Final
General Management Plan
and
Comprehensive River Management Plan / Environmental Impact Statement

National Park Service
U.S. Department of the Interior

Sequoia and Kings Canyon
National Parks
Middle and South Forks of the
Kings River
and North Fork of the Kern River

Tulare and Fresno Counties
California



Volume 3:
Comments and Responses on the Draft Environmental Impact Statement

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SEQUOIA AND KINGS CANYON NATIONAL PARKS
and
MIDDLE AND SOUTH FORKS OF THE KINGS RIVER AND NORTH FORK OF THE KERN RIVER

Tulare and Fresno Counties • California

FINAL
GENERAL MANAGEMENT PLAN AND COMPREHENSIVE RIVER MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

Volume 3: Comments and Responses on the Draft Environmental Impact Statement

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Comments and Responses on the Draft Environmental Impact Statement

This volume summarizes the comments received following the release of the *Draft Environmental Impact Statement* on May 7, 2004. All written comments were considered during the preparation of the *Final Environment Impact Statement*, in accordance with the requirements of Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (40 CFR 1503). The comments allow the study team, NPS decision-makers, and other interested parties to review and assess the views of other agencies, organizations, and individuals related to the preferred alternative, the other alternatives, and potential impacts. It is important to stress that the selection of the preferred alternative and revisions to the alternative are not based on how many people supported a particular alternative.

Substantive comments have been summarized and responses provided; where necessary changes to the draft plan have been made. Comment letters from all federal, state, and local governments, as well as private organizations and individuals that made substantive comments, are reprinted. In the case of the Mineral King permit cabins, due to public interest in the issue, a representative sample of comments is reproduced, but since this issue has been addressed by the passage of Public Law 108-447, no further response is needed. Comments simply expressing a preference for an alternative or action within an alternative were not responded to, nor were questions and comments that did not directly address issues relevant to the general management plan.

The Council on Environmental Quality's regulations for implementing the National Environmental Policy Act require that the National Park Service respond to substantive comments, which are defined in *Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-making Handbook* (NPS 1999), as those that do one or more of the following:

(a) question, with reasonable basis, the accuracy of information in the environmental impact statement

(b) question, with reasonable basis, the adequacy of environmental analysis

(c) present reasonable alternatives other than those presented in the environmental impact statement

(d) cause changes or revisions in the proposal

In other words, substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

RANGE OF COMMENTS

The National Park Service received approximately 400 comments on the draft plan by mail, e-mail, fax, and the Internet. A number of groups / people submitted duplicate comments by different means, and several people commented up to six times. No substantive comments were received from American Indian tribes. Of the comments, around 10 were received from agencies and an elected official, and 23 from organizations. The remaining comments were from individuals and included form letters, a petition, and variations of form letters.

The public comment period began May 7, 2004, and the original 90-day public comment period was extended another 60 days, closing on October 6, 2004. In August 2004 open house public informational meetings were held to summarize what the two-volume draft plan included, to provide information on what constituted substantive comments, and to encourage public comment. Meetings were held in Three Rivers, Visalia, Clovis/Fresno, Bishop, Sacramento, San Francisco, and Los Angeles, as well as at Cedar Grove, Grant Grove, and Lodgepole in the

parks. A staff meeting was held at Ash Mountain headquarters.

The following topics received the most comment:

- *Mineral King special use permit cabins* — Over 300 comments were received, ranging from support for removing the cabins (the no-action alternative and alternative A), public acquisition and public use (preferred alternative), and continued occupancy by special use permit holders with ability to transfer permits (alternative C). However, as stated previously, Public Law 108-447 has superseded the alternatives presented in the *Draft Environmental Impact Statement,* so these comments are not responded to.
- *Stock use related issues* — About 100 comments were received illustrating differing viewpoints: stock use is a traditional use and should be allowed throughout the parks; stock use is not sustainable and must be eliminated; stock use needs to be regulated in terms of use locations; a no-grazing alternative should be considered; the stock impact thresholds or the analysis is wrong, or data are insufficient to analyze impacts.
- *High Sierra camps* — About 45 comments wanted the Bearpaw Meadow camp removed, while some supported an additional high Sierra camp.
- *Wolverton Boy Scout special use permit* — Of the 23 comments received, all supported continued Boy Scout use, plus one new alternative.

Other comments cited a lack of information on carrying capacity, air quality, visitation, traffic, water withdrawals, the Ash Mountain area, and boundary adjustments. Finally, concerns and questions were raised about wilderness, wild and scenic rivers, the Wilsonia Historic District, transit and biking options, aircraft overflights, and interpretive materials. Each of these issues or concerns is addressed specifically in the following responses to comments.

Comments relating to hydroelectric facilities have been superseded by Public Law 108-447.

CHANGES AND CLARIFICATIONS TO THE DRAFT DOCUMENT

Numerous changes were made to the *Draft Environmental Impact Statement* as a result of comments received, as summarized below. This list does not include all the changes that were made to clarify points, provide additional rationale for decisions, or correct minor errors or omissions.

- *Actions Related to Special Park Uses* — The Kaweah no. 3 hydroelectric facilities and the Mineral King permit cabins are no longer addressed as alternative issues because the provisions of Public Law 108-447 superseded the consideration of alternatives. As a result, appropriate changes were made to the purpose of and need for the plan and to the alternative actions.

  Special use permits in the Mineral King area will be managed in accordance with NPS *Management Policies 2001* and *Director's Order #53: Special Use Permits.* In accordance with *Director's Order #53,* permits are temporary uses. If personal property associated with the permits is sold, application may be made to the superintendent to transfer or reassign the permit. Permits are issued only to individuals, joint property couples as defined by the state of California, and corporations / trusts. The permit may be revoked or not renewed if permit conditions are not complied with or if the permit is found to be incompatible with park administration and purposes. Since Congress allowed issuance beyond the original permittee of record, permit conditions will be reviewed to ensure their long-term compatibility with park purposes. Permit conditions are established to support the mission of the National Park Service to protect natural and cultural resources and visitor experiences.

  A review of permit conditions will address, among other things, topics that were listed in the *Draft Environmental Impact Statement:* sustainable use, code compliance (applicable laws, regulations, and orders), utilities, self-sustaining funding (to maintain the historic community appearance),

facilities within the 100-year floodplain, maintenance, potential hazardous materials mitigation, and decision criteria to determine if cabins would be rebuilt in case of a natural disaster (such as a tree fall, flood, or avalanche). The Mineral King cabin permits do not convey exclusive use of park lands — members of the public will continue to have the right to cross cabin tracts to access park features and to view and appreciate cultural resources. Permittees will be responsible for all costs related to ensuring that cabins meet state and local regulations and do not impair park resources.

Permits will be issued unless the "permit is incompatible with the administration of the park pursuant to this section or that the land is needed for park purposes." Permit conditions will be reviewed and revised through a separate NEPA process." (Section 3.4 of the NPS *Management Policies 2001* states, "Regardless of who prepares compliance documents, the applicant is responsible for paying all NPS costs incurred in meeting NEPA and 106 compliance requirements.") Because a general management plan is a vision document, the implementation program for extending permits will be undertaken through a special use permits implementation plan for Mineral King.

A new section on special park uses has been added to "Laws, Regulations, Servicewide Mandates and Policies" in volume 1. Appendix G has been added to volume 2 and includes excerpts from the *Management Policies 2001* and *Director's Order #53: Special Park Uses.*

- Management prescriptions have been rewritten so that each individual prescription discusses carrying capacity, indicators and monitoring, and the range of actions that might be taken if desired resources conditions were not maintained and desired visitor experiences not achieved.
- Stock use issues have been clarified.
- Water withdrawal proposals have been clarified.
- The possibility of a transit system from Visalia to the park has been added.
- Management prescriptions have been rewritten to specifically address illegal marijuana cultivation on public land.
- Laws and policies governing use by Native Americans of park resources have been added to "Laws, Regulations, Servicewide Mandates and Policies" in volume 1.

The summarized comments also address inaccurate information and misperceptions in the comments.

List of Commenters and Comment Topics

NOTE: Letters are numbered in the order that they were recorded. Letters marked with an asterisk (*) have been reprinted in this volume. A duplicate listing of an organization or individual generally means that identical comments were received by various means (i.e., by fax, e-mail, or regular mail).

Comment No.	Commenter	Comment Topics
1*	Backcountry Horsemen of California (Ferguson, Barbara J.)	Stock Use, Other
2	Alltucker, Mike and Marilyn	Mineral King, Cultural Resources
3*	West, Bill	Stock Use, Mineral King, Wilderness
4*	Wilsonia Historic District Trust (Collin, Gus)	Private Land, Education
5	Brady, Jim	Stock Use, Wilderness
6	Hanson, Kathy	Stock Use, Wilderness, Other, High Sierra Camp, Mineral King
7	Hack, Sheryl	Mineral King, Cultural Resources, Other
8*	National Trust for Historic Preservation (Veerkamp, Anthony)	Cultural Resources, Other
9*	Toney, Michael — same as 36	Mineral King, Private Land, Stock Use, Water
10*	National Parks Conservation Association (Boyd, Diane)	Wilderness, Carrying Capacity, High Sierra Camp, Other, Mineral King, Stock Use, Water
11	Brown, Kamber	Mineral King
12*	Fontaine, Joe	Wilderness, High Sierra Camp, Mineral King, Other
13*	Doyle, Barbara, and Greg White	Mineral King, Water, Private Land, General Natural Resources, Cultural Resources
14*	Alliance of Backcountry Parachutists (Heid, Robin)	Visitor Use
15	Blevins, David & Carol	Cultural Resources, Mineral King, Other
16*	Karplus, Katie	Pack Stations, Other, Private Land
17	Livingstone, Rachel	Mineral King, Hydroelectric, Cultural Resources, Water, General Natural Resources
18	Ingram, Timara	Mineral King, Cultural Resources
19	Ross, Eliza Ingram	Mineral King, Education, Cultural Resources
20*	Avery, Chris and Linda	Cultural Resources, Mineral King
21	Riksheim, James	Mineral King
22*	Hack, Karen — same as 293, 310	Mineral King, Other
23	Avery, Jennifer	Mineral King, Cultural Resources
24	David, Joseph	Mineral King, Visitor Use
25*	Austin, John	Carrying Capacity, Water, Transportation
26	O'Brien, Barrie	Mineral King, Cultural Resources
27	Miller, Bruce and Patricia	Mineral King, Cultural Resources
28	Norris, Jennifer	Pack Stations, Stock Use, Visitor Use, Wilderness
29*	Conn, Lawrence	Stock Use, Wilderness, Other
30*	Backcountry Horsemen of California, High Sierra Unit (Garden, Kevin)	Stock Use, Wilderness
31*	The Wilderness Society (Gunn, Susan)	Wilderness, High Sierra Camp, Mineral King, Other, Private Land
32	Johnson, Joseph	Mineral King, Cultural Resources, Other
33	Andersen, Goldie	Mineral King, Cultural Resources, Other
34*	Helms, John and Julie	Mineral King, Stock Use
35	Johnson, Michelle	Other, Mineral King, Cultural Resources
36*	Toney, Michael — same as 9	Pack Stations, Mineral King, Other, High Sierra Camp, Private Land

Comment No.	Commenter	Comment Topics
37*	Wollenman, LaWanda	Mineral King, Cultural Resources
38	Strickland, Gerry	Mineral King, Cultural Resources
39*	Werner, Harold	Wild and Scenic Rivers, Other
40	Hummel, Greg	Stock Use, Wilderness, High Sierra Camp, Mineral King
41	Gravelle, Bruce	Wild and Scenic Rivers, Mineral King, Cultural Resources
42	Wollenman, Guy	Mineral King, Other, Cultural Resources
43	Douglas, Graham	Stock Use, Wilderness, Pack Stations
44	Vassar, Richard	Stock Use, Other, Wilderness, High Sierra Camp, Mineral King
45	Childs, Robert	Stock Use, Wilderness, High Sierra Camp, Pack Stations, Mineral King
46*	Kennedy, Ronald	Mineral King, Other, Visitor Use
47	Gleffe, Marlene	Stock Use, Wilderness, High Sierra Camp, Pack Stations, Mineral King
48*	Merrill, Susan and Arthur — same as 307	Private Land, Wild and Scenic Rivers, Hydroelectric, Stock Use, Wilderness, Pack Stations, Water, Mineral King, Transportation, General Natural Resources, High Sierra Camp
49	Wilbanks, Thor and Karin Ericsson	Stock Use, High Sierra Camp, Wilderness
50*	Boley, Paul	Mineral King
51	Kalish, Stephen	Stock Use, Wilderness
52*	Homeyer, Nancy and Bill	Stock Use, Wilderness, High Sierra Camp, Pack Stations, Mineral King
53*	Badgley, Richard	Mineral King, Visitor Use
54*	Selcer, Donald	Stock Use, Other, Wilderness, Pack Stations
55	Modin, John and Chris	Other, Visitor Use
56	Jali, Rick	Stock Use, Mineral King
57	Megalli, Mary	Mineral King, Cultural Resources
58*	Carpenter, Alan	Stock Use, Wilderness
59*	Mountain Defense League (Rose, Pandora)	Stock Use, Pack Stations, Wilderness, Visitor Use
60	Voorhees, Jean	Mineral King, Cultural Resources
61*	Newton, Brian	Mineral King, Cultural Resources, Visitor Use, Other
62	Tillman, Virginia	Mineral King, Cultural Resources, Other
63*	Peterson, Edward	Mineral King, Cultural Resources
64*	Cochrun, Mary and Larry	Other, Visitor Use
65*	Cosart, Keith	Mineral King, Cultural Resources
66*	Cluck, RoseMary	Mineral King, Cultural Resources
67	Betts, Donald	Boy Scouts
68*	Tulare County Long-Range Planning (George, Finney)	Other, General Natural Resources, Cultural Resources
69*	Mazur, Rachel	Other, Visitor Use, Wilderness, Wild and Scenic Rivers, Mineral King
70	Steinbacher, Kurt	Stock Use, Wilderness, High Sierra Camp
71*	Peters, G	Mineral King, Cultural Resources, Visitor Use, Transportation
72*	Klein, Barry	Mineral King, Cultural Resources
73	Jacobsen, Patricia	Mineral King, Cultural Resources
74	Brown, Gretchen	Mineral King, Cultural Resources
75*	Cairns, Aubrey	Mineral King
76	Ledford, Diane	Mineral King
77	Coughran, Jane	Other, Mineral King, Cultural Resources
78	Wilkins, Lois	Mineral King
79*	Schwaller, Greg and Laurie	Transportation, Other, Mineral King, Visitor Use, Water, Hydroelectric, High Sierra Camp

Comment No.	Commenter	Comment Topics
80	DeRidder, Mitch	Stock Use, Wilderness, High Sierra Camp, Mineral King, Private Land
81*	Foltz, Beverly — same as 122, 321	Mineral King, Cultural Resources
82*	Bancroft, Larry	Carrying Capacity, Water, Other, General Natural Resources
83*	Weaver, John — same as 345	Private Land, Visitor Use, Cultural Resources, Other
84*	Weaver, John	Visitor Use
85	Foster-Keddie, Kevin	Stock Use, Wilderness, Other, High Sierra Camp, Mineral King
86	Schneider, Richard	Stock Use, Wilderness, Mineral King
87*	Sholle, Barbara	Stock Use, Pack Stations, Mineral King
88*	Clohessy, Thomas — same as 391	Wilderness, Other, Mineral King, High Sierra Camp, Stock Use
89*	Sweet, Ed — same as 9	Other, Air Quality, Stock Use, Pack Stations
90	Name withheld	Other, Education, General Natural Resources, Visitor Use
91*	Fontaine, Joe	Other, Mineral King, Transportation, Education, Visitor Use
92*	Modin, John and Chris — same as 126, 320	Mineral King, Pack Stations, Visitor Use, High Sierra Camp, Wilderness
93*	Keller, Walt	Wilderness, Other, Stock Use, Visitor Use, Boy Scouts
94*	Voelz, Dan	Mineral King, Cultural Resources
95	Robbins, Andrew	Boy Scouts
96	Sleeper, Kenneth	Boy Scouts
97	Robbins, Michael	Boy Scouts, Visitor Use
98	Mulholland, Christine	Private Land, Mineral King, Cultural Resources
99*	Bree Ph. D., Donn — same as 125	Cultural Resources, Mineral King
100*	Engelhardt, Thomas	Private Land, Mineral King, Pack Stations
101	Duvol, Sharon	Mineral King, Cultural Resources, Pack Stations
102*	Voorhees, James	Mineral King, Cultural Resources
103	Wilkins, Fred	Mineral King, Other, General Natural Resources
104	Braden, Scott	Other, Visitor Use
105*	Avery, Linda	Cultural Resources, Mineral King
106	Wilson, Leslie	Other, Education, General Natural Resources, Water, Wild and Scenic Rivers
107*	American Conservation Consortium (Williams, Marc)	Mineral King
108*	Crowe, John T. — same as 118	Mineral King, Other, Cultural Resources
109*	Spence, Brian	Stock Use, Wilderness, Visitor Use, High Sierra Camp, Pack Stations, Mineral King
110*	Becker, Bill	Hydroelectric, Mineral King, Visitor Use
111*	Alliance of Backcountry Parachutists (Heid, Robin)	Visitor Use
112	Name withheld	Mineral King
113*	San Joaquin Valley Air Pollution Control District (Guerra, Hector)	Air Quality
114*	Wilsonia Historic District Trust (Collin, Gus)	Private Land, Cultural Resources, Other
115*	U.S. Environmental Protection Agency, Region IX (Hanf, Lisa)	Air Quality, Stock Use, Transportation, Other
116*	Public Employees for Environmental Responsibility (Ruch, Jeff)	Wilderness, Mineral King, Other
117	Crowe, John T.	Mineral King, Other
118*	Crowe, John T. — same as 108	Mineral King, Cultural Resources
119*	Tulare County Resource Management Agency (Blair, James)	Transportation, Mineral King, Visitor Use, Other
120*	Alliance of Backcountry Parachutists (Tilley, Martin)	Visitor Use

Comment No.	Commenter	Comment Topics
121	Snelling, Kenneth and Jo Ann	Pack Stations, Private Land, Other
122*	Foltz, Beverly G. — same as 81, 321	Mineral King
123	Adams, Linda E.	Mineral King, Cultural Resources
124	Koch, Mary	Mineral King, Other
125*	Bree Ph.D., Donn — same as 99	Mineral King, Cultural Resources
126*	Modin, John and Chris — same as 92, 320	Mineral King, Other, Pack Stations, Visitor Use, High Sierra Camp, Wilderness
127	Hack, Nadine	Mineral King, Other
128	Stowell, Robin	Boy Scouts
129	Blalock, Charlene	Other, Mineral King, Cultural Resources
130*	Betts, Thomas	Boy Scouts
131	Cluck, Aaron	Mineral King, Cultural Resources
132	Taylor, John	Boy Scouts, Visitor Use
133*	Alsup, William	Pack Stations, Other, Stock Use, Visitor Use, Wilderness
134	Frazier, Frank	Boy Scouts
135	Filbins, Mylon (?)	Other
136	Blair, Jean	Mineral King
137	Conrad, Kristine	Other, Mineral King, Visitor Use
138	Root, Gail	Mineral King, Cultural Resources
139	Ware, Tom	Mineral King, Cultural Resources
140	Sullivan, Scott	Stock Use, Wilderness, High Sierra Camp, Mineral King
141	Bissiri, Paul and Nadean	Stock Use, Mineral King, Other
142*	Church, Cari	Mineral King, Other
143	Stringham, Dee	Mineral King
144*	Elsas, Donna	Mineral King
145	Sinclaire, Lance	Mineral King
146	Norton, Russ	Mineral King
147	Wilson, Eleanor	Mineral King
148	Viloria-Matsumura	Mineral King
149	Norton, Jill	Mineral King
150	Matsumura, Neil	Mineral King
151	Ternstrom, Chris (?)	Mineral King
152	Ternstrom, Paul	Mineral King
153	Potts, Norma Jean	Mineral King
154	Sinclaire, Joan	Mineral King
155	Stringham, Judy	Mineral King
156	Bradish, Charles	Mineral King
157	Veehala, Deedri	Mineral King
158	Potts, William and Norma	Mineral King
159	Grayson, Douglas	Mineral King
160	Grant, Melanie	Mineral King
161	Billingsly, Don	Mineral King
162	Scott, Joyce	Mineral King
163	Bailey, Carole and Karl	Mineral King
164	Massey, Lenora	Mineral King
165	Billingsly, Betty	Mineral King
166	Bailey, Carole	Mineral King
167	Rosenthal, Arlene	Mineral King
168	Eastin, Charlotte	Mineral King
169	Bailey, Gilbert	Mineral King
170*	Gardiner, Bill	Pack Stations, Stock Use, Wilderness, Water, High Sierra Camp, Pack Stations, Mineral King
171	Pennington, Paula	Stock Use, Wilderness, Mineral King

Comment No.	Commenter	Comment Topics
172	Mann, Robert	Other, Visitor Use
173	Anderson, Milton	Mineral King
174	Parkening, Christopher	Other, Mineral King
175	Selke, Alia	Other, Stock Use, Wilderness, Visitor Use, High Sierra Camp, Mineral King
176*	Murphy, James	Stock Use, High Sierra Camp, Mineral King, Pack Stations, Wilderness
177	Boyd, Earl	Mineral King
178	Koch, Larianne	Mineral King, Cultural Resources
179	Dyer, Linda	Mineral King
180	Thabco, ?	Mineral King
181	Wilkins, Lois	Mineral King, Cultural Resources
182	Beach, Deidra	Mineral King, Cultural Resources
183	Foltz, Dr. David	Mineral King, Cultural Resources
184	Boyd, Joyce	Mineral King
185	Claire, Jeff	Mineral King
186	Hewitt, Meilani	Mineral King
187	Wilkins, L.J.	Mineral King, Other, Education, Wilderness
188	Lois Wilkins	Mineral King, Other, Education, Wilderness
189	Singleton, Mark	Mineral King
190	Carpenter, Gary	Mineral King
191	Annie Carpenter	Mineral King, Other
192	Anderson, Delores	Mineral King
193	Johnson, Alice	Mineral King
194	Tavares, Trevor	Other, Mineral King
195	Roach, Betty	Mineral King
196	Becker, Margaret	Mineral King, Cultural Resources
197	Roper, Ann	Mineral King, Cultural Resources
198	Mancha, Howard	Other, Stock Use, Mineral King
199	Leighton, Charles and Marianne	Other, Wilderness, Wild and Scenic Rivers, Private Land, Mineral King
200	Reynolds, Brian and Diane	Other, Mineral King, Cultural Resources
201	Hauben, Chana	Mineral King
202	Krause, Karen M.	Mineral King
203*	Volding, Doug	Mineral King, Cultural Resources
204	Ingram, Steven C.	Mineral King
205	Duncan, Nancy	Mineral King
206	Brown, Jill	Mineral King, Cultural Resources
207	Halligan, David W.	Mineral King
208	Hicks, Robert B.	Cultural Resources, Mineral King
209	Martin-del-Campo, Felix & Janet	Cultural Resources, Mineral King
210	Gravelle, Bruce	Mineral King, Wild and Scenic Rivers, Cultural Resources
211	Jurevich, Gia McCloskey	Mineral King, Other, Cultural Resources
212*	Diederich, Karl	Stock Use, Wilderness, Pack Stations, Mineral King, High Sierra Camp, General Natural Resources
213	Sherlock, Mike	Mineral King
214	Hendricks, Lillian	Mineral King
215*	Meyer, D. Christian	Mineral King
216*	Meyer, Jacob	Mineral King
217	Ewen, Margie and Alan	Other, Mineral King, Cultural Resources, Education
218	Knipp, Dan	Mineral King
219	Alosi, Jeanette	Stock Use, Wilderness, Pack Stations, Mineral King, High Sierra Camp

Comment No.	Commenter	Comment Topics
220	Williams, Mark	Mineral King
221	Hummel, Greg	Stock Use, Wilderness, Pack Stations, Mineral King, High Sierra Camp
222*	Crowe, John T.	Wild and Scenic Rivers, Mineral King, Visitor Use
223	Peoples, Donna	Stock Use, Wilderness, Pack Stations, Mineral King, High Sierra Camp
224	Reynolds, Les & Gail	Other, Mineral King, Cultural Resources, Hydroelectric
225	DeVol, Sharon	Other, Mineral King, Cultural Resources
226*	Gordon, Michael E.	Other, Stock Use, Pack Stations, Mineral King. High Sierra Camp, Wilderness
227	Eastin, Irving	Mineral King
228	Thaw, Steven	Stock Use, Mineral King, High Sierra Camp, Wilderness, Pack Stations
229	Benedetti, Bob	Other, Stock Use, Wilderness, Mineral King, High Sierra Camp
230	Mott, Virginia L.	Mineral King, Cultural Resources
231	Roberson, Patricia A.	Mineral King, Cultural Resources
232	Roberson, Teddy E.	Mineral King, Cultural Resources
233	Landry, Mauriene	Other, Mineral King
234	Pendley, Alan R.	Other, Stock Use, Wilderness, Pack Stations, High Sierra Camp, Mineral King
235	Stevens, Mark	Stock Use, Wilderness, Pack Stations
236*	Wood, Gordon E.	Mineral King, Cultural Resources, Visitor Use
237	Hath, Douglas C.	Cultural Resources, Mineral King, Other
238	Koch, Bryan	Other, Visitor Use, Private Land
239	(unreadable), Sharon	Mineral King
240	Frederiksen, Linda	Mineral King, Cultural Resources
241	Johnson, Mrs. Clinton H.	Mineral King
242*	Mueller, Helen L.	Other, Visitor Use, Private Land, Socioeconomic
243	Mountain, MarthaElin	Mineral King, Cultural Resources
244	Freeland, Patricia	Mineral King, Cultural Resources
245	Jacobsen, Ann	Mineral King, Cultural Resources
246	McGee, Moe	Mineral King
247	Hack, Nadine	Mineral King, Other
278	Huntsberger, Cynthia W.	Mineral King, Cultural Resources
249	Visher, David	Stock Use, Wilderness, High Sierra Camp, Mineral King, Pack Stations
250	Kiernik, Maria	Stock Use, Wilderness, High Sierra Camp, Pack Stations, Visitor Use
251	Clohessy, Lucille Rella	Stock Use, Wilderness, Pack Stations, High Sierra Camp, Mineral King
252	Godin, Roger J.	Stock Use, Wilderness, Pack Stations
253	Carpenter, Alan F.	Stock Use, Wilderness
254	Merrow, Margaret R.	Other, Mineral King, Wild and Scenic Rivers, Cultural Resources
255	Boley, Paul R.	Mineral King
256	Koontz, Ben R.	Mineral King, Cultural Resources
257	Seely, Melinda	Mineral King, Cultural Resources
258	Hauben, Chana	Mineral King
259	Spain, Cynthia	Mineral King, Cultural Resources
260	Jackson, Alex	Stock Use, Pack Stations, High Sierra Camp, Wilderness, Mineral King

Comment No.	Commenter	Comment Topics
261	Abele, Rich	Stock Use, Pack Stations. High Sierra Camp, Wilderness, Mineral King
262	Manning, Meredith	Other, Stock Use
263	Hasenick, Bob	Stock Use, Wilderness, High Sierra Camp, Visitor Use, Mineral King
264	Wollenman, Guy A.	Other, Mineral King, Cultural Resources
265	Talbert, Jane	Stock Use, Wilderness, Pack Stations, High Sierra Camp, Mineral King
266*	Talbert, Rob	Stock Use, Wilderness, Pack Stations, High Sierra Camp, Mineral King, Pack Stations
267	Robbins, Jack	Stock Use, Wilderness
268	Modin, John and Chris	Other, Visitor Use, Transportation
269	Duvall, Cher	Mineral King, Cultural Resources
270*	Edlund, David M.	Stock Use, Wilderness, High Sierra Camp, Mineral King
271	Sandoval, Norbert	Other, Mineral King, Cultural Resources
272	Sandoval, Christopher	Other, Mineral King, Cultural Resources
273*	Koch, Richard & Jean	Other, Mineral King, Cultural Resources
274*	Meyer, Earl D.	Mineral King, Cultural Resources
275	Meyer, Jana	Mineral King, Cultural Resources
276	Jacobson, Verona & Larry	Mineral King, Cultural Resources
277	Kauling, Robin & Wilma	Other, Mineral King, Cultural Resources
278*	California Save Our Streams Council (Carter, Lloyd)	Stock Use, Wilderness, High Sierra Camp
279	Stringham, JoDee	Mineral King
280	Hill, Cathleen J.	Mineral King
281	Hill, Will	Mineral King
282	Cosart, Keith H.	Mineral King, Cultural Resources
283	Sheppard, Karen	Mineral King, Cultural Resources
284	Koontz, Ben	Mineral King, Cultural Resources
285	Devol, Shirley	Mineral King, Cultural Resources, Education
286	Georgi, Maggi	Other, Stock Use, Pack Stations, High Sierra Camp, Wilderness, Mineral King
287	Saurenman, Louise	Mineral King, Cultural Resources
288*	The Wilderness Society (Gunn, Susan)	Wilderness, High Sierra Camp, Mineral King, Other, Private Land
289*	National Parks Conservation Association (Boyd, Diane)	Wilderness, Carrying Capacity, High Sierra Camp, Other, Mineral King, Stock Use, Water
290*	Back Country Horsemen (Garden, Kevin)	Stock Use, Wilderness
291*	High Sierra Hikers Association (Browning, Peter)	Stock Use, Pack Stations, High Sierra Camp, Other, Mineral King, Wilderness, Water, General Natural Resources, Visitor Use
292	Yates, Arthur G.	Mineral King
293*	Hack, Karen — same as 22, 310	Cultural Resources, Other, Mineral King
294*	Eaton, Perry	Stock Use, High Sierra Camp, Pack Stations, Mineral King, Wilderness, Other
295	Uhlig, Roger	Mineral King, High Sierra Camp, Stock Use, Wilderness
296*	Name withheld	Mineral King, Other, Visitor Use
297*	Hengst, David and Courtney	Mineral King
298*	Lynen, Lo	High Sierra Camp, Other, Mineral King, Pack Stations, Stock Use, Wilderness, Transportation, Education, Hydroelectric
299	Love, Linda	Mineral King
300	Crowe, John T.	Mineral King, Cultural Resources
301	Ingram, James W.	Wild and Scenic Rivers, Mineral King, Other

Comment No.	Commenter	Comment Topics
302*	Judd, Richard	Stock Use, Wilderness, Pack Stations, Visitor Use
303*	Di Silvestro, L. Laile	Mineral King, Cultural Resources, Education
304	Neves, Dr. David and Cathy	Mineral King, Cultural Resources,
305*	Bates, Stuart R.	Mineral King, Visitor Use
306*	Young, Bradley and Victoria	Mineral King, High Sierra Camp, Stock Use, Pack Stations, Wilderness
307*	Merrill, Arthur and Susan — same as 48	Pack Stations, Private Land, Wild and Scenic Rivers, Hydroelectric, Stock Use, Wilderness, Pack Stations, Water, Mineral King, Transportation
308*	Mineral King District Association (Hath, Kathy)	Cultural Resources, Mineral King
309*	Tulare County Resource Management Agency (Blair, James A.)	Transportation, Mineral King
310*	Hack, Karen — same as 22, 293	Mineral King, Other
311*	Mineral King District Association (Van Zandt, Michael J.)	Cultural Resources, Mineral King
312*	Parks, James N.	Cultural Resources, Mineral King, Visitor Use
313	Kennedy, Ronald D.	Mineral King, Other, Visitor Use
314*	Tulare County Resource Management Agency (Finney, George)	Other, General Natural Resources, Cultural Resources, Hydroelectric
315*	Green, D. Adrian	Mineral King, Cultural Resources
316	Blair, James	Visitor Use, Socioeconomic, Mineral King, Other
317*	Barton, Jim	Other, Mineral King, Socioeconomic, Hydroelectric, High Sierra Camp, Visitor Use, Transportation, Boy Scouts, Cultural Resources
318	Lindsey, Irvin E.	Mineral King, High Sierra Camp, Wilderness, Stock Use, Pack Stations, Other
319*	Dunham, Don E.	Other, Stock Use, Mineral King
320*	Modin, John and Chris — same as 92, 126	Mineral King, Other Pack Stations, Visitor Use, High Sierra Camp, Wilderness
321*	Foltz, Beverly G. — same as 81, 122	Mineral King
322	Keesey, John and Joan	Mineral King
323	Felciano, Celeste	Stock Use, Wilderness, Mineral King, High Sierra Camp, Pack Stations
324	Hemlsberger/Huntsberger, Cynthia	Mineral King, Cultural Resources
325	Hath, Kathy	Other, Mineral King, Cultural Resources
326	Stowell, Lorenzo	Mineral King, High Sierra Camp, Stock Use, Wilderness
327	Boesel, John	Stock Use, Pack Stations, Wilderness
328*	Stocking, Stephen	General Natural Resources, Stock Use, Cultural Resources, Visitor Use, Water
329*	Hack, Nadine	Other, Mineral King, Hydroelectric, Cultural Resources, Visitor Use, Pack Stations, Stock Use, Wilderness, High Sierra Camp,
330	Share, Jack B.	Other, Mineral King, Visitor Use, Private Land
331	Roberts, Sir Gilbert	Other, Visitor Use, Hydroelectric
332	Crowe, John T	Wild and Scenic Rivers, Mineral King, Visitor Use
333*	Girshman, Irving L.	Stock Use, General Natural Resources, Mineral King, Wilderness
334*	National Trust for Historic Preservation	Cultural Resources, Other, Mineral King, Private Land
335*	California Equestrian Trails & Lands Coalition (B/C Horsemen)	Stock Use, Pack Stations, Other
336*	High Sierra Hikers Association (Browning, Peter)	Stock Use, Pack Stations, High Sierra Camp, Other, Mineral King, Wilderness, Water, General Natural Resources, Visitor Use

Comment No.	Commenter	Comment Topics
337	Sledge, Karen	Private Land
338*	van Gilluwe, Pete	Other, Air Quality, General Natural Resources
339*	Elliott, John	Mineral King
340	Barton, James	Other, Mineral King, Socioeconomic, Hydroelectric, High Sierra Camp, Visitor Use, Transportation, Boy Scouts
341*	Elliott, Sarah Barton	Mineral King
342	Sachau, B	Other, General Natural Resources, Visitor Use, Transportation
343	Gilbert, Dr. Deborah	Mineral King
344*	Glick, Frank	Boy Scouts, Other, Visitor Use
345*	Weaver, John — same as 83	Other, Visitor Use
346	Weaver, John	Private Land
347	Hamel, Lawrence	Mineral King, Education, Cultural Resources
348	Hill, David	Boy Scouts
349	Becker, Bill	Hydroelectric, Mineral King, Visitor Use
350	Thompson, Russ	Boy Scouts
351	Lynch, Patrick	Boy Scouts
352	Watson, Mike	Boy Scouts
353	Sillman, Arnold	Boy Scouts
354	Glick, Frank	Boy Scouts
355	McMaster, James	Boy Scouts
356	Crothers, Pat	Other, Cultural Resources, Private Land
357	Glick, Frank	Boy Scouts, Other, Visitor Use
358*	Nelson, John	Visitor Use, Mineral King, Transportation, Stock Use
359	Carter, Mark	Mineral King
360	Ingram, Timara	Mineral King, Cultural Resources
361	Pritchett, Sue	Mineral King, Visitor Use, Cultural Resources
362	Benedict, John	Mineral King, Cultural Resources, Other
363	Entz, James	Mineral King, Cultural Resources, Visitor Use
364*	National Parks Conservation Association	Wilderness, Carrying Capacity, High Sierra Camp, Other, Mineral King, Stock Use, Water
365*	Boiano, Danny	Water, Carrying Capacity, General Natural Resources, Cultural Resources
366	Stekel, Peter	High Sierra Camp
367*	Stekel, Peter	Mineral King, Water
368*	Backcountry Horsemen of California, High Sierra Unit (Pendegraft, Karl J.)	Stock Use, Pack Stations, Other, Wilderness, High Sierra Camp, Cultural Resources, Transportation, Visitor Use, Wild and Scenic Rivers
369*	Sierra Club Kern-Kaweah Chapter (Unger, Lorraine)	Mineral King, Air Quality, Transportation, Visitor Use, General Natural Resources, Education
370	Melekian, Bernard	Boy Scouts
371*	Seaborn, Margaret	Private Land, Education, Visitor Use, Stock Use, Pack Stations, Wilderness, Socioeconomic, Hydroelectric, Mineral King, Transportation, WA
372*	National Park Service, Air Resources Division (Reilly, Liana)	Air Quality
373	Douglass, Darrell	Visitor Use, General Natural Resources
374*	U.S. Fish and Wildlife Service	General Natural Resources
375	Faulkner, Bob	Transportation
376	Warner, David B	Other
377	Faszholz, Jean	Private Land, Education
378	Camara, Tom	Other, Hydroelectric

Comment No.	Commenter	Comment Topics
379	Patzkowski, Dennis	Other, General Natural Resources
380	Bissiri, Mark	Other, Mineral King
381	Adams, Penelope	Mineral King
382	Share, Jack B.	Other, Mineral King
383	Betts, Thomas K.	Boy Scouts
384	Girshman, Irving L.	Stock Use, Mineral King, Visitor Use
385	Ward, Jane & Glenn	Stock Use, Wilderness, High Sierra Camp, Mineral King
386	Silpa, Michael L., M.D.	Boy Scouts
387	Stowell, Richard	Boy Scouts
388	Stekel, Peter	Boy Scouts
389*	U.S. Fish and Wildlife Service (Sacramento Office)	General Natural Resources
390	Buckingham, Margaret	Boy Scouts
391*	Clohessy, Thomas — same as 88	Wilderness, Other, Mineral King, High Sierra Camp
392	Barash, Ace, M.D.	Stock Use, Wilderness, Pack Stations, High Sierra Camp, Mineral King
393	Bergantz, George	Stock Use, Pack Stations, Wilderness
394	Biggio, Kim	Mineral King, Cultural Resources
395*	U.S. Senator Feinstein, Dianne	Mineral King, Cultural Resources
396*	U.S. Senator Feinstein, Dianne	Mineral King
397	DeV (unreadable)	Mineral King
398	unreadable	Mineral King
399	Unreadable (Lunbeck)	Mineral King, Cultural Resources, Education
400	Huntsberger, Cynthia	Mineral King, Cultural Resources

Substantive Comments and NPS Responses

Substantive comments from the letters are extracted below. Most comments are quoted from the original letter; they have been edited only for style consistency and spelling. Bracketed numbers at the end of a comment indicate the source of that comment (see previous table for comment letter numbers). The draft document is referred to in the following responses as the DGMP-CRMP / EIS.

Where appropriate, the text in the final document has been revised to address comments and changes, as indicated in the following responses. All page number citations refer to the draft document.

NATURAL RESOURCES

1. Exotic Vegetation

Comment: Illegal marijuana farms should be addressed in the general management plan. [82]

Response: In recent years illegal marijuana farms have been discovered primarily in the foothills area of Sequoia National Park. They were not discussed in the draft plan since they were discovered later in the planning process. NPS *Management Policies* support exotic species eradication, and management prescriptions for Sequoia and Kings Canyon National Parks have been refined to specifically address this misuse of public land.

2. Species

Comments: The general management plan should acknowledge the known and potential impacts of fish stocking and prohibit all fish stocking within the parks. The plan should acknowledge that bighorn sheep populations within the parks are critically endangered, and protection and restoration of populations must take priority over recreational use. [291]

The U.S. Fish and Wildlife Service does not concur with the conclusion that the alternatives are “not likely to adversely affect the bighorn sheep, valley elderberry beetle or vernal pool fairy shrimp” since the plans do not provide sufficient information to fully evaluate the impact on these species. [389]

Response: Fish stocking is not a general management planning issue since it is regulated by policy and is not permitted in these parks. Fish stocking is an activity that was conducted for many years but was discontinued about 1988. This was the result of NPS policies which to this day prohibit fish stocking when that stocking may impair park natural resources or processes. Park managers have determined that fish stocking is harmful to park resources and is therefore prohibited. In recent years actions have been successfully taken to remove nonnative fish species from some wilderness locations in order to restore viable populations of the native yellow-legged frog.

The Sierra Nevada bighorn sheep is an endangered species listed by both the U.S. Fish and Wildlife Service and California. Sequoia and Kings Canyon National Parks work with the U.S. Fish and Wildlife Service and the California Department of Fish and Game to ensure the protection of this species. Recent monitoring activities have shown that the populations are likely expanding, evidenced by the monitoring of existing herds and the discovery of a new herd in Kings Canyon National Park. Park managers will enact controls on recreational pursuits and take other proactive steps, if necessary, to protect the bighorn sheep populations.

