



# InterTribal Sinkyone Wilderness Council

P.O. Box 1523 Ukiah, CA 95482 Phone (707) 468-9500

## InterTribal Cultural Conservation for Sinkyone Indian Lands



January 29, 2009

Deborah Harmon  
Senior Environmental Planner  
California Department of Transportation  
1656 Union Street  
Eureka, CA 95501

Re: Proposed Richardson Grove Operational Improvement Project

Dear Ms. Harmon:

This letter constitutes the InterTribal Sinkyone Wilderness Council's response to Caltrans' Draft Environmental Impact Report (DEIR)/Environmental Assessment and Programmatic Section 4(f) Evaluation for the proposed Richardson Grove Operational Improvement Project.

Founded in 1986, the InterTribal Sinkyone Wilderness Council (Council) is a nonprofit Native land conservation organization comprised of 10 federally recognized California Indian Tribes that retain important cultural, ancestral, and historic ties to the region of Humboldt County within which the proposed project is located. Our peoples have inhabited this region since time immemorial, long before the era when the Grove's now-huge trees were mere seedlings. Native people of this region view the redwood trees of Richardson Grove as sacred, and consider them to be an especially unique and important cultural resource that deserves special protection.

The Council is particularly concerned about the adverse impacts that the Build Alternative would pose to the root systems of the Grove's redwoods and to various other elements of the redwood ecosystem. The Council is strongly opposed to any actions that would threaten the well being of the Grove's redwood trees. The proposed project, as outlined in the DEIR, would result in substantial and adverse impacts to the botanical, avian, wildlife, and other biological and aesthetic values of Richardson Grove State Park and the surrounding environs.

The DEIR's argument that the Build Alternative will produce economic benefits to the region is highly speculative. Further, the DEIR incorrectly assumes that these hypothetical economic benefits present sufficient justification for the irreversible environmental damage that would result if the proposed project were undertaken. Because of these insupportable arguments, the DEIR's other numerous weaknesses, and the various reasons stated above, the Council is opposed to the proposed Build Alternative. The most sensible way to address traffic safety problems at this location is to adopt the No Build Alternative along with additional traffic-slowng measures.

Sincerely,  
*[signed by]*  
Priscilla Hunter  
Chairperson

cc: North Coast Redwoods District, California State Parks  
Save-the-Redwoods League  
Environmental Protection Information Center  
Northcoast Environmental Center