



René Voss – Attorney

Natural Resources Law
15 Alderney Road
San Anselmo, CA 94960

renepvoss@gmail.com
Tel: 415-446-9027

**PROTECTING
NATURAL
RESOURCES**

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

Trisha Maki
Kern River Ranger District
P.O. Box 9
Kernville, CA 93238

cc: Ara Marderosian
Al Watson, Teresa Benson
Steve Montgomery
Joe Fontaine

Subject: **2nd Supplemental Cannell Meadow Bypass Trail Scoping Comments for Sequoia ForestKeeper & Kern-Kaweah Chapter of the Sierra Club**

After our field visit and meeting with District Ranger Al Watson on May 31, 2018, Sequoia ForestKeeper (SFK) and the Kern-Kaweah Chapter of the Sierra Club (the Club) would like to provide the following addition comments and issues the Forest Service should consider regarding the proposed new trail route for the Cannell Meadow Bypass Trail.

1. Wildlife Concerns – Yellow-bellied Marmots and White-tailed Jackrabbits



Figure 1. Yellow-bellied marmot, observed along proposed trail route near Big Meadow on May 31, 2018 (photo by René Voss)

White-tailed jackrabbits and yellow-bellied marmots are known to occur within the trail corridor and could be impacted by habitat disturbance and noise from construction and use by OHVs.

The most southern extension of the white-tailed jackrabbit and yellow-bellied marmot are found next to the trail corridor in Big, Long, and Cannell Meadow. These species could be adversely impacted and any analysis should include the effects of trail construction and use on these species.

2. Poor location of trail on steep slope west of Long Meadow when existing roadbed would be more suitable

SFK followed the orange flagging along the entire trail route west of Long Meadow, which indicates its proposed location. The current proposed trail location would use steep terrain roughly 300-500 feet upslope from the edge of the meadow. It is perplexing why this steep hillside location is proposed when the area includes a well-defined old roadbed lower down the slope, which would make a more suitable trail route for OHVs. See Map Exhibit 1 (attached) and Figures 2 and 3 below.



Figure 2. Well-defined roadbed – Northern Section

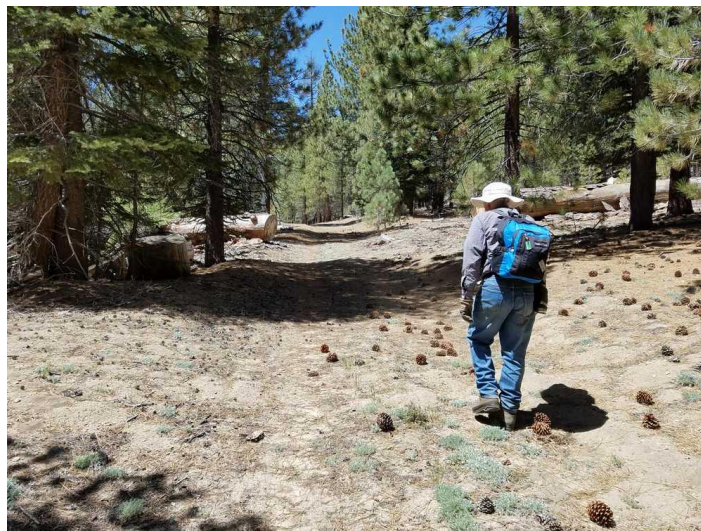


Figure 3. Well-defined roadbed – Southern Section

Instead, most of the trail route leaves the old roadbed on the northern section and traverses very steep terrain, including many rock outcrops, chinquapin and manzanita fields, and even groves of live trees, which would need to be cleared or felled to make way for the proposed trail. Typical views of these steep sloped areas are illustrated in Figures 4 and 5 below.



Figure 4. Steep trail location – Northern Section



Figure 5. Steep trail location – Southern Section

For a full set of photographs of the proposed trail route on these steep slopes, please click the following link, which opens a Google Docs web page after logging in with a Google account: <https://drive.google.com/drive/folders/1uoSol2-RDgrFGgvbBQnsKs0ipw9YspBs>. Each image is geo-referenced and locations are indicated on the attached map. *See Exhibit B.*

In addition, the proposed trail location implicates erosion and safety concerns, if it were constructed high on these steep on erosive granite soils.

Moreover, we have concerns that users and the Forest Service will propose the removal of hazard trees along this new route in the future, which could adversely affect California spotted owl and goshawk habitat.

Finally, there are acoustic resonance concerns, especially if OHV travel is high on the mountain since associated noise could travel throughout the Long Meadow basin and to Taylor Meadow causing increased disturbance to humans and wildlife in an otherwise relatively undisturbed area.

3. Potential Backcountry Horsemen agreement with USFS regarding keeping OHVs out of the southern part of the Kern Plateau

It is unclear whether there is an agreement between Backcountry Horsemen and the Forest Service regarding the use of OHVs along the Cannell Meadow Trail or the southern part of the Kern Plateau. And even if there is no agreement by horsemen, then why is there a necessity for creating a second trail that would segregate horseback riders from motorcycles?

These potential conflicts must be addressed in the analysis.

4. Cumulative Effects to Other Resources – Increased Trail Use from Creation of Loop Rides on Kern Plateau Not Addressed in Travel Management Plan

The new proposed trail segment has not been addressed in the Sequoia Travel Management Plan, which should be revised to consider this additional trail segment. There are likely to be cumulative effects concerns that must be addressed in the analysis, since the proposed trail would act as a connector from the current Cannell Meadows Trail and the rest of the motorized trails on the Kern Plateau. This connector would enable increased trail use on most of those trails, since non-street-legal motorcycles could now start either at the bottom of the Cannell Trail and ride up to the remaining trail sections to the north or begin in the north and ride down the Cannell Trail.

This increased use must be addressed in the analysis with its associated cumulative effects on various resources.

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



René Voss – Attorney at Law