Discussions with the U.S. Fish and Wildlife Service on November 5, 2004, resulted in an agreement that the National Park Service will complete site-specific data collection at the project level to determine if bald eagles, bighorn sheep, valley elderberry longhorn beetles, or vernal pool fairy shrimp are present or if the project would occur within suitable habitat. Based on this information, the National Park Service will complete further consultation for project specific actions that may affect these species to ensure that projects developed under the scope of the

final management plans are in compliance with the provisions of section 7 of the Endangered Species Act.

3. Water Resources

3A. Water Withdrawals

Comment: Existing water withdrawal information is not adequate to determine sustainable water withdrawal amounts for developed areas within the park. [365, 82, 10]

Response: A park resource committee undertook additional review and analysis of historic annual water withdrawals in developed areas. The committee confirmed that water availability may be affected by annual precipitation, which may periodically limit water utilization in some developed areas of the parks. However the committee concluded that the preferred alternative approach remains valid due to the potential to make more efficient use of water by reducing water loss within the water distribution system and through further conservation measures. The NPS Division of Water Resources has been working with park staff on an update of the 1989 *Water Resources Management Plan*. Actions in the alternatives table have been clarified as follows: parkwide — line 35, Grant Grove — line 215, Wuksachi — line 243, Lodgepole — line 271, Wolverton — line 286, Giant Forest — line 300, Ash Mountain — line 343, and the Mineral King area — line 377. Information in appendix E ("Water and Wastewater Use") will be updated as specific water resource studies are done.

3B. Impact of Climate Change on Water Availability

Comment: One of the largest systematic stressors to the park ecosystem is anthropogenic climate change: The climate will continue to warm in the future. This warming, and the impact that this will have on reducing water supplies, must be factored into all water use plans. This likely reduction in water supplies will be particularly important when assessing water withdrawals near giant sequoia groves. The likely reduction in water supplies due to climate change should be noted in the preferred alternative. [36]

Response: The way in which future water supplies will respond to climate change is not presently known, but NPS policy compels a standard of "no impairment" of significant park resources, including giant sequoia groves. Text has been changed in the section addressing "Mitigation for Increased Water Withdrawals" (DGMP-CRMP/EIS, vol. 1, p 73).

4. Air Quality

Comments: More detail is needed related to air quality, existing monitoring sites, and new standards. Technical questions and non-GMP issues were brought up by the NPS Air Resources Division. (Note: Staff turnover in the NPS Air Resources Division resulted in technical review comments being submitted during the public comment period instead of during the NPS internal review.) [372, 115]

The San Joaquin Valley Pollution Control District listed a number of district rules and regulations addressing specific technical requirements for prescribed fire, architectural coatings, wood burning fireplaces, asphalt paving, etc. [113]

The Clean Air Act amendments place on federal land managers an affirmative responsibility to protect air quality related values of their class I areas regardless of the source of pollution. The GMP should clearly articulate a plan for meeting this mandate. [10]

The parks must balance the aggressive goals of prescribed fire with the effects on human health, visitor enjoyment, and reduced quality of life in surrounding communities. Mechanical thinning should be increased to protect already deteriorated visual capabilities in the parks. [338]

Response: A general management plan is intended to be a vision document that does not provide a high level of operational detail about air quality management. NPS policy addresses many of the ideas suggested, so the plan does not need to make decisions relative to many topics. Laws and policies related to air resources, soundscapes, and nightscapes were summarized

in the plan (DGMP-CRMP/EIS, vol. 1, p. 15). Regional pollution control district policies and requirements provide a basis for collaboration and ongoing dialogue between the park and the pollution control district to work toward achieving the mutual goal of improved air quality.

Technical data updates and the level of detail relevant to a general management plan have been included in revisions to "The Affected Environment."

Prescribed fire methods are addressed in the parks' *Fire and Fuels Management Plan.*

The parks' *Air Resources Management Action Plan* details specific air quality management recommendations; a summary of this plan has been added to the "Relationship to Other Planning" section in volume 1. Note that parks' website provides public information about air quality issues.

5. Fire Management

Comment: Do not give prescribed fire a higher priority than mechanical thinning. [338]

Response: As stated in the document, the *Fire and Fuels Management Plan* addresses specific methods related to air quality, fuels management, and prescribed fire.

6. Natural Sound

Comment: A mandatory aircraft overflight ceiling and other limits are needed to protect the natural soundscape. [291, 89]

How are overflights limited? Text [that says] "continue to limit" seems inaccurate. [328]

Response: NPS policy states that "the Service will work cooperatively with agencies of the Department of Defense in order to address the congressionally mandated missions of all agencies" and will "strive to mitigate any adverse effects of military training flights or operational low-level overflights on park resources, values, or visitor experiences." The parks have been addressing the issue of aircraft overflights in various ways. Years of discussions with the military branches have led to some improvements in flight paths and the voluntary establishment of a floor of 18,000 feet above mean sea-level over the parks. Park managers will continue to work closely with the military and the Federal Aviation Administration on overflight issues. However, much of Sequoia National Park constitutes an authorized military overflight zone.

7. Natural Dark

Comment: The plan states that soundscape / night sky would not be affected by any of the alternatives. What about impacts of expansion of Wuksachi and other development projects? Construction projects do impact the soundscape. [82]

Response: Present park policies call for the use of lighting equipment that is compatible with preserving "dark skies" where feasible. Construction projects do affect the soundscapes, but the duration is generally short. Mitigations to impacts of construction on soundscapes, and lighting on dark skies will be detailed in site-specific construction plans and associated NEPA documentation.

WILD AND SCENIC RIVERS

8A. East Fork of the Kaweah

Comment: The East Fork segment does not qualify as eligible and suitable due to development for 100 years. [41, 222]

Response: The commenter appears to be confusing criteria for wilderness with criteria for wild and scenic rivers. As stated in the draft document, the small amount and scale of development, as well as hydroelectric facilities, do not disqualify the East Fork as being suitable and eligible for inclusion in the wild and scenic rivers system because the waterway remains generally natural and riverine in appearance (DGMP-CRMP/EIS, vol. 1, p. 22). As stated on page 21 of volume 1, classification as "Recreational" is appropriate for areas that are readily accessible by road and may have some development along their shores.

8B. North Fork of the Kaweah

Comment: The North Fork should be eligible. There is no good reason for its not being eligible. [82]

Response: Although attractive, the North Fork of the Kaweah was determined not to be eligible because no outstandingly remarkable values were identified within the park. The Bureau of Land Management, however, has determined that portions of the river outside the park are eligible as a scenic and recreational river, with wildlife, cultural, and visual values.

WILDERNESS

9A: Wilderness Discrepancies

Comment: There are numerous discrepancies regarding wilderness. [31]

Response: Even though this comment is not related to the general management planning effort, the following explanation is provided.

Calculating Acreage of Existing Wilderness in the Parks. Most of the acreage figures used in the draft document were generated by means of the parks' Geographic Information System. Some of these figures are still subject to change as an advancing technology is applied and boundary errors are corrected (e.g., adjusting boundaries more closely to the center line of rivers and mountain ridges). The figures in the document, and those provided below, are the result of the most accurate technology available and are more accurate than figures found in other places. According to our latest calculations, these parks combined contain 865,257 acres (this includes the most recent addition of the 1,518-acre Dillonwood area).

In designating the Sequoia-Kings Canyon Wilderness in 1984, Congress stated that it comprises "approximately seven hundred and thirty-six thousand nine hundred and eighty acres." Following the boundary description provided by Congress in the bill authorizing designation of the Sequoia-Kings Canyon Wilderness was calculated through GIS software as 723,036 acres. This means that the designated wilderness in these parks comprises 83.56% of the total park area. The difference between what Congress "approximated" and what was scientifically calculated is approximately 13,944 acres. This difference (less than 1.9%) is due to manual calculation errors dating back to the original map. It is not a result of the parks taking any actions to reduce the original area intended by Congress to be wilderness. Detailed maps showing the wilderness boundary are available at the parks.

Discrepancy of Potential Wilderness. The DGMP-CRMP/EIS was in error in stating that private property at Oriole Lake is potential wilderness. Oriole Lake and adjacent park lands are in wilderness, including a primitive road that provides access to 12 acres of private inholdings. If these inholdings were acquired by the National Park Service from willing sellers, the area would be come wilderness. All references to Oriole Lake as potential wilderness have been corrected in the final document. Also see response 9F.

When the boundary for the Sequoia-Kings Canyon Wilderness was finalized, the potential wilderness acreage at Pear Lake was reduced to 5 acres and the other 25 acres were included as designated wilderness because they were determined to fully meet wilderness character criteria, in accordance with the intent of Congress.

9B. Wilderness Studies

Comment: Wilderness hearings are requested. [116]

Response: The National Park Service is required to assess the wilderness suitability of lands added to national parks to determine if they warrant further wilderness studies. Areas assessed (the Chimney Rock, Mineral King, and Dillonwood additions) were noted on the Backcountry / Wilderness maps for each alternative in the draft document as areas to be studied. While this assessment was outside the scope of the general management plan, the plan noted areas compatible with management as wilderness and suitable areas where further wilderness studies would occur. Public comment was sought during the wilderness suitability assess-

ment period. A memorandum on the wilderness suitability assessment for Sequoia and Kings Canyon National Parks was signed by the Pacific West regional director on April 25, 2005. A notice of final determination relative to suitability and non-suitability for inclusion in wilderness has been published (now in draft).

The wilderness suitability assessment found that the "developed" portion of the Mineral King addition and the Dillonwood addition do not meet the criteria necessary for wilderness designation and warrant no further study. The developed area of Mineral King did not meet criteria because it includes the road corridor and contains significant human-constructed features, such as roads, buildings, and utilities. The Dillonwood addition is extensively roaded and has been greatly modified by timber operations.

The assessment found that the "backcountry," or undeveloped / unroaded segment of the Mineral King addition and the Chimney Rock addition warrant further study because they (1) are predominantly roadless and undeveloped; (2) are greater than 5,000 acres in size or of sufficient size as to make practicable their preservation and use in an unimpaired condition; and (3) meet the five wilderness criteria listed in the NPS *Management Policies 2001*. Separate from the general management plan, wilderness studies with accompanying hearings will proceed for these areas. The text related to wilderness studies on page 24 of the DGMP-CRMP/EIS, volume 1, has been updated.

9C. Wilderness Designation and Wilderness Studies

Comment: No additional wilderness is needed since more than 96% is managed as wilderness. Such designation might preclude effective fuels reduction. Money spent on wilderness studies is better spent protecting resources. [1]

The parks lack sufficient wilderness plans. The National Park Service must continue to manage three roadless areas as recommended wilderness. What does "compatible with wilderness designation" mean? [31]

All areas that qualify should be recommended to Congress for designation. [12]

Response: The Sequoia-Kings Canyon Wilderness was established by the California Wilderness Act of 1984. Two areas of recommended wilderness — the Hockett Plateau and the Redwood Canyon/North Fork areas — were excluded by Congress "without prejudice" in the 1984 act. Three areas added to the parks — Mineral King in 1978, Chimney Rock (also known as the Jennie Lakes addition) in 1984, and Dillonwood in 2001 — were all assessed for wilderness eligibility in 2003. Chimney Rock and the undeveloped portions of Mineral King were found to be eligible for wilderness designation, pending a public wilderness study process. Dillonwood was found to not possess characteristics for eligibility. The suitability assessment was signed by the regional director in May 2005 and was submitted to the director of the National Park Service for consideration. All of the areas named above, except Dillonwood, are managed as wilderness in accordance with NPS *Management Policies 2001*.

By policy, the areas of recommended wilderness, Redwood Canyon/North Fork and the Hockett Plateau, are also managed as wilderness.

The term "compatible with wilderness management" was used in the draft document to describe how areas could potentially be managed under differing alternative scenarios. This term was developed so as not to prejudge any wilderness studies. Areas compatible with wilderness have either been previously recommended for wilderness designation, have not been assessed, or are part of ongoing wilderness studies.

Park wilderness and backcountry areas are currently managed in accordance with two plans from 1986 — the *Backcountry Management Plan* and the *Stock Use and Meadow Management Plan.* While each of these plans provides good guidance, a new wilderness stewardship and stock use plan is scheduled upon the completion of this general management plan.

9D. Hockett Plateau Designation

Comment: Diverse viewpoints and opinions for and against wilderness designation of Hockett Plateau were received. [10, 12, 48]

Response: Hockett Plateau is recommended wilderness and has been managed for its wilderness values in accordance with NPS *Management Policies.* Due to its remoteness and terrain, this type of management is sensible. See further discussion under topic 25B, high Sierra camps.

9E. Mineral King Designation

Comment: Given the significance of the possible designation of these areas as wilderness management areas in terms of the impacts on the cabins, the permit holders, and the Mineral King Cultural Road Historic District, this topic has not been adequately addressed in the plan and in the planning process. It is simply inadequate to indicate that this topic would be studied after the plan is put in place, because the topic will have significant bearing on land uses within the area. This study must be completed as part of the General Management Plan planning process, and should be completed prior to the completion of the plan in order for the impacts of such a designation to be properly considered by the public and the Park Service. [20, 23]

Response: The Mineral King Valley, except for the road corridor and developed areas, was found suitable for wilderness designation (line 151 in the alternatives table, vol. 1), so the designation does not affect the Mineral King Road Cultural Landscape District. Wilderness designation in the Mineral King Valley outside the developed areas and the road corridor would not have a bearing on the cultural landscape district, other than to protect its size and character. Wilderness studies of this area and other areas found suitable for wilderness were conducted independently from the general management planning process, and further studies will be undertaken separately by the parks. Wilderness designation would require recommendations by the secretary of the interior and the president to Congress, followed by legislation. The development of the 1980 *Comprehensive Management Plan for Mineral King* was done with public involvement. However, the level of past public involvement was not sufficient for finalizing a proposal or recommendation for wilderness status. Therefore, a formal wilderness study will be undertaken in the future to address this issue.

9F. Oriole Lake Designation

Comment: Wilderness status should not be considered for either Mineral King or Oriole Lake. These areas are not suitable as they have had habitation for over 100 years, and the whole area presently has multiple uses. Use in these areas should not be restricted. Oriole Lake inholders should be allowed to remain and not be condemned. [93]

Response: Oriole Lake and adjacent park land are designated wilderness, as is a road corridor that provides access to 12 acres of private inholdings. If and when all private properties were acquired by the National Park Service from willing sellers, the area would become wilderness. See response 9E with regard to Mineral King.

CULTURAL RESOURCES

10. Monitoring Cultural Resources

Comment: To ensure for their preservation and to provide some accountability, the protection and preservation of all park historic and prehistoric resources must be monitored by the park and reported to the state historic preservation officer and the national preservation officer as determined by law. [8]

Response: Cultural resource management plans specify how cultural resources are to be protected and preserved; a general management plan is a broad vision document that provides overarching guidance for subsequent implementation plans. Laws and policies applicable to the management of cultural resources are listed on pages 17–18 in volume 1 of the DGMP-CRMP/EIS, and this approach is reiterated in the “Management Prescriptions: Elements Common to All Prescriptions” (DGMP-CRMP/EIS, vol. 1, p. 55).

11. Park Cultural Resource Preservation

Comment: Preservation and adaptive use of older structures should be pursued whenever feasible. Park preservation efforts should not be limited to properties determined eligible for the National Register [of Historic Places]. Many older structures that don't qualify may still contribute to the park's distinctive sense of place. [8]

Response: The National Park Service agrees. The parks have many older buildings that are not identified as culturally significant but that still contribute to the use and character of the parks. Many of these buildings will be retained during the lifetime of this plan.

12. NPS Cultural Resource Maintenance

Comments: The National Park Service is not in business to maintain cultural resources and does not adequately maintain the Mineral King special use permit cabins or other individual cultural resources. [20, 129, 341]

Structures are deteriorated (e.g., the park's first ranger station); interpretation is absent; and historic structures listed on the national register are not identified. [341]

Response: While these are not substantive comments, they point out a common misconception — that the National Park Service is not responsible for cultural resources and that it inadequately maintains cultural resources. The National Park Service manages the most important cultural resources in our nation, ranging from the White House to cultural icons such as the Washington Monument, the Statue of Liberty, and Mount Rushmore. The Park Service is the keeper of the National Register of Historic Places. Within Sequoia and Kings Canyon National Parks, the Park Service maintains numerous cultural resources in addition to those on the List of Classified Structures (see DGMP-CRMP/EIS, vol. 2, appendix C). Some of these maintained cultural resources are not directly connected to the purpose for which the parks were set aside. The draft plan pointed out that the range of management actions within the *Secretary of the Interior's Guidelines* relative to cultural resources is wide. As mentioned at several locations within the document, in consultation with the state historic preservation officer, two Giant Forest historic districts of local significance were removed to protect internationally significant sequoia groves — the reason the parks were set aside. This action illustrates the difficult tradeoffs that must be made within the national park system. The Mineral King special use permit cabins are privately owned structures, and the Park Service is not responsible for their maintenance.

13. Traditional Cultural Property Qualification

Comments: Listing on the National Register of Historic Places applies to the Mineral King community or equates with traditional cultural property designation. [144, 21, 105]

The Mineral King living historic community suggested by public comment is not reflected in the DEIS. [22]

The National Park Service has the responsibility to preserve cultural as well as natural values. You would not preserve an Amish community by evicting its residents — you cannot preserve the Mineral King community by evicting the people and preserving the cabins. [108]

The Mineral King Road Cultural Landscape District fails to identify users as contributing elements. [20]

Stock use should be inventoried as a historic landscape. [368]

There is considerable debate concerning private interests on public lands. As a rule, the National Trust [for Historic Preservation] is committed to preserving cultural heritage resources while maximizing public access. We recognize that some communities have important, long-standing ties to park land, often predating the establishment of parks. We believe that it is appropriate to seek ways to collaborate with these communities and recognize them as potential park assets. [8]

Response: The National Park Service collaborates with Mineral King permit holders by

means of several memoranda of agreement to address issues such as maintenance standards for privately owned historic structures and education.

Traditional uses, such as stock use, do not qualify as a historic landscape.

While outside the scope of a general management plan, it is important to clear up a common misconception. Neither the recreation cabins in Mineral King nor their owners qualify as "traditional cultural properties." At Sequoia and Kings Canyon National Parks there are several such areas, comprised of either inholders or permittees. Two areas in the parks with recreation cabins are listed on the National Register of Historic Places — the Wilsonia Historic District (listed on March 14, 1996) and the Mineral King Road Cultural Landscape District (listed on October 24, 2003). Wilsonia is of local significance as representative of a recreational mountain community developed between 1918 and 1945. Mineral King is also locally significant, and the three summer home tracts are eligible for their architecture and design as notable examples of recreation tracts built in the rustic vernacular style. While cabins in these areas have been used for several generations, they do not rise to the standard defined in the 1980 amendments to the National Historic Preservation Act (see discussion below). They are not different than seasonal recreational cabin tracts in many locations, where seasonal residents have enjoyed various local recreational opportunities.

National Register Bulletin 38 provides guidance for evaluating and documenting traditional cultural properties (NPS 1998f). A traditional cultural property is defined generally as

> one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. . . . There are many definitions of the word "culture"; but in the National Register programs the word is understood to mean the traditions, beliefs, practices, lifeways, arts, crafts, and social institutions of any community, be it an Indian tribe, a local ethnic group, or the people of the nation as a whole . . . One kind of cultural significance a property may possess, and that may make it eligible for inclusion in the Register, is traditional cultural significance. "Traditional" in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is significance derived from the role the property plays in a community's historically rooted beliefs, customs, and practices.

The bulletin further states,

> The subtlety with which the significance of such locations may be expressed makes it easy to ignore them; on the other hand it makes it difficult to distinguish between properties having real significance and those whose putative significance is spurious. As a result, clear guidelines for evaluation of such properties are needed.

In the 1980 amendments to the National Historic Preservation Act, the secretary of the interior, with the American Folklife Center, was directed to study means of

> preserving and conserving the intangible elements of our cultural heritage such as arts, skills, folklife, and folkways

and to recommend ways to

> preserve, conserve, and encourage the continuation of the diverse traditional prehistoric, historic, ethnic, and folk cultural traditions that underlie and are a living expression of our American heritage. (NHPA 502; 16 USC 470a note)

14. Ethnographic Resources

Comment: NPS policy related to Native American uses, including plant gathering, was not accurately stated. [116]

Response: The text has been clarified for Native American relations (line 10 of the alternatives tables), and specific laws and policies for ethnographic resources have been added to "Laws,

Regulations, Servicewide Mandates and Policies" in volume 1.

PARK USE

15. Visitation / Use Levels

15A. Carrying Capacity

Comments: Carrying capacity has not been comprehensively addressed and needs to have more detail.

Determining user capacity and resource limits should be given the highest priority in the decision-making process, to ensure that excessive visitation and use do not degrade the resources we are trying to preserve. With a rapidly increasing population encroaching on these parks, this may prove to be a difficult challenge. [10, 25]

Response: The planning team consulted with an NPS workgroup that has been defining how to address carrying capacity appropriate to the purpose of general management plans. Management prescriptions have been identified as the best place in a plan to discuss carrying capacity, and an extensive new subsection on carrying capacity has been added to each management prescription. Each subsection identifies types of indicators to be monitored and the range of actions that NPS managers would take if monitoring indicated an undesirable change in resource conditions or visitor experiences, The management prescriptions section concludes with a new discussion of carrying capacity implementation and adaptive management.

A general management plan is a vision document, and procedures or methods for monitoring indicators and standards, such as the NPS visitor experience / resource protection process, are more appropriately detailed in other plans. This general management plan for Sequoia and Kings Canyon National Parks has been underway for several years, during the period that principles for managing carrying capacity have been evolving. It is likely that future management plans for these parks will be able to define more specific carrying capacities, especially for backcountry areas, based on a longer history of data collection. It is also likely that resource indicators will be more precise in the future and that management actions will more effectively address cumulative resource effects.

15B: Basis for Crowding

Comment: How was crowding related to carrying capacity defined? Was there a scientific study? [82]

Response: Frontcountry carrying capacity numbers were based on the physical carrying capacity of facilities such as parking lots. Text in each management prescription has been revised to clarify the bases for these numbers.

16. Sustainable Growth

Comment: Define sustainable growth.

Response: Sustainable growth is using park resources and environments in a way that does not deplete or permanently damage them, allowing the uses to continue for an extended time. This definition has been added to the glossary in volume 2.

17. Use Levels

17A: Parkwide Visitor Use Levels

Comment: The general management plan should decide that more visitor use is desirable. The appropriate amounts of visitation to the parks should be increased without causing irreparable resource damage; however, altering the desired experience will change as the population and use increase, and therefore should not be a determining item. [84]

Visitation projections are insufficient. The cumulative impacts of population increase, national monument plans, and highway improvements on visitation need to be addressed. [25]

Response: During public scoping for this general management plan most people strongly preferred maintaining current visitor experiences and a low-key park character. To balance this desire with considerable regional population growth, the preferred alternative states, "Accommodate moderate increased visitation, with

an emphasis on day use"(DGMP-CRMP/EIS, vol. 1, line 15 of the alternatives table). Day use results in fewer demands on water supplies within the parks. Moderate visitation increases would occur in frontcountry areas, where additional road capacity exists. However, there may be times when some highly popular day use areas cannot accommodate additional people, and visitors will need to proceed to other locations or use transit. At present there are no constraints on the number of people entering the parks.

Visitation projections were calculated based on historical data from the NPS Statistics Office, with a 10% annual increase as the high end of the range, and a 10% decrease the low end. As explained in the document, it is unlikely that visitor use would either rise or fall at a steady 10% rate or remain exactly the same over the next few years. A more likely scenario would be random increases or decreases from year to year averaging 1% to 3% over a five-year period, with extraordinary spikes of plus or minus 10%, much like the patterns of actual visitor use data (DGMP-CRMP/EIS, vol. 2, p. 59). Projections in the final document have been updated using more recent data, which indicated there were 525,035 visits to Kings Canyon in 2004 and 1,000,177 to Sequoia. Both of these numbers were within the range included in the DGMP-CRMP/EIS (vol. 2, p. 61).

17B: Ash Mountain Area Visitor Use

Comment: More information is needed to address visitor use. Use is concentrated at Ash Mountain now, and there are inadequate facilities to manage the situation. Sites need to be hardened. [39]

Response: Management prescriptions call for river protection measures so that trails and riparian areas can be protected in a way that withstands use. Use of the Ash Mountain area is limited by parking capacity. The carrying capacity section added to each management prescription describes types of indicators that will be monitored to determine when management actions such as hardening areas or locally restricting use are needed.

17C. Mineral King Visitation

Comment: Include and update visitation figures for the Mineral King area, showing a breakdown of user types. This is needed to project facility needs and is related to the fate of the area. [316]

Response: The parks keep annual visitation figures for various areas in the parks. Overnight stays indicate that in 2000 the Cold Spring campground had 8,000 overnight stays, making it the fourth busiest campground in Sequoia National Park, and the Atwell Mill campground had 2,000 stays, making it the sixth busiest campground. There may be some value to a further breakdown of visitation in the Mineral King area in terms of developing equitable fees for special use permits and campgrounds and of seeking some compensation for the use of park roads by private landowners.

18. User Fees

Comment: Any fees imposed for backcountry use should be used only for maintenance and restoration purposes and not for new "improvements." There are enough trails already, and restrooms and other amenities only attract more use. There is too much use already. [92]

Response: User fees at these parks are enacted in full compliance with legislation passed by Congress. In December 2004 Congress passed the Federal Lands Recreation Enhancement Act. These parks will be analyzing the nature and structure of all fees to ensure compliance with the new act. The backcountry trail network is less extensive than it was 50 years ago. Backcountry toilets are provided to protect park resources only in a few heavily used areas.

TRANSPORTATION

19. Regional Transit Connections

Comment: A transit vision for connections to the valley needs to be included. [119]

Response: Line 12 of the alternatives table has been revised to recognize ongoing park and local

discussions to connect local communities to the parks through transit.

20. Transit and Transportation Planning Alternatives

Comments: The document acknowledges a serious air quality problem and the expectation of visitation increasing in the future, but the draft does not do much to address eliminating generation of air pollution within the park. There is the tiny shuttle service in the Giant Forest area and some language to explore a more extensive transportation system under some alternatives, but there is nothing that presents a really significant change. The park should have explored one alternative that seriously considered elimination of pollution using known technologies. An example of some components within a "green" alternative might read something like this:

> All public (and maybe some administrative) access would be restricted to a mass transit system utilizing non-polluting technologies. The system would pick up visitors from parking garages in gateway communities (or just inside our park entrances or include major urban areas and airports) and move them within the park. Alternatively, visitors may enter on bicycle or on foot and be excluded from an entrance fee, rewarding them for practicing the cleanest form of transit. [39]

If you need information, or you would like someone to do the driving for you or you're driving a vehicle too big to go up the switchbacks after Hospital Rock, you come quickly to a visitor center with a LOT of parking, where you can get orientation, direction, information, food, a movie, and public transportation to your in-park destination. You can walk some foothill trails and access the river directly from here, and you can picnic here also. Ash Mountain might be converted to such a center. Or it might be better even closer to Three Rivers (maybe where the Edison plant is, by the park entrance?) to reduce vehicle traffic into the parks and to make it easy for those staying in Three Rivers to hop a shuttle that circulates through the town and takes employees and visitors to the orientation / administration area (this also happens at Zion and its gateway town). Another shuttle would loop to Visalia. The shuttles are quiet, fuel-efficient, all-weather vehicles. They are only about the size of airport shuttles, so they can easily navigate the worst of Generals Highway and Moro Rock and Crystal Cave roads. Relatively small, they fill up and unload quickly, so their turnaround times are quick and they can be flexibly scheduled. [79]

The FEIS should discuss options for expanding the shuttle system, identify criteria for analysis, and indicate whether analysis would be subject to future tiered NEPA documents. The FEIS should include a map depicting current and future shuttle routes. [115]

Response: The plan authorizes exploration of these and other transportation visions. NPS transit policy is to utilize non-polluting and energy-efficient technologies wherever feasible. This is a technical area where specific studies are required. The general management plan leaves these details to be worked out in subsequent planning efforts. The parks lie within one of the most heavily polluted air basins in the United States; any changes in park emissions will unfortunately provide only negligible improvement.

Transit for the Giant Forest area was addressed in the *Interim Management Plan* (the "Finding of No Significant Impact" for which was signed in April 1996). That plan included route maps, shuttle types and limited access roads. Some bus stops have been constructed. A transit system plan is schedule to begin operations in summer 2007. No service is currently being provided. The alternatives presented in this plan include links to public transit outside the parks. If additional facilities were required, compliance would also be required.

21. Gas Stations in the Parks

Comment: The preferred alternative should not allow for any gas stations in the parks, since gas is readily available outside the parks. Any gas station inside the parks will only create unnecessary environmental problems such as increased air pollution due to fumes from filling and to the inevitable gas spills. Gas stations will also lead

to even more traffic congestion, because the large gas tankers necessary for filling the stations would have to travel the already crowded park roads. [36]

Response: The preferred alternative calls only for consideration of a self-service gas pump at the Lodgepole market. While there are environmental challenges associated with providing a gas pump in the parks, this is offset by the energy consumption and air pollution that would be generated by people driving greater distances to find fuel.

22. Mineral King Road Traffic Counts

Comment: The traffic counts indicated for Mineral King are inadequately documented and highly suspect. [316]

Response: The volume and capacity estimates for park roadways, including Mineral King Road (DGMP-CRMP/ EIS, vol. 2, Table 40) are based on highway characteristics and recorded traffic counts undertaken by transportation engineers using standard methodologies and practices.

VISITOR EXPERIENCES

23. Stock Use

23A. Stock Use

Comments: Stock use is a traditional, historic, and cultural cornerstone in the establishment, management, and public use of Sequoia and Kings Canyon National Parks. [34, 335]

Stock use is not sustainable. [291]

Response: The traditional range of park activities listed on page 34, volume 1 of the DGMP-CRMP/ EIS, was not meant to be inclusive of all park activities. The National Park Service agrees that stock use is a valid traditional park activity.

The 1971 *Master Plan* proposed the eventual phaseout of "livestock in the higher elevations" of the parks. Also, major planning efforts since that time, including the *Backcountry Management Plan* (1986) and the *Stock Use and Meadow Management Plan* (1986), provided for the sustainable continued use of pack stock for recreational and administrative purposes. The latter two documents were done in compliance with the National Environmental Policy Act, including a thorough public review process. They are the basis upon which the parks' backcountry and wilderness have been successfully managed for the past 20 years. Continued access to the parks' backcountry and wilderness by recreational and administrative pack stock was analyzed in the GMP-CRMP/EIS because it is appropriate to analyze major changes to previous plans to determine if the changes are necessary to meet the mission of the parks.

23B. Stock Regulation

Comments: Regulations indicate an anti-stock bias. [290]

Regulations are needed. Suggest hardening stock camps, stock should not be allowed in sensitive areas such as wetlands, regulate water pollution by stock, and use stock group size limits. [291]

Regulations and monitoring are not adequately discussed. [1]

Do not separate users since it does not support the parks goal to "promote and educate and foster better understanding between user groups." Separation lays the foundation for animosity and conflict. [368, 109]

The draft GMP presents inconsistent rationale for the restrictions of stock-based activities. Stock use impacts were not included in the list of backcountry stressors (p 67, vol. 1), so clearly they are not a stressor. [1]

Recommend numerous changes to regulations. [1]

Response: To preserve and protect park resources, many uses are regulated, including driving, hiking, camping, and stock use (whether private or commercial). Limits are based on the ability of resources to sustain use without impairment.

Sections 8.6.8.1 and 8.6.8.2 of the NPS *Management Policies 2001* state that stock will be kept within the carrying capacity of an area; that

managers must regulate use so that resource conditions are protected; that conflicts with other public uses are kept to a minimum; and that use of pack-in feed (preferably weed-free pellets) is encouraged and required wherever grazing would have unacceptable impacts on park resources. Section 8.2.2.1 states that superintendents will consider a wide range of techniques in managing use, including "separation of conflicting uses by time or location."

The carrying capacity discussion, which has been expanded in the final document, monitors indicators of resource conditions to determine when park managers must take actions to protect resources or visitor experiences. The range of actions that managers could take is described in the carrying capacity discussion for each management prescription. For example, in the cross-country zone, the range of management actions includes modifying quotas to reduce or shift use, closing areas to use, removing trails, resting and rotating use areas, removing invasive plants, destroying / demolishing illegal plants and related construction, and expanding education (especially "leave-no-trace" ethics).

The National Park Service agrees that group size limits, on-trail and off-trail for both hikers and stock, need to be analyzed. This, again, is an issue of detail that is treated programmatically in this *Final Environmental Impact Statement* and will be explored in more detail in the future wilderness stewardship and stock use plan.

The "inconsistent" statement on page 67 under "Backcountry" was meant to refer to broad-scale, systemic stressors, such as air pollution and climate change. The list does not include all stressors. Stock and hiker use can also be a source of local impacts that require controls to minimize those impacts.

23C. Stock Use Locations

Comments: Limit areas for stock use; stock should not be allowed in sensitive areas. The general management plan should have retained key language from the 1971 *Master Plan* to phase out non-essential stock use in sensitive areas. [54]

Stock users have the right to go anywhere. [48]

Stock users may be restricted and not have the experience of exploring and experiencing solitude — wilderness values that are as important to stock users as hikers. [1]

Response: The issue of stock use in high elevation areas of these parks will be thoroughly considered and analyzed in the future wilderness stewardship and stock use plan.

Management prescriptions allow stock use in all backcountry zones, but not in every location. For example,

- *Major Trails:* Stock use may be permitted, with restrictions on stock party size and the location and timing of use. If stock use is allowed, trails and bridges are designed and maintained to stock standards, and appropriate facilities (such as campsites, hitch rails, and drift fences) may be provided.
- *Secondary Trails:* Stock use may be permitted on trails that can sustain use without significant resource damage.
- *Cross-Country Areas:* Stock use may be permitted.

The establishment of stock-free areas and foot-travel-only trails is an issue of detail that will be analyzed in a future wilderness stewardship and stock use plan.

23D. Stock Use Alternatives

Comments: The general management plan should not have looked at a no-stock alternative since the 1971 Master Plan was replaced by plans that continued stock use. [1]

The general management plan should have included a no-grazing alternative, which is reasonable and feasible and had been requested by numerous people. [54, 29, 87, 88]

The DEIS violates the Wilderness Act by proposing removal of a historic use and violates authorizing legislation which calls for a "pleasure ground" with "freest use . . . for recreation purposes by the public." [30]

Fees should be charged to stock users to cover the cost of trail maintenance. [3]

Response: The National Park Service disagrees that the no-stock alternative evaluated in the Final Environmental Impact Statement violates the Wilderness Act. Moreover, under the National Environmental Policy Act, it is appropriate to consider a range of alternatives. The National Park Service's preferred alternative does not propose removal of historic stock use, but it would regulate stock use as mandated by policy.

The analysis of a no-grazing alternative is outside the scope of this plan, but it may be appropriate during the development of a wilderness stewardship and stock use plan for these parks. It is the policy of the National Park Service to develop general management plans that provide broad, overall guidance, not to treat each issue in fine detail. More detailed considerations, i.e., grazing vs. no-grazing, will be handled in the wilderness stewardship and stock use plan. If a no-grazing alternative is to be analyzed, the appropriate place to do that is during the development of the wilderness stewardship and stock use plan. Also see response to 23B.

Fee structures, which are outside the scope of a general management plan, are reconsidered periodically by park managers.

23E. Stock Use Impacts

Comments: I urge the park to respond to the real negative impacts of stock in the high country, and revise the general management plan accordingly. (Impacts described include dust, feces, urine, noise, visual/aesthetics and behavioral disturbances.) [133, 170, 176]

[Impact] thresholds are wrong, and there is insufficient data for analysis. [1]

It is unclear what measures are being taken to address eroded trails or trespass cattle. The FEIS should provide information about enforcement and monitoring measures to protect surface water quality. [115]

Response: The preferred alternative provides for the use of pack and saddle stock in many areas of the parks. The National Park Service believes that recreational stock use can be managed to ensure minimal impacts on resources and visitor experiences. It is beyond the scope of this general management plan to analyze all the details of stock (or hiker) use. A detailed analysis of stock and other wilderness activities will be conducted for the future wilderness stewardship and stock use plan, which will also include public input and review in accordance with the National Environmental Policy Act. The details of any future monitoring studies and additional control measures, if needed, will also be evaluated in that planning effort.

There are, at times, impacts on park resources from pack stock, as well as from other backcountry and wilderness uses. Park managers have employed actions, as identified in the above referenced plans, to monitor and mitigate these impacts. Mitigation efforts include controlling access based on soil moisture conditions, restricting use numbers, timing use and closing meadows to grazing, improving trails (maintenance, rerouting away from moist areas, and hardening), requesting use of weed-free feed, and continuing ongoing educational efforts to encourage minimum impact practices.

Residual biomass, or the amount of aboveground plant material remaining in a meadow at the end of the growing season, is one component of the meadow monitoring program at Sequoia and Kings Canyon National Parks. In systems dominated by perennial herbaceous plants, adequate residue provides nutrients for recovery the following season, protects soil surfaces and plants, replenishes the soil mulch and organic layers, and traps and holds moisture. Residual biomass also provides both shelter and forage for the many animals that depend on meadows for all or part of their life cycles. As such, it is an important integrator of meadow function and can provide a quantifiable and repeatable measure to guide management.

Because this method does not require the ability to identify individual species, it can be carried out by non-biologists with a minimum amount of training; in these parks wilderness rangers collect the majority of the residual biomass data. Meadow condition is also assessed during a re-

connaissance of the meadow and plots. The extent of trampled vegetation, deep hoof prints, closely cropped vegetation, and erosion potential are recorded. Groundcover (live plant, bare ground, rock or litter) is estimated through the step-point method along transects used to estimate residual biomass.

The residual biomass protocol is the key component of a multi-faceted monitoring program. For the evaluation of meadow condition, results from the residual biomass program are taken into consideration along with assessments of groundcover, trampling, hoof print impacts, and erosion potential before recommendations are made as to specific management actions, whether by closing areas to use or instituting restrictions. Expanding the monitoring program to more formally address mechanical impacts of stock use will be considered in the future wilderness stewardship and stock use plan.

The carrying capacity discussion has been expanded within the management prescriptions to address indicators such as soils and water quality, monitoring, and the range of actions that could be taken to address changes in resource conditions.

23F. Water Impacts of Stock Use

Comment: Stock use contaminates surface waters, violating California water quality standards. This is primarily the result of direct input of urine and manure into waters that could be controlled by regulating grazing. [291, 109, 212]

Response: Park managers share your concern about ensuring that visitor and management activities do not contaminate or otherwise impair pristine park waters. Occasionally park staff get reports of stock discharges into streams and lakes, but water quality is excellent when compared to the standards in the *Water Quality Control Plan* for the Central Valley Regional Water Quality Control Board. In the early 1980s water samples were collected above and below a heavy use stock area on the Hockett Plateau, and nutrients and fecal bacteria were sampled for about seven years; no stock-related impacts could be detected. During runoff events the natural contribution from meadow mice and other organisms far outweighed any contributions from stock. This does not mean that stock do not cause impacts to water quality, but the impact was not detectable. Recent work in this area, in particular a 2004 study by Dr. Robert Derlet and Dr. James Carlson of the University of California at Davis School of Medicine, likewise failed to show any detectable correlation between increased waterborne pathogens and high-use stock areas. Most park meadows are wetlands, and wetlands are well known for their ability to improve water quality. Water quality monitoring will be a component of the Sierra Networks' vital signs program that is currently being developed for Devils Postpile National Monument, and Yosemite, Sequoia, and Kings Canyon national parks.

Your suggestion to tie and feed stock is an option. It also has its own impacts, such as soil disturbance. These issues will be thoroughly analyzed during development of the parks' wilderness stewardship and stock use plan.

23G. Wetlands and Stock

Comment: Wetlands are adversely affected by stock use. [291]

Response: Park wetlands have been inventoried, and information is available to the public through the National Wetlands Inventory program. The inventory has been independently evaluated to identify where additional information is needed.

The management of wetlands used for grazing is covered by the current *Stock Use and Meadow Management Plan.* Stock use and meadow conditions are monitored, and when problems are discovered, meadows are rested and adjustments are made to allow recovery and prevent the problem from recurring. This program will be analyzed as part of the future wilderness stewardship and stock use plan.

