) are important as they related to the needs of the fast-growing community of West Redding. Because of their critical importance, any potential loss of trail resources is a significant loss. Once lands available for trail activities are lost to development they can never be reclaimed.

The BLM is not charged in its mission to directly provide and manage urban recreation opportunities. It is understandable and consistent with its mission and planning guidance to work toward divestiture of urban blocks of public land and to strive to create more manageable stewardship blocks outside of urban areas. However, historically, trail use has been the number one recreation-use activity as identified by BLM field offices

throughout the nation. Additionally, it should be noted that one of the management actions the BLM set for itself in the 1993 Redding RMP was to contact the local community to provide those recreation opportunities through transfer of public lands through sale or exchange or via the Recreation and Public Purposes Act. In the RMP Record of Decision (Page 44, I, F, 2) it specifically states, for those lands outside of special management areas in the Shasta Management Area, that the goal is to “enhance resource management efficiency and the public service mission of local, state and Federal agencies via transfer of jurisdiction of specific public lands from BLM.” This recognizes the intent of the Agency to sit down with representatives of the local community to work diligently toward the maintenance of recreation resources important to the community, especially in a growing urban area. It is clear public involvement was provided for in the exchange process, however, it is regrettable that finding a community solution was not the highest priority for the BLM.

While the divestiture of scattered public land is indeed consistent with the RMP’s goals, it is also true that the extensive block of Federal land in the proposed exchange (215+ acres) is substantially large enough to lend itself to management by a local jurisdiction in support of already existing trail and open space use. Local planning for trail system corridors has been ongoing in the area for some time. In 2000, an interagency plan under the auspices of the NPS was forwarded that roughly sketched out a conceptual trail corridor that might serve to carry users from the Redding area across the Sacramento River westward to connect with larger blocks of Federal land. One of these corridors passes directly south and east of Area 51 (across Lower Springs Road). However, there has been no further work to flesh out the corridor’s exact route or to undertake any work to develop the trail corridor. Area 51 has the potential to provide such a corridor by linking with the Lower Salt Creek Trail System to the northeast and then westward toward either the Shasta-Trinity National Forest via Muletown Road area or the Mule Mountain Pass Trail, or both.

It is also true, however, that there are significant impediments to trail rights of way across private lands and roads to effect such a linkage. It is important to note that Shasta County, in a response to the pre-development proposal of the prospective owner of the Federal lands in the exchange, indicated it would entertain working with the developer to establish a trial route crossing of roads to effect a trail link, once developmental planning was underway. So, it is clear, a solution to the private impediments cited in the planning and decision documents is available, however difficult it might prove to be.

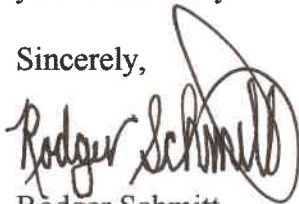
As to the recreational value of the Grass Valley Creek (GVC) Non-Federal parcel, it is difficult to see any appreciable improvement in the recreation opportunities currently available in the nearby Federal lands by its acquisition, notwithstanding other resource values it might contain. Buckhorn Dam is primarily a sediment retention basin and is not a true recreation area in the common sense of the word. The statement that there is potential for trail and related recreation opportunity development in the GVC parcel is all that the BLM points to as a counter to the loss of recreation opportunities in Area 51. Little, if any, specific efforts have been undertaken to date to improve recreation opportunities on the 16,000 acres surrounding the GVC parcel. And the GVC parcel adds

only 3+% additional land to the surrounding public lands currently under BLM stewardship and available for recreation. At best, the additional recreation opportunities available on the GVC parcel are marginal and not close to the value of those available in Area 51.

There is more to effecting a land exchange than meeting RMP objectives. The concerns and needs of the local community should be paramount in determining how meeting those objectives will proceed. It is certainly clear from the materials reviewed that there is a clear inequity in the recreation values of the two parcels, with the Federal parcel having a much more significant potential for improving the community through a transfer of the Federal lands to a local entity. When a single party stands to gain more than the community in an exchange there should be pause to review the proposed action and look to a better community solution. Surely there are other Federal lands that might also meet the needs of the GVC parcel's owner.

I wish you the best of luck in your endeavor to secure valuable recreation resources for your community.

Sincerely,

A handwritten signature in black ink that reads "Rodger Schmitt". The signature is written in a cursive style with a large, sweeping loop at the end of the last name.

Rödger Schmitt

National Recreation Program Manager, retired
Bureau of Land Management