



6412 Clear View Drive ● Anderson, CA 96007 ● [www.reddingtrailsandbikeways.org](http://www.reddingtrailsandbikeways.org)

Attention: Steve Anderson, Redding Field Manager  
Bureau of Land Management  
355 Hemsted Drive  
Redding, CA 96002

Subject: EA Number CA-360-RE-2004-15 (Salmon Creek Resources Exchange)

Dear Mr. Anderson:

The Trails and Bikeways Council of Greater Redding (TBC) believes that this proposed land exchange (of the Shasta County BLM parcel for the Trinity County parcel owned by Mr. Joe Rice), if completed as currently structured, will not be in the public interest because it sacrifices Area 51 resources of great public value by providing little or no protection for them. They are:

- Salt Creek
- The Area 51 Trail System
- Historic Artifacts of Area 51

**Salt Creek** is not only is the most pristine stream in the Redding area, but also one of two Sacramento tributaries upstream from the ACID diversion dam that is capable of supporting a viable population of anadromous fish, chiefly, Chinook salmon and steelhead. While the BLM has downgraded the importance of upper Salt Creek (the portion upstream from Route 299) as a spawning area, its full potential as a spawning stream is not being realized because the culvert that carries Salt Creek beneath route 299 blocks the vast majority (over 90% by one estimate) of fish that attempt to spawn in the upper Salt Creek (another fish-blocking culvert located near the Sacramento River Trail was removed in 2002). Work is scheduled on the culvert in the summer of 2006 to allow for more fish migration to upper Salt Creek which contains more spawning habitat than the lower creek. Middle Creek, the other salmonid spawning stream above the ACID diversion dam has been severely degraded by siltation caused by previous destructive development in the Middle Creek watershed. The subsequent partial restoration of Middle Creek to keep it viable as a spawning stream was a multimillion dollar expenditure of taxpayers' dollars.

Permitting construction within fifty feet of the stream (as this trade does) virtually guarantees that Salt Creek will be severely degraded, if not destroyed,

as a spawning stream for trout and salmonid if Area 51 development proceeds as currently planned by Mr. Rice.

**The Area 51 Trail System**, contrary to the BLM position that it is a “dead end” trail system with only one entry and exit on Victoria Drive, can easily have an exit to Lower Springs Road from the BLM property. Several property owners along Swasey Drive and Tilton Mine Road are willing to grant trail easements across their property after any land exchange takes place. The Area 51 trail system is easily accessible to over 80,000 people in the Redding area. Existing Trail systems surround it (see attached map). It can be directly connected to the Westside Trail via the Foxwood Estates subdivision east of Lower Springs Road (the developer is willing to make this trail connection through this future equestrian development) and to the Sacramento River Trail creating a miles long linear riparian park for the entire community that connects the Sacramento River Trail to the foothills and the Whiskeytown National Recreation area. The few and largely undeveloped private parcels immediately upstream from Route 299 should not prove to be insurmountable barriers to the development of this trails system.

Because this land exchange does not provide for any trail protection, it is virtually guaranteed that nearly five miles of litter-free pristine Area 51 trails that have enjoyed decades of caring implied public use by hundreds of people throughout the area for many years will disappear. The exchange does provide for any mitigation of this great loss to the local community. The Grass Valley parcel is far from any population center, contains no trails, and has no plans for any.

**Historic Artifacts of Area 51** include 1849 Gold Rush water ditches which are the most important and fragile part of the Area 51 trail system. The water ditches are especially valuable, not only as preserved history but also as smooth and level trail that can be used by nearly anyone who is able to walk.

As this exchange provides for no protection of these well-preserved and invaluable pieces of local history (located within the Shasta community which lives, breathes, and values its history and tries hard to preserve it), it will be lost forever if Mr. Rice proceeds with his current development plans.

The TBC would not have opposed the land exchange with Joe Rice, had the BLM placed restrictions on the property that would have preserved the Area 51 resources of public value, or if Mr. Rice or the BLM had been willing work with the TBC and other groups and individuals to ensure that these valuable public assets were not lost. However, despite strenuous attempts by the TBC and other organizations and individuals to prevent this loss to the community, no meaningful local public resource protection for Area 51 was included in the trade agreement which we believe is fatally flawed and should be shelved,

particularly when the BLM has received a counteroffer from the Shasta Resources Council (SRC) which provides for all the protections of stream, trail, and historic artifact that concerned citizens and groups have been requesting. The SRC offer would, from a bottom line analysis, be even more beneficial to the local BLM budget and allow for purchase of Sacramento River Bend property or other property of comparable public value. We strongly believe that a direct SRC purchase of Area 51 would both allow the BLM to achieve its goal of divesting itself of unwanted urban interface land while acquiring land it values and allow the Redding area to benefit from preservation of valuable salmonid and other wildlife habitat, public recreation, and historic artifact.

The Grass Valley Creek parcel, at its current appraisal, is more valuable to Mr. Rice (or to anyone) as property to exchange with the BLM for something more developable in the Redding or other urban interface area than as property to develop or log or to sell to another private party for the same purpose. Mr. Rice could easily trade this parcel for another BLM parcel that he could develop any time in the future. It should be safe from degradation for many years.

Area 51 is a federal property of great public value for all the reasons stated above. The Rice exchange serves private interests while sacrificing Area 51 assets and the public good. It should not be concluded. An SRC purchase of Area 51 would be of far greater public benefit to community and BLM alike.

Sincerely,

Lang M. Dayton, Board Member  
Trails and Bikeways Council of Greater Redding

C: Shasta Resources Council  
C: Paul Edgren, Signature-Northwest  
C: Mark Cibula, Shasta County Supervisor  
C: David Kehoe, Shasta County Supervisor  
C: Bill Walker, Sr. Planner, Shasta County  
C: Shasta Community Services District  
C: Redding Record Searchlight.  
C: Shasta Coalition for the Preservation of Public Land  
C: Congressman Wally Herger  
C: Senator Barbara Boxer  
C: Office of Senator Diane Feinstein, Jim Molinare, State  
C: Mike Poole, State Director, BLM, California State Office