23H. Stock and Aesthetic Impacts and Wilderness Character

Comment: Stock use adversely impacts wilderness character and aesthetics. [291]

Response: Aesthetics in the wilderness environment are subjective, especially when it comes to recreational pack stock. The NPS Organic Act, the Wilderness Act, and the California Wilderness Act were all enacted with the understanding that the use of recreational pack stock to experience large natural areas, including designated wilderness, was an acceptable traditional practice. One of the originators of the concept of wilderness, Aldo Leopold, even stated that one reason for having wilderness is to perpetuate "primitive skills in pioneering travel." He specifically indicated that one of those skills is travel by pack-train. These parks strive to meet the desires of many user groups, including hikers and stock users. Comments both for and against continuing stock use have been received, and the National Park Service believes that recreational stock use can be managed in a manner that is sustainable and does not harm resources, nor unreasonably disrupts other wilderness users.

Again, many of the details that commenters have requested be considered and analyzed in the general management plan (e.g., designated stock camps, foot-travel only zones, no-grazing, and the extent and role of commercial stock operators) will be more properly addressed in a future wilderness stewardship and stock use plan.

24. Commercial Pack Stations

24A. Parkwide

Comments: All commercial pack stations should be removed from park lands due to resource impairment. [291]

The operation of pack stations is contributing to the demise of songbird populations in Sequoia and Kings Canyon by creating artificial habitat for the parasitic brown-headed cowbird. [291]

The plan favors commercial stock interests over private use. [170]

Response: A general management plan provides broad guidance. The preferred alternative proposes possible pack stations in the parks as a commercial service, which would be subject to NPS commercial services policy, as referenced on page 19 of volume 1 of the DGMP-CRMP / EIS. The general management plan is not intended to serve as a site-specific operations or development document.

Eliminating pack stations from park lands might reduce cowbirds, but these birds feed in many developed sites, especially around campgrounds. The parks have had the threat of cowbirds professionally evaluated, specifically in a two-year study conducted by the Kern River Research Center during 1995 and 1996. The study included Cedar Grove, Grant Grove, Giant Forest, and Mineral King. During that study 198 nests were examined, of which 129 nests were potential hosts for cowbirds, but only four nests (3.1%) had been parasitized. The study concluded that cowbirds were not causing significant effects to the nesting success of songbird populations in these parks.

24B: Wolverton and Mineral King Pack Stations

Comments: In most of the proposed alternatives, including the preferred alternative, the pack station in Mineral King is proposed for relocation "to a more suitable location" and to "improve resource conditions." (These terms were used without definition). However, no proposed indication of where the pack station would be located is provided, nor is any process for designating such a location specified. More information must be provided on these issues before this document can be considered to be complete. [20]

Locations need to be identified for replacement of the Wolverton and Mineral King pack stations. More information about potential sites and process to select are needed. [23, 82, 39, 298, 371]

After 28 years and a new management plan, it's time to relocate the lots and pack station to a more suitable site in the Faculty Flat area.

Response: At least six possible new locations for a pack station have been identified in the Lodgepole / Wolverton area. A preferred alternative has not yet been identified and must await the preparation and public review of an environmental assessment. A new pack station site in Mineral King that protects park resources while

providing the necessary logistics for operation has not yet been determined.

25. High Sierra Tent Camps

25A. Bearpaw Meadow High Sierra Camp

Comments: Remove the Bearpaw Meadow camp. (A total of 45 commenters supported removal of the camp. Many commenters expressed concern that the camp was inconsistent with wilderness values and stated that park managers had promised not to expand the camp.) [31, 294, 306]

The Bearpaw Meadow camp in Sequoia National Park provides valuable recreational opportunities to park visitors without degrading the wilderness environment. (A much smaller number of commenters supported the camp. Several supporters felt high Sierra camps met the needs of the elderly and people with disabilities, as well as providing hardened facilities to mitigate the impacts of stock use.) [368]

Response: The impacts of the Bearpaw Meadow camp are known and are deemed to be reasonable and easily reversible. Park managers believe that these impacts do not constitute resource impairment. The parks are in compliance with wording in House Report 98-40, which was prepared as supporting documentation for the California Wilderness Act. That report states, "if and when . . . the continued operation of these facilities in these parks at the then current acceptable operational standard results in an increased adverse impact on the adjacent wilderness environment (including increased adverse impact on the natural environment within the enclaves themselves), the operation of these facilities shall be promptly terminated" (U.S. Congress, House of Representatives 1983). It is the professional opinion of park managers that impacts have been reduced over time and are within an acceptable operational standard.

25B. New High Sierra Camp on Hockett Plateau

Comments: The preferred alternative should not allow for a new high Sierra tent hotel on the Hockett Plateau. Such a hotel would only negatively impact the environment around the plateau (helicopter noise, increased stock use, crowding, trampling of soils and vegetation loss). The hotel would also prevent the adjacent area from becoming a wilderness, which violates NPS *Management Policies 2001*, which state that the National Park Service will take no action to diminish the suitability of an area possessing wilderness characteristics (DGMP-CRMP/EIS, vol. 2, p. 187). From a land area perspective, the area near the hotel that would not be included in any wilderness represents a small fraction of the Hockett Plateau region that may be considered as a wilderness (0.07%). However, the sheer numbers are deceptive, because they ignore the qualitative negative impact that the hotel would have on wilderness. (This comment was generally typical of the majority who did not support this idea.) [31, 291, 10]

A new high Sierra camp at the Hockett Plateau would be a positive impact on recreational activities due to increased accessibility. [317]

A new high Sierra camp, which would have a positive impact on education, should be considered and the Hockett Plateau should not be included in any wilderness designation. [307]

There is no justification for such a proposal; the public doesn't want it; the park can't afford it; and it would result in additional pollution and commercial exploitation. Former Superintendent Ritter stated, "No additional camps of this nature would be established." [291]

Response: The preferred alternative proposes only to study the feasibility of an additional backcountry camp at Hockett Plateau; this is within the authority of park managers and within the scope of this general management plan. Impacts would be assessed during any feasibility study. Any determination to move forward with this option would involve a separate public review process and would be in compliance with existing legislation and policy. The National Park Service acknowledges that high Sierra camps are popular, and that they meet the needs of many who find backpacking and camping too difficult. A high Sierra camp would not prevent the surrounding area from becoming wilderness, as supported by the establishment of the Se-

quoia-Kings Canyon Wilderness with several areas of exclusion, including the Bearpaw Meadow high Sierra camp.

26. Winter Use

26A. Snowmobile Use

Comments: Snowmobiles should be permitted on some park trails, as they were historically, to allow an appropriate winter visitor experience that would also provide increased recreational access for persons with disabilities. [345]

The preferred alternative should ban all snowmobiles from the parks. Snowmobiles, being motorized equipment, have no place in national parks and, given the limited winter staffing levels, the National Park Service will not be able to enforce any rules limiting snowmobile access. [9]

Response: Law and NPS *Management Policies 2001* (sections 8.2 and 8.2.3.2) govern the use of off-road vehicles (which includes snowmobiles) in parks and wilderness. Snowmobiling may be allowed in designated areas only by special regulations and when consistent with the purposes for which the parks were established. Snowmobiling is not a recreational use to be encouraged. Designated routes can only be in locations where there would be no adverse impacts on the area's natural, cultural, scenic, or aesthetic values and in consideration of other visitor uses. Section 8.2 of the *Management Policies* does not allow visitor activities that unreasonably interfere with (among other things) the atmosphere of peace and tranquillity or the natural soundscape. Both current practice and the preferred alternative provide for limited snowmobile use only on road surfaces and only to access private cabins in Wilsonia (line 212 in the alternatives table, DGMP-CRMP/EIS, vol. 1) and along the Mineral King corridor (line 373). This is considered the minimum accommodation for winter access and does not include recreational use. Rangers in both locales enforce park regulations. Park staff use snowmobiles for administrative access to these areas, as well as for winter search and rescue in limited areas, when these tasks cannot be reasonably accomplished by other means.

26B: Mineral King Winter Use

Comment: Mineral King Road should remain open during the winter to the public, not just permit holders; suggest using a Snow Cat for access to increase winter visitation. [358]

Response: The proposal is similar to alternative D in the draft document, which encourages winter use. However, as indicated by the preferred alternative, other than necessary access by residents, the most appropriate winter use of Mineral King Road is for cross-country skiing.

27. Tent Camping

Comments: All developed campgrounds should have quiet areas reserved for tents only to accommodate those campers wishing a more peaceful camping experience.

The Atwell Mill campground should be retained; its distance from the river makes it safer for families. [64, 100]

Response: The preferred alternative makes particular provision for different styles of camping, including RV, tents only, and bike-in campsites (see line 178 in the alternatives table, DGMP-CRMP/EIS). It also provides for primitive campgrounds in low-use frontcountry zones, where RVs would be precluded. The parks currently provide areas dedicated only to tent camping where more developed campgrounds are large enough to accommodate a variety of uses.

The Atwell Mill campground has been determined to cause unacceptable impacts to the health and enjoyment of the giant sequoia grove in which it occurs, so it is proposed for removal.

28. Backcountry Parachuting

Comment: Backcountry parachuting should be added to activities listed in the management prescriptions. [14, 111, 120]

Response: NPS *Management Policies 2001* (sec. 8.2.2.7) do not allow backcountry parachuting since it "is not an appropriate public use activity within national park areas and is prohibited by 36 CFR 2.17(3)." Section 8.2 of the

Management Policies states, "many forms of recreation enjoyed by the public do not require a national park setting, and are more appropriate to other venues." A few NPS exceptions, such as on Bridge Day at Delaware Water Gap, have been allowed.

29. Visitor Education

29A: Mineral King Education

Comment: One of the special characteristics of Mineral King, and one of the aspects of Mineral King that is appreciated by visitors, is its long and interesting history of human habitation. The history of the area is as valuable as its beauty. Visitors to the park have commented very favorably on fireside chats and walks covering historic topics. Members of the Mineral King community include historians and are valuable resources in building and delivering history programs. The park system has a unique and wonderful opportunity to draw from a sizable community of people who have strong connections to the area dating back over 100 years and have demonstrated a desire to share that history with visitors for decades. I would like to see a plan that includes a way to preserve the non-structural historic heritage of the area and share it with visitors. I believe that the cabin owners have demonstrated that they can play a valuable role in such a plan. [303]

Response: NPS policy calls for the development of interpretive plans to guide educational efforts in national parks. These policies also strongly encourage partnerships. An agreement with the Mineral King Preservation Society currently provides for cooperative interpretive activities.

29B. Wilsonia Education

Comment: At least one of the historic structures in Wilsonia might be used as an "Educational Center" for a joint NPS+WHDT [Wilsonia Historic District Trust] educational program focusing on the flora, fauna, and history of the entire Grant Grove area. [4]

Response: Although not specifically addressed, an "educational center" using a Wilsonia historic structure is not incompatible with the preferred alternative and would be worth further discussion. Use of structures by the University of California at Merced and other institutions for field instruction is anticipated.

29C. Multi-lingual Education

Comment: The general management plan should address the increase in Hispanic population with education, bilingual rangers, and programs designed to attract this regional population. [90]

Response: The National Park Service agrees, and the preferred alternative is titled, "Accommodate Sustainable Growth and Visitor Enjoyment, Protect Ecosystem Diversity, and Preserve Basic Character While Adapting to Changing User Groups." This vision includes meeting the educational needs of new user groups such as the growing Hispanic community. While a general management plan does not specify the details for achieving goals, line 17 in the alternatives table does accommodate the types of ideas suggested.

SPECIAL USE PERMITS

30. Mineral King Special Use Permit Cabins

Comments relating to the Mineral King special use permit cabins are summarized from the following letters: 22, 37, 46, 50, 53, 23, 61, 63, 64, 65, 66, 71, 72, 75, 79, 81, 89, 91, 92, 94, 99, 100, 102, 105, 108, 110, 142, 144 (form letter), 199, 203, 207, 215, 216, 236, 270, 273, 274, 296, 297. 298, 305, 306, 311, 315, 319, 329, 333, 339, 341]

30A. Legislation Related to Mineral King Special Use Permit Cabins

Comments: Public Law 95-625 of November 10, 1978, which required the Mineral King historic cabins to be removed on death of the lessee of record, must be amended to allow the continuation of leaseholds in perpetuity. (Approximately half of the comment letters expressed some variation of this viewpoint. A diverse

sample of these letters has been reprinted to illustrate this point of view.)

The cabins at Mineral King should be removed when the permittee-of-record dies and the sites restored to their natural condition, as envisioned by Congress when it added Mineral King to Sequoia National Park. (Around a quarter to a third of the comments supported some variation of this viewpoint, and similarly a sample of these letters has been reprinted.)

Response: The National Park Service cannot amend public law. Numerous letters incorrectly mentioned lease holdings; however, the Mineral King cabins are not leases but special use permits.

Since the release of the draft plan, Congress passed Public Law 108-447 to amend Public Law 95-625 and indefinitely extend special use permits and allow them to be transferred to heirs, successors, and assigns. In accordance with the original terms of Public Law 95-625, permits may still be revoked by the secretary of the interior at any time if it is determined that continued use of the cabins by private owners is incompatible with park purposes or if the land is needed for park purposes.

30B: Preservation of Mineral King Special Use Permit Cabins.

Comments: Existing Mineral King cabin owners are best suited to preserve and protect these structures for future generations. Existing cabin owners have fulfilled this role for decades at no cost to the public and will continue with this stewardship responsibility.

California has an interest in cabin preservation.

Response: Under Public Law 108-447 cabin owners retain responsibility for maintaining their cabins to the standards set forth in a memorandum of understanding between the National Park Service and the Mineral King Preservation Society (a five-year agreement, dated March 8, 2003). Standards may be included in updated permit conditions. Also see response 30A.

30C: Non-contributing Elements of Special Use Permit Cabins

Comment: Features of the Mineral King Historic District that have been determined non-contributing should be re-assessed as part of the plan and given the opportunity to be made contributing if possible.

Response: The National Park Service agrees. As a broad vision document, a general management plan does not deal with details that will be more appropriately addressed in updated permit agreements. However the Park Service agrees with the goal of a more accurate representation of the Mineral King Road Cultural Landscape District implied in this comment. This concept was included for alternative C in the draft plan, which stated the following goal, "Features of cabins that made them non-contributing elements of the landscape district would have to be removed as a condition of the permit extension in order to portray a more historical appearance" (line 372 in the alternatives table, DGMP-CRMP/EIS, vol. 1, p. 155). Because Public Law 108-447 has superseded the draft plan, the removal of noncontributing elements could be voluntary, made part of the Mineral King Preservation Society memorandum of understanding, or included in revised permit conditions.

30D: Potential Relocation and Removal of Historic Structures

Comment: Wild and scenic river designation may lead to attempts to remove some or all structures listed on the National Register of Historic Places. [300]

Response: Potential wild and scenic river designation of the East Fork of the Kaweah River under the classification of "recreational" would not require the removal of structures. However, dam studies required by Congress in reauthorizing hydroelectric special use permits would assess whether any habitable structures are in hazardous locations. The relocation of these structures could be required for health and safety reasons. The National Park Service attempts to comply with all laws, including the Wild and Scenic

Rivers Act; it does not prejudge possible conflicts among statutes.

30E. Mineral King Road

Comment: Preliminary evaluation indicates that park access constitutes a large percentage of use, and the county has initiated discussion about potential park funding for the maintenance of roads and bridges. [119]

Response: The National Park Service maintains Mineral King Road within the boundary of the park; outside the park maintenance has been and continues to be the responsibility of the owner, in this case Tulare County.

30F. Mineral King Socioeconomic Impact

Comment: Socioeconomic conclusions need to be reconsidered. A regional comparison (impact on the county) makes more sense than the impact of the permits to the park budget. [316]

Response: Permit fees are paid to the park and taxes are paid to the county. As accurately stated in the analysis, both are quite insignificant to the regional economy. There appears to be no rationale to revising the analysis.

30G. Utilities

Comment: Water quality is a big issue. The Mineral King area suffers from lack of oversight. There is no sewage system, and effluent is not regulated. Cabin water systems are scattered, with pipes both above- and belowgrade. The systems are probably not up to any kind of building or health code. The buildings are eyesores, with maintenance, safety and fire hazards. [367]

Response: The National Park Service and the Mineral King Preservation Society will use the *Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (NPS 1995d) to maintain the cabins in a manner that preserves the integrity of the Mineral King Cultural Landscape District. Permit conditions will be updated to meet applicable fire, safety, and health codes; sanitation codes will be met without causing unacceptable adverse impacts to park resources.

31. Hydroelectric Facilities

31A. Laws and Permits Regulating Operations

Comment: Public Law 99-338, which stipulates that the dams above the Mineral King Valley must be removed in the year 2006, must be stricken and new legislation passed. [371]

Response: Public Law 108-447, signed into law on December 8, 2004, authorizes the secretary of the interior to permit continued operation of the Kaweah hydroelectric generation facilities, which includes the dams above the Mineral King Valley, for two additional periods of 10 years each. Consequently, the preferred alternative language which calls for removal of all hydroelectric facilities is now moot. Studies of downstream impacts and dam hazards are required by the legislation.

31B: Dams and Artificial Lakes

Comment: Dams should not be removed from the area. The beautiful lakes that surround Mineral King in the mountains are so much a part of the valley. Please reconsider removing the dams that will cause the drainage of many of these beautiful and historic lakes. [2]

Response: Dams were constructed to enlarge natural lakes for hydroelectric generation purposes. If the dams were removed, it would be undertaken in a way that would restore these lakes to historic water levels.

31C: Hydroelectric Impacts

Comments: The preferred alternative should call for the removal of all dams, impoundments, and diversions of free-flowing rivers within the parks. While the presence of some of these constructions does not preclude the inclusion of adjacent river segments in the wild and scenic rivers system, these constructions do not belong in national

parks: they adversely impact the purpose of protecting forever the greater Sierran ecosystem and its natural evolution. The removal of these [structures] would have important environmental impact on soils and vegetation as well as improve visitor experiences: who wants to see a dam in the middle of an otherwise free-flowing river? Any historic sites could be preserved by photographic recording. The loss of recreational activity directly associated with any dam removal is small. The arguments given in volume 2, page 298, that the removal of Mineral King dams would result in moderate-major adverse impacts is misleading, because it does not consider that many of the stated recreational activities (e.g., camping, hiking and fishing) could continue even if the dams were removed. [298]

Mitigation measures and added impacts suggested the need for retaining dams and fisheries. Without dams, low years could not sustain fish. [371]

Response: While this issue is now moot for the present (see response 31A), the National Park Service believes that deconstruction and removal of the dams would have clearly detectable to noticeable and substantial impacts that would be long term, but not permanent. The Park Service does not disagree with the desired condition being eventual removal of hydroelectric facilities, as the conditions of the special use permit stipulate.

32. Wolverton Boy Scout Camp

All 23 comments received on this topic supported the continuation of the Boy Scout special use permit.

Comments: There may be changes planned for the Boy Scout facility, Camp Wolverton, in Sequoia National Park. This is a great camp and a wonderful opportunity for the young scouts to experience the best part of the Sierra Nevada. I was a counselor there in 1965 and the amazing thing was watching the mountains change inner city LA tough boys into caring naturalists (this really happened, you should have seen it!). I urge you to adopt the no-change alternative for the Camp Wolverton Boy Scout camp. [130]

What does "permit Boy Scout use as much as possible" mean? [82]

In the preferred alternative, the Boy Scouts could partner with the National Park Service to manage the permit facilities for use by park volunteers and others. Language on line 282 of the alternatives matrix related to the Wolverton Boy Scout Camp could be revised to say:

> Retain the permit Boy Scout camp with modifications to the permit. Modifications shall include but not be limited to the following: The Boy Scouts shall provide camping space to park volunteers at no charge to the National Park Service. Park volunteers shall pay a minimal cost to the Boy Scouts to cover expenses such as water, tables, hot showers, bear-proof food storage, trash pick-up, etc. The Boy Scouts shall provide a reservation system for park volunteers to use the camp. The Boy Scouts shall maintain the existing infrastructure of the camp at no charge to the Park Service. The Boy Scouts shall make the camp accessible to other youth groups in addition to the Boy Scouts of America for outdoor education camping experiences. [344]

Response: The preferred alternative as written does not preclude the use of this site by the Boy Scouts. It expands its availability to other groups, including youth groups and park volunteers. The National Park Service agrees that the Boy Scouts and many other groups have benefited from using the camp over the years. The specifics of the operation of the Wolverton camp will be developed in consultation with present and potential users. Specific substantive proposals, such as the one presented in the comment above, will be fully discussed.

PRIVATE LAND

33. Wilsonia

33A. Purchase and Use of Wilsonia Properties

Comment: Why would the park want to buy out Wilsonia, and what does the park plan to do with historic structures if they buy them? Can these properties be used to supplement the inadequate

employee housing situation in Grant Grove? Could they be used for more office space? It is my understanding that the park has allowed the historic structures which they own in Wilsonia to slide into disrepair. What does the National Park Service plan to do with them? [16]

Response: The commenter misunderstood the proposal. The preferred alternative says: "The recreational community continues private residential uses. Adaptively reuse NPS-owned historic buildings through the historic leasing program for seasonal staff residences, public lodging, or concession housing. Remove nonhistoric NPS structures and restore the areas. Acquire properties on a willing-seller / willing-buyer basis when funding is available or resources are threatened. Septic constraints could limit adaptive use" (DGMP-CRMP/EIS, vol. 1, alternatives table, line 211). One or more structures in Wilsonia may support research in the parks through assignment to the Sierra Nevada Research Institute at the University of California Merced. Further, the park is presently attempting to restore structures it owns that are contributing elements to the historic district. No buildings are specifically targeted for acquisition under this proposal. As identified in this plan, the Park Service intends to carry out its legal responsibilities as the owner and manager of cultural resources within Wilsonia.

33B. Wilsonia Historic District

Comment: We support the adaptive use of NPS-owned buildings through the historic leasing program. However, we are concerned that its focus on continued NPS acquisition will result in continued erosion of the historic character and viability of the Wilsonia community. As a rule, only threatened historic resources should be targeted for acquisition. Likewise, only those nonhistoric NPS structures which detract from the rustic character of the community should be removed. In general we support the vision of seeking to "preserve a private residential community" with opportunities for public lodging.

In the case of Wilsonia, the National Park Service's past policy of acquiring parcels and structures as opportunities occurred significantly impacted the integrity of Wilsonia, both from a historic resource management perspective, but also from a community viability perspective. The Park Service directly contributed to blight in the community, and its actions eroded the sense of community. The National Trust opposes continued acquisition of historic structures in Wilsonia unless it can be demonstrated that NPS ownership is the best strategy for the preservation of these resources. Instead, the National Park Service should explore purchasing conservation easements on private properties. [8]

Response: The preferred alternative appears to meet the concerns expressed in these comments. The National Park Service will evaluate NPS buildings contributing to Wilsonia's historic status. The land protection plan for Wilsonia will be updated following the completion of the general management plan and will recognize the historic status of the Wilsonia Historic District and address protection of the historic character.

33C. Wilsonia History Questioned

Comment: In volume 2, page 68, the history of the area for Wilsonia should be modified. It is my understanding General Grant National Park was established in 1890, and a 200-acre privately owned area was adjacent to the park boundary. (Page 307, and some later pages, indicate "Private land at Wilsonia predates the creation of the park in 1890.") This should be clarified on page 68. In 1919 a portion of this privately owned land was subdivided and became Wilsonia. In 1940 Sequoia National Park and Kings Canyon National Park became one. At this time a finger of land was acquired which physically connected the Grant Grove section to Sequoia/Kings Canyon National Park. This finger of land included Redwood Mountain Grove, Redwood Canyon, and encircled Wilsonia. I believe the University of California Forest Research project in Redwood Canyon was the catalyst for this, as well as the desire to have the entire park lands physically connected. At one time I believe this area also contained Whittaker Forest, maintained by the University of California.

If this is correct, the plan should reflect it. If it is not correct, please let me know. [83]

Response: The history of Wilsonia in the DGMP-CRMP/EIS, volume 2, page 68 is correct.

33D: Wilsonia Wells

Comment: There are more than 11 wells in Wilsonia. Most of the cabins have their own wells. Perhaps the Park Service owns 11 wells at the 92 tracts it owns in Wilsonia, since the former owners are using 10. If this is correct, it should be clarified. [83]

Response: The number of wells will have to be investigated and corrected if necessary. Since it may affect water availability in Grant Grove, updates to the *Water Resources Management Plan* will incorporate data about private water use in Wilsonia.

34. Oriole Lake

Comments: The inholdings should remain and public access improved. [48]

Acquire Oriole Lake inholdings from willing sellers. The less rugged terrain at Oriole Lake lends itself to some form of camping and parking that could help with overcrowding in other frontcountry areas. If driving in is not feasible, then hike in. [371]

Response: The preferred alternative includes trail access and would not necessarily preclude camping**.** However, the fragility of Oriole Lake and the extreme rarity of its type would necessitate low-impact use. Also see response 9E.

35. Silver City

35A: Expanded Services and Mineral King Road Carrying Capacity

Comment: The road from Three Rivers to Mineral King cannot support increased traffic. The road's twists, turns, and narrowness in parts makes the drive challenging at best. How will additional cars be accommodated? Do you have some plans to improve the road not discussed in the general management plan? [13]

Response: Although the Mineral King Road represents challenging driving, it is not near capacity and could easily provide for the small increase in traffic envisioned. The action stated in the preferred alternative is to pave additional sections to reduce maintenance and resource damage (DGMP-CRMP/EIS, vol. 1, alternatives table, line 357), but it does not commit the Park Service to any actions nor to provide funding.

35B. Expanded Services and Water Availability

Comment: There is no "extra" water to supply any additional facilities at the Silver City Resort. Was the park planning to drill wells or somehow otherwise secure additional water supplies not discussed in the plan? [13, 48]

Response: The visions in the draft plan allow for certain actions, but do not mandate them. The partnership proposed for Silver City to provide expanded services (DGMP-CRMP/EIS, vol. 1, alternatives table, line 369) would be contingent on the support of the private owners of the Silver City Resort. Such a partnership might consider securing additional water supplies, but any expansion of services would be constrained by the protection of park resources and existing water rights and availability.

36. Private Land in Mineral King Valley

Comments: The legislation adding Mineral King Valley to Sequoia National Park does not call out a "willing seller" or any restrictions on acquiring inholdings. This willing seller addition is not called out by Congress and should be totally deleted from this environmental impact statement. [46]

Call out Disney as the property owner and reference in indices. The Disney land at the old dump site has loose asbestos that needs to be mitigated. [46]

Response: Acquisition of property by the National Park Service is an option covered by the

agency's land protection policy. Acquisition methods include purchase, donation, bargain sale, or condemnation. Generally parks only seek acquisition from willing sellers. Cooperative management approaches to private land within the parks is another protection approach. Land protection plans relative to private land would be updated at the completion of the general management plan. A general management plan establishes land acquisition goals for land protection plans. The preferred alternative recommends the acquisition of only a very small amount of private land within the parks to improve visitor access and use.

Walt Disney Corporation does own two small parcels in the Mineral King Valley. These parcels were purchased years ago when a ski resort was initially being considered. The parks have expressed an interest in acquiring those properties to resolve trespass and parking issues.

Thank you for your concern about hazardous materials. Mitigation for asbestos is a responsibility of the landowner. The scheduled update of the parks' *Land Protection Plan* will address this type of specific issue.

THE GMP DOCUMENT AND ALTERNATIVES

37. Inadequate Maps

Comments: The draft plan does not provide adequate mapping of areas of concern, including but not limited to inholding areas, sensitive and endangered species, historic resources including hydroelectric facilities and historic districts, pack station facilities, and backcountry facilities. This makes the draft plan impossible for the average reader to assess, and improperly limits understanding by the public of the impacts of the alternatives proposed. [20]

Final wilderness maps and legal descriptions should be included in the appendix. [31]

Response: A general management plan is not intended to serve as a site-specific operations or development document. The existing maps in the draft document are adequate for this planning purpose. Additional maps, if needed by groups or individuals, can be obtained from park headquarters upon request. Additional wilderness information will be included in the forthcoming wilderness stewardship and stock use plan. Information about the location of sensitive park resources is intentionally withheld to help ensure their protection.

Inholdings, hydroelectric facilities, and ranger station locations identified on the alternatives maps were keyed to the parks' Geographic Information System. Similarly, zones have been keyed to GIS but the maps included are intended to be conceptual and to be supplemented with proposed actions in the alternatives table (DGMP-CRMP/EIS, vol. 1, pp. 80–159).

38. Environmentally Preferred Alternative

Comment: The National Park Service appears to deem its preferred alternative as the "environmentally preferred alternative" only on the basis that the alternative offers more balancing between population and resource use. While balancing such factors is one of several general goals of the National Environmental Policy Act, it does not render an alternative as the "environmentally preferred" alternative. Nor is such balancing the mission of the National Park Service, which rests instead on an unequivocal commitment to preserving resources first, and allowing for their enjoyment second, in an unimpaired way. The Wilderness Society hopes that the Park Service will adopt changes in the Final GMP/EIS that will improve the document and afford greater protection to the resources of Sequoia and Kings Canyon National Parks for future generations. [31, 3, 54]

The draft plan improperly concluded that the environmentally preferred alternative is environmentally superior to the "no stock" alternative — this makes no sense and does not pass the red face test. [3]

Response: Section 101(b) of the National Environmental Policy Act includes six goals for determining the environmentally preferable alternative, all of which are addressed in the comparison table on pages 77–78 of vol. 1 of the draft document. The six goals have elements that address both resource protection and public use.

Section 1.4.3 of the NPS *Management Policies 2001* states that the agency does have a "fundamental purpose" that "begins with a mandate to conserve park resources and values" and "also includes providing for the enjoyment of park resources and values by people of the United States" and that when there is a conflict "conservation is to be predominant." The environmentally preferred alternative most effectively strikes a balance between resource protection and visitor use to achieve these fundamental purposes without impairment of resources.

39. Boundary Adjustments

Comment: Boundary adjustments were not seriously addressed. [39]

Response: As described in the DGMP-CRMP / EIS, following the scoping period two actions occurred that made several proposed boundary adjustments unnecessary — the creation of Giant Sequoia National Monument, and the addition of Dillonwood to Sequoia National Park. These actions provided additional protection for adjacent natural resources. Therefore, the final plan proposes only a modest amount of future acquisition to improve visitor experiences. This includes acquisition of the Alley property just outside the Sequoia National Park boundary on the North Fork of the Kaweah to improve access; acquisition on a willing-seller basis of Oriole Lake properties inside Sequoia National Park to provide public access to a foothills lake environment; and acquisition of the Disney owned property in the Mineral King Valley to improve visitor facilities.

40. Administrative Facilities Impacts

Comments: In the preferred alternative the park would move administrative facilities out of the park. It was not clear whether this was intended for administration, maintenance, resources, research, fire and rangers, or only for a portion of these. I am concerned about this on several levels. Impacts to park operations from having to drive further to and from projects were not considered. Employees having to drive through the entrance station in the middle of the day will also impact traffic and congestion. It may be possible to make this work in Ash Mountain, but I do not think it is safe or ecologically ethical to do that in Grant Grove or any other part of the park. The nearest land that the park could use on CA 180 is a long way down the highway so employees would spend a lot more of their time commuting to the park from their shop or office. [16]

Administrative facilities outside the park would adversely affect air quality from increased traffic congestion. Consider the former Ash Mountain CCC camp. [317]

Response: The proposed action, as stated in the alternatives table in volume 1, is to relocate some functions and facilities outside the parks to meet management needs (line 32). Line 336 refers specifically to the Ash Mountain area and adds a "when beneficial" caveat. The purpose of retaining an option to redesign and possibly relocate some facilities outside the parks is to provide future park managers flexibility in how they can reduce impacts on park resources and accommodate needed park operations. Any relocation would take into account all impacts, including those described as well as local and county requirements and zoning, and additional compliance would be required for specific construction projects.

41. Cedar Grove Season

Comment: All of the alternatives state that seasons in Cedar Grove are "extended fall and spring." What does this mean and what will the impacts be to park operations and to staff and visitor safety? The road is dangerous when it is icy. It can easily start snowing in October, and it would be a lot of work to try to keep the road clear through the winter. Visitors could become stranded if there were a large storm. Rocks fall on the road continuously throughout the rainy and snowy season, and it could be hazardous to keep the road open when there is a lot of rock fall. [16, 79]

Response: The vision for the preferred alternative is to include more spring and fall time (DGMP-CRMP/ EIS, vol. 1, alternatives table,

line 165). Implementation of this alternative would depend on encouraging the California Department of Transportation to keep the highway open longer in fall and spring (see line 169). This would be contingent on a determination that keeping the road open for a longer season would be both safe and practical.

42. "Green" Approaches Recommended

Comment: We strongly agree that basic, natural, and rustic are key criteria in the parks' built environment, which should be as harmonious as possible with its setting, while at the same time showing visitors that sustainable structures can be beautiful, functional, and appropriate in any setting. Displays should explain the energy-efficient, "green" features of the buildings (solar power, natural heating and cooling, native plants only for landscaping, etc.), giving visitors ideas they can use at home. [79]

Response: The National Park Service agrees. Section 1.6 of the *Management Policies 2001* requires the agency to provide proactive environmental leadership in all aspects of its activities, including facilities, construction, education, and operations. NPS policy directs that new structures be energy-efficient. Sequoia and Kings Canyon National Parks have architectural guidelines that include rusticity and integration with the natural landscape. Also old nonnative landscaping is being gradually replaced with local native species. The parks use alternate fueled vehicles when feasible. Giant Forest wayside and museum exhibits have provided education about the environmental consequences of past decisions.

43. Grant Grove Entrance Station

Comment: The preferred alternative proposal to redesign and or relocate the entrance station needs more detail and analysis.

Response: The vision in the preferred alternative is to reduce entrance station wait times and to improve the visitor experience by redesigning or relocating the entrance station. The general management plan is not the appropriate planning document to design or assess a site-specific proposal. An environmental assessment will be required when a project is considered for construction. Listing in a general management plan does not ensure funding for a project.

44. Milk Ranch Area

Comment: The Draft GMP makes no mention of the Milk Ranch Road. Congress designated the road and the Milk Ranch fire tower as wilderness (reference the 1980 map cited by Congress). The road is therefore closed to motor vehicles. The National Park Service has drawn a map that excludes the road corridor, the fire tower, and a buffer zone around it from wilderness. The National Park Service's rationale is that fire towers cannot be in wilderness. However, fire towers exist in wilderness throughout the nation. The fire tower itself is acceptable in wilderness under the minimum requirement exception of the Wilderness Act, section 4(c). Roads cannot be in wilderness. Instead of closing the Milk Ranch Road, the National Park Service has instead selected to keep it open to the operation of motor vehicles. [31]

Therefore, it appears that the National Park Service administratively attempted to create a Milk Ranch Road wilderness exclusion 6,800′ long and 60 feet wide through wilderness, i.e., over a mile long (10 acres). The National Park Service has prioritized the operation of motor vehicles on the road to gain access to BLM lands outside of the park [rather] than protecting the lands [and] administering [the lands] as wilderness, as directed by law. [31]

The National Park Service appears to have once again substituted its judgment for that of the Congress. In the late 1970s Sequoia park superintendent David Thompson recommended that the Milk Ranch Road be excluded from wilderness. (See: "Important Issues Concerning Wilderness Recommendations for Sequoia and Kings Canyon National Parks.") However, contrary to this recommendation, Congress did not exclude the Milk Ranch Road from wilderness in the 1984 designation act. [31]

The Wilderness Society believes that it is illegal for the National Park Service to administratively

de-designate lands designated by Congress as wilderness. The submission of maps and legal descriptions to Congress that declared Milk Lake Ranch Road outside of "wilderness" is not a valid process to change this designation. The Park Service's ability to make final maps and legal descriptions of wilderness boundaries does not provide it the capability to alter those boundaries to achieve a new management goal. Recreationists who wish to gain access across park wilderness on the Milk Ranch Road to BLM lands to the west of the park can do so by foot or horseback. The Park Service must manage what Congress designates. (31)

Response: Those portions of the Milk Ranch Road inside the park, as well as the fire lookout, are in wilderness. All NPS motorized uses of the road within park boundaries must be preceded by a minimum requirement / minimum tool analysis and determination. Access to private lands served by the road is not affected by wilderness designation.

45. Bicycling

Comments: Support opening of the Colony Mill trail to non-motorized vehicles to provide a safer bicycling alternative to the Generals Highway. [358]

The existing policy is too restrictive — mountain bikes should be allowed on the Colony Mill trail and along flumes which are seldom used. [331]

Strongly oppose use the Colony Mill Road for bicycling (without any justification). [291]

Allowing bicycles on the Generals Highway does not seem to be a prudent idea. There is a major safety issue. Bicycles should not be permitted on the Generals Highway. [82]

The draft plan does virtually nothing for bicycles, the greenest form of transportation (other than hiking). Bicycling should be rewarded by not having to pay an entrance fee. The current draft provides for some local bicycle use in Cedar Grove and considers bicycle use on the Colony Mill Trail in one alternative. That is sad support for a clean, non-polluting form of transportation. We need to give bicyclists the ability to safely travel to all road accessible points within the park, even if it means excluding cars from some areas or building special bicycle paths that parallel some roads. [39]

Response: Bicycling is allowed by NPS policy on park roads and on designated trails. The National Park Service agrees that bike riding on the Generals Highway may not be safe or comfortable for many bicyclists, particularly families. The preferred alternative would facilitate bike riding by closing much of River Road in Cedar Grove to motorized vehicles; by providing bike access to Park Ridge Lookout at Grant Grove; by providing a seasonal safer transit and bike use of Crescent Meadow Road in the Giant Forest; and by designating Shepherd Saddle Road as a bike trail.

46. Mitigation Measures

Comment: Mitigation measures are inadequate, difficult to locate, and should be with the environmental consequences. [23, 82, 311]

Response: As stated in the Council on Environmental Quality's "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act" (40 CFR Parts 1500–1508), mitigation measures are to be included in the description of alternatives (sec. 1502.14(g)) and may be included in the environmental consequences if necessary (sec. 1502.16(h)). The discussion of mitigation measures in the DGMP-CRMP/EIS is consistent with this direction. Mitigation measures are also called out in the indexes of both volumes.

47. Employee Housing

Comments: Employee housing has not been adequately addressed. [69]

How do work camps square with policy not to provide housing? [328]

Response: One of the purposes of the general management plan is to articulate goals and objectives for future management, not to provide detailed actions to accomplish them, which is

left to implementation plans. Section 9.4.3 of the NPS *Management Policies 2001* states that the agency's policy for housing is to rely on the private sector for employee housing while providing required occupancy housing for essential persons to provide for timely response to park protection needs, to prevent threats to resources, and to protect the health and safety of visitors and employees.

Work camps would provide short-term, not long-term housing. The housing management plan for each park addresses permanent, seasonal, and temporary housing needs of volunteers, researchers, cooperators, contractors, and concession employees.

48. Proposed Actions

Comment: A number of the proposed actions, such as the major transportation system for the Giant Forest area, have not been fully assessed in the Draft EIS. [25]

Response: The Giant Forest transportation system was addressed in the April 1996 *Interim Management Plan Environmental Assessment*, for which public involvement was conducted and a "Finding of No Significant Impact" was issued. These actions have been incorporated into the DGMP-CRMP/EIS to confirm that the National Park Service still supports that concept, and the actions are common to every alternative for the Giant Forest area (lines 288–303 of the alternatives table in vol. 1). Additional compliance for specific parts of the transportation system will occur as the projects are funded for design and construction.

Letters Received

CONGRESSIONAL DELEGATION

'ANNE FEINSTEIN
CALIFORNIA

COMMITTEE ON APPROPRIATIONS
COMMITTEE ON ENERGY AND NATURAL RESOURCES
COMMITTEE ON THE JUDICIARY
COMMITTEE ON RULES AND ADMINISTRATION
SELECT COMMITTEE ON INTELLIGENCE

United States Senate
WASHINGTON, DC 20510-0504
http://feinstein.senate.gov

August 30, 2004

Mr. John J. Reynolds
Regional Director Pacific West
National Park Service
1111 Jackson Suite 700
Oakland, California 94607

Dear Mr. Reynolds:

I am writing to bring to your attention a letter from Mark Williams regarding the preservation of the Mineral King Historic Community. Please look into the issues raised, as quickly as possible, so I can appropriately respond to Mr. Williams.

Attached you will find the enclosures from my constituent to assist you with your review. After you have completed your review, please send your written response to Ashley Tveit of my San Francisco office. Ms. Tveit may be contacted at (415) 393-0707 if you have any questions.

