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Sent to: pshibley@fs.fed.us and
comments-pacificsouthwest-sequoia-greenhorn@fs.fed.us

Penelope Shibley, District Planner
Kern River Ranger District
P.O. Box 9, 105 Whitney Road
Kernville, CA 93238

cc: Ara Marderosian
Georgette Theotig

Subject: Borel Relicensing Recreation Enhancement EA Comments for Sequoia
ForestKeeper & Kern-Kaweah Chapter of the Sierra Club

Ms. Shibley,

Thank you for the opportunity to comment on the proposed Borel Relicensing Recreation Enhancement EA. Sequoia ForestKeeper (SFK) and the Kern-Kaweah Chapter of the Sierra Club (SC) support this project but urge the Forest Service to clarify a few minor issues in its analysis.

Project Proposal

The PEA states that the Borel Relicensing Recreation Enhancement Project, as proposed, provides an opportunity to address a significant part of the District's recreation site deferred maintenance and to improve the conditions of facilities used by the recreating public.

The proposed action will: (1) Reconstruct a road to improve access for forest visitors, as well as, sanitation and trash service vehicles; (2) Install permanent concrete pads for trash dumpsters where currently none exist; (3) Provide new toilet facilities to replace outdated portable toilets and the lack of capacity associated with this type of unit; (4) Provide new shade shelters where currently none exist; (5) Construct accessible pathways to new restroom facilities, shade shelters, and near the river for public access and to meet ADA standards; and (6) Add signs as appropriate at these recreation sites.

Comments

The PEA states at p. 5: "These Forest Service recreation improvements at Sandy Flat Campground, Sandy Flat Put-in/Take-out, and Black Gulch South are funded by Southern California Edison as part of an agreement associated with the Borel Hydroelectric Project."

Please clarify if this also means that Southern California Edison (SCE) must maintain these roads and facilities and the Forest Service is not required to pay for the ongoing maintenance and how

long SCE will maintain these updated facilities into the future. Or does the Forest Service plan to charge recreation user fees or require displaying a pass, such as the Southern Sierra Pass, to use the facilities? Will anyone who wants to park and fish or boat from this location on the river front need a permit or pay a parking fee? Please disclose the cost over ten years to maintain this site. Please disclose who will manage access to this site who will empty the vault toilets at this site and who will pay for these services.

The PEA states that the Forest Service Outdoor Recreation Accessibility Guidelines (FSORAG) provide guidance for the agency to maximize accessibility of outdoor recreation areas in the National Forest System, while at the same time protecting the unique characteristics of the natural setting.

Please clarify how paving roads and improving developments are compatible with protecting the unique characteristics of the natural setting?

Please also clarify how reconstructing a road and constructing new pathways is consistent with 36 C.F.R. § 212, Subpart A when the Forest Service has not yet started the analysis to determine the minimum transportation system on the Sequoia National Forest.

The PEA states that all of the project sites are located outside the streamside management zone (SMZ) and that project sites would comply with BMP 4.4 Control of Sanitation Facilities which would be implemented and monitored. The PEA, however, should explain whether providing access for the public to streamside could affect the SMZ regardless of the BMP. Please explain how the BMP prevent the public from trashing the area with human and other waste.

The PEA states that Forest Service will control road drainage and that the objective of this practice is to minimize the erosive effects of water concentrated by road drainage features; to disperse runoff from disturbances within the road clearing limits; to lessen the sediment yield from disturbances within the roaded areas; to minimize erosion of the road prism by runoff from road surfaces and uphill areas. It states that standard maintenance practices would be implemented on all restored unauthorized routes to meet the above objectives, including but not limited to rolling dips and water bars. It also states that erosion control measures would be implemented on the reconstructed Black Gulch South Road, as well as on all constructed accessible paths and that erosion control measures must include, but are not limited to, cross ditches (water bars) and rocking Black Gulch South Road and paving the accessible routes to the shade shelters and vault toilet buildings.

Please explain how installing road culverts that can concentrate water flows and cause erosion protect the unique characteristics of the natural setting as is required by the Forest Service Outdoor Recreation Accessibility Guidelines.

Finally, the PEA states that the Forest Service will control solid waste disposal (BMP 4.5) with the objective of protecting water from nutrients, bacteria, and chemicals associated with solid waste disposal. To comply with this BMP dumpster pads and dumpsters would be installed within Black Gulch South. Moreover, the PEA states that there will be an Oil and Hazardous Substance Spill Contingency Plan and Spill Prevention Control and Countermeasure (SPCC) Plan (BMP 7.4), the objective of which is to prevent contamination of waters from accidental spills.

We suggest in addition to this BMP, in the event that visitors to the site dump containers of petroleum or other hazardous products in the dumpsters, that the agency consider designing and constructing the new dumpster pads with a lip surrounding the pad, so any liquids would be contained on the pad as a means of preventing contamination of the ground and water resources.

For Sequoia ForestKeeper and the Kern-Kaweah Chapter of the Sierra Club,

A handwritten signature in blue ink, appearing to read "René Voss". The signature is fluid and cursive, with a long horizontal stroke at the end.

René Voss – Attorney at Law