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Kern River Ranger District,
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cc: Georgette Theotig
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Subject: Comment #3 - Boulder Gulch OHV Restoration Project; Lower Kern Canyon and Greenhorn Mountains Off-Highway Vehicle (OHV) Restoration Project, and the Borel Relicensing Recreation Enhancement Project

The Scoping document says,

“The Lower Kern Canyon and Greenhorn Mountains OHV Restoration Project (LKC/GHM OHV RP) is proposed to occur in three phases. The first phase will focus on decommissioning and restoring 26 unauthorized routes at Black Gulch North Recreation Area, nine unauthorized routes at Black Gulch South Dispersed Recreation Area, and two unauthorized routes at China Gardens Dispersed Recreation Area. This phase includes installing approximately one mile of range fencing along both sides of Black Gulch Creek to protect the riparian corridor. Some hard barricades, such as boulders, fences and/or pipe gates may be placed to limit vehicular access to closed routes. Restoration activities would include breaking up compacted soils and vertical mulching with native materials to restore identified areas to natural conditions. Barriers and signage would be used to discourage further route proliferation.”

“The second phase of the LKC/GHM OHV RP focuses on improving campsites and trails. At Evans Flat Campground the FS plans to relocate two campsites by moving both the picnic tables and fire rings at each campsite to a new location within the campground’s interior; restore the vacated campsites to a natural condition; decommission approximately 1/8 mile of road which led to the two campsites; remove the existing cattle gate and relocate within the campground; and install a pipe gate to prevent motor vehicle access to restored area. This phase will also reroute approximately one mile of Woodward Peak Trail (Trail #32E53) and two miles of Kern Canyon Trail (Trail 31E75) to protect sensitive species.”

We requested copies of maps showing the locations of the rerouted trails. So far we have received only the map of the “**Kern Canyon Trail ReRoute Kern River Ranger**

District Sequoia National Forest NAD 1983 UTM ZONE 11.” We have not received the map of the proposed Evans Flat Woodward Peak Trail (Trail #32E53) reroute.

We are concerned about trails cutting across any elevation changes because trails cutting across the ‘grade’ could be sources of more erosion. We are also concerned about trails going through drainage areas and making multiple stream crossings, which can also cause additional erosion as well as sediment flows.

How would trails cutting across grade be constructed to prevent erosion and sediment flows? Are there alternative reroute locations that would reduce trail slope and erosion?

How will stream crossings be armored to prevent gulling, erosion, and sediment flows? Will concrete pads be cast at stream crossings to protect against damage to the banks and streams? Are there alternative reroute locations that would minimize the number of stream crossings and erosion? Are you considering bridges to cross streams?

The map you provided shows an existing 4WD road/trail, which intersects either end of the rerouted trail section. Why can’t this existing road/trail be used as an alternative route for the Kern Canyon Trail? That route would eliminate two of the new stream crossings proposed in the reroute.

The Keyesville area, where two miles of the Kern Canyon Trail (Trail 31E75) reroute is proposed, is nesting and foraging habitat for a number of species that should be protected from habitat damage and disturbance. Some of these species about which we are concerned are the following:

Avian Species: Lark Sparrow, Kern Redwing Blackbird, Lawrence's Goldfinch, Long eared owl, Great Horned owl, Barn owl, Western Screech owl, Cooper’s hawk, Golden Eagle, Burrowing owl, Loggerhead shrike, Nuttall’s woodpecker, Oak titmouse, Yellow warbler, and Lark Sparrow.

The Evans Flat area, where one mile of the Woodward Peak Trail (Trail #32E53) reroute is proposed, is nesting and foraging habitat for a number of species that should be protected from habitat damage and disturbance. Some of these species about which we are concerned are the following:

Avian Species: California Spotted owl, Goshawk, and Pileated woodpecker, Coopers Hawk, Northern, Flamulated owl, White-headed woodpecker, Red Breasted sapsucker, Olive sided flycatcher, hermit warbler, chipping sparrow, Kern Redwing Blackbird, Lawrence’s Goldfinch, 18 species of bats listed as of concern (most not there) - but Pallid bat, Horney bat, and Western Small-footed myotis, Fringed myotis, Long-eared myotis, Yuma myotis, and western mastiff bats.

Mammal Species: Northern flying squirrels, the Lodgepole chipmunks, and the Pacific fisher.

Any impacts to the Pacific fisher are of particular concern due to its dwindling population and continued habitat loss. Since the Pacific fisher in this area is at the southern end of their range, any impacts that could open the canopy could exacerbate Climate Change.

Doing anything in the southern conifer area, white fir is a species of concern for most wildlife. Fir and oak trees should both be protected. The Blue or City grouse and California Spotted owl nest almost exclusively in white fir and flying squirrel and Douglas squirrel depend on white fir as well.

Carving new trails through habitat of the Pacific fisher and other species of concern is an extraordinary circumstance and should trigger an EA with a variety of Alternatives to study the impacts to the species, their habitat, and Climate Change to determine the best way to protect the species and their habitat.

Sequoia ForestKeeper and the Kern-Kaweah Chapter of the Sierra Club thank you for the opportunity to comment. Please keep us on the contact list for all stages of this project and for all actions in your district.

Respectfully submitted,

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