Sincerely,

Dianne Feinstein
United States Senator

DF: at

FRESNO OFFICE:
1130 O STREET
SUITE 2448
FRESNO, CA 93721
(559) 485-7430

LOS ANGELES OFFICE:
11111 SANTA MONICA BOULEVARD
SUITE 915
LOS ANGELES, CA 90025
(310) 914-7300

SAN DIEGO OFFICE:
750 B STREET
SUITE 1030
SAN DIEGO, CA 92101
(619) 231-9712

SAN FRANCISCO OFFICE:
ONE POST STREET
SUITE 2450
SAN FRANCISCO, CA 94104
(415) 393-0707

396

DIANNE FEINSTEIN
CALIFORNIA

COMMITTEE ON FOREIGN RELATIONS
COMMITTEE ON THE JUDICIARY
COMMITTEE ON RULES AND ADMINISTRATION

United States Senate

WASHINGTON, DC 20510-0504

September 3, 1996

Mr. Tom Dungan
El Don Farming Company
Post Office Box 275
Exeter, California 93221

Dear Mr. Dungan:

Thank you for contacting me about H.R. 3534, the Mineral King Act of 1996. I appreciate hearing from you.

This legislation would allow the Department of Interior to renew permits for the occupants of 65 cabins in the Mineral King area of Sequoia National Park. A 1978 law transferring the land from the Forest Service to the park continued the permits for the occupants of the cabins, with the understanding that the permits would not be transferred to others and that the cabins would be demolished when the permit holders died.

I support the Mineral King legislation. It is a long-held belief of mine that the government should not evict people from their homes.

As you may know, the House of Representative is proposing to include the Mineral King Act in the Presidio/Omnibus Parks bill. The Presidio/Omnibus Parks bill is currently in conference, where differences between the House and Senate parks bills are being worked out.

Again, thank you for writing. If you have any further questions or comments, please do not hesitate to contact Jon Chase of my Washington, D.C. office at 202/224-3841.

With warmest regards.

Sincerely,

Dianne Feinstein

FEDERAL, STATE, AND LOCAL GOVERNMENTAL AGENCIES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

115-1

June 25, 2004

David Graber
GMP Coordinator
Sequoia and Kings Canyon Na ional Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Subject: Sequoia and Kings Canyon National Parks/Middle and South Forks of the Kings River and North Fork of the Kern River General Management Plan and Comprehensive River Management Plan Draft Environmental Impact Statement (DEIS) [CEQ# 040207].

Dear Mr. Graber:

The U.S. Environmental Protection Agency (EPA) has reviewed the document referenced above. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

We have rated this DEIS as LO – Lack of Objections (see enclosed "Summary of Rating Definitions"). However, we request some additional information be included in the Final Environmental Impact Statement (FEIS) for clarification.

The DEIS mentions in several sections the possibility of expanding the shuttle system, which would reduce vehicle miles traveled within the parks and relieve traffic and parking congestion in some high-use areas. The DEIS (Vol. 2, p. 243) states that a new transit system is planned to begin at Giant Forest/Lodgepole in 2005. The FEIS should discuss options for expanding the shuttle system, identify criteria that would be used to analyze these options, and indicate whether the analysis would be the subject of a future tiered NEPA document. The FEIS should also include a map depicting the current and planned shuttle/transit routes.

On July 18, 1997, EPA promulgated an annual PM2.5 standard of 15 $\mu g/m^3$, a 24-hour PM2.5 standard of 65 $\mu g/m^3$, and an 8-hour ozone standard of 0.08 parts per million (62 FR 38652 and 38856). The San Joaquin Valley is non-attainment for the new PM2.5 and ozone standards. Volume 2, Table 2 of the DEIS should be revised to include the annual and 24-hour PM2.5 (particulate matter smaller than 2.5 microns) standards and the eight-hour ozone standard, which are currently in effect. Tables 32 through 36 should also include the projected PM2.5 emissions for each alternative.

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The Park Service conducts monitoring and research on the stock carrying capacity of park areas, including meadows and riparian areas, and some mitigation measures are identified in the DEIS. According to the DEIS (Vol.2, p. 62), some front country stock use trails are heavily eroded. Riparian areas are also being damaged by trespass cattle (DEIS, Vol. 2, p. 15). However, it is unclear what measures are being taken or will be taken to prevent further damage, repair trails, and monitor and enforce against trespass cattle in order to protect surface water quality. The FEIS should provide this information.

We appreciate the opportunity to review this DEIS. Please send a copy of the FEIS to this office when it is officially filed with our Washington, D.C., office. In the meantime, if you have any questions, please contact Jeanne Geselbracht, the lead reviewer for this project. Jeanne can be reached at (415) 972-3853 or geselbracht.jeanne@epa.gov.

Sincerely,

Lisa B. Hanf, Manager
Federal Activities Office

Enclosure

2

372

Received DSC-P
AUG 18 2004

August 13, 2004

N3615 (2350)

Memorandum

To: Dr. David Graber
Senior Scientist, Sequoia and Kings Canyon National Parks

From: /s/ Liana Reilly
Environmental Protection Specialist
Policy, Planning and Permit Review Branch, Air Resources Division

Subject: Comments on Sequoia and Kings Canyon National Parks Draft General Management Plan

Thank you for sending the Draft General Management Plan for Sequoia and Kings Canyon National Parks (SEKI) for our review. The Air Resources Division (ARD) is especially interested in working with SEKI with the GMP as these Class I parks experience some of the worst air quality days in the nation. As the GMP indicates, the results of the air pollution are being seen in the parks; from the deterioration of trees, to high levels of atmospheric oxygen being detected in lakes to the potential impacts ranging from an altered composition and structure of the forest to changes in wildlife reproductive capacity, longevity, intelligence and behavior. ARD commends Sequoia and Kings Canyon (SEKI) for recognizing the impact that air pollution is having on the natural resources within the parks and looks forward to working with the parks to address these impacts. Thank you for considering the comments below to further improve the Air Quality segments of the proposed GMP.

General Comments

- Firstly, ARD would like to commend SEKI for its involvement with state and local air quality planning efforts. As the majority of the emissions that affect park resources originate outside of the park boundaries, ARD commends and encourages the continued contribution that SEKI makes by sitting on local and state air quality boards/commissions.

- ARD also commends SEKI for implementing an air advisory program. ARD further encourages the continued utilization and publication of the program.

- ARD is aware that numerous air quality monitors are situated throughout the park to measure ozone, particulates, acid deposition and visibility. Please include results from these monitors, including a map of their location. Results can be incorporated in an appendix.

- Please include any general or transportation conformity projects that are currently underway or are planned for the near future.

- Please be consistent with labeling the sources of information for tables and charts.

Summary
It is noted that SEKI is trying to protect the night sky/natural dark from light pollution. Please explain how this is being/will be accomplished.

Introduction: Context for the plan
Page 22. ARD commends SEKI for increasingly using alternative fuels, including CNG, for the park service fleet to reduce localized transportation-related emissions. ARD encourages the continued utilization of clean fuels, the purchase and utilization of hybrid vehicles and the use of pollution control devices where feasible.

Relationship to Other Planning
ARD is encouraged by the parks' interest in transit. ARD believes that air pollution can be decreased via increasing public transportation/shuttles within the parks; especially as vehicular traffic is one of the major sources of pollutants in the San Joaquin Valley and the park. ARD supports the parks' efforts to further develop the transit system within and to the parks.

Affected Environment
General
This section does an inadequate job of addressing air quality as an impact topic considering the severity of air quality at SEKI. This section should also thoroughly discuss existing air quality, trends, and resource impacts, including a more comprehensive discussion of known air quality related values and impacts.

Specific

- Page 19, Regional Air Quality. Please add a map showing the overlap between the counties, nonattainment areas, and park boundaries.

- Page 20, Table 2. The table should include the new ozone and particulate matter standards. Even though implementation of these standards is evolving, the designations for the 8-hr ozone standard have been finalized and those for PM fine are soon to follow. Since the GMP is forward-looking, the affected environment should be written within the context of the new standards. (Note: This may lead to a complication in the Environmental Consequences Section as impact definitions track the old standard. We suggest that the definitions be revised).

- Page 21, Table 3. This table should be updated to reflect new ozone and particulate matter standards.

- Page 21, Table 4. We would consider a contribution of up to 30% of a county's air pollutants to be a significant amount. ARD is concerned that the county and state stationary source emission estimates in Table 4 are incorrect. The parks should contact CARB for corrected estimates or otherwise account for the impacts that SEKI has on regional air quality.

- Page 21. Park emissions from stationary, area, fire, and mobile sources should all be disclosed and ideally summarized in a single table.

- Page 21, Smoke Emissions. The referenced smoke emission estimates contained in the San Joaquin Valley Smoke Management Plan should be disclosed in this section. These are contained in the Fire Management Plan, but only for particulate matter.

- Page 22, Air Quality Monitoring and Research. This section should include a summary of air quality monitoring at SEKI. The summary should discuss recent ozone, pm, deposition, etc., as well as trends.

- Page 23, Air Quality Monitoring and Research. It is unclear whether the last paragraph is providing a web link for monitoring data or effects data. This should be clarified. The link to Air Resources Information System (i.e., Air Quality Related Values) data for SEKI, http://www2.nature.nps.gov/air/Permits/ARIS/seki/index.htm should be added.

Environmental Consequences

General

- Please include emissions from smoke, even if just in summary format as it is understood that the emissions are incorporated in the valley's plan. Furthermore, the Fire Management Plan should discuss measures to mitigate smoke emissions. These should be reproduced in this section or at least referenced.

- Although the fate of air quality is largely not a result of park management actions, the NPS should do our part to mitigate emissions where possible. There is no discussion of mitigation measures as there are with other impact topics. A list of mitigation measures common to all alternatives should be included. It should address smoke emissions, transportation emissions, construction emissions and stationary source emissions. It may be that much of this is addressed (as best management practices) in the *Air Resources Management Action Plan (1999).* If so, those mitigation measures should be summarized and updated in this section.

- This section should base impacts on new ozone and PM standards.

Specific

- Page 158, Transportation-Related Impacts, Park Visitor Use Studies, paragraph beginning "The 1998 'Visitor Use Study' included ...." Change to: "the vast majority of vehicles (94%) were passenger cars and trucks ..."

- Page 158, Transportation-Related Impacts, last paragraph. Begin new section: Mobile Emissions.

- Page 161. Please describe how the mobile emission numbers were derived. Please indicate if the emission estimates encompass data from all seasons or if they focus on the summer season. Please be clear of what is included in the numbers in the report.

- Page 159-161, Transportation-Related Impacts. Please include an air quality support document that lists the models used to estimate vehicle emissions as well as the inputs for the models. The later need not be in the main text, but should be referenced. Also, please place a note in the text regarding the assumptions used as well as the limitations of the model. Regarding the later, the mobile emission factors provided by CARB reflect either state or national vehicle fleet distributions (i.e., vehicle type, year, and mileage accumulation) contained in such models as MOBILE6.2 (USEPA) or EMFAC (CARB). Recent studies conducted by UC Riverside's Center for Environmental Research and Technology (October 2000) and the USDOT Volpe Center (draft July 2004) indicate that the park visitor vehicle characteristics differ from those defaults. In general, park visitor vehicles are newer than in the defaults and are comprised of a greater fraction of light-duty vehicles, heavy light-duty trucks (RVs?), and motorcycles. In addition, the driving patterns of park visitor vehicles are not necessarily well represented by the default drive cycles of MOBILE6.2 or EMFAC. The effect of the park fleet distribution is a decrease in VOC, NOx, CO, and PM, emissions at all speeds. The effect of the park driving patterns is, on the other hand, an increase in all but NOx emissions. As a result, the CARB emission factors may not reflect park visitor vehicles as well as those taken from the studies referenced above. At a minimum, this should be acknowledged. Furthermore, please clarify that the emission numbers/fleet mix did or did not take into account the fact that the fleet mix will not alter dramatically in the next few years-there is a phase in period before it can be assumed that a drastically new mix is present. Please note how the fleet mix was derived.

- p.163. Please discuss why a change in emissions is expected, i.e. why SO2 is expected to decrease and why NOx is expected to increase.

- Page 238. SEKI correctly acknowledges that mobile source emissions vary through the year. We recommend that special attention be given to traffic emissions from May-September to account for the ozone season.

- Page 239. Please confirm if the daily average is the average daily number averaged throughout the year or for a specific season. It is recommended that if the daily number is averaged by days for a specific time frame, that this number be an average of summer or summer weekend days.

- Page 242: Giant Forest Shuttle. Please explain why Wolverton parking area is NOT included in carrying capacity.

- Page 242, Transit. ARD supports increasing the transit system in the park for this leads not only to decrease traffic but to a decrease in VMT and also pollution levels. We recommend that further steps be taken to protect air quality via the transit system. Additional measures that can be taken to further improve the air quality of SEKI include utilizing clean fuels, adding pollution control devices to vehicles and limiting idling time of transit vehicles.

ARD commends SEKI for making an effort to address air quality issues in the GMP. ARD encourages the parks to further develop the air quality section. Although it is acknowledged that the bulk of the air pollution that impacts SEKI comes from outside the park boundaries, ARD requests that the parks look more at what can be done internally to minimize air pollution. This can be done by enacting mitigation measures for mobile, stationary, smoke and construction emissions. ARD also encourages SEKI to work with Caltrans and encourage them to a) assist in the development of more public transportation options to Sequoia and Kings Canyon National Parks and b) to take mitigation measures when constructing new roads, i.e. State Route 65, to minimize the amount of pollutants entering the air and consequently the parks.

Thank you for the opportunity to comment on the Draft GMP for SEKI. Should you have any questions regarding the comments herein or should you desire assistance in incorporating these comments, please do not hesitate to contact me at: 303 987 6895 or liana_reilly@nps.gov.

bcc:
SEKI: Superintendent
IMRO: NPS GMP Team Leader, Susan Spain
IMRO: Chief of Planning, John Reber
ARD-DEN: Shaver, Bunyak, Reading and Project Files
ARD-DEN: LReilly:LR:8/13/04:x6895:SEKI.mem.doc

3741

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846

In Reply Refer To:
1-1-04-I-1797

JUL 29 2004

Memorandum

To: Elaine Rideout, Design and Construction Division, Denver Service Center

From: Division Chief, Sacramento Fish and Wildlife Office, Sacramento, California

Subject: Informal Endangered Species Consultation on the Draft General Management Plan and Comprehensive River Management Plan / Environmental Impact Statement, Sequoia and Kings Canyon National Parks and Middle and South Forks of the Kings River and North Fork of the Kern River, Fresno and Tulare Counties, California.

This memorandum is in response to your letter dated May 7, 2004, received by us on May 13, 2004, requesting the U.S. Fish and Wildlife Service's (Service) concurrence with the determination that the preferred alternative of the subject action would have no effect on the threatened grizzly bear (*Ursus arctos*), bald eagle (*Haliaeetus leucocephalus*), Little Kern golden trout (*Oncorhynchus aquabonita whitei*) and the endangered California condor (*Gymnogyps californianus*); however may affect but is not likely to adversely affect the endangered bighorn sheep (*Ovis canadensis californiana*), the threatened valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), vernal pool fairy shrimp (*Branchinecta lynchi*) or any other federally listed threatened or endangered species pursuant to the Endangered Species Act of 1973, as amended (Act). We have reviewed the following information: Volume 1 and 2 of the May 2004 *Draft General Management Plan and Comprehensive River Management Plan / Environmental Impact Statement, Sequoia and Kings Canyon National Parks and Middle and South Forks of the Kings River and North Fork of the Kern River, Fresno and Tulare Counties, California* (DEIS).

After reviewing the information provided, the Service concurs with your determination that the draft management plans, as proposed, will have no effect on the grizzly bear, California condor, or the Little Kern golden trout. Should project plans change, or if additional information concerning the distribution of the species listed above becomes available, this determination may be reconsidered. Volume 2, page 17 of the DEIS states the bald eagle "..rarely uses the parks..." which implies an occasional, albeit infrequent, use of the park by this species. Based on this information it is unclear as to how this plan may or may not affect the bald eagle. Therefore, we can not concur with the no effect determination for the bald eagle.

At this time, the Service is unable to concur with your determination that the draft management plans, as proposed, may affect but are not likely to adversely affect the bighorn sheep, valley elderberry longhorn beetle or vernal pool fairy shrimp. The draft management plans do not provide sufficient information concerning project specific actions to fully evaluate the potential impacts to these species.

Projects developed under the scope of the final management plans are subject to the provisions of Section 7 of the Act. As noted in Volume 2, page 143 of the DEIS, before any specific actions are implemented under the final management plans, site specific data collection is needed to fully evaluate the impact to species covered under the Act. We look forward to commenting on those projects as they become available for review.

We appreciate the opportunity to comment on the DEIS. If you have any further questions regarding this action, please contact Andy DeVolder or Roberta Gerson of my staff at (916) 414-6600.

cc:
Dr. David Graber, SEKI Senior Scientist

ORGANIZATIONS

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Alliance of Backcountry Parachutists
2091 Goetz Road
Perris California 92570 USA
www.backcountryparachutists.org

August 20, 2004

RECEIVED
AUG 23 2004
SEQUOIA AND KINGS CANYON NP

Dick Martin, superintendent
47050 Generals Highway
Three Rivers, CA 93271-9700

Dear Superintendent Martin:

The Alliance of Backcountry Parachutists is contacting you at the direction of Interior Department assistant secretary P. Lynn Scarlett, who on July 1, 2004, wrote to Congressman Tom Tancredo concerning fair access to the park system by backcountry parachutists: "We hope that members of the parachuting community will avail themselves of the many opportunities that the parks offer for involving them in the planning and decision-making process..."

Assistant secretary Scarlett's letter is attached, along with Congressman Tancredo's April 2003 letter to NPS regarding its blanket prohibition of backcountry parachuting. In that letter, the assistant secretary also said that, official prohibition aside, she is "confident that (Director Mainella) would expect park superintendents and other NPS decision-makers to give serious consideration to parachuting and similar activities as part of their normal responsibilities for managing recreational uses."

So here we are, ready to get involved in the planning and decision-making process so that backcountry parachuting and its participants can become a routine, responsible and respected part of your unit's backcountry activities.

Like Congressman Tancredo, we very much appreciate Director Mainella for having begun this fair access process in 2002 with the New River Gorge National River, and look forward to working with you on an approach tailored specifically for the needs and circumstances of your unit.

In particular, we want to stress that we agree with assistant secretary Scarlett that the New River waiver, while it did in fact set a new precedent for NPS-parachutist cooperation, is in no way a model for parachuting in other areas of the national park system. New River jumping occurs one day each year at a specific location and time, and is specifically designed to draw tens of thousands of spectators to the promotional event of which parachuting is the signature element.

The fair access we seek is routine wilderness access: Backcountry parachutists as individuals and small groups pursuing their recreational activity of choice in a way that is operationally identical to rock climbing activities as they currently exist in your unit.

Since backcountry parachuting is so operationally similar to rock climbing, we think a good management starting point is to regulate it the same way your unit currently manages rock climbing regulations. It's the most logical way to handle the activity, plus it follows an already established procedure that reduces planning and administrative efforts accordingly.

We would like to meet or discuss with you at your earliest convenience how we can most effectively start involving ourselves in your backcountry planning and decision-making process and very much appreciate this opportunity to start fresh with the Park Service in finding common ground and fair access for our recreational activities.

Thank you in advance for your attention to this matter, and we look forward to hearing soon from you soon.

Sincerely,

Martin Tilley
American Director
Alliance of Backcountry Parachutists

The Alliance of Backcountry Parachutists (ABP) is an international group of individuals and associated organizations dedicated to fair access and responsible use parachutists who like to jump in the backcountry. 2

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"Eagle Dancer Images" <edl@tstonramp.com>
10/06/2004 03:23 PM MST

To: <susan_spain@nps.gov>
cc:
Subject: NPS: SEKI GMP comments

NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service - DSC
12795 W. Alameda Parkway
Denver, Colorado 80225-0287
(303) 969-2280
E-mail: susan_spain@nps.gov

Dear Ms. Spain:

Herewith are the comments from the Alliance of Backcountry Parachutists regarding the draft General Management Plan:

Topic 1: Miscellaneous Comments and Ideas

Per Assistant Secretary of the Interior P. Lynn Scarlett's July1, 2004, letter to Congressman Thomas Tancredo regarding backcountry parachuting in national park units, we hereby propose that the term and activity of "backcountry parachuting" be included in the following sections and pages of the Draft, General Management Plan and Comprehensive River Management Plan/Environmental Impact Statement, Volume 1: Purpose pf and Need for Action/The Alternatives/Index:

SCOPE OF THE PLAN/ Values and Issue Identified During Scoping, Page 32: Wilderness Values. Amend the last sentence to read: "Widerness is also valued for the different recreational opportunities it provides - primarily hiking, backpacking, stock use, rock climbing and backcountry parachuting."

MANAGEMENT PRESCRIPTIONS/Frontcountry Prescriptions, page 57: Appropriate activities. Amend first sentence to read: "Activities may include onsite programs, hiking, water play, fishing, caving, rock climbing, backcountry parachuting, nonmotorized watercraft use, cross-country skiing, snowshoeing, bicycling and stock use in designated areas."

MANAGEMENT PRESCRIPTIONS/ Frontcountry Zone, page 58: Appropriate activities. Amend first sentence to read: "Activities include driving, sightseeing, hiking, camping, caving, rock climbing, backcountry parachuting, water play, fishing, nonmotorized watercraft use, cross-country skiing, snowshoeing, and picnicking."

MANAGEMENT PRESCRIPTIONS/ Backcountry (and Wilderness) Prescriptions, Major Trails page 62: Appropriate activities. Amend first sentence to read: "Activities include hiking, backpacking, fishing, rock climbing, backcountry parachuting, nonmotorized watercraft use, and winter uses (cross-country skiing and snowshoeing)."

MANAGEMENT PRESCRIPTIONS/ Backcountry (and Wilderness) Prescriptions, Secondary Trails page 63: Appropriate activities. Amend first sentence to read: "Activities include hiking, backpacking, fishing, rock climbing, backcountry parachuting, nonmotorized watercraft use, and winter uses (cross-country skiing and snowshoeing)."

MANAGEMENT ALTERNATIVES/Mitigating Measure Included in the Alternatives/Mitigation for Impacts on Threatened, Endangered, or Sensitive

Species, page 73. Amend Paragraph 2, second sentence to read: "This could include closures of areas or restrictions on use (e.g., rock climbing and backcountry parachuting in sheep habitat or trail use and backcountry parachuting in the vicinity of occupied raptor nests."

ALTERNATIVES CHARTS, page 91, reference 61. Amend Recreation entry to read: "Recreation - Outstanding recreational opportunities, such as hiking, camping, climbing, backcountry parachuting, photography and opportunities to experience solitude."

ALTERNATIVES CHARTS, page 91, reference 63. Amend Recreation entry to read: "Recreation - The adjacent trail provides exceptional hiking and camping opportunities. Excellent opportunities for unconfined recreation such as mountain and rock climbing, backcountry parachuting, and for solitude."

General commentary related to these proposed amendments:

Backcountry parachuting is a nonpolluting, nonmotorized recreational activity that is very much akin to rock climbing in its general character and practice, except that there is no physical impact to the rock walls by protection devices or chalk. This activity has been going on in the national parks for more than 20 years now, despite official access discrimination by the National Park Service.

As a result of Assistant Secretary of the Interior P. Lynn Scarlett's July 1, 2004, letter to Congressman Thomas Tancredo, it is important for NPS planners to operate in good faith and with an open mind to the possibility of allowing backcountry parachuting to become an accepted part of the backcountry recreational opportunities and practices in Kings Canyon/Sequoia and other national park units.

The ABP recognizes that there are multiple management issues at work in any decision to include backcountry parachuting in your GMP or other use plans, and we are ready and willing to be flexible and patient as we work together to include this now-traditional backcountry activity in the officially recognized and accepted activities of Kings Canyon/Sequoia.

Thanks you for you attention to this matter.

Robin Heid
Access Coordinator
Alliance of Backcountry Parachutists

Cc: Tancredo/Scarlett/Mainella

EDITOR'S NOTE: Attachments have not been included. The original letter is on file at park headquarters.

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Dr. David Graber, Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

RE: Sequoia-Kings Canyon National Parks Draft General Management Plan comments:

I am an avid hiker and backpacker, although this latter pursuit was much more avid in my younger years. In spite of this limitation, I have backpacked in the Mineral King basin, and have spent several other extended visits day hiking out of the Mineral King Village area. It is a rare opportunity to interact with the natural environment while surrounded by the historic environment. Mineral King offers this opportunity. The historic setting of mines, mining structures, cabins, trails, and roads is particularly significant. All too often, history is erased in the misguided attempt to experience nature. Nature in its purest form can be accessed easily simply by hiking over Sawtooth Pass, entrance to thousands of acres of back country. But the wonderful ambience of Mineral King can only be felt by soaking in the history it represents. And in particular, the cabins and village structure are of paramount importance.

My several visits to Mineral King have convinced me that the preservation of this special mountain community (the road, buildings and families), is important as a meaningful aspect of Sierran history. Where else are seventh generation families living as their forefathers did without modern amenities? Park visitors enjoy learning of the past from community members at campfires, on the trail and in guided walks. This culture and environment must be preserved for future generations to enjoy and experience.

It appears that the most efficient and cost-effective way in which to ensure the preservation of the cabins and the community is to continue the special use cabin permits. The families have proven their willingness and ability to maintain the historic integrity of the cabins and to act as stewards of the valley. They have invested their own resources, both time and money, towards the preservation of this important historic resource - at no cost to the taxpayers.

The General Management Plan for Sequoia must provide for issuing permits to the current cabin owners. If that necessitates additional legislation, the National Park Service should pursue this. A national historic district within the Park greatly enhances the visitor experience.

I can say with certainty that if the cabins and other historic resources do not continue to exist in their current form, I will not again visit Mineral King. The combination of natural beauty and historic integrity is the only reason I will chose this destination over other alternatives.

Marc Williams, President
American Conservation Consortium, Ltd.
85 North Road
Fremont, NH 03044
603-679-8307

acc@conservator.com

email #1

REGARDING: SEKI GMP

Dear Ms. Spain and Dr. Graber,

By way of background, the Backcountry Horsemen of California (BCHC) is a state-wide organization of over 4,000 members representing 26 units whose purpose is to improve and promote the use, care and development of California backcountry trails, campsites, streams and meadows and to keep the backcountry trails and forage areas open to horsemen on all public lands. We also have extensive educational programs and literature for our membership and the public on good trail manners and wise use of public lands. Our organization contributes significant labor to trail maintenance and other volunteer efforts on both federal and state public lands on an annual basis.

We are a state member of the Backcountry Horsemen of America representing 19 state organizations and 16,000 members nationally. National wide the Backcountry Horsemen contributed over $3.4 million in volunteer efforts on public lands in 2003.

The following comments are related to the Draft General Management Plan and Environmental Impact Statement.

1 – Historical Mission:

Stock Use is a traditional, historic and cultural cornerstone in the establishment, management, and public use of Sequoia and Kings Canyon National Parks.

- It is a valid use and has been documented throughout the Parks' history. As such it should be preserved and protected to a much greater degree than what is proposed in the Draft GMP.

- Stock use meets the Parks' mission by enhancing visitor experiences, provides greater access to people of limited physical abilities, and accommodates different user skills abilities and age levels.

- Moreover, because over 90% of the Parks is either designated or managed as Wilderness, those guidelines prohibit mechanical means of transportation, stock use is the only method available to support both park and visitor services in those wilderness areas.

- By the very virtue of being an historic, traditional and cultural activity, pack and saddle stock use is appropriate in Sequoia and Kings Canyon National Parks (SEKI).

- The Mission Goal 1a on page 11, to protect natural and cultural resources and associated values, supports our argument that pack and saddle stock use is appropriate in Sequoia and Kings Canyon National Parks. The continued use of pack and saddle stock ensures the preservation and protection of an important aspect of our cultural history and the values

associated with western settlement. Initial visitors to the park utilized pack and saddle stock. The result of these early visitations, and the appreciation of the unique features of the environment, led to the designation of the area as a national park.

- The National Environmental Policy Act Section 10(b) 4 mandates preservation of "important historic, cultural, and natural aspects of our national heritage…" Pack and saddle stock use is an important historic and cultural aspect of our national heritage. Pack and saddle stock use pre-dates the formation of both Sequoia and Kings Canyon National Parks. First stock use by Euro-Americans was in the late 1850's. In 1861 horse use and trail building took place in Log Meadow. In 1890 Sequoia National Park was formed, and the 4th US Calvary conducted its first administrative patrols in 1891. In 1902, a contract was awarded for commercial transportation with horses and mules (wagons, pack trains, etc). Moreover, stock use was the primary means of access into Sequoia and Kings Canyon National Parks into the early 20th century.

- Active support of pack and saddle stock use by the public, commercial service providers, and Park employees will fulfill the Park's mandate to preserve an important aspect of our national and especially our western cultural heritage.

- The second mandate of Section 10(b)4 is to "maintain…an environment that supports diversity and variety of individual choice." The banning of stock from the Parks would eliminate the diversity and individual choice by making the Park accessible only to those who can hike into the wilderness, or access the front country by a mechanized means.

- In order for SEKI to have support for its program and activities, it must remain accessible to all user groups not just an elite, physically fit few.

- The National Historic Preservation Act, Section 470(b)(1) states: *"the spirit and direction of the Nation are founded upon and reflected in its historic heritage;"* and subsection (2) states: *"the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people."*

The use of pack and saddle stock is a part of our historical and cultural heritage and the foundation of the settlement of the West and establishment and use of the Parks. Every effort should be made to preserve and increase pack and saddle stock in the Sequoia and Kings Canyon National Parks.

#2 – Concerns with Alternatives

All of the alternatives presented propose to either eliminate, increasingly regulate, and/or severely limit stock use throughout the Parks.

Examples include:

- More regulated party size limits - Preferred Alternative and Alternative C.

- Greater levels of on site regulations - Preferred Alternative and Alternative C.

- Separation of use areas - Alternatives C & D.

- The Preferred Alternative and Alternative C propose to modify the quota system for resource protection. NO data is given to support the need for an adjustment in the quota system.

- Alternative C proposes to "disperse use in small groups." No data is given to support this proposal for a group size reduction.

- Additionally, the Preferred Alternative and Alternative C would limit or cap commercial pack operations. These last elements would further reduce the economic viability of the commercial pack operations within the park forcing their removal from the Parks. This would have a net effect of further reducing opportunities and facilities for stock access for both the general public and for users of private stock.

- Alternative A would completely eliminate all pack and saddle stock from the Park. We believe that Alternative A is not a viable alternative as required by NEPA. Park Service guidelines for preparation of Environmental Impact Statements states that "CEQ defines reasonable alternatives as those that are technically and economically feasible and that show evidence of common sense." Page 35 states that the general management plan must decide whether stock use is appropriate, noting that "some groups" want stock use eliminated. Stock use is an historic use in the Parks and has been rigorously restricted and monitored since 1986. A "no stock" alternative does not show evidence of common sense. Additionally, in the Draft GMP 'management alternatives,' Volume I, page 77, Goal 2, Alternative A "does not meet the goal" of NEPA section 101(b).

Furthermore, you state in the "Need for the Plans" section (page 6) that the 1971 *Master Plan* had a goal to phase out stock use but that goal was replaced by the 1986 *Stock Use and Meadow Management Plan* that regulated stock use to protect park resources. Consequentially, there is no justification for a "no stock alternative" in this Plan.

A "no stock" alternative belongs with those alternatives considered but rejected because of the arguments stated above.

All alternatives imply an inappropriate anti stock bias.

In addition to the above points, the following further supports our contention that the General Plan has an inappropriate anti stock bias:

- Page 34 lists 'Appropriate Visitor Experiences.' Stock use is completely ignored in the 'traditional range of Park activities.'

- Page 35 – The question is posed 'can stock use be accommodated as an activity.' The GMP states 'the Management Plan must decide whether stock use is appropriate." By virtue of its historic and cultural precedent, stock use is an appropriate use.

#3 – Insufficient Data for Analysis of Alternatives:

On Page 35, the document states: "The general management plan will look at whether resource condition monitoring and research indicate that stock use can be continued without irreparable resource degradation." We find no further discussion in the document about "resource condition monitoring" vis a vis stock use.

Due to the lack of important data that you indicated would be part of the Plan, the alternatives cannot be assessed because no quantitative information is presented that will allow evaluation of the alternatives or to assess the effects of the proposed actions.

As an example, the preferred alternative would reduce stock party size. No information is given on what the existing stock party size is, and no information is given on what the proposed stock party size would be. Thus, there is no justification for the stock party size reductions. Changes in stock party size need to be analyzed and evaluated through the NEPA process.

Furthermore, this proposed action may be unnecessary given that backcountry use accounts for only 2-3% of the visitation in the Park and 4% of the 2-3 % is stock use, and 50% of the 4% is administrative stock use. Our point is that stock use is insignificant. The document clearly identifies the major stressors as coming from environmental conditions outside of, and beyond the control of the National Parks. Consequently stock use, accounting for an insignificant amount of use (.05-.1%) of the Parks, is not a significant stressor.

Another example of insufficient data is on Page 114 – the Preferred Alternative. The Draft Plan states "modify quota system as needed for resource protection." This would imply a need. The Plan does not provide any data to support any need for modification (reduction) to the current trailhead quota system.

Then, on Page 114, the Plan states "Determine party size limits through a revised wilderness and backcountry management plan." This statement is too vague and we cannot determine if party size limits will be decreased, and use further restricted, or if the party size limits will be increased to match those of the surrounding national forests and other national parks. Thus it is not possible to comment on the alternatives' merits and to the effects and changes that may result.

The maps are completely insufficient. This includes the Wild & Scenic river map through the wilderness maps. There is no detail that allows one to become oriented to features, improvements and other facilities. The legends are insufficient and it is impossible to determine the areas on the map that are being referenced.

#4 - Conflicting Information:

- Pg 67 – "Most stressors to the backcountry are region wide such as air pollution and climate change, *rather than from activities* within the parks." Since stock use is completely unrelated to air pollution and climate change, it is clearly not a stressor to the backcountry. Yet, on Page 86 – The Preferred Alternative would "expand use of controls on stock party size, regulation of dates and locations, designation of areas, and appropriate closures as needed." This is totally inconsistent with the statement about stressors implies that those things cause degradation in the backcountry. Region wide caused by … not by activities within the park. Limit backcountry use to improve resource conditions. But the stressors are not even related to the use.

- Pg 114 – Preferred Alternative – "modify quota system as needed for resource protection" implies a need. There is no need for modifications if degradation is not caused by stock use. Additionally, there is no data presented on the performance of the existing quotas that would justify a need to change the quotas.

- On Pg 189 – Environmental Consequences, Vegetation & Soils. Preferred Alternative "Limiting backcountry use to improve resource conditions would result in minor to moderate, beneficial long-term, localized effects." Since most stressors are not stock related, but are region wide factors (air quality and climate change) there is no apparent reason for more limits on backcountry stock use.

Moreover Park figures put stock use at approximate 2% of all backcountry use further reducing any contention that stock can be a significant stressor to the backcountry environment.

RECOMMENDATIONS:

1. Provide for the continued use of pack and saddle stock in both the front country and wilderness areas of the parks at the traditional use levels using 1954 as the base level (50 year historic benchmark).

2. Change grazing restrictions on all trail systems to facilitate shorter travel distances. The maximum distance between allowable camping and grazing areas should be no greater than 7 miles, with camping limits of no less than 2 nights per area. This provides opportunities for visitors to travel with both young and old members of their group and aids in the Parks' mission to facilitate and enhance visitor experiences.

3. Meadow closures would not exceed 1 year. A rest – rotation schedule could replace the closure system that is currently in effect. We would encourage the Parks to utilize the knowledge and expertise of accredited Range Management specialists and local stock users to develop a realistic and feasible grazing program.

4. Party and group size limits should be no less than 15 people and 25 head of stock.

5. Increase private and commercial stock use. The carrying capacity is far greater than what

current limits allow. Considering the fact that in 1955 almost 45,000 stock user nights were recorded in both parks (summary report of stock use in Wilderness Meadows from 1955 to 1999) and that in 2003 there were only 2500 commercial and private stock use nights it is clear that the parks capacity to handle more stock use is far greater than current use levels. It is therefore our contention and our recommendation that private and commercial stock use be increased and use areas expanded (trails, corrals, overnight facilities, hitch rails, bear boxes, etc.).

6. Trails Inventory – We request that the general plan describe the existing trails inventory, both in the front country, backcountry and wilderness areas and state as a goal that a trails transportation system be evaluated for current and future use and that standards be established that would preserve the condition of the trails to allow use by pack and saddle stock. The Plan does not discuss the adequacy of the trails transportation system nor does it reference a trails inventory of any kind.

7. Stock use will be allowed on major trails, secondary trails and allowed to travel cross country. Particularly in the backcountry and wilderness, the experience of exploring and having opportunities for solitude are just as important to stock users. Stock use may be limited on the heavy use front-country interpretative trails.

8. Reestablish commercial pack station operations in the Wolverton area. Establish a facility that can provide services for day rides and overnight trips; include facilities and services for persons with disabilities; include overnight corrals and facilities for private stock users; include camping sites for stock users for both short term (1 night) and longer term (14 nights). Improve and expand pack station operations in Mineral King, Grant Grove, and Cedar Grove. Continue to allow commercial pack stations to enter from surrounding national forests.

9. Reinstate the provision for commercial pack stations to issue wilderness permits to stock parties.

10. Expand visitor access for stock users by developing an additional High Sierra Camp on the Hockett Plateau with stock facilities (corrals, hitch rails, pastures, bear boxes, etc.).

11. Do not select any alternative that separates user groups. This does not support the Parks' Mission to 'promote and educate and foster better understanding between user groups.' Rather it lays the foundation for animosity and conflict.

12. Supplying backcountry and wilderness administrative functions should be done primarily using pack and saddle stock. The use of helicopters should be limited to emergency situations including evacuations, rescues, and initial attack on fires.

13. The Preferred Alternative states that 46.8 miles of river are suitable for a "wild" designation and 24 miles are suitable for "recreational" designation under the Wild and Scenic Rivers Act. We can only support further designations if the historic use of trails

and camp sites along these stretches of the rivers are preserved.

While Section 7(a) of the Wild and Scenic Rivers Act precludes the construction of any water resources projects that would have a direct and adverse effect on the values of wild and scenic rivers. The river stretches identified as "eligible and suitable" (starting on page 100) would be afforded "additional long-term protection against downstream water resource projects." However, the GP fails to note that the same section of the act states "Nothing contained in the foregoing sentence, however, shall preclude licensing of, or assistance to, developments below or above a wild, scenic or recreational river area or on any stream tributary thereto which will not invade the area or unreasonably diminish the scenic, recreational, and fish and wildlife values present in the area on the date of designation of a river as a component of the national wild and scenic rivers system."

14. We cannot support any further wilderness designations for the following reasons:

- More than 96% of the Parks are managed as wilderness,
- The designation of more wilderness would preclude the effective use of fuels reduction activities that reduce the threat of catastrophic fire,
- The effort (in manpower and dollars) necessary to further study areas for wilderness designation would be better spent on maintaining wilderness trails to protect the resource and other wilderness maintenance needs.

Respectfully submitted,

Barbara J. Ferguson
Vice President, Public Lands
BCHC

cc: John Keyes, President, BCHC
Karl Pendegraph, High Sierra Unit President
Stephen Didier, Chairman, BCHA
Kevin Garden esq., Saltman and Stevens
Congressman Devin Nunes
Congressman George Radanovich

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Backcountry Horsemen of California
High Sierra Unit
P.O. Box 4427
Visalia, CA 93278

Received DSC-P
OCT 19 2004

NPS GMP Team Leader, Susan Spain
National Park Service – DSC
12795 W. Alameda Parkway
Denver, Colorado 80225-0287

Dear Susan:

The following comments are submitted on behalf of the High Sierra Unit of the Backcountry Horsemen of California. Our unit is comprised of approximately 250 members. The High Sierra Unit was the first Backcountry Horsemen unit in the state of California, and we have been in existence for over 20 years. Originally, the unit was formed to protect the uses of pack and saddle stock in Sequoia and Kings Canyon National Parks, and Sequoia National Forest. There are now 25 units throughout the state representing approximately 4000 members. Additionally, we are affiliated with the Backcountry Horsemen of America, which has representatives in 19 states.

We have taken an active role in Sequoia-Kings Canyon National Park planning issues since the early 1980's. We also take an active role in volunteer service projects. Members from our unit are also involved in organizations that help support Sequoia and Kings Canyon National Parks (ie: the Sequoia Fund and the Sequoia Natural History Association). To summarize – we care deeply about the past, present and future of these parks; ensuring the preservation of the cultural and historic use of pack and saddle stock; and protecting access to these public lands.

It is with great concern that we submit our comments to the Draft General Management Plan. We feel the GMP does not provide adequate protection of historic and cultural uses; each of the alternatives appears to add additional restrictions and limitations to stock use, including the possibility of total elimination; there is insufficient data provided to substantiate the need for the proposed restrictions and limitations; and there is conflicting information as to the rationale for the proposed restrictions. Because there is no clear alternative that meets our needs for the future, we have listed our suggested recommendations that should be incorporated into the final decision for the Plan.

We would like to see Sequoia and Kings Canyon National Parks take the lead nationally, in preserving the traditional and historic uses of pack and saddle stock. This includes opportunities for both the private stock user and for those needing the services of a commercial provider. We would like to see front-country facilities that are stock use oriented, such as campgrounds for stock use, as well as trailheads with overnight camping facilities. Stock use should be inventoried as an historic landscape. Backcountry and wilderness areas (trails) should not be closed to areas historically used by stock. The regulations should be more realistic for visitors traveling by stock in terms of areas between meadows open for grazing, length of stay, and access to campsites with bear proof food lockers. Commercial pack stations should be re-established at Wolverton and Mineral King, and the operations at Cedar Grove and Grant Grove should be issued new long term contracts.

It is our strong belief that the Congressional direction in the establishment of Sequoia National Park should be evident in the activities provided for in the future. Congress stated that the Park was being "dedicated and set apart as a public park, or pleasure ground, for the benefit and enjoyment of the people." And furthermore, Congress stated that the regulations implemented for activities in the Park shall be "primarily aimed at the freest use of said park for recreation purposes by the public..." A review of the current list of stock use restrictions and regulations does not depict 'freest use.' Additionally, we do not believe the alternatives and proposals in the Draft GMP reflect the spirit and the specifics of the National Historic Preservation Act. The Act states, "the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people." If the stock use traditions in SEKI are reduced and diminished, it reflects poorly on the planners and administration for making decisions that would result in a loss of an important heritage.

Our specific comments pertaining to the Draft GMP are as follows:

1. Stock use is a traditional, historic and cultural cornerstone in the establishment, management, and public use of Sequoia and Kings Canyon National Parks.

   - It is a valid use and has been documented throughout the Parks' history. As such it should be preserved and protected to a much greater degree than what is proposed in the Draft GMP. By the very virtue of being an historic, traditional and cultural activity, pack and saddle stock use is appropriate in Sequoia and Kings Canyon National Parks (SEKI).

   - Stock use meets the Parks' mission by enhancing visitor experiences, provides greater access to people of limited physical abilities, and accommodates different user skills abilities and age levels.

   - The Mission Goal 1a on page 11, to protect natural and cultural resources and associated values, supports our argument that pack and saddle stock use is appropriate in Sequoia and Kings Canyon National Parks. The continued use of pack and saddle stock ensures the preservation and protection of an important aspect of our cultural history and the values associated with western settlement. Initial visitors to the park utilized pack and saddle stock. The result of these early visitations, and the appreciation of the unique features of the environment, led to the designation of the area as a national park.

   - The National Environmental Policy Act Section 10(b) 4 mandates preservation of "important historic, cultural, and natural aspects of our national heritage..." Pack and saddle stock use is an important historic and cultural aspect of our national heritage. Pack and saddle stock use pre-dates the formation of both Sequoia and Kings Canyon National Parks. First stock use by Euro-Americans was in the late 1850's. In 1861 horse use and trail building took place in Log Meadow. In 1890 Sequoia National Park was formed, and the 4th US Calvary conducted its first administrative patrols in 1891. In 1902, a contract was awarded for commercial transportation with horses and mules (wagons, pack trains, etc). Moreover, stock use was the primary means of access into Sequoia and Kings Canyon National Parks into the early 20th century.

- Active support of pack and saddle stock use by the public, commercial service providers, and Park employees will fulfill the Park's mandate to preserve an important aspect of our national and especially our western cultural heritage.

- The second mandate of Section 10(b) 4 is to "maintain…an environment that supports diversity and variety of individual choice." The banning of stock from the Parks would eliminate the diversity and individual choice by making the Park accessible only to those who can hike into the wilderness, or access the front country by a mechanized means.

- Because over 90% of the Parks is either designated or managed as Wilderness, the wilderness guidelines prohibit mechanical means of transportation. Stock use is the only method available to support both park and visitor services in those wilderness areas.

- In order for SEKI to have support for its program and activities, it must remain accessible to all user groups not just an elite, physically fit few.

2. <u>All of the alternatives presented propose to either eliminate, increasingly regulate, and/or severely limit stock use throughout the Parks.</u>

   - Alternative A would completely eliminate all pack and saddle stock from the Park. We believe that Alternative A is not a viable alternative as required by NEPA. Park Service guidelines for preparation of Environmental Impact Statements states that "CEQ defines reasonable alternatives as those that are technically and economically feasible and that show evidence of common sense." Page 35 states that the general management plan must decide whether stock use is appropriate, noting that "some groups" want stock use eliminated. Stock use is an historic use in the Parks and has been rigorously restricted and monitored since 1986. The Draft GMP 'management alternatives,' Volume I, page 77, Goal 2, Alternative A "does not meet the goal" of NEPA section 101(b).

     Furthermore, the "Need for the Plans" section (page 6) states that the 1971 *Master Plan* had a goal to phase out stock use but that goal was <u>replaced</u> by the 1986 *Stock Use and Meadow Management Plan* that regulated stock use to protect park resources. Consequentially, there is no justification for a "no stock alternative" in this Plan. A "no stock" alternative belongs with those alternatives considered but rejected.

   - Page 34 lists 'Appropriate Visitor Experiences.' Stock use is completely omitted in the 'traditional range of Park activities.'

   - Page 35 – The question is posed 'can stock use be accommodated as an activity.' The GMP states, "the Management Plan must decide whether stock use is appropriate." By virtue of its historic and cultural precedent, stock use is an appropriate use. To include the question 'should stock use be appropriate' reflects an anti stock use bias in the GMP.

- Additional examples of regulations and restrictions are as follows:
  More regulated party size limits - Preferred Alternative and Alternative C.
  Greater levels of on site regulations - Preferred Alternative and Alternative C.
  Separation of use areas - Alternatives C & D.

- Additionally, the Preferred Alternative and Alternative C would limit or cap commercial pack operations. These last elements would further reduce the economic viability of the commercial pack operations within the park forcing their removal from the Parks. This would have a net effect of further reducing opportunities and facilities for stock access for both the general public and for users of private stock.

3. The GMP lacks sufficient data for a thorough and adequate analysis of the alternatives.

   - On Page 35, the document states: "The general management plan will look at whether resource condition monitoring and research indicate that stock use can be continued without irreparable resource degradation." We find no further discussion in the document about "resource condition monitoring" pertaining to stock use.

   - Due to the lack of important data, the alternatives cannot be assessed because no quantitative information is presented that will allow evaluation of the alternatives or to assess the effects of the proposed actions.

     As an example, the preferred alternative would reduce stock party size. No information is given on what the existing stock party size is, and no information is given on what the proposed stock party size would be. Thus, there is no justification for the stock party size reductions. Changes in stock party size need to be analyzed and evaluated through the NEPA process. Furthermore, this proposed action is unnecessary given that backcountry use accounts for only 2-3% of the visitation in the Park and 4% of the 2-3 % is stock use, and 50% of the 4% is administrative stock use. The amount of stock use is insignificant.

     The document identifies major 'stressors' as coming from environmental conditions outside of, and beyond the control of the National Parks. Consequently stock use, accounting for an insignificant amount of use (.05-.1%) of the Parks, can not be a significant stressor.

   - Page 114, the Plan states "Determine party size limits through a revised wilderness and backcountry management plan." This statement is too vague and we cannot determine if party size limits will be decreased, and use further restricted, or if the party size limits will be increased to match those of the surrounding national forests and other national parks. Thus it is not possible to comment on the alternatives' merits and to the effects and changes that may result.

   - The Preferred Alternative and Alternative C propose to modify the quota system for resource protection. NO data is given to support the need for an adjustment in the quota system.

- Another example of insufficient data is on Page 114 – the Preferred Alternative. The Draft Plan states "modify quota system as needed for resource protection." This would imply a need. The Plan does not provide any data to support any need for modification (reduction) to the current trailhead quota system.

- The maps are completely insufficient. This includes the Wild & Scenic river map through the wilderness maps. There is no detail that allows one to become oriented to features, improvements and other facilities. The legends are insufficient and it is impossible to determine the areas on the map that are being referenced.

- Alternative C proposes to "disperse use in small groups." No data is given to support this proposal for a group size reduction.

4. <u>The Draft GMP presents conflicting information for the proposed restrictions.</u>

Examples include the following:

- Air quality and climate change.
  Pg 67 – "Most stressors to the backcountry are region wide such as air pollution and climate change, *rather than from activities* within the parks." Since stock use is completely unrelated to air pollution and climate change, it is clearly **not** a stressor to the backcountry. Yet, on Page 86 – The Preferred Alternative would "expand use of controls on stock party size, regulation of dates and locations, designation of areas, and appropriate closures as needed." This is totally inconsistent with the statement about stressors implies that those things cause degradation in the backcountry are region wide and caused by external factors (i.e.: air pollution and climate change) not by activities within the park. Yet the Plan proposes to limit backcountry use to improve resource conditions, even though the 'stressors' are not related to the use.

- Page 114 – Preferred Alternative – "modify quota system as needed for resource protection" implies a need. There is no need for modifications if degradation is not caused by stock use. Additionally, there is no data presented on the performance of the existing quotas that would justify a need to change the quotas.

- Page 189 – Environmental Consequences, Vegetation and Soils. The Preferred Alternative states that "Limiting backcountry use to improve resource conditions would result in minor to moderate, beneficial long-term, localized effects." Since most stressors are not stock related, but are region wide factors (air quality and climate change) there is no apparent reason for more limits on backcountry stock use. Park figures put stock use at approximate 2% of all backcountry use further reducing any contention that stock can be a significant stressor to the backcountry environment.

RECOMMENDATIONS:

1. Provide for the continued use of pack and saddle stock in both the front country and wilderness areas of the parks at the traditional use levels using 1954 as the base level (50 year historic benchmark).

2. Change grazing restrictions on all trail systems to facilitate shorter travel distances. The maximum distance between allowable camping and grazing areas should be no greater than 7 miles, with camping limits of no less than 3 nights per area. This provides opportunities for visitors to travel with both young and old members of their group and aids in the Parks' mission to facilitate and enhance visitor experiences. It also allows groups to have 'layover days' to enjoy and explore the scenery in various areas throughout the Parks.

3. Meadow closures would not exceed 1 year. A rest – rotation schedule could replace the closure system that is currently in effect. We would encourage the Parks to utilize the knowledge and expertise of accredited Range Management specialists and local stock users to develop a realistic and feasible grazing program.

4. Party and group size limits should be no less than 15 people and 25 head of stock.

5. Increase private and commercial stock use. The carrying capacity is far greater than what current limits allow. Considering the fact that in 1955 almost 45,000 stock user nights were recorded in both parks (summary report of stock use in Wilderness Meadows from 1955 to 1999) and that in 2003 there were only 2500 commercial and private stock use nights, it is evident that the parks' capacity to handle more stock use is far greater than current use levels. It is our contention and our recommendation that private and commercial stock use be increased and use areas expanded (trails, corrals, overnight facilities, hitch rails, bear boxes, etc.).

6. Trails Inventory – We request that the general plan describe the existing trails inventory, both in the front country, backcountry and wilderness areas. It should also state as a goal that a trails transportation system be evaluated for current and future use, and standards be established that would preserve the condition of the trails to allow use by pack and saddle stock. The Plan does not discuss the adequacy of the trails transportation system nor does it reference a trails inventory of any kind.

7. Stock use will be allowed on major trails, secondary trails and allowed to travel cross country. Particularly in the backcountry and wilderness, the experience of exploring and having opportunities for solitude are just as important to stock users.

8. Reestablish commercial pack station operations in the Wolverton area. Establish facilities that can provide services for day rides and overnight trips; include facilities and services for persons with disabilities; include overnight corrals and facilities for private stock users; include camping sites for stock users for both short term (1 night) and longer term (14 nights).

9. Improve and expand pack station operations in Mineral King, Grant Grove, and Cedar Grove. Include overnight corrals and facilities for private stock users; include camping sites for stock users for both short term (1 night) and longer term (14 nights). Continue to allow commercial pack stations to enter from surrounding national forests.

10. Reinstate the provision to allow the commercial pack stations to issue wilderness permits to stock parties.

11. Expand visitor access for stock users by developing an additional High Sierra Camp on the Hockett Plateau with stock facilities (corrals, hitch rails, pastures, bear boxes, etc.).

12. Do not select any alternative that separates user groups. This does not support the Parks' Mission to 'promote and educate and foster better understanding between user groups.' Rather it lays the foundation for animosity and conflict.

13. The use of helicopters should be limited to emergency situations including evacuations, rescues, and initial attack on fires. Supplying backcountry and wilderness administrative functions should be done primarily using pack and saddle stock.

14. Stock use should be inventoried as an historic landscape

15. Recommendations for the Management Prescriptions:
    - ✔ Giant Sequoia Groves: Must include historic uses, including stock. Stock should not be prohibited from any trails or areas in or around Giant Sequoia groves where they have traditionally been traveling. Stock use access should be the same as when the military patrolled the Park.
    - ✔ River Protection Measures: There should be NO additional restrictions than what existed at the time of Congressional designation for roads, trails, and stock use.
    - ✔ Natural Sound: Do not prohibit necessary management items such as bells on stock in the backcountry.
    - ✔ Cultural Resources: Cultural landscapes are to be protected and preserved. Stock use is historic, pre-dating the establishment of both Sequoia and Kings Canyon National Parks. This historic use needs to be recognized and preserved.
    - ✔ Commercial Services: Pack stations must be re-established at Wolverton & Mineral King ASAP. The Plan must provide for viable operations at Cedar Grove and Grant Grove. Incidental business permits for packing operations (based outside the Park) must be allowed to continue for pack station operations on the adjacent Inyo, Sierra and Sequoia National Forests. Commercial packing services need to be expanded to encourage opportunities for the disabled, elderly, youth groups, and to provide for accommodating private stock use for short term boarding.

16. Recommendations for Park Facilities:
    - Roads:
      Roads and trailheads should accommodate stock trailer travel and parking.

17. Recommendations for Park Development:
    - Need Campgrounds for stock users. For front country areas – campgrounds that could accommodate overnight camping to the same stay limits as regular campgrounds. Trailhead camping for 1 night to accommodate stock groups going into the wilderness. Need ability to stay with stock and not required to unhook trailers.

    - Backcountry prescriptions: Need to allow stock use where terrain permits. Stock should not be prohibited from any trail. The trails can be signed as 'not recommended for stock'. Cross country should be allowed for all stock use (private & commercial).

18. Recommendations Common to All Alternatives:
    - Kings Canyon: Need stock camping facility for short and long term camping. Need facility to accommodate stock for day rides, and trailhead areas for short term camping before going into the backcountry.

    - Wolverton: Need commercial pack station services to the public, including providing staging area and boarding facility for private stock.

    - Mineral King: Need commercial pack station services to the public, including providing staging area and boarding facility for private stock.

    - Dillonwood: Has a long history of being used for stock use, which should continue. Dillonwood needs a facility for overnight stock accommodations for short term camping and long term camping.

19. Wilderness Act:
    - The Plan has omitted information on the purposes of wilderness, specifically that wilderness areas 'shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use' and about commercial use. There are misleading statements about what is prohibited. Commercial use is NOT prohibited, but rather allowed 'as necessary to meet minimum requirements for the administration of the area for the purpose of this Act…' The Plan misconstrues the facts to the public.

20. Potential wilderness:
    - Bear Paw would ***not*** have to be removed if the area were designated wilderness. There are many such facilities and services that are specifically provided for in other wilderness areas' enacting legislation.

21. Visitor and Community Values and Issues:
    - ✔ The citizens have stated they want little change. The historic use of pack and saddle stock is an integral part of the SEKI landscape. As mentioned previously, the Parks were established for public enjoyment, and the public expects to have access to these parks. Access provides opportunities for visitors to want the parks to remain open to future generations. We need to ensure that a range of experiences are available for persons with different skills, abilities and ages. Closure and restriction of stock facilities narrows that range of experiences, and it certainly makes wilderness suitable for an elite few.

22. Additional lands designated as wilderness :
    There should not be one more acre of designated wilderness until legislation is enacted that protects existing pack and saddle stock use at levels existing at 1964, the date of the original Wilderness Act.

23. Additional lands designated as Wild & Scenic Rivers :
    We will only support further designation of lands under the Wild & Scenic River Act if the historic use of trails and camp sites for stock use are preserved.

We appreciate the opportunity to submit our comments to the Draft General Management Plan. Please keep the High Sierra Unit of the Backcountry Horsemen of California on all mailing lists for any subsequent planning documents and correspondence pertaining to Sequoia and Kings Canyon National Parks. Our mailing address is: P.O. Box 4427, Visalia, CA 93278.

Respectfully submitted,

Karl J. Pendegraft, DDS
President, High Sierra Unit
Backcountry Horsemen of California

cc: John Keyes, President, BCHC
Barbara J. Ferguson, Vice President, Public Lands, BCHC
Stephen Didier, Chairman, BCHA
Kevin Garden esq., Saltman and Stevens
Congressman Devin Nunes
Congressman George Radanovich

290.

SALTMAN & STEVENS, P.C.

1801 K Street, N.W., Washington, D.C. 20006

(202) 452-2140
Fax: (202) 775-8217
Email: kgarden@saltmanandstevens.com

October 5, 2004

VIA U.S. MAIL AND E-MAIL

Park GMP Coordinator
Dr. David Graber, Senior Scientist
david_graber@nps.gov
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Re: *Comments regarding SEKI GMP*

Dear Mr. Graber:

We are submitting these comments on behalf of, and as legal counsel for, the High Sierra Unit of the Back Country Horsemen of California ("HSU-BCHC") regarding the National Park Service's Draft General Management Plan and Comprehensive River Management Plan/Environmental Impact Statement for the Sequoia and Kings Canyon National Parks ("Draft GMP/EIS"). HSU-BCHC will also be submitting an additional set of comments in addition to, but complimentary with, the legal comments set forth herein.

In summary, these comments address deficiencies in the Draft GMP/EIS based on the Wilderness Act of 1964 and authorizing statutes for Sequoia National Park. In addition, these comments also address the failure of the draft Environmental Impact Statement to properly evaluate the environmental impacts related to stock use in the areas at issue pursuant to the National Environmental Policy Act ("NEPA").

The Wilderness Act of 1964

As you are aware, pack and saddle stock use was occurring in the area, now part of Sequoia and Kings Canyon National Parks, long before those areas were designated as national parks in 1890 and 1940, respectively.[1] In addition, such historical stock use was well-established as of 1984 when areas within the parks were determined to have the qualities of "wilderness" and were added to the National Wilderness Preservation System. Since that designation, this use has been reduced. Nonetheless, the Draft GMP/EIS proposes that even further reductions in stock

[1] A portion of Kings Canyon National Park had previously been designated as General Grant National Park in 1890.

use are necessary in order to preserve the area's wilderness character, which was clearly present in the 1980s with much higher stock use.

As the Draft GMP/EIS notes, under the preferred alternative 96% of the park area is designated or managed as wilderness. Draft GMP/EIS, Vol. 1 at 112. However, notwithstanding the historical stock use which has occurred in these areas since the 1800s, the Draft GMP/EIS fails to properly acknowledge, address and preserve this historical use.[2] This failure constitutes a violation of the Wilderness Act of 1964 ("the Wilderness Act").

As explicitly stated in the Wilderness Act, "wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use." 16 U.S.C. § 1133(b). However, notwithstanding the well-established historical use of stock within the wilderness areas at issue, NPS not only ignored its obligation to preserve this use, it included in the draft Environmental Impact Statement ("DEIS") an alternative ("Alternative A") that would eliminate stock use altogether. Including this alternative in the DEIS, in and of itself, is contrary to the Wilderness Act. Moreover, inclusion of this alternative, in large part based on the apparent belief that stock use is inconsistent with wilderness, demonstrates an inherent bias in the document against stock use.

In defining "wilderness," the Wilderness Act states that wilderness should be in contrast with those areas where man's works "dominate the landscape." 16 U.S.C. § 1131(c). Clearly, stock use does not conflict with this element of wilderness. The Act further defines wilderness as being an area "untrammeled" by man where man is a visitor who "does not remain." *Id.* Given that the definition of "untrammeled" is "not captured or controlled," use of pack and saddle stock also does not violate this provision. Moreover, given that stock users are similar to backpackers as to how much time they spend in the wilderness, stock users similarly do not violate the definition of wilderness by remaining in those areas. Wilderness is further defined to be an area "retaining its primeval character and influence" and without "permanent improvements or human habitation." *Id.* Again, stock use is no more inconsistent with these criteria than backpacking (which, while it also uses trails, in fact typically involves far more modern gear and a much less traditional appearance). And the fact that stock use is no less consistent than backpacking with the applicable wilderness criteria applies equally to each of the remaining criteria used to define wilderness, such as wilderness being an area primarily (not

[2]Not only does the Draft GMP/EIS *completely ignore* the huge role played by stock in the cultural history of the area in its recitation of this history (*see* Draft GMP/EIS, Vol. 2, pages 34-44), it actually omits altogether stock use from its listing of "traditional park activities." *See* Draft GMP/EIS at Vol. 1, page 34. This omission is a blatant example of deliberate revisionist history.

exclusively) affected by the forces of nature with man's imprint "substantially unnoticeable" and involving opportunities for solitude. *Id.*

Finally, while NPS sets forth various provisions of its NPS Management Policies 2001 manual in the draft GMP/EIS (*see* Vol. 1, pages 13-19), it omits the highly-pertinent direction in that same policy manual which states that, as to wilderness areas, "**Historic and/or prehistoric trails will be administered in keeping with approved cultural resources and wilderness management plan requirements.**" NPS Policies Management 2001 at 6.3.10.2 (Trails in Wilderness) (emphasis added). Needless to say, the Draft GMP/EIS makes no effort to comply with this very clear requirement set forth in NPS's own internal policy manual.

Authorizing statutes

While NPS sets forth a lengthy list of various statutes applicable to the management of Sequoia National Park in the Draft GMP/EIS at Volume 1, pages 13-19, NPS omitted the statute establishing Sequoia National Park in which Congress stated that the park was being "dedicated and set apart as a public park, or pleasure ground, for the benefit and enjoyment of the people." 16 U.S.C. § 41 (emphasis added).[3] NPS also omitted from its lengthy list the statute in which Congress stated that the regulations implemented for activities in Sequoia National Park shall be "primarily aimed at the freest use of said park for recreation purposes by the public and for the preservation from injury or spoliation of all timber, natural curiosities, or wonders within said park, and their retention in their natural condition as far as practicable." 16 U.S.C. § 45b (emphasis added).[4]

Given this explicit Congressional direction to allow for the "freest use" of recreation along with preserving the "natural curiosities" and "wonders" in the park, NPS at a minimum has an obligation to specifically justify any restrictions on that recreation. However, while the Draft GMP/EIS proposes at one point eliminating all stock use, and proposes in the preferred alternative substantial limitations on this use, NPS never justifies why this elimination or substantial limitations are being imposed. Because the statutes clearly demand the "freest use" of the park, the burden is on NPS to justify restrictions on that use. Overly protective measures which impinge on the "freest use" for recreation are in direct violation of this statutory requirement. NPS clearly does not meet this burden with respect to the restrictions it has proposed for stock use.[5]

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[3]The Draft GMP/EIS refers to this language in passing at Volume 1, page 9, but does not dwell on its significance.

[4]*See note 2, supra.*

National Environmental Policy Act

The purpose of NEPA is to ensure that the decision maker is fully aware of all the environmental impacts associated with the various alternatives he or she is offered, as well as ensuring that a reasonable range of alternatives are offered as well. 42 U.S.C. § 4332. As stated in the applicable regulations:

> [The EIS] shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.

40 C.F.R. § 1502.1. However, the lack of quantitative information in the Draft GMP/EIS as to the impacts, or lack thereof, of stock use completely precludes the decision maker from making an informed selection of an appropriate alternative.

For example, there is no overall assessment of the purported detrimental harm caused by stock use. Moreover, this harm appears to be largely anecdotal as opposed to objective given that only 2-3% of the visitors to the parks go into the backcountry, which includes the wilderness areas. Of that 2-3% use, only 4% is stock use (.1% of the overall use in the parks). In addition, of that .1% of overall use, half is by NPS stock! Thus, private stock use is only .05% of the use in the park areas. There is no discussion or analysis in the Draft GMP/EIS of how this little amount of use can be causing enough harm to merit contemplating its total elimination. In another example, the preferred alternative in the Draft GMP/EIS proposes reducing the party size of groups using stock. However, no proposed party sizes are given. As such, it is completely impossible to assess the physical impacts of this alternative as well as the social, all of which are part of the "human environment" which must be analyzed in an EIS. *See* 42 U.S.C. § 4332(2)(C); 40 C.F.R. § 1508.14.

The complete lack of a quantitative analysis of the impact of stock use precludes any decision maker from making a rational decision as to which alternative to select. This type of decision making is precisely what NEPA prohibits. Therefore, absent more information as to the

[5]In fact, NPS appears to turn this statutory language on its head by stating in the Draft GMP/EIS that "the general management plan must decide whether stock use (horses, mules, llamas) is appropriate." Draft GMP/EIS, Vol. 1 at page 35. This proposition presumes that stock use should be eliminated unless its use can be justified. However, under the statute, recreational activities such as stock use are to be continued unless their elimination can be justified. The assertion nonetheless clearly, if unintentionally, displays an inherent bias *against* stock use by the drafters of the Draft GMP/EIS.

purported detrimental impacts of stock use, any NPS decision as to the GMP will be in violation of NEPA.

In addition to these issues related to measuring environmental impacts and as the Draft GMP/EIS actually notes, NEPA expressly states that the federal government has a "continuing responsibility" to "preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity and variety of individual choice." 42 U.S.C. § 4331(b)(4). Given this direction from Congress, NPS has a responsibility to preserve, wherever possible, historic and cultural aspects of our heritage. Traditional pack and saddle stock use is clearly one of these aspects. Yet NPS has included in the Draft GMP/EIS a proposal to completely eliminate this use. In addition, NPS has identified a preferred alternative which substantially limits this use. Because of this express Congressional direction, as well as the similar obligations imposed under the Wilderness Act as to historical uses, NPS has a heightened burden for justifying restrictions on stock use. A review of the DEIS demonstrates that the basis for NPS's decisions are simply insufficient to meet this burden. The Draft GMP/EIS not only violates the specific obligations under NEPA, but its overall purpose as well.

Conclusion

For the reasons set forth above, as supplemented by HSU-BCHC's additional comments, the Draft GMP/EIS violates the Wilderness Act, NEPA and the authorizing statute for the Sequoia National Park.

We appreciate the opportunity to submit these comments.

Very truly yours,

SALTMAN & STEVENS, P.C.

Kevin R. Garden

cc: Susan Spain
NPS GMP Team Leader
Marily Reese
HSU-BCHC

3351



California Equestrian Trails & Lands Coalition

Charles (Toby) Horst, Chairman
36281 Lodge Road
Tollhouse, CA 93667

Richard Martin, Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Ref: SEKI General Management Plan

Dear Superintendent Martin,

The California Equestrian Trails and Lands Coalition (CET&LC), representing all the major recreational equestrian organizations in California (46,000 members in 370+ clubs) has been following with interest the Sequoia/Kings National Park General Management Plan. It contains many references to recreational stock use that we will comment in depth. One of our principle members, Backcountry Horsemen of California, has done a complete review of the proposed plan and we will paraphrase many of their comments.

Our organizational purpose is to maintain recreation stock use of trails and facilities in all public lands as part of the heritage use. Listed below are some of our concerns and proposed changes.

Historical Mission:

Stock Use is a traditional, historic and cultural cornerstone in the establishment, management, and public use of Sequoia and Kings Canyon National Parks.

- It is a valid use and has been documented throughout the Parks' history. As such it should be preserved and protected to a much greater degree than what is proposed in the Draft GMP.
- Stock use meets the Parks' mission by enhancing visitor experiences, provides greater access to people of limited physical abilities, and accommodates different user skills abilities and age levels.
- Moreover, because over 90% of the Parks is either designated or managed as Wilderness, those guidelines prohibit mechanical means of transportation, stock use is the only method available to support both park and visitor services in those wilderness areas.
- By the very virtue of being an historic, traditional and cultural activity, there is absolutely no question that pack and saddle stock use is appropriate in Sequoia and Kings Canyon National Parks. (This is not subject to different 'opinions' from other user groups. SUGGEST YOU TOTALLY DROP THIS SENTENCE.)

P. O. Box 201, Prather, CA 93651, (559) 855-7765. FAX (559) 855-2236
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- Your Mission Goal Ia (page 11) to protect natural and cultural resources and associated values supports our argument that pack and saddle stock use is appropriate in Sequoia and Kings Canyon National Parks. The continued use of pack and saddle stock insures the preservation and protection of an important aspect of our cultural history and the values associated with western settlement and the fact that pack and saddle stock allowed initial and subsequent visitation to the Park.
- The National Environmental Policy Act Section 10(b) 4 mandates preservation of "important historic, cultural, and natural aspects of our national heritage..." Pack and saddle stock use is an important historic and cultural aspect of our national heritage.

  Pack and saddle stock use pre-dates the formation of either Sequoia or Kings Canyon National Parks. First stock use by Euro-Americans was in the late 1850's. 1861 horse use and trail building took place in Log Meadow. Sequoia Park in 1890. The 4th US Calvary conducted first administrative patrols in 1891. 1902 contract awarded for commercial transportation with horses and mules (wagons, pack trains)... Stock use was the primary means of access into Sequoia & Kings Canyon National Parks in the early 20th century. To even consider reducing access to historic stock use would be contrary to your cultural mandate.
- The second mandate of Section 10(b)4 is to "maintain...an environment that supports diversity and variety of individual choice." The consideration of banning stock use from the Park would eliminate diversity and individual choice by making the Park accessible only to those who can hike in backcountry or wilderness or access the front country by a mechanized means.
- In order for SEKI to have support for its program and activities, it must remain accessible to all user groups not just the elite physically fit few.

Concerns with Alternatives

All the alternatives as presented reflect an attitude to eliminate or more severely restrict and reduce stock use throughout the Parks:

- More regulated party size limits (Preferred Alternative and Alternative C),
- Greater levels of on site regulations (Preferred Alternative and Alternative C),
- Separation of use areas (Alternative C & D).
- The Preferred Alternative and Alternative C propose to modify the quota system for resource protection, NO data is given to support the need for an adjustment in the quota system.
- Alternative C proposes to "disperse use in small groups". No data is given to support this proposal for a group size reduction.
- Additionally, the Preferred Alternative and Alternative C would limit or cap commercial pack operations. These last elements would further reduce the economic viability of the commercial pack operations within the park forcing their possible removal from the Parks. This would have a net effect of further reducing opportunities and facilities for stock access for both the general public and for users of private stock.
- Alternative A would completely eliminate all pack and saddle stock from the Park. We believe that Alternative A is not a viable alternative as required by NEPA. Park Service guidelines for preparation of Environmental Impact Statements states that "CEQ defines reasonable alternatives as those that are technically and economically feasible and that show evidence of common sense." Page 35 states that the general management plan must decide whether stock use is appropriate, noting that "some groups" want stock use eliminated. Stock use is an historic use in the Parks and has been rigorously restricted and monitored since 1986. A "no stock" alternative does not show evidence of common sense.

- Furthermore, you state in the "Need for the Plans" section (page 6) that the 1971 *Master Plan* had a goal to phase out stock use but that goal was replaced by the 1986 *Stock Use and Meadow Management Plan* that regulated stock use to protect park resources. Consequentially, there is no justification for a "no stock alternative" in this Plan.

- A "no stock" alternative belongs with those alternatives considered but rejected because of the arguments stated above.

Insufficient Data for Analysis of Alternatives:

On Page 35, the document states: "The general management plan will look at whether resource condition monitoring and research indicate that stock use can be continued without irreparable resource degradation." We find no further discussion in the document about "resource condition monitoring" vis a vis stock use.

Due to the lack of important data that you indicated would be part of the Plan, the Plan's alternatives cannot be assessed because no quantitative information is presented that will allow evaluation of the alternatives or to assess the effects of the proposed actions.

As an example, the preferred alternative would reduce stock party size. No information is given on what the existing stock party size is, and no information is given on what the proposed stock party size would be. Thus, there is no justification for the stock party size reductions. Furthermore, this proposed action is unnecessary given that backcountry use accounts for only 2-3% of the visitation in the Park and 4% of the 2-3 % is stock use, and 50% of the 4% is administrative stock use. Our point is that stock use is insignificant and consequently could only be a very minor stressor with very minor resource impacts.

Pg 114 – Preferred Alternative – "modify quota system as needed for resource protection" implies a need. The Plan does not provide any data to support modification (reduction) to the current trailhead quota system. Where is the resource data that justifies this consideration?

Pg 114 -- "Determine party size limits through a revised wilderness and backcountry management plan." The Plan does not provide any data to support the need to address party size limits or the need to revise the 1986 Backcountry Management Plan. It is very misleading that only the Preferred Alternative addresses changing the 1986 Backcountry Management Plan and it is not mentioned in the other Alternatives.

Maps are completely insufficient. The Wild & Scenic river map through the wilderness maps – there is no detail that allows one to become oriented to features, improvements and other facilities. The legends are insufficient and it is impossible to determine the areas on the map that are

Conflicting Information:

- Air quality and climate change.
  Pg 67 – "Most stressors to the backcountry are region wide such as air pollution and climate change, *rather than from activities* within the parks." Since stock use is completely unrelated to air pollution and climate change, it is clearly not a stressor to the backcountry. Yet, on Page 86 – The Preferred Alternative would "expand use of controls on stock party size, regulation of dates and locations, designation of areas, and appropriate closures as needed." This is totally

P. O. Box 201, Prather, CA 93651, (559) 855-7765. FAX (559) 855-2236
www.calequestriancoalition.com Email: easyrider@psnw.com

inconsistent with the statement about stressors implies that those things cause degradation in the backcountry. Region wide caused by … not by activities within the park. Limit backcountry use to improve resource conditions. But the stressors are not even related to the use.

Pg 114 – Preferred Alternative – "modify quota system as needed for resource protection" implies a need. There is no need for modifications if degradation is not caused by stock use. Additionally, there is no data presented on the performance of the existing quotas that would justify a need to change the quotas.

On Pg 189 – Environmental Consequences, Veg. & Soils. Preferred Alternative "Limiting backcountry use to improve resource conditions would result in minor to moderate, beneficial long-term, localized effects." Since most stressors are not stock related, but are region wide factors (air quality and climate change) there is no apparent reason for more limits on backcountry stock use.

Moreover Park figures put stock use at approximate 2% of all backcountry use further reducing any contention that stock can be a significant stressor to the backcountry environment.

- Stock use at all time low. Plan states in 2000, 2% of 4% of use spread over 97% of acreage. (NPS has not reissued the permits for Wolverton and Mineral King Pack Stations).
- Stock use still declining 2003 wilderness permits indicated stock parties were issued 1% of permits issued park wide.

RECOMMENDATIONS:

1. Provide for the continued use of pack and saddle stock in both the front country and wilderness areas of the parks at the traditional use levels using 1954 as the base level (50 year historic benchmark).
2. Remove grazing restrictions on all trail systems to facilitate shorter travel distances. The maximum distance between allowable camping and grazing areas should be no greater than 7 miles, with camping limits of no less than 2 nights per area. This provides opportunities for visitors to travel with both young and old members of their group.
3. Meadow closures would not exceed 1 year. A rest – rotation schedule could replace the closure system that is currently in effect. We would encourage the Parks to utilize the knowledge and expertise of accredited Range Management specialists and local stock users to develop a realistic and feasible grazing program.
4. Party and group size limits should be compatible with adjacent national forest areas and should be 15 people and 25 head of stock. This will allow visitors to travel between administrative units without undue hardships caused by a plethora of varying regulations.
5. Carrying Capacity -- Considering the fact that in 1955 almost 45,000 stock user nights were recorded in both parks (summary report of stock use in Wilderness Meadows from 1955 to 1999) and that in 2003 there were only 2500 commercial and private stock use nights it is clear that the parks capacity to handle more stock use is far greater than current use levels. It is therefore our contention and our recommendation that stock use be expanded.
6. Trails Inventory – The Plan does not discuss the adequacy of the trails transportation system nor does it reference a trails inventory of any kind. We request that the general plan describe the existing trails inventory, both in the front country, backcountry and wilderness areas and state as a goal that a trails transportation system be evaluated for current and future use and that

standards be established that would preserve the condition of the trails to allow use by pack and saddle stock.

Summary:

It is obvious why the CET&LC has great concern with the SEKI general Management Plan. You have implied in your meetings with our organizational representatives that the Park supports continued use of recreational stock use but this plan says the contrary. If you mean some very limited use as outlined, this is hardly support when it is clearly a cultural and historic use at levels far above present use. We as a representative coalition of equestrian users, strongly object to such limiting alternatives, as noted above, and ask that you reconsider stock limiting references and leave as is.

Respectfully;

Charles (Toby) Horst, Chairman

P. O. Box 201, Prather, CA 93651, (559) 855-7765. FAX (559) 855-2236
www.calequestriancoalition.com Email: easyrider@psnw.com

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HIGH SIERRA HIKERS ASSOCIATION

PO BOX 8920 SO. LAKE TAHOE CA 96158

36 pgs.

CERTIFIED MAIL
October 5, 2004

Richard H. Martin, Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271

SUBJECT: Comments on Draft General Management Plan and DEIS

Dear Superintendent Martin:

This letter transmits comments of the High Sierra Hikers Association regarding the *Draft General Management Plan and Comprehenstve River Management Plan / Environmental Impact Statement* (Draft GMP) for Sequoia and Kings Canyon National Parks. The High Sierra Hikers Association appreciates this opportunity to submit comments for your consideration.

The High Sierra Hikers Association (HSHA) is a nonprofit public-benefit organization that educates its members, public officials, and the public-at-large about issues affecting the High Sierra, and that seeks to protect wildland values in the High Sierra for the public benefit. The HSHA represents thousands of citizens, many of whom use and enjoy both the "frontcountry" and "backcountry" areas of Sequoia and Kings Canyon National Parks (SEKI) for hiking, camping, backpacking, climbing, mountaineering, cross-country skiing, horse packing, wildlife viewing, photography, and other pursuits, as well as to seek solitude and quiet.

As detailed in these comments, our members' use and enjoyment of SEKI would be significantly harmed under the proposed action (i.e., the Draft GMP's "preferred alternative").

The HSHA submitted detailed scoping comments dated March 30, 1998, and April 9, 1998. Both scoping letters are incorporated by reference. I encourage you to review those comments along with this letter.

In sum, we are enormously disappointed that—after more than six years of work—the Park Service has produced a Draft GMP (and in particular a "Preferred Alternative") that

fails to address most of the key issues raised in our previous comments, that fails to provide adequate protection for the scenery and natural resources of SEKI as required by the 1916 Organic Act that created the National Park Service, that fails to preserve the wilderness character of the Sequoia-Kings Canyon Wilderness as required by the 1964 Wilderness Act and the 1984 California Wilderness Act, and that also fails to adequately evaluate a range of alternatives and the environmental impacts of those alternatives as required by the National Environmental Policy Act (NEPA). As discussed below, these failures render the document and its proposed action inadequate to satisfy legal requirements.

The Draft GMP/EIS needs to be substantially supplemented to address the relevant key issues. Our specific comments are as follows:

Stock use in sensitive high-elevation areas

SEKI's existing Master Plan calls for the phase-out of all stock animal use in SEKI's unique and fragile high-elevation areas. The Draft GMP proposes to eliminate that important programmatic direction. This would constitute a major change to existing programmatic direction, and the Draft GMP/EIS fails to even mention this fact, let alone evaluate and disclose the environmental consequences. SEKI's existing Master Plan states:

> "Because of the damage resulting from livestock foraging for food and resultant trampling of soils, possible pollution of water, and conflict with foot travelers, use of livestock in the higher elevations for any purpose should be phased out as conditions permit…Livestock may be used in the lower elevations and around developed areas where it can be stabled and fed without open grazing on park lands." (SEKI Master Plan, p. 24)

As requested by numerous commenters throughout this planning process, this existing Master Plan language should be retained and incorporated into the new GMP. Or, alternatively, the new GMP should be supplemented to provide equivalent or better protection of SEKI's scenery, natural resources and visitors' experiences when compared to the language of the 1971 Master Plan. At minimum, the new GMP/EIS must disclose the environmental consequences of discarding or weakening the existing programmatic direction (a NEPA requirement), and provide direction that avoids impairment of the scenery, natural resources, and wilderness character (as required by the Organic Act and Wilderness Act).

In contrast, the proposed action effectively eliminates this key Master Plan language without providing equivalent programmatic protection or any analysis or disclosure of the environmental consequences of discarding this language. This would be illegal, for the following reasons: (1) Removing the Master Plan's programmatic direction and substituting the proposed stock management scheme would result in significant impairment of natural resources, scenery, and visitors' experiences, in violation of the Organic Act, the Wilderness Act, and the California Wilderness Act; and (2) The DEIS

fails to take a hard look (or any look at all) at the environmental impacts of eliminating this current management direction, as required by NEPA.

Many research scientists have documented the significant, adverse impacts that result from recreational stock use. Whitson (1974) provides a good discussion of how horse impact differs from hiker impact. Dale and Weaver (1974) observed that routes used by horses were deeper than those used by hikers only. Trottier and Scotter (1975) documented deterioration of trails used by large horse parties. Weaver and Dale (1978) found that horses caused significantly greater trail erosion than hikers. Whittaker (1978) concluded that horses significantly increased the potential for severe erosion by churning soil into dust or mud. Weaver et al. (1979) found that horses caused more trail wear than both hikers and motorcycles. After reviewing the available literature, Kuss et al. (1986) concluded that: "Pack stock and horse travel is considerably more damaging to trails than hiking." More recent studies (e.g., Wilson and Seney 1994, Deluca et al. 1998) have confirmed these earlier studies, documenting that horses produce more erosion than hikers, bicycles, and even motorcycles.

Numerous studies have documented adverse impacts to meadows caused by recreation livestock (Cole 1977, DeBenedetti and Parsons 1979, Haultain and Das 2000, Merkle 1963, Nagy and Scotter 1974, Neuman 1990, Neuman 1991a-b, Neuman 1992, Neuman 1993, Neuman 1994a-b, Olson-Rutz et al. 1996, Schelz 1996a-c, Strand 1972, Strand 1979a-c, Sumner and Leonard 1947, Weaver and Dale 1978). In addition to the impacts outlined above, trampling and grazing by livestock are known to increase bare ground and soil compaction, and to contribute to streambank erosion, sedimentation, widening and shallowing of channels, elevated stream temperatures, and physical destruction of vegetation (Behnke and Raliegh 1978, Bohn and Buckhouse 1985, Kauffman and Krueger 1984, Kauffman et al. 1983, Olson-Rutz et al. 1996, Sickert et al. 1985). Streambanks and lakeshores are particularly susceptible to trampling because of their high moisture content (Marlow and Pogacnik 1985). Unstable streambanks lead to accelerated erosion and elevated instream sediment loads (Duff 1979, Winegar 1977).

Of significant concern are the physical, or "mechanical," impacts that result to fragile high-elevation soils, meadows, and wetlands when these areas are trampled by recreation stock animals (i.e., horses and mules). The impact is severe because:

> "A small bearing surface carrying heavy weight, a horse's hoof can generate pressures of up to 1,500 pounds per square inch." (Cole 1990)

When stock animals are released to graze in areas with low soil strength—such as is found throughout much of the SEKI high country—these high pressures can result in numerous deep hoofprints, broken sod, plant pedestalling, increased erosion, shifts in species composition, and even lowering of water tables. Many reports prepared by SEKI staff over the years have documented such persistent, ongoing damage (see DeBenedetti and Parsons 1979; Haultain 1999; Haultain and Das 2000; Neuman 1991b, 1992, 1994a; Schelz 1996d; Suk 1989, 1990, 1991; and SEKI's "case incident reports" #200835, 200836, 200842, 201491; and others).

The "opening dates" adopted by SEKI to reduce trampling impacts during the early summer season have not been effective at preventing significant, adverse impacts to meadows, streambanks, lakeshores, and wetlands (see references in preceding paragraph). Studies conducted at SEKI have documented some of the long-term effects of multiple deep hoofprints left by recreation livestock in high-elevation meadows (see "hoofprint impact study" in Neuman 1991b, 1992, 1994a). These SEKI reports clearly show that stock trampling of high-elevation meadows in SEKI results in long-term adverse changes in meadow ecology. For example, the SEKI scientist who conducted the studies concluded that the numerous deep hoofprints created by stock animals contributed to soil loss, declines in species diversity, and shifts in species composition. He concluded that:

> "These changes may have occurred in imperceptible stages, remaining fully vegetated and showing only moderate impact at any given time during the process, but the result is undeniably a negative change in the meadow that can be considered permanent." (Neuman 1994a)

Unfortunately, the studies described in the preceding paragraphs were discontinued in 1994, due to "other priorities." According to SEKI staff, the hoofprint impact studies were discontinued in favor of developing a "residual biomass" monitoring protocol that managers hope will allow them to assign forage utilization limits to specific meadows. (We have detailed in previous correspondence, and incorporate by reference, our concerns regarding the inadequacy of SEKI's residual biomass scheme, i.e., lack of statistical power to reliably detect change, absence of management standards to maintain meadows in an "unimpaired" condition, lack of practical means to implement and enforce grazing limits in remote settings, lack of ability to adjust limits before overgrazing occurs, etc.).

Aside from the shortcomings of the residual biomass (RB) proposal, we find it very disturbing that managers at SEKI seem so willing to divert their limited resources to "dividing up the pie" for stock users, while ignoring readily available evidence that continued grazing and trampling by stock in the fragile SEKI high country is causing significant ecological impacts. SEKI's obstinate focus on RB monitoring is especially disturbing since SEKI scientists have reported clearly that the RB monitoring program cannot address the key issues of physical damage resulting from stock animals being allowed to graze in fragile areas.[1]

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[1] A June 2000 report by the SEKI Division of Science and Natural Resources Management states: "This very wet meadow...continues to receive use while soils are still saturated. Given the hydrologic regime of this meadow, these soils are likely to remain too wet to withstand stock use without resulting in a net loss of soil during runoff. Reconnaissance surveys in 1997, 1998 and 1999 noted deep, persistent hoofprints in the meadow adjacent to the stock camp and along the streambanks on both sides of the creek. As mentioned in earlier reports, it is important to note that these concerns are not related to residual biomass, but rather to physical damage to plant roots and soil erosion resulting from animals being turned out into very wet soils." (Haultain and Das 2000, discussing Upper Colby Meadow, which to this day remains open to grazing.)

Please consider for a moment that your agency quietly discontinued a study (the hoofprint impact study) which concluded that stock trampling of high-elevation meadows is "undeniably" resulting in **negative** and **permanent** changes in meadows. And instead of investigating further (or paying any heed to the available results), SEKI staff appears to be moving forward, heads down, in an effort to implement a flawed RB methodology that NPS managers have indefensibly been touting as a panacea to grazing management issues at SEKI. We believe that this example illustrates the strong bias of SEKI managers to defend continued livestock grazing at all cost.

In an attempt to address these issues, reports prepared by SEKI scientists (Schelz 1996b, 1996c) recommend and support an **immediate** ban on grazing in "Production Class 1" (i.e., high-elevation) meadows in SEKI:

> "All production Class 1 meadows should be closed to grazing. This includes all measured Class 1 meadows and all others within the elevation limits of this class. In other words, all meadows above 9700 feet should be closed to grazing...Class 1 meadows are our very sensitive high elevation meadows that generally do not receive much use...but they are so sensitive to disturbance that the little use they do get causes high impacts and the available feed is exhausted quickly." (Schelz 1996c, emphasis added)

This recommendation by SEKI's professional scientific staff should have been implemented immediately via an order of the Superintendent, yet it has languished for years and still has not been implemented. While the public has been told repeatedly that the Superintendent has the discretion and authority to rapidly adopt restrictions whenever necessary to avoid adverse impacts to park resources, this authority is rarely used when the interests of stock users may be affected. Quoting from a recent United States District Court ruling:

> "...the evidence demonstrates that SEKI management's discretion may be too heavily impacted by political factors to have a predictable ability to protect the environment..." *High Sierra Hikers Association v. Kennedy*, No. C 94-03570 CW (N.D. Cal. June 14, 1995)

In sum, the failure to take a hard look at the relevant factors, and the failure to conclude the obvious—that grazing is inappropriate in the high elevations of SEKI—can only be characterized as arbitrary and capricious. The Draft GMP is fatally flawed because it does not synthesize the readily available information about the impacts of stock use in high elevation areas (i.e., above 9,700 feet), it does not consider all of the many significant aspects of the environmental impact of the proposed action, and it does not inform the public that it has indeed considered environmental concerns in its decision-making process. And by discarding the protective language of the 1971 Master Plan in favor of an inadequate and politically driven regulatory scheme, it would result in significant impairment of SEKI's scenery, natural resources, and wilderness character.

The studies and reports cited above and elsewhere throughout these comments are but a fraction of the available information that the DEIS fails to synthesize. Numerous other range management and ranger patrol reports are readily available in SEKI's own files and elsewhere that document significant, adverse impacts due to stock use in the high elevations of SEKI. See for example the many "end-of-season" reports prepared annually by SEKI's backcountry rangers, and other documents in the files of the Division of Science and Natural Resources Management.

Your DEIS should evaluate and synthesize all of the accumulated knowledge about the impacts of stock use at high elevations, and conclude that the programmatic direction contained in the 1971 Master Plan should be retained or strengthened, not discarded in lieu of the woefully inadequate regulatory scheme proposed by the Draft GMP. The only logical, defensible approach to this issue is to adopt programmatic direction in this new GMP that prohibits all grazing above 9,700 feet elevation throughout SEKI—as has been recommended for years by SEKI's own scientists and rangers.

Livestock grazing—parkwide

Nearly all of the impacts described and referenced above could be avoided by prohibiting grazing throughout SEKI (i.e., requiring stock users to carry feed for their animals), as is required in most other national parks. As shown in Exhibit A, many national parks throughout the United States have recognized the myriad impacts caused by grazing and trampling by stock animals, and have adopted bans on consumptive use (i.e., grazing) by domestic stock within national park boundaries. **We, and numerous other commenters, strongly advocate a ban on grazing by domestic stock animals throughout SEKI, as required in most other national parks.** There is simply no valid justification for allowing the known and significant adverse impacts to continue within SEKI when feasible alternatives readily exist. The convenience of a minority special-interest group (i.e., stock users) must not be allowed to guide such key park management direction.

Throughout this planning process, the HSHA and numerous other commenters have repeatedly requested full consideration and adoption of a "no grazing" alternative for all of SEKI. The Draft GMP/EIS violates the National Environmental Policy Act (NEPA) because it fails to evaluate and consider a "no grazing" alternative. NEPA very clearly requires consideration of a range of reasonable alternatives. The NPS needs to back up, and carefully evaluate and consider the environmental benefits of a parkwide "no grazing" alternative.

The Draft GMP/EIS fails to take a hard look at (or even mention) the abundant number of comments that requested consideration of a "no grazing" alternative. It fails to consider that a "no grazing" alternative would be entirely feasible and in the best interest of these parks. A "no grazing" alternative would allow administrative, commercial, and private stock use to continue (because stock users could carry feed for their animals). A "no grazing" alternative would avoid nearly all of the on-going impacts of stock grazing and trampling of meadows, wetlands, and lakeshores. A "no grazing" alternative would eliminate most of the direct inputs of stock manure and urine into surface waters.

Instead of evaluating a "no grazing" alternative, which is eminently reasonable and was advocated by numerous commenters, the Draft GMP/EIS instead includes a "no stock" alternative, which nobody advocated or even suggested. The inclusion of a "no stock" alternative (supported by no one), while ignoring the many calls for a "no grazing" alternative, is completely arbitrary. A "no stock" alternative would unnecessarily prohibit all stock use. It would even prohibit the Park Service from using stock animals for essential administrative functions, such as re-supplying trail crews, ranger patrols, and search/rescue operations. This would necessitate the use of motorized transport (i.e., helicopters) for many such administrative functions, in tension with the Wilderness Act. For these reasons, the "no stock" alternative is in truth so radical that it will not even receive serious consideration by Park Service decision-makers.

Why is this issue of such concern? First, a strict "no stock" alternative will never be selected (or even seriously considered), and it diverts attention from an entirely reasonable alternative that could eliminate most stock impacts while still allowing stock use to continue (i.e., no grazing). And second, the Draft GMP/EIS justifies the "preferred alternative" (i.e., continuation of current damaging stock use practices) by claiming that it is somehow environmentally superior to the "no stock" alternative. How can this be?

Specifically, how can all of the documented impacts associated with current stock use possibly be "environmentally preferred" when compared to no stock use at all? Table 2 (Vol. 1, pp. 77-78) tells us: Because a strict "no stock" alternative doesn't allow stock use and would "hamper resource protection efforts." This is a circular, disingenuous, capricious argument. The Draft GMP/EIS first puts forth a strict "no stock" alternative, and then concludes that it's not desirable because it doesn't allow stock use! The document appears to be crafted in such a way as to make meaningful change in SEKI's archaic stock use practices appear infeasible.

What the Park Service needs to do at this point is to craft an alternative that allows stock use to continue, while also mitigating the known, documented, significant effects of that use. The best way to accomplish this is with a "no grazing" alternative.[2] The GMP/EIS simply cannot satisfy NEPA requirements without consideration of such an alternative.

Water Pollution

The Park Service does not effectively control the direct deposition (or surface runoff) of stock animal wastes into surface waters. Stock urine and manure deposited by grazing animals is known to contaminate surface waters in SEKI (Schelz 1996c, p. 22), and to contribute to the accelerated eutrophication of streams and lakes (Stanley et al. 1979). Increased nutrient inputs to surface waters is also known to adversely affect instream aquatic organisms and alter their community assemblages (USEPA 1999). Such impacts

[2] If the Park Service truly believes and can demonstrate that grazing by administrative stock is necessary for administrative "resource protection efforts," then it should also evaluate an alternative that allows grazing by administrative stock to the extent necessary, yet which requires all commercial and private stock users to carry feed for their animals.

are a significant concern in the natural aquatic environments of SEKI, which should be protected from impairment.

Because stock animals that are released to graze openly on park lands deposit large quantities of manure and urine directly into surface waters, a "no grazing" alternative should consider the benefits of requiring that stock animals be tied and fed without open grazing on park lands. Packing feed and keeping animals tied up would avoid most discharges of stock manure and urine into surface waters.

The contamination of SEKI's surface waters by livestock manure and urine violates State of California water quality standards (objectives)—in particular, objectives for nutrients, bacteria, and the nondegradation objective contained in the *Water Quality Control Plan (Basin Plan) for the Central Valley Regional Water Quality Control Board.* The State's objectives for drinking water are violated because park visitors do not want to drink water when they see controllable discharges of stock manure and urine into them. The objectives for recreation are violated because park visitors are repulsed when they see direct discharges of stock manure and urine into surface waters. Visitors will avoid contact with the water, and their recreational experience is significantly impaired.

Regarding the State's nondegradation objective, the California State Water Resources Control Board's Resolution 68-16 ("Statement of Policy with Respect to Maintaining High Quality of Waters in California") lays out mandatory requirements that apply to Park Service lands in California. State water quality objectives and policies, including Resolution 68-16, which must be adhered to by SEKI, require that specific, formal findings be made by State officials before water quality may be degraded by controllable sources such as direct inputs of stock manure and urine into park waters. These findings have not been made (or even discussed) in the draft GMP/EIS.

Livestock manure can also pollute water with organisms such as Giardia, Campylobacter, and Cryptosporidium which may be pathogenic to humans and other animals. Some "pro-livestock" interest groups often claim that recreational livestock do not spread these organisms, and that the strains of Giardia, Campylobacter, and Cryptosporidium spread by domestic livestock may not be infective to humans. Neither of these claims is substantiated. While the cross-transmission of enteric pathogens from stock animals is certainly controversial, there is ample evidence to demonstrate the potential for cross-transmission of these diseases between stock animals and humans. (see Bemrick 1968, Blaser et al. 1984, Buret et al. 1990, Butzler 1984, Capon et al. 1989, Davies and Hibler 1979, Faubert 1988, Isaac-Renton 1993, Kasprzak and Pawlowski 1989, Kirkpatrick and Skand 1985, Kirkpatrick 1989, LeChevallier et al. 1991, Manahan 1970, Manser and Dalziel 1985, Meyer 1988, Rosquist 1984, Rush et al. 1987, Saeed et al. 1993, Stranden et al. 1990, Suk 1983, Suk et al. 1986, Taylor et al. 1983, Upcroft and Upcroft 1994, Weniger et al. 1983, Xiao et al. 1993, Xiao and Herd 1994).

The contamination of surface waters due to stock manure and urine, and all of the resulting significant and potentially significant impacts to water quality (e.g., eutrophication, alteration of instream community assemblages, spread of diseases), could

be substantially avoided by a "no grazing" alternative, if such an alternative includes park-wide mitigation measures, such as requiring that all campsites for stock users be designated (away from water sources, on level and dry sites), and that stock animals wear diapers, which are now readily available (see Exhibit B), and could be emptied away from surface waters to minimize discharges of waste.

The Park Service might be able to make a case that such a stock management strategy could replace the Master Plan language without causing significant impacts. But it certainly can't make a credible case that the "preferred alternative" won't produce substantial impacts compared to the current programmatic direction (i.e., the Master Plan).

Aesthetic Impacts—adverse impacts to park scenery and the "wilderness experience" (i.e., wilderness character)

The 1916 Organic Act that created the National Park Service establishes its mission:

> "...to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

And the 1964 Wilderness Act establishes the Park Service's duty when managing designated wilderness:

> "...each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such area for such other purposes for which it may have been established as also to preserve its wilderness character."

The many members of the High Sierra Hikers Association (and other commenters) are very concerned about the myriad aesthetic impacts that result from stock use, such as the presence of annoying bells, dust, manure, urine, and flies; the proliferation of unsightly hoofprints and drift fences; and impairment of the scenery due to the unnatural appearance of meadows grazed by domestic stock (see Absher and Absher 1979, Cole 1990, Lee 1975, Stankey 1973, Watson et al. 1993).

In an attempt to rationalize the "preferred alternative" (i.e., continue stock use at "present levels") the Draft GMP/EIS purports to analyze the many concerns about stock impacts in two sentences:

> "Impacts of horse use (feces, eroded trails, dust) would continue to cause minor, adverse, long-term impacts on a small number of backcountry hikers, but increased regulation and stock-free areas would somewhat mitigate this impact. Monitoring, regulation, and education would gradually improve trail and backcountry conditions." (Vol. 2, p. 274)

First, the Draft GMP proposes no new "stock-free areas" and no programmatic direction to establish stock-free areas (even though we have long advocated a ban on off-trail use by stock and the designation of a network of foot-travel-only trails). Second, case law is clear that monitoring does not—and cannot—constitute mitigation of environmental impacts. Third, the record is abundantly clear that SEKI's regulation of stock use is inadequate to prevent ongoing significant adverse impacts, and the "preferred alternative" would essentially codify SEKI's current deplorable regulatory scheme by tossing out protective language in the current Master Plan while requiring nothing new. And fourth, to claim (without any supporting evidence) that the impacts of stock use are "minor," or that those impacts affect only "a small number of backcountry hikers," is absolutely arbitrary.

One study in the Sierra Nevada found that 60 percent of groups surveyed thought that the use of stock was entirely inappropriate (Absher and Absher 1979). Another study found that 59 percent of visitors preferred not to meet horse users in the wilderness (Stankey 1973). Another study in Yosemite National Park found that the presence of horse manure, and facilities such as hitch rails, were key sources of visitor dissatisfaction (Lee 1975). A study in Rocky Mountain National Park showed that a majority of hikers who disapproved of horse use—57 percent of all users—did so because they disliked horse manure and urine, and the flies and other insects attracted to it (see Cole 1990). A recent study in Sequoia and Kings Canyon National Parks documents similar findings (Watson et al. 1993).

One key provision of the Organic Act directs the Park Service to protect the scenery of the national parks. Yet managers at SEKI continue to demonstrate complete reluctance to regulate stock use in any way to comply with this mandate. Put simply, park visitors have an absolute right to view park meadows (i.e., scenery) in a healthy, natural, unimpaired condition. Ranger Randy Morgenson perhaps said it best—that park visitors should have the opportunity to view:

> "...knee-high grasses, ripe and open panicles drifting in the moving air, luminous-bronze in the backlight." (Morgenson 1989)

Such an experience simply cannot be had in meadows that are open to grazing and trampling by domestic livestock. The Park Service needs to acknowledge this truth.

The year-end reports prepared by SEKI's backcountry rangers should be a key source of information to your planning team. Those reports document many of the impacts discussed above, as well as complaints registered by the public. For example, one such report states:

> "McClure Meadow is one of the most unique examples of an alpine meadow in the Sierra. Even after twenty years of fairly strict grazing regulations, it still shows much evidence of poor recovery....in the summer heat—even a week

> after a stock party leaves—the entire meadow smells like a corral....a major source of complaints by hikers."

The preponderance of public comments and other evidence readily available to SEKI staff show that the majority of park visitors who encounter stock impacts are significantly and adversely affected, and that the impacts of stock animals are "a major source of complaints." The statement in the Draft GMP/EIS that stock impacts are "minor" and affect only a "small number" of park visitors are without any basis in fact. Such statements are false, and arbitrary, and render invalid the conclusions that the "preferred alternative" poses no significant effects and is environmentally superior to the "no stock" alternative.

Simply stated, SEKI's current management paradigm is devoid of any serious consideration of scenic or aesthetic impacts. Your GMP/EIS should fully evaluate the impacts discussed above, and incorporate provisions into the GMP that will protect (and restore where necessary) the precious scenery and wilderness character of these majestic national parks. This should include careful evaluation and adoption of a park-wide "no grazing" alternative (as discussed above), programmatic direction allowing commercial stock use only to the extent necessary,[3] and adoption of programmatic direction requiring other park-wide mitigation measures for stock use, such as designated campsites and horse diapers (see Exhibit B) to keep manure off trails and out of waterways and campsites. Programmatic direction to designate campsites for stock users would prevent sites used by hikers from being polluted with stock manure and urine. Programmatic direction to keep stock tied and to supply feed would eliminate the need for annoying bells and unsightly drift fences, and would prevent grazing and trampling impacts, and water pollution. Programmatic direction to designate a network of "foot travel only" trails would provide hikers who so desire with a "stock-free" experience (i.e., free of the manure, urine, flies, and dust characteristic of trails churned by stock). And direction to adopt lower group size limits based on scientific principles (see Cole 1989 & 1990, Watson et al. 1993) would reduce the substantial impacts of large stock groups on scenery, natural resources, the experience of other park visitors.

In the defense of continued heavy stock use in SEKI, the Park Service invariably recites the mantra of "historically and culturally significant," which makes it sound as if stock users have grandfather rights to exploit these parks because they've been doing it for so long. But no one has such grandfather rights. There is nothing in the Organic Act, the Wilderness Act, or the California Wilderness Act that grants grandfather rights to any individual, group, or category of people to conduct activities harmful to the scenery, natural resources, or wilderness character of SEKI. Nor is there any language that

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[3] We suggest that the GMP provide programmatic direction to limit commercial stock use in SEKI only to those persons who cannot walk, hike, or carry a backpack. Using stock animals for comfort, convenience, or "fun" is not truly necessary, and due to the known significant adverse impacts, should be discouraged. Any unnecessary stock use should be confined to lower-elevation, non-wilderness trails that are designed, constructed, and maintained to fully withstand the impacts of stock use. Only the GMP can provide such programmatic direction.

specifies—or even permits—harmful commercial exploitation of SEKI by private interests for their own gain.

Impacts to wetlands

High-elevation meadows, due to their characteristic short growing seasons, saturated conditions from snowmelt, high ground water tables, and wetland-dependent plant communities, often meet the definition of jurisdictional wetlands. Unfortunately, the hundreds of meadows in the SEKI high country that qualify as jurisdictional wetlands have never been adequately disclosed or protected from the adverse impacts of stock trampling. (See hoofprint impact studies and other discussion above re: physical trampling impacts.)

Federal statute, regulation, executive order, and policy call for the protection and enhancement of wetlands. At minimum, the following items should be addressed in any GMP to be adopted for SEKI (see also NPS-77, "Natural Resources Management Guideline"):

- Inventory wetland resources in the SEKI wilderness as a part of the planning process. Clearly, many wetlands exist within SEKI. National Park Service policies (see NPS-77) require that wetlands be inventoried as part of the planning process in order to facilitate management of wetland resources. At minimum, the GMP should provide strong programmatic direction to protect wetlands area, functions, and values from the impacts of human activities, including stock use.

- Specify mitigation measures that will "avoid any action with the potential for adversely impacting wetlands." In order to prevent loss of wetlands area, functions, or values due to livestock trampling of wetlands, this will necessarily include closures of sensitive wetlands (such as those exhibiting low "soil strength") to all domestic livestock grazing. The current system of opening dates and grazing management at SEKI is clearly inadequate, because it allows trampling (i.e., numerous deep hoofprints, shearing of streambanks and lakeshores, etc.) to significantly impact wetlands. Hoofprint impacts have been shown to cause long-term ecosystem changes in wetland areas, as discussed above. A "no grazing" alternative could feasibly achieve the needed wetlands protection.

- Specify what actions will be taken to restore wetland functions and values where they have been harmed by previous human actions. Examples include: re-routing existing trails out of wetland areas where practical alternatives exist, and prohibiting all grazing in wetland areas that have been degraded by past livestock trampling.

- Specify "requirements for monitoring programs and other actions to ensure protection, enhancement, and successful restoration of wetland values to the greatest extent feasible." The GMP should include a specific monitoring element

to track the progress of wetlands protection and restoration measures. The current monitoring programs at SEKI are incapable by design of detecting adverse impacts to wetlands caused by stock trampling.

Programmatic direction is clearly needed in the GMP if the broad federal and state wetlands protection requirements are to be met. Clearly, those mandates are not currently met; sensitive wetlands in SEKI continue to be significantly impaired by stock trampling, and the NPS needs to address this issue in its GMP.

Bearpaw Camp (and proposed new commercial camp on Hockett Plateau)

The ugly commercial camp at Bearpaw Meadow should be removed, and this planning process is the best time and place to direct its removal. The polluting camp is an affront to the national park, an intrusion on the wilderness, and requires continual massive inputs of high-impact maintenance, such as mule trains and helicopter flights. The camp creates adverse impacts due to sewage disposal, greywater disposal, food storage, helicopter use, stock use, noise, and impairment of the scenery.

In 1984—two full decades ago—Congress instructed the National Park Service to prepare a report on the impacts caused by the Bearpaw commercial camp. In defiance of the will of Congress and the American people, the Park Service has apparently never conducted the intended studies. Congress also asked the Park Service to regularly monitor environmental impacts at the camp, and to remove the camp if impacts ever increased above 1984 levels. In its House Committee Report on the 1984 Act that designated the SEKI Wilderness, Congress recognized the incompatibility of this "High Sierra camp," and, in a rare move, deferred Congressional authority so that the Secretary of Interior may designate the enclaves as wilderness once the nonconforming developments are removed. This vision will never be realized as long as the Park Service continues to ignore Congressional direction and to blindly promote continuance of the Bearpaw camp.

Clear direction is needed to remedy this situation. Put simply, the GMP should direct that the Bearpaw camp be removed as soon as possible, and the site restored. At minimum, the GMP should require the following: (a) an independent study to document baseline conditions at the Bearpaw Meadow camp, funded by the Park Service and conducted under contract by a reputable third party (such as a California university), (b) a provision for mandatory monitoring (of parameters to be recommended by the initial study), no less frequent than every two years (under contract as in "a" above), and (c) a provision (without loopholes) that if any adverse environmental impacts resulting from operation of the Bearpaw Meadow camp should ever increase beyond those documented in the baseline study, that the camp will be promptly removed and the area immediately recommended to the Secretary of Interior and to Congress for wilderness designation. This is the process that Congress intended to put in motion more than 20 years ago.

Not only does the Draft GMP fail to address the ongoing substantial impacts at the Bearpaw camp, it proposes to study the construction of a new such camp on the Hockett

Plateau. The document provides no information about how such a ridiculous proposal came into being. The Park Service knows full well that the Bearpaw camp is causing adverse impacts to SEKI's scenery, natural resources, and surrounding wilderness character, yet it denies culpability on grounds that it cannot afford to conduct the detailed monitoring of those impacts as directed by Congress. And it proposes to build another such camp?

In 1992, then Superintendent J. Thomas Ritter wrote:

> "Our policies regarding the Bearpaw Camp have long documented a policy of no further development at that site. We have also established that no additional camps of this nature would be established." (Exhibit C, emphasis added)

Given that SEKI has previously established that no additional camps of this nature would be allowed, it is both arbitrary and capricious to now propose direction to consider a new such camp on the Hockett Plateau. There is no valid justification—and in fact no justification at all—for such a bizarre idea. The public doesn't want it, the park can't afford it, and it would result only in more pollution and commercial exploitation. This senseless proposal must be stricken from the GMP without further discussion.

Removal of commercial pack stations from park lands

Due to resource impairment, all commercial packstock facilities should be removed from SEKI.[4] The Draft GMP/EIS instead proposes to retain or relocate all existing pack stations. The GMP/EIS should carefully evaluate the impacts of these facilities, and use this planning opportunity to address those impacts. It would be especially damaging to direct that pack stations be built where none currently exist (i.e., relocated). This would simply move the impacts to new areas.

The operation of pack stations is contributing to the demise of songbird populations in SEKI by creating artificial habitat for the parasitic brown-headed cowbird. Cowbirds are obligate brood parasites that can significantly impact native passerine species. One study in the northern Sierra found that up to 78 percent of warbler nests are parasitized by cowbirds, resulting in significant decreases in the reproductive success of those species (Airola 1986). Individual female cowbirds in the Sierra Nevada have been reported to lay an average of 30 eggs per season (Fleischer et al. 1987). These high rates of parasitism and fecundity by cowbirds indicate that significant local impacts occur wherever cowbird populations are present. Habitat modifications and the presence of livestock throughout the Sierra may contribute significantly to regional declines in songbird populations (Graber 1996). Pack stations in particular are known to be breeding centers for cowbirds.

[4] This would not preclude commercial stock use. In fact, most commercial stock outfitters that operate in SEKI are based outside the parks. The Park Service should be looking for actions that allow recreational activities to continue, but that also protect park resources. At the top of the list should be removal of packstock facilities from park lands. The few affected operators have held monopolies on these facilities for years, and should be grateful for the privileges they have enjoyed. They could continue to operate from outside the parks, if they so choose, just like the other outfitters, via incidental business permits.

As discussed above, the Draft GMP/EIS evaluates a radical "no stock" alternative, but it fails to evaluate an alternative that would allow stock use to continue while truly mitigating the effects. A "no grazing" alternative that includes removal of the commercial packstock facilities is eminently reasonable, because it would allow stock use to continue while mitigating most of the adverse effects.[5] The mandates of NEPA cannot be satisfied unless the Park Service evaluates such feasible alternatives.

Group size limits

The group size limits currently in effect at SEKI are inadequate to sufficiently protect the scenery, natural resources, and wilderness character of SEKI. Group size limits (for both number of persons and number of stock animals) must be lowered.

The "preferred alternative" proposes to put this issue off to later consideration (i.e., during development of the parks' wilderness management plan). The issue should be addressed now—by providing programmatic direction that group size limits be lowered to protect natural resources and visitors' experiences—because this issue affects the whole park, not just the wilderness and backcountry portions.

The group size limits selected by the Sierra interagency wilderness managers group in the early 1990s (15 persons, 25 stock animals) were dictated without the benefit of any formal environmental analysis or NEPA documentation. Those limits were chosen by a small group of pro-stock managers, and adopted without NEPA compliance—over the strong objections of the vast majority of commenters. The managers knew at the time that if they went through the public involvement procedures and conducted a scientific analysis as required by NEPA, that those numbers could not be justified. This is evidenced by a memorandum from the Forest Supervisor of the Inyo National Forest (Exhibit D) which states:

> "...we did not feel that it was necessary to go through the NEPA process on this....as an aside, I will assure you as I have Tanner and London, that if we take this through NEPA the numbers will, in all likelihood, come out lower, and all of our packers will be significantly impacted."

It is truly disheartening that the interagency wilderness managers placed a higher priority on protecting the interests of the commercial packers than protecting the natural resources under their charge. We can only hope that this attitude has changed.

[5] If the Park Service cannot muster the will to remove all of the commercial packstock facilities, it should at minimum remove the Mineral King Pack Station (without relocating it, as proposed). This pack station services a particularly sensitive portion of SEKI that is not well-suited to stock use. The trails in Mineral King are both rugged and very popular with day hikers and backpackers, and conflicts between hikers and stock (even injuries) have been documented. The trails leaving the pack station have become severely eroded due to heavy stock use. The soils of the Great Western Divide (the main area accessed by this pack station) are fragile and remain very wet and susceptible to severe trampling damage throughout even the driest years. The operating season of this pack station would be prohibitively short if it were opened after the snowmelt and songbird breeding season (i.e., early August).

Impacts of group size on the experience of park visitors. The fact that large groups have an adverse impact on the experience of park visitors was documented in the early 1970s by Dr. George H. Stankey (1973). A 1990 wilderness management manual co-authored by Dr. Stankey and endorsed by federal agencies, including the National Park Service (Hendee et al. 1990), concludes:

> "Large parties are not common in most wildernesses, but the few that occur seriously diminish other visitors' experiences."

Recent research conducted in SEKI confirms Dr. Stankey's early work, and demonstrates that the current group size limits in SEKI (both for number of persons and stock animals) are inadequate to protect the experience of park visitors (Watson et al. 1993). This is key research that deserves full consideration by your planning team. It documents that even the average stock user in SEKI strongly supports smaller group sizes than those currently in effect. For example, the average stock user in SEKI recommended 13 as the maximum allowable number of stock animals per group. The average hiker in SEKI recommended six animals per group as a maximum. Regarding the maximum number of persons per group, the average stock user in SEKI recommended 12; the average hiker in SEKI recommended nine. These recommendations by the visiting public are approximately equal to the limits suggested by scientists and adopted by many other national parks (discussed below, and see Exhibit A).

There simply is not any valid justification for the higher limits currently in effect at SEKI. Although the commercial outfitters would prefer the existing (or larger) group size limits, the existing (or larger) limits cannot be supported by either the scientific evidence or public opinion.

Numerous comment letters contained in the administrative record for this planning process also demonstrate that SEKI's current group size limits are having significant adverse impacts on the experience of SEKI park visitors.

Impacts of group size on the biological-ecological wilderness character. Other research scientists specializing in wilderness management have also documented the social and ecological impacts caused by large groups. For instance, Dr. David N. Cole (1989) concluded:

> "The effectiveness of reduced party sizes in reducing resource damage is greatest where impact is likely to occur quickly (for example, in fragile areas, in little-used and relatively undisturbed areas, and where parties travel with stock). Limits on party size must be quite low (certainly no larger than 10) to be worthwhile."

Concerning group size limits for numbers of stock animals, Dr. Cole (1990) concluded:

> "A large party detracts much more from visitor satisfaction than a small party (Stankey 1973). Although a limit on party size is currently the most common packstock management technique in wilderness—almost one-half of all areas have a limit—the number allowed ranges from five to 50 animals per party, with 20 the most common limit (Washburne and Cole 1983). Such high limits will have very little beneficial effect; both social and campsite impacts are unlikely to be reduced unless limits are 10 animals or less."

Group size limits for off-trail travel. Off-trail travel by stock parties is of particular concern because of the damage that is often caused when stock animals leave constructed trails. Dr. Cole (1989) concluded:

> "Trampling impacts of packstock are particularly severe because considerable weight is carried on a small bearing surface (Weaver and others 1979). Therefore, vegetation and soil damage occur rapidly where stock leave the trail...The size of stock parties influences the severity of a number of problems. Particularly in little-used and off-trail places, it is critical that stock party size is minimized."

Many other park and forest areas throughout the nation acknowledge the potential adverse impacts of off-trail stock use by prohibiting all cross-country travel by stock animals.

Summary and conclusion re: group size. National parks throughout the western United States have adopted maximum group size limits significantly lower than those in effect at SEKI (see Exhibit A). This GMP should be used as an opportunity to provide programmatic direction that SEKI's maximum group size limits, both for numbers of persons and numbers of stock, will be lowered to protect natural resources and visitors' experiences. Better still, the GMP should: (1) evaluate and establish lower limits for maximum number of persons per group on trails (i.e., ~10 persons per group); (2) establish appropriate limits for maximum group size "off-trail" (i.e., 4-6 persons per group); (3) evaluate and establish lower limits for maximum number of stock animals on trails (i.e., 6-10 animals per group); and (4) prohibit all cross-country (off-trail) travel by stock animals.

Mineral King Cabins

The HSHA supports removal of all permittee cabins at Mineral King, and restoration of the sites, at the earliest possible time. This is what Congress intended when it added Mineral King to the national park, and it is what should happen. The Park Service should make no concessions to the permittees to extend the permits or to grant any further privileges. All of the cabins should be removed as soon as the permittee-of-record dies. Period.

Aircraft overflights

The natural quiet of SEKI is an invaluable resource. Aircraft (military, commercial, and private) overflights are a significant intrusion on the peace and quiet of these parks. The problem has been well documented in reports by SEKI staff. The GMP should fully evaluate impacts from overflights, and propose strategies to reduce impacts associated with overflights. Simply eliminating low-flying jets will not be enough. The currently voluntary ceiling (2,000-3,000 feet AGL) is inadequate to protect the natural quiet. The GMP should incorporate a provision that the Park Service shall make a recommendation to the Federal Aviation Administration that it adopt a mandatory ceiling and other limits as necessary to fully restore and protect the natural quiet over SEKI. The military agencies claim that their inaction is justified because the Park Service has never made any such recommendations to protect the natural quiet. This GMP is an historic opportunity to address noise from aircraft overflights, and the Park Service must seize this opportunity.

Other Issues and Concerns

There are several other issues raised in our scoping comments that do not appear to be addressed in the Draft GMP/EIS. The following issues should be addressed as discussed in our comments dated March 30, 1998: (1) fish stocking; (2) bighorn sheep; (3) user fees; (4) establishment of stock-free areas and foot-travel-only trails; and (5) wilderness designation. We strongly oppose mechanized (i.e., bicycle, downhill go-cart, overland skateboards, etc.) use of the old mill road (Yucca Mountain area), and we support wilderness designation for the following areas: Hockett Plateau, Mineral King, Yucca Mountain, Bearpaw & Pear Lake additions.

Summary and Conclusions

The Draft GMP/EIS fails to comply with important legal mandates, as discussed above. The draft needs to be substantially supplemented and revised to comply with all relevant laws, regulations, and policies.

All of the above issues are "park wide" issues, and addressing them cannot properly be put off to some future planning process (such as SEKI's wilderness planning process). These issues require park-wide programmatic direction, and need to be addressed in the GMP. We urge bold, concerted action to do what's right for the future of these parks.

Richard H. Martin, page 19 of 26

Again, we appreciate this opportunity to comment. Please revise and supplement the draft GMP in light of the above comments, contact us at the letterhead address if you desire clarification of these comments, and keep us informed of all opportunities for comment.

Sincerely yours,

/Original signed by/

Peter Browning, Coordinator
High Sierra Hikers Association

EDITOR'S NOTE: The exhibits and the list of references cited have not been reprinted. The original letter is available at park headquarters.

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We are commenting on the draft General Management Plan for Sequoia and Kings Canyon National Parks.

The GMP should either retain the language from the 1971 Master Plan that calls for phasing out grazing and phasing out all non-essential stock use in the most fragile high-elevation areas, or - at minimum - the GMP should be supplemented to provide replacement language that will fully preserve the wilderness character of the SEKI wilderness. Simply continuing current management practices (as proposed) is not acceptable, due to the ongoing impacts of trampling and grazing of fragile wetland meadows and lakeshores.

The GMP needs to be supplemented to clearly direct staff at SEKI to limit commercial enterprises in the SEKI wilderness to the extent necessary and proper under the Wilderness Act.

The commercial development at Bearpaw Meadow should be removed, and the site restored to a level that eliminates all impacts on the surrounding wildernes

Sincerely,
Pandora Rose
Director
Mountain Defense League
434 Creelman Lane
Ramona, Ca 92065
760.789.8134

"Growth for growth's sake is the ideology of the cancer cell."
Edward Abbey

311

MCQUAID BEDFORD & VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL·415/905·0200
FAX·415/905·0202

OCT - 8 2004

21404-002

October 6, 2004

Mr. Richard Martin
Superintendent
National Park Service
47050 Generals Highway
Three Rivers, CA 93271

Re: Comment Letter for SEKI General Management Plan Draft Environmental Impact Statement

Dear Mr. Martin:

These comments are filed on behalf the Mineral King District Association ("MKDA"), a group representing cabin owners with special use permits in the Mineral King Area of Sequoia National Park. The comments relate to the Draft General Management Plan and Comprehensive River Management Plan/Environmental Impact Statement that the National Park Service prepared for Sequoia and King's Canyon National Parks ("Park").

BACKGROUND

The Mineral King Cabins, part of the Mineral King Area Historic District, on the National Register of Historic Place, were first constructed when the area was first opened to development in the late 19th century. In fact, the cabins long predate the current national park, which was created in 1978, and even the national forest, established in the first part of the 20th century. As part of a historic agriculture, mining and recreation community, these cabins form an integral piece not only of the park's history, but also of the history of California and the settling of the West. With unique architecture and a past laden with stories of westward migration and the can-do spirit of the pioneers, the cabins are a critical element of the Park's historic and cultural heritage.

The cabins are privately owned and the owners have special use permits from the Park allowing them to use the cabins on federal land. The cabins were first built by prominent citizens and early leaders from the Central Valley and Southern California. Some of the cabins are in an area known as "Faculty Flats," where chemistry professors from Southern California gathered to work on the first university chemistry text published in California.

As part of the 1978 legislation creating Sequoia National Park, the government changed the special use permits so that only the holder as of that date could renew the permits. Therefore,

once the present permit holders die, the permits will expire. Currently, both a memorandum of understanding and additional legislation are pending to address what will happen next. By preventing any lapse in maintenance, the pending solutions attempt to ensure the continued health and vibrancy of these essential elements of the Park's history.

COMMENTS

There are several problems with the draft EIS.

Lack of Mitigation Discussion

Discussion of migration measures is at best perfunctory, and does not follow from any clear analysis of the impact on historic resources.

Discussion of mitigation measures is a critical element of an EIS. Robertson v. Methow Valley Citizens' Council, 490 U.S. 332, 352 (1989). In requiring agencies to take a "hard look" at environmental consequences of proposed action and the EIS process, the mitigation discussion ensures that "the agency [and] other interested groups and individuals can properly evaluate the severity of the adverse effects." Id.

When an EIS identifies significant, adverse environmental impacts with a reasonable degree of certainty – such as the certain removal of the historic cabins – then the agency favoring action must include more than a mere list or perfunctory description of measures to mitigate those impacts. Neighbors of Cuddy Mtn. v. United States Forest Service, 137 F.3d 1372, 1380-81 (9th Cir. 1998); Idaho Sporting Congress v. Thomason, 137 F.3d 1146, 1151 (9th Cir. 1998); cf. National Parks & Conservation Ass'n v. United States Department of Transp. (NCPA), 222 F.3d 677, 681 (9th Cir. 2000) (requiring detailed mitigation discussion even when "possible environmental damage, if any, is purely speculative"). While the agency does not need to actually establish a fully developed mitigation plan, or guarantee its implementation, Methow, 490 U.S. at 352-53, there must be something more than a few possible alternatives. Cuddy, 137 F.3d at 1380-81.

Even when the environmental impacts are uncertain and speculative, the EIS still must include a detailed examination of mitigation measures, such as plans to consult with local agencies for protection, measures to be implemented if certain events occur, and discussion of resources available to lessen impacts. Methow, 490 U.S. at 352-53; NCPA, 222 F.3d 681. When the impact is certain, however, the EIS must include even more detail – focused discussions of the impacts, where they will occur, what the results will be, what the mitigation measures are and whether those measures will actually lessen the impact. Cuddy, 137 F.3d at 1380-81.

Here, demolition of some or all of the cabins is part of every alternative save alternative C – "The Mineral King Cabins would be removed, resulting in moderate to major, adverse, permanent impacts." (EIS, Volume 2, p. 201). As the EIS acknowledges, this would have a significant, long-term, adverse impact on the Park's cultural heritage and on the character of this registered historic district. Since the impact of the loss of the cabins is identified, the Park must include in the EIS analytic data describing mitigation, a determination of whether the measures would be adopted, and how effective they would be. But this information is not in the EIS – instead, there is at best a perfunctory list of options, with no analysis of how they will address the loss of the cabins.

Historic buildings once removed are irreplaceable, as the EIS notes, but there is no accounting for this fact in the EIS, or for the minuscule number of random acres gained for "public access" (in relation to the massive size of the Park), in exchange for the permanent loss of cultural resources. Also, the EIS claims that preserving cultural resources is limited by financial constraints, without quantifying how much it would cost, or even identifying options that would preserve the resources. The cabins are the major contributing factor for the historical district and their removal would severely compromise its integrity. How is this mitigated? There is also no discussion of what will happen to the cabins if they are removed. Will they be demolished? Will they be relocated? How will the cabin owners be compensated? What is the plan?

Even a brief look at the impacts on the cabins raises several possible mitigation measures that the Park could include in the EIS. As a preliminary step, the EIS should require full consultation between the affected parties – the Park, the cabin owners and the California Historic Preservation Officer – before any action is taken. This way, the parties can ensure that the maximum benefit is achieved with the minimum harm.

As for possible mitigation measures, they run a spectrum from integrated management plans within the current structure to outright removal. Since it is a given that the Park must act to preserve cultural and historic resources, the most environmentally beneficial option would involve preservation; the least favorable would be removal.

On the favorable end of the scale, there are currently two solutions pending. The first option is a Memorandum of Understanding ("MOU") regarding the future of the cabins, which the Park and the cabin owners have negotiated but not yet executed. In exchange for the right to retain occupancy, the cabin owners agree to substantial management duties. Thus the MOU ensures preservation of the cabins according to strict architectural standards at almost no cost to the Park. This is in contrast to the proposed solutions stated in the EIS – contracting with unnamed outside parties to manage the resources, at some similarly unnamed expense.

The second favorable option is new legislation pending before Congress that would amend the 1978 enabling legislation for the Mineral King Valley to allow the cabin owners to stay on in exchange for a clearly defined role as managers of this historic resource.

If the Park were to support these two options, then it would have available a ready-made solution to the question of what to do with the cabins, and how to manage them, with almost no cost for the Park. These two options are not speculative, or even simply possible – they are in progress, and available to help mitigate impacts. It would be a serious error for the EIS to fail to discuss the role that the MOU and new legislation could play in managing the cabins.

Other favorable options for retaining the cabins would be to sell the underlying land to the cabin owners. This would remedy the perceived problems that the Park has with the private use of federal lands, and also ensure preservation of the historic district. Similarly, the Park could enter into long term leases with the cabin owners. An option already mentioned, but little discussed, would be to have an outside non-profit organization manage the cabins. Contracting with a non-profit organization, however, would be an economic challenge, unless the Park was willing to fund it. This option would achieve essentially the same result as the MOU solution, but would not include the added benefit of the cabin owners' long experience in the Valley, and it would be costly.

Further down the favorable spectrum, another solution could be to move the cabins to private property instead of demolition. That way their historic character could be preserved, thereby ensuring compliance with the directive for the Park's mission to, among other things, shepherd and preserve cultural heritage. However, the historic nature of Mineral King as a community would be destroyed.

It is only as a last resort, then, that the Park should approach razing the cabins, and then only if removal is unavoidable. The EIS states that removal is an option, but says nothing about whether this option is a last resort or avoidable. There must at least be some plan for how to deal with the loss of these irreplaceable historic resources. Since the removal of a building is always going to be a significant impact, the Park must make some attempt to show how they will account for and mitigate this impact.

But there is essentially nothing in the EIS addressing mitigations. The only express reference to mitigation of cabin removal is that "facilities that were removed would be documented to HABS/HAER/HALS standards to mitigate any adverse effects." (EIS, Volume 2, 206). This statement only appears in the preferred alternative, with no account given in any other alternative to what would happen after removal.

If the Park plans to monument the structures after removal, documenting them rather than

keeping them, it needs to make this intent clear and explain how this would mitigate the loss of the cabins. For example, if the cabins are removed, how will the Park retain the historic character of the area? If only a few cabins remain, that is a far cry from the community that currently exists. And it is the community, not any one individual cabin, that truly defines this area's significance.

Before this EIS is final, there must be some discussion of what the real impact will be of all the alternatives, from the most favorable to the least. And the Park must make detailed showing of how the impacts will be mitigated, what the processes will be to mitigate, and who will be involved.

Failure to Comply With Park Service and Federal Historical Preservation Guidelines

The Park is required, under its own guidelines and regulations as well as by section 106 of the National Historic Preservation Act, to ensure that cultural and historical resources are preserved. The EIS, to be sure, discusses these items. But the EIS fails to give proper weight to historical preservation. Instead, the Park appears to have entered this process with a result in mind – restoration of natural conditions and an increase in "public access." As discussed below, the increase in public access is not even really a benefit. More importantly, the approach that the Park takes improperly puts preservation onto a lower rung of importance than other directives.

Historic preservation is, however, more than just a subset of other directives. Historic preservation is at least of equal value with maintaining natural areas and ensuring public access. One only has to visit Gettysburg National Battlefield Park to appreciate this. Thus the Park must balance the competing directives, rather than arbitrarily assigning historic preservation to a lesser role.

Preservation of historical buildings and areas plays a prominent role in many National Parks. And the mere fact that private citizens control the buildings does not diminish the historical importance of the Mineral King Cabins. As the possible mitigation measures discussed above show, partnerships with the current permittees is the best way to preserve and manage these resources. Before this can happen, though, the Park must account for the equal importance of preserving historical as well as natural resources in the EIS.

No Clear Purpose for Cabin Removal

The EIS does not say what removing the cabins will accomplish. Nor does it balance the loss of cultural heritage with any gain for public access. Instead, the EIS assumes that public access is a greater need than preserving cultural resources. The end result of every plan, save

plan C, is that the cabins are removed, and public access is restored. But the EIS does not state why public access is more important than historic preservation – two equally weighted goals that the Park must try to accomplish. Instead of balancing, the Park has arbitrarily weighted public access to a greater degree than preservation,

Impact of Cabin Removal

The EIS somewhat incongruously describes the loss of the historic cabins as a benefit because it restores public access. But there is no discussion of what is lost to gain this putative benefit. To begin with, the benefit from removing the homes is overstated – at most 65 acres of land will be freed, in relation to hundreds of thousands of acres in the rest of the Park. And the EIS itself notes that the cabins are widely dispersed, further attenuating the "benefit" of removing the cabins. (EIS, Volume 2, p. 302). Plus, the Mineral King area lines the access road to Mineral King Valley itself, near a parking lot, across from developed inholdings. Thus the area is not a core wilderness tract, for example, but is instead an already developed access point. Any impacts, then, from allowing the cabins to remain are attenuated.

By removing the cabins, the Park will gain little by restoring public access to the scattered and small plots of land. The Park, in contrast, would be removing one of the primary benefits that users of the Mineral King Valley enjoy. The access road to Mineral King is nearly 25 miles long, taking over two hours of rough driving to reach the trailhead and parking area. This is no luxury resort, reserved for the elite, but rather a rough and tumble, near back country experience for the hardiest explorers in the Park.

The cabins are unobtrusive, and blend into the surrounding scenery. To the extent that they are visible, they help form an essential aspect of the area's character, making it a part of the context that includes the moldering mining remains in the Mineral King Valley. The area is at best sparsely attended, so even if there were no cabins, the number of park visitors to use the increased space would be insignificant compared to total park visits.

Those who make the trip are rewarded by the volunteerism of the cabin owners. Cabin owners provide advice, man ranger stations, recommend trails, hold informational campfire gatherings, and add to the whole effect. The residents are friendly, and always offer to help. As contemplated by the MOU, the residents would take on an even greater role, further sparing the Park the expense of managing critical resources.

It is not simply the cabins that are lost, and the ground restored. It is this whole experience, this essential element of the Park that would be lost, too. In exchange for a few scattered acres of newly available land, the park gives up a free management resource, an endless well of goodwill, and an invaluable fount of historical knowledge and experience. There is no

accounting for this impact in the EIS, nothing offered in opposition to the claimed "benefit" for restoring public access. Therefore, the EIS must also include some discussion of this critical social and historical context.

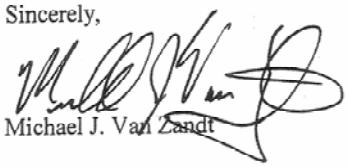
Protecting California's Interests

California has a significant interest in these historic cabins, as they form a part of the history of this State's development. Yet there is no accounting for participation by state officials to ensure preservation. An EIS will frequently describe, in detail, how local agencies will be involved in the process. By systematically excluding the State from the discussion of how to preserve these historic cabins, the EIS fails to properly account for all the interested parties. While the EIS claims that "mitigation measures would be determined through consultation with the California state historic preservation officers," it offers no more detail on this point. (EIS, Volume 2, p. 197.) Since the impacts of removal are fairly certain, the EIS must include a more detailed examination of roles, as well as of possible solutions, for ensuring an active state role. Consultation with the cabin owners and the SHPO must take place before the EIS is finalized.

CONCLUSION

The Draft EIS, in particular, fails to address mitigation measures for the proposed serious impact on the cabins. Beyond that technical requirement, however, the whole tone of the document is missing a critical element – proper accounting for preservation of historic resources. Ensuring that the reasons for and results of removing the cabins are clearly stated is only the first step. The Park must also clearly describe how it will address this impact, and it has not. The Park should amend the EIS to include the historical detail included in the this letter, to expand on and better describe the historical context of the Mineral King cabins. And the EIS should also include a more balanced analysis of the options to include a fair treatment of historical resources in line with all other Park resources. The best solution in this process is the simplest solution: the Park should retain all of the cabins under the control of the cabin owners, thus preserving the unique and magical character of Mineral King as an irreplaceable asset in this nation's National Park system.

Sincerely,



Michael J. Van Zandt

cc: MKDA

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308-1

Mineral King District Association

October 5, 2004

Park GMP Coordinator
Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271

Dear Dr. Graber:

Enclosed is a copy of a letter to Superintendent Martin, with copies of the petitions which accompanied that letter.

We believe that these petitions are very relevant to the Draft General Management Plan now under consideration. They specifically address the question of the Mineral King Special Use Permit Cabins from the unique perspective of the users of the Mineral King and Cold Springs campgrounds.

The Draft GMP recognizes the unique characteristics of the Mineral King Valley from a geologic perspective, but does not seem to recognize that the cabin community itself is one of the unique characteristics which ought to be preserved. As Doctor Don Bree pointed out in a recent article in the Kaweah Commonwealth, you would not preserve the Amish community in Pennsylvania by evicting the people and preserving the buildings – as it is the people and their way of life which make up the community.

The petitions signed by the campers evidence their belief that the cabin owners, as well as the cabins, are an important part of the Mineral King Valley – and that they should be allowed to remain, with their cabins, in the Valley.

Since these campers represent a significant element of the public which the Park Service is obliged to serve, we request that the petitions be added to the comments on the Mineral King Special Use Permit Cabins, and that their views be considered in the preparation of the final General Management Plan.

Yours very truly,

Kathy Hath

Kathy Hath
Vice President
Mineral King District Association

cc: Superintendent Martin

Mineral King District Association

October 5, 2004

Richard Martin, Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651

Dear Superintendent Martin:

On each of the four weekends in August of this year, the Mineral King District Association circulated petitions in the Cold Springs and Atwell Mill campgrounds. Those petitions (all signed originals) are enclosed.

We approached every adult camper present in either campground each weekend, returning at various times each day to ensure that no one was missed. Of the one hundred people we approached, only two declined to sign the petition. One gentleman stated that he supported the cabin owners, but that he never signed petitions of any kind. The other gentleman gave no reason for not signing.

The campers were tremendously supportive. Many said that they returned to Mineral King each year precisely because it has changed so little over the years – and that the cabins and the cabin community were an important part of its attraction for them. They all agreed that the cabin owners were the people best qualified to maintain and preserve the cabins and the character of the Mineral King historic district.

They hope, as we do, that the Park Service will find a way to protect both the cabins and the cabin community – as together they provide a rare opportunity for the public to enjoy not just historic buildings but a way of life no longer found elsewhere in our society.

Yours very truly,

Kathy Hath

Kathy Hath
Vice President
Mineral King District Association

EDITOR'S NOTE: The nine-page, signed petition has not been reprinted. The original copy is available at park headquarters.

#10

SEKI DRAFT GMP COMMENTS
FROM THE NATIONAL PARKS CONSERVATION ASSOCIATION
OCT 6, 2004

INTRODUCTION

On behalf of the more than 300,000 members and supporters of the National Parks Conservation Association (NPCA), we respectfully submit the following comments on the Sequoia and Kings Canyon National Parks (SEKI) Draft General Management Plan (GMP). NPCA recognizes and appreciates the National Park Service staff who have tireless worked to produce the draft, and hopes our comments will provide constructive feedback for the final document.

NPCA's comments serve to raise what we see as important questions and key issues that could use further reflection and clarification. Additionally, these comments also point out inconsistencies throughout the document that NPCA hopes the NPS can address in the final GMP. The comments also highlight important areas of agreement with the preferred GMP alternative.

In general, NPCA supports the preferred alternative of SEKI's Draft General Management Plan (GMP). However, as expressed in these comments, there are areas in the GMP that appear to be inconsistent with key requirements of law, with Council on Environmental Quality (CEQ) regulations, and with National Park Service (NPS) policies.

NPCA's comments are divided into seven sections of primary concern:

- Water Withdrawal and Quality
- Carrying Capacity
- Wilderness
- Mineral King Cabins
- Stock Use
- Air Quality
- Funding

The next twenty years for California, the Central Valley and SEKI will be a time of noteworthy changes in demographics, population, land use, and visitation styles. Some predictions indicate climate change will result in ecosystems disappearing and temperature fluctuations that equate to elimination of snowpacks that currently provide the parks with important water resources. For all these reasons, the draft GMP must outline clearly the desired future conditions, and account for the aforementioned changes in ways that truly ensure these parks will retain the characters and qualities of the 20th century into the 21st century while meeting the needs of a changing public. The challenge of producing a GMP that embodies SEKI's mission statement, "…to protect forever the greater Sierran ecosystem…and to provide appropriate opportunities to present and future generations to experience and understand park resources and values" is a great one.

1. WATER WITHDRAWAL AND WATER QUALITY

According to NPS Director's Order 12, CEQ requires that an EIS examine connected actions, cumulative impacts, secondary or indirect impacts, and similar actions. The Draft GMP/EIS does not clearly assess the cumulative impacts of several activities, including:

- water withdrawals
- wastewater disposal
- forecast population increases, highway improvements, and plans for the adjacent national monument

The Draft GMP/EIS does not fully clarify all impacts on the resource. The document states that water resources will be positively impacted by the preferred alternative, but does not mention the negative impacts of diminishment of streams, pollution of groundwater, and the challenge of meeting required state water quality standards.

Section 2 of NPS Management Policies states that a GMP will define the set of resource conditions which best achieves the mandate to preserve resources unimpaired for the enjoyment of future generations. However, the desired resource conditions are not always clear.

Water Withdrawals

As mentioned in the introduction, climate change is one factor that may have an impact on water availability in the parks in the coming decades. The preferred alternative states that there will not be an increase of water withdrawals which is important if resources are to be protected. How will the park deal with additional needs for water if the availability decreases? What are the impacts to the resource and how does the park intend to address this?

The Draft GMP/EIS states that all management prescriptions would manage ground and surface water conditions to protect the hydrology of sequoia groves (Volume 1, page 54). What is meant by this statement? Is the intent to increase or remove water? The actions should be clearly stated.

The GMP should also manage ground and surface water conditions to protect creeks and wetlands. The document recognizes that water withdrawals have altered natural water flows and hydrology, adversely stressed meadows, and impacted biological resources (Volume 2, pages 12, 96, and 128). The desired resource conditions should state how much alteration and impact is acceptable.

In drought years water withdrawals significantly reduce the flow in a number of creeks. The preferred alternative will have continued use and development, along with even more visitation. The document concludes that the preferred alternative would result in minor to moderate, beneficial effects to the free-flowing conditions of rivers, floodplains, water quality, and biological communities (Volume 2, page 101). The language used here does not clearly define the impacts of water withdrawal and should be more specific.

In describing water withdrawals a variety of terms are used, including "would be limited," "only dry season withdrawals" (Volume 1, page 88, reference 35), "summertime withdrawals" (Volume 1, page 188), "net average withdrawals during the low-flow season" (Volume 2, page 99), "peak-season withdrawals" (Volume 1, page 188), and at times all water withdrawals (Volume 1, page 186). Terms and actions should be clearly defined.

The document states (Volume 1, pages 88-89, reference 35) that all of the action alternatives would limit water withdrawals to current levels to protect resources. What is meant by "current levels"? Is this based

on actual withdrawals for 2004? The document implies this is based on a number of different years, including 2001 as implied in Volume 1, page 73 and 2000 as implied in Volume 2, page 381, Table E-1. Again, terms and actions should be clearly defined.

The document uses the terms "water use," "water consumption," and "water withdrawal." These terms should be defined so that it is clear if the intent is a different action for each different term.

The discussion of water withdrawals contains some inconsistencies that should be clarified. For example, the document states in several places that Alternative C would limit dry season water withdrawals to current levels but that it would react to additional growth by seeking new water sources (Volume 1, pages 88 and 135, references 35 and 271). The Draft GMP/EIS predicts that more day use at Grant Grove under the no-action alternative would raise annual water consumption (Volume 1, page 188). But in another place, the document states that peak-season water consumption at Grant Grove is not expected to increase under the no-action alternative. (Volume 2, page 114). The Draft GMP/EIS says in several places (Volume 1, pages 88-89, reference 35) that all of the action alternatives would limit water withdrawals to current levels to protect resources. Yet the document provides a section on Mitigation for Increased Water Withdrawals (Volume 1, page 73). Why is mitigation being undertaken if withdrawals are being capped at present levels?

The Draft GMP/EIS states that the preferred alternative would limit facilities in some areas (Grant Grove and Ash Mountain) to those that can be sustained by the current water supply. (Volume 2, page 99). Does this mean there are other areas where facilities would not be limited to those that can be sustained by the current water supply?

Existing water withdrawals at Grant Grove average 33,500 gallons/day during the peak use season. Drought production is 31,824 gallons/day (Volume 2, page 381, Table E-1). Grant Grove peak water consumption is expected to increase to 53,650 gallons/day under the preferred alternative. However, water withdrawals would not be increased beyond 35,500 gallons/day. (Volume 2, page 116). During drought years consumption would exceed withdrawal by at least 18,150 gallons/day. Where does the preferred alternative propose to get the rest?

All action alternatives propose to conduct an in-depth watershed study in Grant Grove to determine water availability, springwater recharge, and groundwater availability. (Volume 1, pages 124-125, reference 215). If the park finds that current withdrawals are impacting resources will those withdrawals be decreased? If the park finds that there is a surplus of water available will the water withdrawals be increased? What is the intended action of the study?

The Draft GMP/EIS says that future studies will be completed and a monitoring program implemented to determine potential impacts from increased water withdrawals before any new facilities for additional visitor use are undertaken (Volume 1, page 73). Is the park committing to complete these studies and implement the monitoring program before undertaking any new facilities for additional visitor use? If the studies or the monitoring program indicate that there are or will be potential impacts will the facilities not be built?

The Draft GMP/EIS states that studies will evaluate the cumulative impacts of water withdrawals (Volume 1, page 73). This implies that this EIS is not fully assessing the cumulative impacts of water withdrawals. If the studies show that the cumulative impacts of water withdrawals is adversely affecting park resources will the park take action in response? Is the desired future condition "no cumulative impacts from water withdrawals?" What is the desired future condition concerning water withdrawals?

The Draft GMP/EIS does not seem to fully address the cumulative impacts of water withdrawals – especially when one single water source is shared. Do water withdrawals affect the water supply available to residents of Wilsonia? Would the addition of private lots in Wilsonia have a cumulative effect on the park water resources?

The Draft GMP/EIS states in several places (Volume 1, pages 88, 124 and 134, references 35, 215 and 271) that the no-action alternative does not propose to limit future water withdrawals and that new water needs would be addressed by seeking new water sources and establishing additional storage. This does not qualify as "no-action" and should be addressed.

The Draft GMP/EIS states in several places (Volume 1, pages 88-89, 124-125, and 134-135, references 35, 215 and 271) that some alternatives propose to develop new water sources and establish additional storage. The impact of these proposed actions is not adequately assessed in the document. If any of the alternatives propose actions such as developing new water supplies, constructing new water storage, or increasing water withdrawals, then the impacts of those actions should be fully assessed in the Draft GMP/EIS.

The Draft GMP/EIS states that water usage would be substantially reduced with removal of development at Giant Forest, more than offsetting an expected increase in water use from future development at Wuksachi (Volume 2, page 100). In several places (Volume 2, page 124) the document repeats a 1979 NPS prediction that removing development and restoring Giant Forest is expected to substantially decrease water demand from Wolverton Creek. Did the prediction prove to be accurate? By how much was the water demand decreased? Was water use reduced enough to more than offset the expected increase in water use at Wuksachi?

The Draft GMP/EIS does not clearly show that visitor use capacity can be increased without impacting the water resources and desired future conditions. The Final GMP should:

- Clearly state the commitment to limit water withdrawals to 2004 levels, or less dependent upon conditions, to protect resources. State precisely how much water can be withdrawn per day at each of the frontcountry water systems with varying caps based on conditions.
- Commit to not increasing visitor use capacity until it can be demonstrated that the proposed increase can reasonably be accommodated without exceeding allowable water withdrawals for that area.
- For each frontcountry water system, call for an in-depth study of the impacts of water withdrawals, including creation of a monitoring program. Commit to completing at least half these studies and implementing the associated monitoring program by 2010.
- Fully assess the cumulative impacts of water withdrawals. Specifically include the impacts of withdrawals at private systems, including the potential for new lots in Wilsonia.
- Clearly state how the plan will deal with water treatment in regards to cabins in Mineral King or Wilsonia. If the intent is for the park to eventually develop sustainable water treatment systems, this should be clearly stated and the impacts fully assessed.

Wastewater Treatment

What is the desired future resource condition for water quality? At a minimum the park must meet state water quality standards and Clean Water Act standards. It is not clear from the document that this is being

addressed completely. The Draft GMP/EIS does not adequately assess the costs and impact of upgrading wastewater systems to meet state regulations and to handle the development proposed in the various alternatives. In particular, the document should fully assess how the various alternatives would address the Grant Grove buildout (Volume 2, page 382, Table E-2).

The Draft GMP/EIS recognizes that the discharge of wastewater alters hydrology, local species composition, and nutrient availability (Volume 2, page 12). The desired resource conditions should identify how much alteration is acceptable.

The environmental consequences section in Volume 2 refers to actions and mitigating measures that are not contained in the description of the alternatives. For example, the document says that as the Mineral King permit cabins are acquired for public use, sustainable utility systems would be developed (Volume 2, page 327). The construction of these new utility systems does not appear to be in the description of the alternatives (Volume 1, page 156, reference 378). Furthermore, the document does not adequately address the nature, cost, and impact of these sustainable utility systems.

The Draft GMP/EIS does not adequately address the cumulative impacts of wastewater disposal on water quality at Mineral King (Volume 2, page 384, Table E-2). The document does not appear to address the privately owned septic systems in the Mineral King area, addressing these only as a potential source of pollution. It is highly probably that the Mineral King septic systems are contaminating the groundwater. This impact should be addressed in the GMP/EIS.

The Draft GMP/EIS acknowledges that Wilsonia septic systems are contaminating the groundwater (Volume 2, page 381, Table E-1). The preferred alternative is to acquire the Wilsonia cabins from willing sellers at the rate of approximately one property every 12 years and remove the utility systems (Volume 2, page 327). Are other efforts being taken to address groundwater contamination? Additional wastewater discharge will occur as new and bigger cabins are built in Wilsonia and more year-round use occurs (Volume 2, page 328). The Draft GMP/EIS does not adequately address the cumulative impacts of the Wilsonia septic systems on water quality. It is not apparent that the desired resource conditions will result in a reduction of groundwater contamination.

The Draft GMP/EIS does not make it clear that visitor use capacity can be increased without adversely impacting park water quality and desired future conditions. The Final GMP should:

- Commit to not increasing visitor use capacity until it can be demonstrated that the associated wastewater treatment plant can reasonably be expected to achieve state standards while accommodating the proposed increase in visitor use capacity.
- Fully assess the cumulative impacts of wastewater discharges. Specifically include the impacts of discharges at park and private systems, including the potential for new development in Wilsonia and for the current situation at Mineral King, as well as the acquisition of Mineral King cabins as proposed in the preferred alternative.
- Clearly state how the plan will deal with polluting discharges from private septic systems. If the intent is for the park to eventually develop sustainable wastewater treatment systems, this should be clearly stated and the impacts fully assessed.

2. CARRYING CAPACITY

NPS Management Policies (Sections 2.0, 2.2, and 8.2.1) require a GMP to determine the desired resource and visitor experience conditions that are the foundation for carrying capacity analysis and decision making, clearly define the desired resource conditions and visitor experiences to be achieved and maintained over time, and define the set of resource conditions and visitor experiences which best achieves the mandate "to preserve resources unimpaired for the enjoyment of future generations." However, the Draft GMP/EIS does not appear to establish a comprehensive set of clear, precise, measurable resource conditions. For example, marijuana farms pose a significant threat to the park and could seriously impair the parks' resources. The Draft GMP/EIS does not address this threat or establish clear, precise, and measurable resource conditions that would address it.

CEQ regulations (40 CFR 1502.21) forbid agencies from incorporating material by reference when the effect will be to impede agency and public review of the action. It is difficult to understand the visitation and visitor traffic projections in the document. The visitor traffic projections appear to come from a "1998 Visitor Use Study." The Draft GMP/EIS does not seem to incorporate the critical material from that study to aid in clarification of these projections.

NPS Management Policies (Section 8.2.2.1) require superintendents to manage recreational use to avoid adverse impacts on park resources or desired visitor experiences. However, the Draft GMP/EIS does not appear to adequately assess the threats to the desired future conditions and visitor experiences. Adequate actions to mitigate those threats should also be developed. The Draft GMP/EIS appears to leave implementation of carrying capacity to multiple implementation plans that are to be prepared at some point in the future. If the plan proposes to accommodate significant increases in visitation and visitor traffic, what are the threats to the desired future conditions? Visitor capacity should not be increased until carrying capacity is established and implemented. At this point it should be made clear a proposed capacity increase would be consistent with, and not negatively impact, the desired future conditions.

An EIS should provide an objective assessment of the alternatives. The Draft GMP/EIS tends to emphasize the positive impacts, yet does not fully clarify the negative impacts. For example, the document mentions that visitors will be positively impacted by the preferred alternative, but does not fully explain the negative visitor impacts – such as overcrowding.

CEQ regulations (40 CFR 1502.24) require agencies to explicitly identify any methodologies relied upon for conclusions in the EIS. However, the Draft GMP/EIS contains a number of unsupported conclusions such as:

- Crowding at the General Sherman Tree doesn't begin to adversely affect visitor enjoyment until 400–450 people are present.
- The projected frontcountry visitation levels can generally be accommodated in all alternatives without adverse resource impacts.
- Low-use frontcountry areas have the capacity to absorb more visitation without jeopardizing the uncrowded visitor experience that is valued by many visitors.

NPS Management Policies (Section 8.2.2.1) require that public use limits be based on the results of scientific research. The Draft GMP/EIS establishes public use limits for the General Sherman Tree, the General Grant Tree, and Moro Rock. However, no evidence is presented to suggest these limits were based on scientific research.

Desired Future Conditions

As mentioned in NPCA's introductory remarks desired future conditions should be at the heart of the GMP. Currently, the Draft GMP leaves the reader without a clear sense of the parks' overall vision for desired future conditions. Furthermore, does the GMP/EIS provide adequate environmental compliance for implementing carrying capacity in the park? If not, how would the environmental compliance be covered?

In portions of the Draft GMP/EIS statements of desired future conditions are often unclear to the reader and the ability to measure these conditions is left to broad interpretation. For example, one of the desired future cultural resource conditions is "original cultural resources are retained and reused, or they are removed or relocated" (Volume 1, page 61). It is not clear if the desired future condition is to retain, reuse, remove or relocate. An example of one of the desired future natural resource conditions is "damaged areas are restored or left to regenerate naturally" (Volume 1, page 61). Is the desired future condition to restored areas damaged or to leave them to regenerate naturally? These statements do not accurately describe what the park *intends* to do. They may describe management actions, but not desired future conditions.

In Table 1 (Volume 1, pages 11-19), the Draft GMP/EIS cites laws and NPS Management Policies that govern desired future conditions, yet these desired future conditions do not appear to be part of the management prescriptions. The GMP should establish carrying capacity in terms of desired resource conditions and visitor experiences that are in the management prescriptions (Volume 1, pages vi, 6, and 52; Volume 2, page 391; and Section 2 of Management Policies).

The Draft GMP/EIS says that the legal mandates and policies in Table 1 provide the foundation for resource conditions that are to be achieved in the parks (Volume 1, page11). Does this mean that desired conditions in Table 1 are elements common to each of the management prescriptions? Are the desired conditions in Table 1 being incorporated by reference into each of the management prescriptions?

The Draft GMP/EIS identifies elements that are common to all management prescriptions (Volume 1, pages 54-56). Some of these elements contain statements that are similar to desired future conditions. Does this mean that the desired future conditions in these elements are being incorporated by reference into each of the management prescriptions?

The Draft GMP/EIS states that NPS policies and federal law require that resource management goals and desired conditions be achieved, as stated in the 1999 Resources Management Plan (RMP) (Volume 1, page 12). Does the Draft GMP/EIS endorse the resource management goals and desired future conditions as stated in the RMP? Are the desired future conditions in the RMP being incorporated by reference into each of the management prescriptions?

Implementing carrying capacity is contingent on having a GMP prepared consistent with Section 2 of the NPS Management Policies. Those policies state that a GMP will clearly define the desired resource conditions. However, the Draft GMP/EIS does not appear to establish clear, precise, and measurable desired future conditions.

The glossary defines "management prescription" as a term that describes desired resource conditions and visitor experiences in a particular area that will be achieved by implementing the GMP (Volume 2, page 391). Is the park committing to achieve the desired future conditions?

Achieving some of the desired future conditions will require a significant undertaking. Is the park committing to do this in the near future? If the park is committing to achieving and maintaining the desired future conditions, does this commitment apply to the entire management zone, or only to the core

of the management zone? Does the plan propose to manage each zone for desired future conditions right up to the edge? Or, where two management zones meet, will the park treat this area as a buffer zone and take a less stringent view of desired future conditions?

To implement carrying capacity, the desired resource conditions and visitor experiences have to be converted into indicators and standards and a monitoring plan instituted. Is that conversion and monitoring left up to implementation plans such as the Backcountry Management Plan and the Stock Use and Meadows Management Plan? What implementation plan would do the conversion and monitoring for the frontcountry of the park? Is the intent to do this through the visitor use management plan required by Section 8.2.1 of NPS Management Policies? When is the earliest that such a plan might reasonably be completed? Visitor capacity should demonstrate that any proposed capacity increases should be consistent with the desired future conditions.

The language used to describe the relationship of backcountry carrying capacity to implementation plans (particularly the Backcountry Management Plan and the Stock Use and Meadows Management Plan) is somewhat unclear (Volume 1, pages 53 and 112). Is the document stating that implementation plans will monitor conditions throughout the backcountry and will prescribe management action to ensure that the desired future conditions are achieved?

In several places, the document states that impact studies must be completed before any new facilities for additional visitor use are undertaken (Volume 1, page 73 and elsewhere). Carrying capacity should also be implemented before any new facilities for additional visitor use are undertaken. Only then is it clear that the proposed increase is consistent with desired future conditions.

The Draft GMP/EIS states that visitor carrying capacity is the type and level of visitor use that can be accommodated while sustaining desired resource conditions and visitor experiences (Volume 1, pages vi and 52). This is consistent with Section 8.2.1 of NPS Management Policies. But in another part of the document, the alternatives matrix describes how backcountry carrying capacity will be implemented. For example, the preferred alternative would revise the trailhead/zone quota system in the Wilderness Management Plan as needed based on monitoring of wilderness character, wild and scenic rivers, outstandingly remarkable values, and travel patterns to protect resources and visitor experiences (Volume 1, page 112). These statements are not consistent.

Visitation is projected to increase by as much as 48% by 2010 and presumably much more by 2025. (Volume 2, pages 256 and 346). Yet the document maintains that the frontcountry visitation levels that are being considered under the alternatives analyzed in this document can be accommodated without adverse resource impacts. Therefore, the document concludes that carrying capacity can be dealt with primarily as a seasonal visitor experience issue. (Volume 1, page 52). This does not seem plausible. Major visitation and traffic increases of the levels being projected could easily impact desired resource conditions. For example, desired resource conditions could be threatened by such things as water withdrawals, wastewater discharge, campfire smoke, and trampling of riverside vegetation. Desired resource conditions need to be clearly established and fully implemented.

The Draft GMP/EIS states that a multi faceted approach would be used to manage carrying capacity at destinations within the high use frontcountry zone and the high use scenic driving zone. Examples of things that might happen are redesigning some facilities in the Grant Grove area to better accommodate sustainable visitation levels and attempting to redirect Hume Lake traffic away from Grant Grove Village. (Volume 1, page 52). Since these are examples of what might happen, it is not clear how carrying capacity will actually be dealt with in these situations.

Providing additional transit services might be a useful part of the proposed multi faceted approach to managing highway carrying capacity. The Draft GMP/EIS states that the preferred alternative would explore the feasibility of additional alternative transportation throughout the park (Volume 1, page 84, reference 12). Yet in a different part of the document, it states that the preferred alternative would only provide transit services in the Wuksachi, Lodgepole, and Giant Forest areas (Volume 2, page 248). These statements are inconsistent.

Low-use frontcountry areas are the management zones in the park identified as having the capacity to absorb higher visitation (Volume 1, page 53). Does this suggest that no other management zones have the capacity to absorb more visitation? All management zones should be described using similar language for clarity.

The desired future conditions expressed in the management prescriptions do not clearly establish carrying capacity. No desired future condition is provided for many important resources - and others are sometimes left to broad interpretation. The Draft GMP/EIS does not seem to fully present a set of clear, precise, and measurable desired future conditions. According to law and policy, the Draft GMP/EIS must define the set of resource conditions that best preserves resources unimpaired for the enjoyment of future generations.

The Draft GMP/EIS does not make it clear that visitor use capacity, including transportation, parking lots, overnight accommodations, and trailhead quotas can be increased without adversely impacting park resources and desired future conditions. The Final GMP should:

- Revise management prescriptions to include a much more comprehensive set of desired future conditions.
- Explicitly commit to achieving the desired future conditions and to implementing a scientifically based monitoring program for at least half of them by 2010.
- Commit to not increasing visitor use capacity until it can be demonstrated that the proposed increase can reasonably be accommodated without impacting the desired future conditions.

Visitation Projections

A major increase in visitation is forecast to occur. Most of the alternatives propose to limit visitation. The park will obviously need to take significant action to achieve the desired future conditions. Limiting the number of visitors will clearly have a negative effect on some visitors. The Draft GMP/EIS does not appear to fully assess the impact of this and other actions required to achieve the desired future conditions. The Draft GMP/EIS clearly must deal with the projected increase in population and visitation. It is not apparent that clear and consistent visitation projections are used for each alternative.

The Draft GMP/EIS states that it is based on a range of likely visitation growth rates (Volume 2, page 59). While the document does contain visitation projections, it is not clear how they are incorporated. There does not seem to be significant correlation between visitation projections and the environmental consequences section, between visitation projections and projections of water consumption, or between visitation projections and projections of visitor traffic. The plan should clearly state what visitation assumptions it is built on and then use these consistent throughout the document.

The Draft GMP/EIS acknowledges that Tulare and Fresno Counties have grown considerably in the past few decades (Volume 2, pages 80 and 90) and that the parks could be affected by changes in the region such as the potential expansion of visitor facilities in Giant Sequoia National Monument, the growth of subdivision development in Tulare County, and proposed improvements to Highways 180 and 65 (Volume 2, page 200 and elsewhere).

Projections of regional population growth for the next several decades should be included in the Draft GMP. For example, the population of Tulare and Fresno Counties is projected to increase by 54% between 2000 and 2025 (California Department of Finance). By 2025, the parks' neighboring population will have increased to over 1.8 million people. That is within the 20 year lifetime of the GMP and should be included in the analysis.

The expected population projections, national monument plans, and road improvements should be factored into the visitation projections. There should be a clear link between what the Central Valley is expected to look like in 20 years and park planning and management.

The draft GMP presents two different visitation projections (Volume 2, page 59 and 240). It is not clear that either of these projections is based on changes that are forecast to occur in regional transportation corridors and communities around the park. One projection goes to 2005 and the other to 2010. Neither of these appear adequate to support a document charged with park management through 2025, (Volume 1, page i). The Draft GMP/EIS should state what level of visitation is expected over the next 20 years.

In describing the predicted visitation in the preferred alternative, the document refers to:

- "some" growth in visitation (Volume 2, page 276)
- roads and parking areas would accommodate "limited" visitation growth (Volume 2, pages 248)
- "moderate increased" visitation would be accommodated (Volume 1, pages 78 and 84)
- "sustainable" growth being accommodated (Volume 1, pages i and 80; Volume 2, pages 191 and 338)

Similar problems seem to exist with other alternatives as well, especially Alternative D. Use of one consistent term would assist in the clear communication of the document's intent.

The Draft GMP/EIS often refers to "sustainable growth" (Volume 1, pages i and 80). Neither "sustainable" or "sustainable growth" is defined in the glossary. The definition and use is unclear.

If the preferred alternative is only accommodating sustainable growth, then some visitors will not be accommodated. The Draft GMP/EIS implies that some visitors will not accommodated in the preferred alternative. Is that the intent? If so, this should be clearly stated. For example, with redesign of Grant Grove parking, the preferred alternative would only be able to accommodate some of the forecast growth (Volume 2, page 249). The preferred alternative would cap visitation growth in the Grant Grove area (Volume 2, page 248). To what extent would the preferred alternative not accommodate visitors? This visitor impact should be fully assessed in the environmental consequences section of the document.

The Draft GMP/EIS is unclear about the amount of visitation predicted in each of the alternatives. In the preferred alternative, visitation is projected to increase by 30% by 2010. (Volume 2, pages 248 and 338). Some of the alternatives are projecting twice as much growth as others. This is a critical difference among alternatives and should be clearly described. The alternatives matrix should state the number of visitors predicted under each of the alternatives. These important figures should be clearly stated and cover the full 20 year lifespan of the Draft GMP.

It is not clear why visitor use projections are different for each alternative. Why are there more visitors in Alternative D than in the no-action alternative? Is it that Alternative D has increased visitor capacity? These projections appear to be projections of capacity than of visitor demand. The point should be clarified.

The Draft GMP/EIS is unclear about how many visitors would be accommodated in each of the alternatives. Some of the alternatives are apparently projecting accommodating far more visitors than others. This critical difference among alternatives should be clearly stated and described. The alternatives matrix should state how many of the projected visitors would be accommodated and how many would be turned away.

The Draft GMP/EIS assumes that the average visitation figures for 1993-2000 (920,762 for Sequoia and 605,666 for Kings Canyon) as starting positions to project visitation (Volume 2, page 59). This is consistent with the Sequoia projection graph (Figure 6, volume 2, page 61) which uses 920,762 for a starting point. Yet, this conflicts with the Kings Canyon projection graph (Figure 5, volume 2, page 61) which uses 528,987 for a starting point. Because the Kings Canyon projection graph uses an alternative starting point (528,987 rather than 605,666), then the entire projection is off by 76,679. This is a significant difference.

Does this visitation projection (Volume 2, pages 59-61) apply to all the alternatives or only to the no-action alternative? Projections for the action alternatives should be included and visitation projections should be as specific as visitor traffic projections (Tables 33-36, volume 2, pages 161-169).

In projecting visitation, the document does not address actual visitation for the years 2001-2003 (Volume 2, pages 59-61). These three years represent the most current visitation and should be incorporated in the planning.

The Draft GMP/EIS states that visitation would increase under the preferred alternative (Volume 2, page 109 and elsewhere) and under the no-action alternative (Volume 1, page 78, 188, and elsewhere). This is not consistent with the Visitor Use Projections section (Volume 2, pages 59-61) which states that annual visitation growth would likely fall within a plus 10% to a minus 10% range and that this would offer a reasonable forecast. Does each alternative accommodate a range of positive or negative visitation or are they based on increased visitation? What is the assumed level of increased visitation for each alternative?

Alternative D would not limit visitation. (Volume 2, page 288). This is significant. Does this mean that growth would not be limited at even the highest projected visitation – even if it threatens desired resource conditions? All alternatives should manage growth to achieve desired future conditions.

Based on the Goal #5 row in Table 2 (Volume 1, page 78), Alternative D is the only alternative that "establishes a pattern of increased visitation." Do the other alternatives take action to prevent increased visitation? Does this mean that Alternative D would accommodate fewer visitors? (Volume 2, page 288)?

The visitation projections contained in the Draft GMP/EIS do not appear to thoroughly establish a consistent foundation upon which to construct and compare alternatives or impacts. The Final GMP/EIS should project the maximum number of visitors that can be expected to visit the park in 2025. For each alternative, the Final GMP/EIS should identify the maximum number of visitors who will be accommodated at each major frontcountry area. The environmental consequences section should reflect these projections.

Visitor Traffic Projections

Volume 2, page 163 states that visitor traffic projections under the preferred alternative are expected to increase by 30% compared to the no-action alternative, yet this is inconsistent with statements made elsewhere. Visitor traffic projections under the no-action alternative are expected to increase by 23% from 1997 to 2010 (Table 33, volume 2, page 161). Visitor traffic projections under the preferred alternative are expected to increase by 30% from 1997 to 2010 (Table 34, volume 2, page 164). This should read that

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visitor traffic under the preferred alternative is projected to be 5.7% higher in 2010 than under the no-action alternative.

The Draft GMP/EIS projects visitor traffic from 1997 to 2010 (Tables 33-36, volume 2, pages 161-169). For example, traffic is projected to increase 23% under the no-action alternative (Table 33, volume 2, page 161) and to increase 30% under the preferred alternative (Table 34, volume 2, page 164). These increases are assumed to be the same in all areas of the park and unrelated to the implementation of a transportation system. The section on methodology for analyzing transportation impacts (Volume 2, page 238) should explain how the traffic projections are derived.

CEQ regulations (40 CFR 1502.21) do not allow incorporating material by reference. The Draft GMP/EIS appears to do that. Visitor traffic projections are clearly relevant to the proposed action. Visitor traffic methodology should be more thoroughly explained in the document.

Park visitation is projected in one part of the document (Volume 2, pages 59-61) while park visitor traffic is projected in another (Tables 33-36, volume 2, pages 161-169). There should be a very strong relationship between these two projections, yet the methodologies sections (Volume 2, pages 238 and 260) do clearly lay this out. As a result, the projections are in conflict.

The Draft GMP/EIS projects visitor traffic from 1997 to 2010. SEKI is halfway through this projection period. How well have the projections held up? How does the no-action projection for 2003 relate to the actual traffic that was present that year? If the projection is accurate then there would be increased confidence in its application. If the projection is off then there is less reason to rely on it for the remaining half of the projection period.

The Draft GMP/EIS assumes that visitor traffic for each of the alternatives will grow at significantly different rates from 1997 to 2010. When those forecasts were made, what assumption was made about when the alternative would be fully implemented? Was it assumed that the alternative would be fully implemented in 1998? None of the action alternatives will even begin to be implemented before 2005 at the earliest.

The visitor traffic projections contained in the Draft GMP/EIS do not appear to thoroughly establish a consistent foundation upon which to construct and compare alternatives or impacts. The Final GMP/EIS should project the maximum number of vehicles that can be expected to visit the park in 2025. For each alternative, the Final GMP/EIS should identify the maximum number of vehicles that can be accommodated at each major frontcountry area. The environmental consequences section should reflect these projections.

Perceived Crowding

The Draft GMP/EIS should more clearly determine carrying capacity (Volume 1, page 32). The glossary defines "carrying capacity" as "The upper limit of human use and desired visitor experiences while maintaining desired resource conditions without degradation" (Volume 2, page 389). The Draft GMP/EIS states that is will decide if more visitor use is desirable, what levels of crowding and social contact are acceptable, and what makes a good park experience and that there is a need to deal with crowding proactively in order to maintain a quiet, low-key, and uncrowded experience. (Volume 1, page 33). However, as stated below, there are problems and inconsistencies in the document on this topic.

The Draft GMP/EIS states that the preferred alternative uses management prescriptions as a framework for responding to problems and visitor needs, with limits for carrying capacity (Volume 1, page 77, NEPA Goal #1). The Draft GMP/EIS gives ranges for perceived crowding at three popular destinations (Volume 1, page 52). For example, it says that crowding begins to adversely affect visitor enjoyment

when approximately 400–450 people visit the General Sherman Tree. Are those three ranges (General Sherman Tree, General Grant Tree, and Moro Rock) considered to be some of the limits for carrying capacity? Does the document establish any other limits for carrying capacity?

Is the document stating that the desired future visitor experience at the General Sherman Tree is to keep use below 400-450 people and to avoid adversely affecting visitor enjoyment? If use at the General Sherman Tree were to exceed approximately 400–450 people, then there would be perceived crowding and the visitor enjoyment would be adversely affected (Volume 1, page 52). Does this finding apply to all alternatives?

All of the alternatives take action to prevent adverse effects to the visitor experience. Does this mean they would all take action necessary to keep General Sherman Tree use below the 450-limit? Is the impact of such action covered by this GMP/EIS or would it be necessary to do further planning before the park was ready to take action?

Is the 450-500 threshold open to interpretation by future managers or is it a specific, measurable upper limit? What is the park committing to? Is the park committing to keep use at General Sherman Tree below 450 people? The threshold and means of achieving it are unclear. At what point do visitors get turned away from the General Sherman Tree? Is this 450-500 number per, hour, per day, or bases on something else? More precise and measurable would help clarify the intent of the document.

NPS Management Policies (Section 8.2.2.1) require that public use limits be based on the results of scientific research. What methodology was used to achieve the 450-500 number? What are the consequences of setting a 450 limit? How does that limit compare with the current visitation during peak use periods? The Draft GMP/EIS should be based on a range of plausible visitation growth rates (Volume 2, page 59). At the highest projected growth rate, approximately how long will it take to hit the 450 limit and start turning away visitors?

The Draft GMP/EIS states that ranges for perceived crowding would also be developed for other popular visitor destinations (Volume 1, page 52). How and when will those limits be developed? Is the intent to allow use at those popular visitor destinations to continue growing while the ranges for perceived crowding are developed? Here again, implementing carrying capacity would help demonstrate that any proposed capacity increase would be consistent with the desired future conditions.

Based on the Goal #5 row in Table 2 (Volume 1, page 78), the preferred alternative "accommodates moderate increases in visitation" while Alternative A "limits visitation". What exactly does the latter statement mean? How much visitation does Alternative A accommodate? Does it accommodate less than the preferred alternative but more than at present? The alternatives should be described using parallel language so that the differences among them are sharply defined.

When park staff perceives that a popular area has become crowded, they will attempt to redirect visitors to less crowded locations (Volume 1, page 52). Does this apply to all alternatives, even the no-action alternative? How specifically does redirection achieve desired future carrying capacity conditions?

The preferred alternative attempts to redirect visitors from high-use frontcountry areas to low-use frontcountry areas, especially at the most crowded times and redirect use from high-use times to low-use times (Volume 1, page 53). If this is successful, the visitor experience may be reduced. That negative visitor impact is not fully assessed in the environmental consequences section.

According to planning meetings and written comments the public appreciates the opportunity to participate in recreational activities in relatively uncrowded locations (Volume 1, page 31). Public

comments made throughout the GMP planning process clearly indicate that the NPS should deal with crowding proactively in order to maintain a quiet and uncrowded experience (Volume 1, page 33). Yet the Draft GMP/EIS maintains that low-use frontcountry areas have the capacity to absorb more visitation (Volume 1, page 53). This conclusion does not seem to be supported by public comment.

The desired visitor experience for low-use frontcountry trails is that visitors can experience greater solitude. (Volume 1, page 57). The Draft GMP/EIS should address crowding proactively in order to maintain a quiet and uncrowded visitor experience. This means deciding if more visitor use is desirable and what level of crowding is acceptable. (Volume 1, page 33). How much increased use is desirable on low-use frontcountry roads and trails? The Draft GMP/EIS is based on a range of plausible visitation growth rates (Volume 2, page 59). At the highest projected growth rate, approximately how many years will it take to hit that limit?

Seasonal congestion would continue as a major long-term impact in several park areas under the no-action alternative. Popular visitor areas and trails would remain crowded under the no-action alternative, adversely affecting the visitor experience. (Volume 1, page xvi). Under the preferred alternative seasonal congestion and crowding would not continue (Volume 1, page xv). It is not apparent what action the preferred alternative would take to prevent such congestion and crowding. It appears that the preferred alternative will be nearly as crowded and congested as the no-action alternative. The alternatives should be described using similar language so that the differences among them are clearly defined.

Severe congestion is incompatible with the desired visitor experience. The perception of congestion on park roads would likely contribute to a negative experience for many visitors (Volume 2, page 238). None of the action alternatives should propose a condition that would cause the desired visitor experience to deteriorate.

It is not clear in the Draft GMP/EIS that visitor use capacity can be increased without adversely impacting the desired visitor experience. The Final GMP should:

- Clearly state the specific desired carrying capacity conditions at the General Sherman Tree, General Grant Tree, and Moro Rock. State the scientific methodology that was used to identify these conditions in context with current and projected visitation numbers.
- Commit to actions necessary that would achieve the desired visitor experience. Project what actions are reasonably foreseeable to occur during the lifetime of the GMP and assess the impact of those actions in the environmental consequences section.
- Demonstrate that proposed increases can reasonably be accommodated without resulting in perceived crowding.

Based on the Goal #5 row in Table 2 (Volume 1, page 78), the preferred alternative "accommodates moderate increases in visitation" while Alternative A "limits visitation." What does the latter statement mean? How much visitation does Alternative A accommodate? The alternatives should be described using similar language so that the differences among them are clearly defined.

3. WILDERNESS/BACKCOUNTRY

The preferred alternative of the Draft GMP would designate a small amount of additional land as wilderness. NPCA supports this concept. However, the addition of this wilderness states that it will "accommodate sustainable growth." Again, how is "sustainable growth" defined? What additional use will be permitted that is "sustainable?" What are the impacts on the resource?

The Draft GMP preferred alternative would continue the use of the High Sierra Camp at Bearpaw Meadow. Is this still an appropriate use of park land?

There has been a promise to study the creation of a new camp at Hockett Plateau. What are the impacts of this new camp on the resource? How will water usage, food storage, and waste, among other things, be dealt with?

The Draft GMP states that "expanding the popular backcountry high Sierra tent-hotel concept would result in a negligible, adverse, long-term impact." What is meant by "negligible, adverse, long-term impact?" Specific language should be used to help clarify these impacts.

Under the preferred alternative of the Draft GMP up to 96.1 percent of the parks would be designated wilderness or backcountry. Under this alternative "resource conditions in the parks' backcountry and wilderness are improved." How are the resources improved? What are the impacts of not converting this additional land to wilderness? What are the impacts on the visitor experience of converting this land to wilderness?

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4. MINERAL KING

The Draft GMP preferred alternative states:
"Mineral King Valley represents an extraordinary and spectacular experience in the Sierra Nevada because of its unusual metamorphic geology and appearance. Mineral King Road continues to provide access to the alpine backcountry, public recreation, campgrounds, and Silver City private cabins and resort. Qualities that made the road corridor eligible for listing on the national register are maintained and preserved, while the road corridor provides increased public recreational access to the alpine backcountry and historic resources. Slightly higher levels of public use are accommodated. As special use permits expire, permit cabins are acquired and adaptively reused for public purposes. (The National Park Service would partner with a nonprofit or commercial services organization to provide public lodging or other public use. A plan would be developed for public uses, including limited use by former permittees. The plan would address treatment methods to preserve the Mineral King Road Cultural Landscape District, sustainable use, code compliance, needed utilities, self-sustaining funding, maintenance, and potential hazardous materials mitigation. It would also develop a decision tree for management in case of a natural disaster.)"

NPCA supports this preferred alternative and the action to continue providing five-year permits to the original surviving permittees of the 1978 Act that granted the five-year permits. This alternative would allow the NPS to collaboratively manage the cabins for public use and simultaneously provide the permittees of record in 1978 with lifetime use of the cabins - giving priority to their heirs for a multi-week timeframe each summer. This option would allow for public access to these structures for learning and enjoyment, and would allow the Park Service to better manage the area for all visitors. We believe this transition follows with the mandate of the National Park Service to manage public lands for the benefit of all Americans.

However, the Draft GMP/EIS does not adequately address the cumulative impacts of wastewater disposal on water quality at Mineral King (Volume 2, page 384, Table E-2). The document does not appear to address the privately owned septic systems in the Mineral King area, addressing these only as a potential source of pollution. It is highly probably that the Mineral King septic systems are contaminating the groundwater. This impact should be addressed in the GMP/EIS.

The environmental consequences section refers to actions and mitigating measures that are not contained in the description of the alternatives. For example, the document states that if the Mineral King permit cabins are acquired for public use, sustainable utility systems would be developed (Volume 2, page 327). The construction of these new utility systems does not appear to be in the description of the alternatives (Volume 1, page 156, reference 378). Furthermore, the document does not adequately address the nature, cost, and impact of these sustainable utility systems. These impacts should be fully addressed.

Of great concern is the largely unregulated human waste issue. This must be dealt with under all of the alternatives. What is the Draft GMP's plan for addressing the issue? How and when will the park institute a waste water system for Mineral King that meets all county, state, and Clean Water Act standards? What are the environmental impacts under each of the alternatives for the implementation of such a system? How will the park deal with this if it begins to take ownership of the cabins under the preferred alternative? Clearly state how the plan will deal with water treatment when acquiring cabins in Mineral King. If the intent is for the park to eventually develop sustainable water treatment systems, this should be clearly stated and the impacts fully assessed.

5. STOCK USE

NPCA supports the historic use of stock in the parks. However, all stock use, whether personal, commercial, or administrative, should of course be managed with minimum impact on the resource. This includes the creation and configuring of stock trails that are maintained and configured to prevent erosion.

Stock use should be managed to minimize conflict with other users. This should be reflected in the creation, configuring and maintenance of trails that minimize conflict with hikers and those employing other forms of transportation.

NPCA supports the preferred alternative statement to "expand controls of stock party size, regulation of dates and locations, designations areas, and appropriate closures as needed." We strongly believe these pieces should be in place to aid minimum impact to the resource. How are these regulations determined and manifested in the parks?

The preferred alternative in the Draft GMP states that grazing studies will be conducted and that the data from such studies will be used to further manage stock in the park. What is the action plan if it is determined that stock use is significantly impacting native grasses and flora in the park? Clearly stated scientific monitoring processes of the native grasses within the park must be in place to determine if stock use is having an impact on these grasses. Is there significant impact? If so, what is the plan of action to end any degradation of native grasses?

With regard to carrying capacity for stock use, what studies have been done or what actions are in place to make certain that stock use is not having a negative impact on the resource? The preferred alternative states that commercial pack operations will be limited and managed to protect park resources. What is the definition of "limited" under this alternative? What are the benefits to the resource? What are the specific current impacts that are necessitating the limitations?

The Draft GMP states that the preferred alternative will "accommodate sustainable stock use" at Ash Mountain/Foothills. What is meant by sustainable stock use? What are the determining factors for this designation? How will this be measured?

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6. AIR

Unfortunately SEKI has some of the worst air quality in the nation. The impact of this can be seen in lakes, streams, Jeffrey pines, and other aquatic and terrestrial species. The risk to park visitors and staff with compromised lung capacity is of concern. Visibility has also been significantly compromised.

NPCA recognizes that a large percentage of pollution in the park comes from sources outside the park boundaries. However, the Clean Air Act amendments place on federal land managers an affirmative responsibility to protect the air quality related values (AQRVs) of their Class I areas regardless of the source of the pollution. AQRVs include protecting physical resources from adverse effects as well as visibility and staff/visitor health and experience. The Draft GMP should clearly articulate a plan for meeting this legislative mandate.

The National Park Service must lead by example and opt for any and all practices that would reduce pollution. This includes using cleaner fleets of vehicles, increased visitor education about the sources and manifestations of reduced air quality within and around the parks, and working with surrounding communities on opportunities for mass and alternative transportation to and within the park. Additionally, NPCA supports the implementation of public transportation recommendation in the Giant Forest Interim Management Plan.

7. PARK STAFFING AND BUDGET

The Draft GMP preferred alternative states that "impacts on park operations from the assistance of other groups - the natural history association, volunteer, concessionaires, commercial or incidental business permit holders, and partners – would be minor to major and beneficial." While NPCA appreciates and commends these other organizations for their contribution toward the parks, these contributions are not a substitute for the diminished funding appropriated by the federal budget for the National Park Service.

Nationwide our national parks face an annual operating shortfall of $600 million. According to its 2003 Business Plan, SEKI faces a $14 million dollar annual operational shortfall. The growing costs of National Park Service operations have outpaced annual appropriations, resulting in the elimination of ranger positions and a reduction in visitor services. We must ensure that there will be an adequate number of rangers to staff park sites as well as an adequate number of maintenance personnel to maintain trails, bathrooms, and to help preserve park resources for future generations as states in the enabling legislation of the park.

NPCA supports the preferred alternative increase in park staffing levels by "37.6 full-time employees and 41.7 seasonal employees." As stated in the Draft GMP this increase would benefit local communities with an increase in purchases of goods and services. An increase in budget and staffing would further assist SEKI in its mandate to protect and preserve park resources unimpaired for future generations. Additional financial investment for operational needs by the federal government is critical, and makes good economic and environmental sense.

WESTERN OFFICE



NATIONAL TRUST
for HISTORIC PRESERVATION

8-1

October 6, 2004

Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

RE: Comments on the SEKI Draft GMP/EIS

Dear Dr. Graber:

On behalf of the National Trust for Historic Preservation, I am writing to comment on the Sequoia and Kings Canyon National Parks Draft General Management Plan and Comprehensive River Management Plan/Environmental Impact Statement.

The National Trust for Historic Preservation is a privately funded non-profit organization that provides leadership, education and advocacy to save America's diverse historic places and revitalize our communities. As the leader of America's preservation movement, the National Trust for Historic Preservation has worked for more than half a century to save the historic buildings, neighborhoods, and landscapes that form our communities and enrich our lives.

As you are aware, our office has been involved in cultural heritage resource stewardship issues at Sequoia and Kings Canyon National Parks for some time. Beginning in 1998, our office has been particularly engaged in the debate over park policy regarding historic inholdings (Wilsonia) and special permit properties (Mineral King).

During this period, we have noted a significant evolution in park management's philosophy and actions regarding the parks' rich cultural heritage. This is especially evident in management's commitment to dialogue and outreach with partners and neighbors. We recognize that the special permit properties, in particular, remain a thorny public policy and resource management issue for the park, but we are encouraged that the Draft GMP's alternatives consider a meaningful range of stewardship options for these important resources.

The National Trust believes that the final General Management Plan should reflect the following broad principles:

- Preservation and adaptive use of older structures should be pursued whenever feasible. Park

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- preservation efforts should not be limited to properties determined eligible for the National Register. Many older structures that don't qualify may still contribute to the park's distinctive sense of place.
- Ongoing survey and evaluation of cultural heritage resources is critical. Properties determined ineligible for the National Register should be periodically reevaluated.
- Innovative partnerships will be critical in developing and implementing historic resource management plans.
- There is considerable debate over appropriate policy concerning private interests on public lands. As a rule, the National Trust is committed to preserving cultural heritage resources while maximizing public access. However, we recognize that some communities have important longstanding ties to park lands, often pre-dating the establishment of parks. We believe that it is appropriate to seek ways to collaborate with these communities and recognize them as potential park assets.
- The National Parks Service's capacity to provide appropriate stewardship to historic and cultural resources is a critical concern. In light of limited staffing and funding, we believe the NPS needs to carefully assess whether it offers the best promise of protection of historic resources when considering acquisitions. In the absence of an imminent threat, the NPS should only take on stewardship of historic resources with a plan in place for their long-term preservation and maintenance.

Our specific comments, organized by reference numbers indicated in the Draft GMP, follow. Unless otherwise stated, we support the management of cultural and historic resources as proposed in the preferred alternative.

Parkwide Visions and Concepts

1. The National Trust supports the overall park vision described in the preferred alternative. We understand this park vision to protect the integrity of cultural resources and natural resources with equal vigor.

Natural and Cultural Resources

8. We support the preferred alternative. Given the enormous loss of historic resources at Giant Forest, however, we believe that the threshold for the removal of more cultural resources in order to satisfy natural resource stewardship goals must be set high.
10. We support the preferred alternative.

Visitor Use and Facilities

17. We support the preferred alternative, particularly for its increase in cultural resource interpretation. We encourage cooperating with partner organizations in the development and implementation of interpretive programs.

Private Land and Special Use Permits on Park Land

29. We support the preferred alternative, but with significant caveats and reservations.

- In the case of Wilsonia, we note that the NPS's past policy of acquiring parcels and structures as opportunities occurred significantly impacted the integrity of Wilsonia, both from a historic resource management perspective, but also from a community viability

perspective. The NPS directly contributed to blight in the community, and its actions eroded the sense of community. The National Trust opposes continued acquisition of historic structures in Wilsonia unless it can be demonstrated that NPS ownership is the best strategy for the preservation of these resources. Instead, the NPS should explore purchasing conservation easements on private properties.

- We are not familiar with the inholdings at Oriole Lake, but recognize that there is a case to be made for acquisition of scattered private inholdings if they compromise key park management goals.

- Mineral King presents the most complicated picture. As a general policy standard, the National Trust prefers public ownership

Backcountry/Wilderness

Areas Managed as Wilderness

153-4. We strongly encourage the preservation and/or rehabilitation of historic structures within designated Wilderness Areas.

155. We encourage the evaluation, designation, preservation, and interpretation of historic trails.

Kings Canyon National Park

Cedar Grove and the Floor of the Kings Canyon

167. We support the preferred alternative: the preservation of Knapp's Cabin

168. We encourage the evaluation, designation, preservation, and interpretation of historic visitor facilities.

Grant Grove

186-8. We support the preferred alternative: the preservation and adaptive use of historic resources in the Grant Grove village and at Grant Tree, and of the Redwood Mountain residence.

189. We encourage the survey, nomination, preservation, and interpretation of the Big Stump Basin and other potential cultural landscapes, recognizing that such landscapes may continue to evolve over time.

Private Land and Special Use Permits on Park Land

211. We support the adaptive use of NPS-owned buildings through the historic leasing program. However, we are concerned that its focus on continued NPS acquisition will result in continued erosion of the historic character and viability of the Wilsonia community. As a rule, only threatened historic resources should be targeted for acquisition. Likewise, only those non-historic NPS structures which detract from the rustic character of the community should be removed. In general we support the vision of seeking to "preserve a private residential community" with opportunities for public lodging.

Sequoia National Park

Dorst/Halstead Meadow/Cabin Creek

219. We support the preferred alternative: preservation/adaptive reuse of historic Cabin Creek structures.

Wuksachi

230. We support the preferred alternative: preservation of the Clover Creek Bridge.

Lodgepole

247-8. We support the preferred alternative: preservation of historic buildings and the Marble Fork Bridge. Any infill construction should be sensitively designed and compatible.

Wolverton

275. We support the evaluation, designation, preservation, and interpretation of historic resource at Wolverton.

Giant Forest

290. We regret the destruction of two historic districts at Giant Forest, but support the continued implementation of the 1996 Interim Management Plan.

Ash Mountain/Foothills

309. We support the development of partnerships with gateway communities, and encourage the NPS to work cooperatively with neighbors and other partners to ensure sustainable design and to contain sprawl.
311. We support the preferred alternative: protection of ethnographic resources at Hospital Rock, Potwisha, and throughout the park.
312. We support the preferred alternative: preservation of Tunnel Rock, park entrance sign, CCC era work on Generals Highway.
313. We encourage the evaluation, designation, preservation, and interpretation of historic resources at Ash Mountain and Sycamore CCC camp.
314. We support the preferred alternative: preservation of CCC era facilities.
315. We support the preferred alternative: retain the historic Colony Mill Road as a trail.
316. The actual treatment of the historic #3 flume is not clear.
317. We support the preferred alternative: expand collections storage; improve facility to meet museum standards.
335. See 367.

Mineral King

350. Broadly speaking, we support the preferred alternative, but with important caveats concerning NPS acquisition of permit cabins (see 372.)
351. We support the zones described in the preferred alternative.
352. We support the preferred alternative, but with important caveats.
353. We support the preferred alternative: stabilize and preserve historic NPS facilities.
354. We support the preferred alternative: preserve Atwell Mill and Alles cabin, using the cabin to illustrate the conservation movement in the Mineral King area. This interpretation should be developed with partner organizations.

355. We support the preferred alternative, leaving mining remnants in place.
356. We support the preferred alternative: preserve the historic lookout point residence.
367. We are not familiar with the Kaweah no. 3 hydroelectric generation system. We note that the system would be discontinued under all alternatives except alternative C. While the Draft GMP notes that "hydroelectric facilities are a special permitted use that is not related to the parks' purpose and significance," few would dispute the importance of hydroelectric power in the history of the Sierra Nevada.

While we recognize that significant resource management benefits can result from dam removal, we are not prepared to support the preferred alternative without a more deliberate exploration of alternatives that would preserve the generation system intact, or the preservation of key elements of the system. The interpretive potential of combining natural resource restoration with preservation of elements of the hydro system is not adequately considered.

369. We support the preferred alternative to develop a partnership with the Silver City resort and the use of scenic easements.
370. We support the preferred alternative to seek a scenic easement on Kaweah Han.
371. We support the preferred alternative to acquire selected historic facilities for public use provided a sound management plan is in place for their ongoing protection.
372. Conceptually, we believe that the preferred alternative seeks an appropriate balance among competing management goals. We believe that preservation of the Mineral King cabins and the Mineral King Road Cultural Landscape District is of paramount importance. We also believe that the current permitees and their families have a fascinating story to tell to park visitors, and that the NPS should take advantage of their commitment and knowledge.

The National Trust has long supported a stewardship compromise along the lines of that envisioned by the preferred alternative.* However, the preferred alternative offers no guarantees that the NPS will have the resources or the commitment to provide for the long-term preservation of the Mineral King cabins. What if analysis suggests that the operation of the acquired cabins as public lodging would not be "economically feasible?"

* *"The best result for the cabins would probably be a historic lease arrangement stipulating adherence to the Secretary Standards with a non-profit that could operate the cabins as an environmental camp, for example. Potential partners include AYH and Elderhostel. The Mineral King Preservation Society could reorganize as a nonprofit to jointly hold the leases on cabins that become the property of the NPS as leases expire. The NPS could offer some form of technical assistance to cabin owners to assure adherence to the Secretary Standards until they give up their leases. The reconstituted Mineral King Preservation Society could jointly care for the cabins, perhaps with some of the cabins set aside for group use, while others could be let on a weekly basis as vacation rentals. Existing permitees and their families could be granted some preference in the rental scheme, perhaps offering free rentals in exchange for their participation in interpretive programs. There may even be the possibility for current permitees to retain their link to a given cabin: they could act as stewards of the cabins in exchange for a number of weeks of use of the cabin."* --January 2000 National Trust briefing memo

Given the very real financial constraints facing the NPS, we have serious concerns that the cabins would be lost to deferred maintenance and Mineral King's extreme climate. We suggest that the NPS adopt a plan similar to that described in the preferred alternative. However, planning should commence immediately to assess the feasibility of the concept. If it becomes clear that the NPS is not the best guarantor of the preservation of the cabins, other preservation alternatives—including the renewal of permits on a case-by-case basis—will need to be considered.

We recognize that a successful solution for the management of Mineral King will require extensive ongoing planning and dialogue. The National Trust would be pleased to be part of the effort to identify a viable strategy to assure the preservation of this unique community for future generations.

Thank you for the opportunity to comment on this important planning effort. We look forward to continuing to partner with the Sequoia and Kings Canyon National Parks in efforts to preserve the parks' unique heritage.

Sincerely,

Anthony Veerkamp
Senior Program Officer

cc: Wayne Donaldson, CA OHP

Dave Graber
116-1

PEER
Public Employees for Environmental Responsibility
2001 S Street, NW • Suite 570 • Washington, D.C. 20009 • 202-265-PEER (7337) • fax: 202-265-4192
e-mail: info@peer.org • website: www.peer.org

Mr. Richard Martin
Superintendent
Sequoia – Kings Canyon National Parks
Three Rivers, CA 93271

August 25, 2004

Dear Mr. Martin:

Public Employees for Environmental Responsibility (PEER) thanks you for the opportunity to comment on the Draft General Management Plan (GMP), Environmental Impact Statement (EIS) for Sequoia and Kings Canyon National Parks, California.

Other groups will no doubt comment on issues of public use, conservation of resources, Mineral King and wilderness. PEER wishes to reinforce those comments on two issues:

- First, PEER supports a rapid disposition of the Jennie Lakes and Mineral King wilderness review. PEER believes that the NPS should now conduct formal public hearings, as required by the Wilderness Act, to develop a wilderness recommendation that may be transmitted to Congress.

- Second, PEER opposes any efforts to allow continued special use of the 61 cabins that are federally owned in Mineral King Valley by persons whose reserved rights of occupancy have expired. Even if the NPS decides to retain the cabins and allow for their use as lodging (the NPS' Preferred Alternative), the former owners should have no more privilege of use than any other member of the public. To confer privileges of extended special use periods on the former owners puts them in category superior to the millions of other Americans who now own these cabins. Any such scheme raises serious questions of equal access. There are also implications of racial exclusivity since the class of former owners is almost entirely of one racial and ethnic group.

PEER also wishes to comment on an issue that we believe has not been previously raised. The Draft proposes to tolerate and allow Indian gathering of park natural resources in violation of current NPS regulations and Management Policies. Appendix D of the Draft contains several references to Indian gathering of park plant resources. However the Appendix fails to recognize the governing authorities that restrict plant gathering in the national park system.

Existing Regulations at 36 CFR 2.1

ces: California • Maine • Montana • New England • Refuge Keeper • Rocky Mountain • Southwest • Tennessee • Texas • Washington

NPS regulations at 36 CFR Part 2 generally prohibit the take of park resources EXCEPT as provided for in law. The NPS regulations at 36 CFR 2.1(a), prohibit the "possessing, destroying, injuring, defacing, removing, digging, or disturbing from its natural state:

(i) Living or dead wildlife or fish, or the parts or products thereof, such as antlers or nests.
(ii) Plants or their parts or products thereof.
(iii) Nonfossilized and fossilized paleontological specimens, cultural or archeological resources, or the parts thereof.
(iv)A mineral resource or cave formation or the parts thereof."(emphasis added)

On June 30, 1983, the Department of the Interior stated in the Preamble to Final Rule for 36 CFR Part 1 and 2 that the prohibitions found at section 2.1 (and 2.2 (wildlife protection) and2.3 (fishing)) were "...intended to cover activities undertaken by Native Americans." The Preamble continued "(T)he Service recognizes that the American Indian Religious Freedom Act directs the exercise of discretion to accommodate Native religious practice consistent with statutory management obligations. The NPS intends to provide reasonable access to and use of, park lands and park resources by Native Americans for religious and traditional activities. However, the National Park Service is limited by law and regulation from authorizing the consumptive use of park resources." (emphasis added) (48 FR 30255).

In the Final Rule, the NPS added a paragraph (d) to section 2.1 to address some public comments that urged that Native Americans receive limited or complete exemption from the 2.1 prohibitions. Section 2.1(d) states:

> "This section (2.1) shall not be construed as authorizing the taking, use or possession of fish, wildlife or plants for ceremonial or religious purposes, except where specifically authorized by Federal statutory law, treaty rights, or in accordance with sections 2.2 or 2.3."

In explaining new paragraph (d), the Preamble repeated, at greater length, why AIRFA does not provide the specific statutory authorization to satisfy the test of 2.1(d). The Preamble states:

> "This statute (AIRFA) does not create additional rights or change existing authorities. Rather it directs the exercise of discretion to accommodate Native religious practices consistent with statutory management obligations. Therefore, the Service will provide reasonable access to and use of park lands and park resources by Native Americans for religious and traditional activities. However, the National Park Service is limited by law and regulation from authorizing the consumptive use of park resources." (emphasis added)

Paragraph (d) of 36 CFR 2.1 provides a "treaty rights" exception for Indian taking of natural resources. However, the Draft EIS, Appendix D points to no treaty right to gather park natural resources. Indeed, the band of Indians, primarily engaged in gathering plants, the Wuksachi, is not even a federally recognized Tribe.

The regulations themselves provide another exception to the prohibition at 2.1(a). Under 36 CFR 2.1(c), a park superintendent may designate certain "fruits, berries and nuts" that persons may gather "by hand for personal use or consumption." However, the Draft GMI does not limit Indian gathering of park resources only to designated fruits, berries and nuts for personal use or consumption. The GMP would allow gathering leaves, stems, branches, bark, roots, and trees, shrubs or whole plants, even for commercial purposes (e.g. baskets for sale).

The contemplated activity finds no authority in NPS rules and is in fact contrary to them. Any NPS rebuttal to this contention that relies on AIRFA must recognize that the NPS specifically and formally analyzed AIRFA when it crafted the present rules in 1983. The NPS found then that AIRFA provided no basis to alter NPS rules that protect park plants and wildlife.

On September 21, 1978, five weeks after AIRFA's enactment, Associate Interior Department Solicitor for Conservation and Wildlife James Webb advised the NPS Director that, in evaluating any conflict between Indian religious practices and the Service's policies/regulations, "...The National Park Service must in particular be guided by the injunction that...(t)he authorization of activities, and the administration of these areas shall be conducted in light of the high public value and integrity of the National Park System..." This provision of the Act of March 27, 1978 (the Redwood Amendments), he continued "...elevates the decisionmaking and management standards of the National Park Service in favor of greater protection for park resources and values."

Associate Solicitor Webb advised, "In this context, this special provision (the Redwood Amendments) reiterates an overriding governmental interest in the protection of park resources, and values and reinforces the limitations on the Secretary's discretion and flexibility in making those administrative changes to accommodate religious activities that would have adverse effect on park resources and values. As a consequence, the National Park Service should, more so than other agencies, seek express congressional guidance and specific legislative solutions on identified conflicts." (emphasis added).

Clearly, the highest legal advisor to the NPS in the Department of the Interior did not believe that AIRFA suspended laws or regulations protecting park resources. And the NPS followed the Solicitor's advice when composing the current regulations at 36 CFR parts 1 and 2.

A GMP does not have the power to overturn NPS regulations, even if the intention is good and the conviction righteous. The NPS must either live within existing rules or alter those rules in a public rulemaking process.

NPS Management Policies

The Draft (Appendix D) cites NPS Management Policies (2001) as a basis for Indian plant gathering. The Draft does not quote the relevant section. The relevant part states: 5.3.5.3.1 Resource Access and Use "Consistent with the requirements of the Organic Act, NHPA, AIRFA, ARPA, NEPA, and Executive Order 13007 cited in section 5. 3. 5. 3

above, the Service will strive to allow American Indians and other traditionally associated peoples access to, and use of, ethnographic resources."

Continued access to and use of ethnographic resources is often essential to the survival of family, community, or regional cultural systems, including patterns of belief and sociocultural and religious life. However, the Service may not allow access and use if it would violate the criteria listed in section 8.2.

"The Service generally supports traditional access and use, and is considering policy and regulatory revisions that will clarify when reasonable accommodations can be made under NPS authorities to allow greater access and use..."

With regard to consumptive use of park resources, current NPS policy is reflected in regulations published at 36 CFR 2.1. These regulations allow superintendents to designate certain fruits, berries, nuts, or unoccupied seashells that may be gathered by hand for personal use or consumption if it will not adversely affect park wildlife or the reproductive potential of a plant species, or otherwise adversely affect park resources:

> "The regulations do not authorize the taking, use, or possession of fish, wildlife, or plants for ceremonial or religious purposes, except where specifically authorized by Federal statute or treaty rights, or where hunting, trapping, or fishing are otherwise allowed. These regulations are currently under review, and NPS policy is evolving in this area. " (emphasis added)

The above-cited regulations appear quite unambiguous. Though some may wish it were otherwise, the NPS has yet to develop new regulations to allow the conduct of Indian plant gathering. Until such time, the NPS at Sequoia must obey and enforce existing rules. Agencies are not free to disregard or feign the nonexistence of a rule that they do not like.

Conclusion
The GMP must quote and explain the actual NPS regulations and real Management Policies when discussing Indian gathering of park natural resources.

Sincerely,

Jeff Ruch
Executive Director

3691

SIERRA CLUB KERN-KAWEAH CHAPTER

2815 La Cresta Dr
Bakersfield Ca 93305-1719

NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service – DSC
12795 W. Alameda Parkway
Denver, