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Priscilla Summers, District Ranger  
Anne Thomas [mariannethomas@fs.fed.us](mailto:mariannethomas@fs.fed.us)  
Western Divide Ranger District  
32588 Highway 190  
Springville, CA 93265

RE: Fallen Giant Sequoia at Trail of 100 Giants

Dear Ms. Summers:

Thank you for reopening the Trail of 100 Giants to the public, for providing the opportunity to observe the fallen sequoia, and for providing the opportunity to 'brainstorm' on what the Forest Service should do next.

The handout provided to the public requested suggestions from the public on "what to do to restore the accessible trail." The page lists a number of suggestions already submitted.

1. Construct a tunnel through the downed sequoias near the base where the tree is sitting perpendicular to the trail, inside could be carved out to show tree rings of historical significance, and/or a bench to sit on.
2. Leave sequoias on the trail, re-route the trail for accessibility with pavement or a boardwalk, or close portions of the trail.
3. Cut steps and a bridge along the top of the downed sequoia(s); utilize the wood cut out of other sections of the log to construct the bridge with railings for safety.
4. Construct a bridge over and along the sequoia(s) without cutting into them.
5. Saw each side of the sequoias near the base where they cross the trail, and then interpret the tree rings of historical significance.
6. Cut out slices of the trunk and transport them to Forest Service visitor centers and schools to educate the public that are unable to travel to the mountains to see giant sequoias.
7. Sell material for personal use firewood.
8. Tunnel through the sequoia(s) laying parallel to the trail for a long tunnel through the trunk.
9. Combination of several of the comments identified above.

The Forest Service is implying with this handout that they must restore the trail to provide access for the disabled in compliance with the American's with Disabilities Act (ADA).

The old trail does provide that ADA compliant access. Since the ADA does not require access to every parcel and it does not require that all trails be a loop trail, the trail already provides access by the disabled to both ends of the tree and, thus, the ADA is still satisfied by the existing trail, as it is, with the fallen tree in place. There is no ADA requirement to do anything more. The Forest Service doesn't have to build connecting trails, because the existing trail already complies with the ADA.

But the Forest Service must also comply with the Presidential Proclamation of April 15, 2000, which provided protection for all objects in the Monument, including sequoia trees regardless of their location or orientation in the Monument. According to the ruling by Federal Judge Breyer, the Proclamation is the dominant authority in the Monument and the Forest Service must comply with the protective purposes of the Proclamation. Arguably, giant sequoia trees are the primary objects intended for protection in the Monument Proclamation. In our view, it would violate the letter and intent of the Proclamation to damage or degrade these fallen giants when it is unnecessary, as it is in this situation.

The sequoia ecosystem has been sustained for millennia by parts and pieces of the trees falling to the ground and decomposing in place, holding moisture, and restoring depleted soil nutrients that were used to create those trees, so future trees would have the energy, nutrients, and resources to replace the fallen trees. Removing any portion of the fallen trees would not provide the ecological restoration required by the Proclamation.

Therefore, I suggest that the fallen tree and all the debris from other trees should be left as a classroom for the public and scientists to study what happens in nature; they should preserve everything as it is, remove nothing, cut through nothing, and alter nothing.

I walked around and on the tree and the debris and saw all sides of the fallen giant. The area between the group of five sequoias and the fallen tree is filled with debris, including branches from the fallen tree and the three sequoias that are joined at their bases. Debris from several pines that were toppled by the fall remains in place on both sides of the fallen tree. One pine landed up hill and to the north of and on top of the fallen tree. Another pine was struck while the sequoia was falling, which made the pine fall to the south of the sequoia but the pine split in half and folded back on itself when it struck another pine on its way down. Also, what appears to me to be the top (with all of its sequoia branches and needles) from one of the three joined sequoias (the USFS says it is a sequoia branch) was impaled in the ground south of the fallen tree.

The attached .JPG file is a scan of the GSNM Association map (not to scale) of the trail with my addition of the dark red fallen giant (in the upper left) which is shown across the trail and actually on top of what was a bridge over the stream. The trail emerges from beneath the trunk of the fallen giant. A section of trail, including a paved switchback, farther along the fallen tree is also covered by the downed tree.

If the USFS insists on restoring the loop trail, one way or another, the shortest reconnection trail would be one placed to the south of the fallen giant, represented on the attached map by my addition to the map of the blue curved line below of the fallen giant.

If the loop trail is to be restored with a section to the south, the trail should be reconnected with a new section of trail that is placed south of the fallen tree that starts at the bridge at the root ball end of the fallen giant and goes south of the sequoia branch that was impaled in the ground and south of the pine tree that was snapped into two pieces by the falling giant, then leads to what would be a new bridge or elevated walkway across the small stream and reconnected to the switchback section of the old trail as far east as possible to minimize the elevation gain per foot. The new section of trail could be a gradually-sloping elevated boardwalk to prevent further soil compaction.

A new trail on either side of the fallen tree to reconnect the severed ends of the old trail could be made compliant with the ADA requirement for slope per foot.

During the field trip, I asked about the pine tree that fell across the fallen giant. I asked why the section of the pine tree that was on the ground up hill from all of the other debris had been chain sawed and removed from the area. I was told "it was a hazard." I said it was on the ground like all of the rest of this debris, which wasn't a hazard and it shouldn't have been removed.

According to the ruling by Federal Judge Breyer, the Forest Service must also comply with the Mediated Settlement Agreement (MSA). According to the MSA, the Forest Service must have a grove specific EIS to take action in a sequoia grove.

If there is any feasible way the trail can be rerouted without removing or disturbing any trees, the Forest Service has a way to comply with both the Proclamation and the Americans with Disabilities Act without cutting into the fallen giants.

I was told at the "brainstorming" meeting at the Trail of 100 Giants that "this is not scoping." Please email scoping documents and all future correspondence to us when available.

Please keep me on the mailing list to receive all notices of actions in your ranger district.

Respectfully submitted,

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