



A CALIFORNIA PUBLIC INTEREST NONPROFIT

Elizabeth Duxbury, President
Jose Luis Pino, Vice-President
Brett Duxbury, Secretary-Treasurer
kernriverboaters@gmail.com

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Russell Kashiwa
County of Tulare Project Planner
RKashiwa@tularecounty.ca.gov

Regarding **PSP 21-114, Corral Creek Permanent Tent Camp Development**

Hi Mr Kashiwa,

It's come to my attention that Tulare County is proposing final permit approvals AND the waiving of CEQA environmental analysis of the SoCal Camping tent site at Corral Creek on the NF Kern River. I find it appalling that the site has been allowed to be developed as it has—it looks like a refugee camp. The place is just a mess of bulldozing, plant and environmental annihilation, and sporadic outhouses, all wrapped in some sort of black trash bag landscaping fabric and falling fences.

There is no way this place should add more tents and continue to simply bypass all environmental analyses. The *Notice of Exemption* for this project claims "The project does not have the potential for causing a significant effect on the environment, and therefore, is not subject to CEQA." I disagree. It already has caused a significant impact on the environment by bulldozing flat what looks like the entirety of the parcels to the west of M99, digging holes and mounding up loose berm walls and generally removing all signs of the environment that belongs on the site.

The *Notice of Exemption* continues "The project will not result in significant impacts and will not require additional public services. Therefore, Section 15303 is applicable and appropriate." I disagree. The project has already had major impacts on the site and on the public usage of the surrounding area. The site looks like a disaster area already, and more tents are being

proposed with no changes or mitigations? Are there no aesthetic requirements or considerations at all? Actually, there are, see the next section...

Even worse, from the *Statement Regarding Use Permit No. PSP 21-114 (STET Sister Corporation) and a Categorical Exemption per Section 15303 from the California Environmental Quality Act*: "**Aesthetics - No Impact.** The proposed project will not have a direct or cumulative impact or create an unusual circumstance that will cause the proposed project to have a significant effect on the aesthetics of the area." I disagree, strongly. This camp looks terrible driving up and down the wild and scenic NF Kern River. Not only does it disrupt the view from the scenic M99, it can be seen from the river, and from the Whiskey Flat trail across the river. The US Forest Service has delineated the entire area within and around the NF Kern River basin as High and Very High Scenic Integrity Objectives as a part of Sequoia NF planning (see attached reproduction from SCE's KR3 PAD). Yet this eyesore has not been given any review or analysis, and is not required to study or mitigate for the awful damage they've been causing for years, and is simply permitted to destroy and denigrate this lovely access point? This seems wrong.

Continuing, "**Biological Resources - No Impact.** The proposed project will not have a direct or cumulative impact or create an unusual circumstance that will cause the proposed project to have a significant effect on the biological resources of the area." I disagree. The point of performing an environmental impact assessment is to determine what the impacts may be; one is not entitled to simply write it off as not having an impact, especially after years of major unpermitted grading and construction work has been done. Regarding the particular biological resources:

- KR Rainbow Trout: the document rightly points out the existence of Kern River Rainbow Trout, a species of critical concern (per the state of CA), in the river immediately adjacent to this parcel. Kern River Rainbow Trout are particularly susceptible to grazing and other human activities in the Kern River Basin which have degraded meadow, riparian, and stream habitat that support Kern River Rainbow trout and alter the runoff and composition of the river (Upper Kern Basin Fishery Management Plan by CDFW, Sequoia NF, and Sequoia NP).

Altering the entire site by major landscaping renovations, digging, and berming have a major potential to further alter and degrade the runoff and sediment in the river. Where is the review?

- The report also rightly points out that a portion of the parcel is categorized as FEMA Zone A, which is because it is the border of the riparian zone and river flood plain. And yet this section attempts to claim "The project site does not contain wetlands, creeks, waterways, a waterfowl refuge, or riparian habitat". I disagree—the river frontage and flood plain nature of the site indicates that the area does actually contain riparian habitat as it is, and therefore has potential to harbor other native species of concern such as the Fairview Slender Salamander or the Foothill Yellow Legged Frog. It should be evaluated as such.
- Finally, the last unsubstantiated claim made is that "The subject site and surrounding area are regularly disturbed by the activities generated by the Corral Creek Lodge and contains existing structures. As such, the site does not contain any habitat suitable for special status species." I disagree—yes, this site has been disturbed significantly by the unpermitted activity of the owning parties; but the surrounding area is beautiful and undisturbed National Forest land, and is protected and managed by both the Upper Kern Basin Fishery Management Plan and Sequoia NF Management Plan. To claim otherwise is just false.

As a resident of Kernville, and frequent user of the NF Kern river recreational opportunities on both land and water, I cannot believe that this monstrosity has been allowed to continue, and is being granted further permitting and waiver of environmental review. It is objectionable to anyone who visits the area, and should instead be managed, reviewed, and regulated in a means consistent with the value and aesthetics of the area which it is attempting to commercialize and monetize. This means proper environmental assessments, mitigations, and adherence to the management guidance in the area.

Thank you for your consideration,

Liz Duxbury
President
Kern River Boaters
lizbie3@gmail.com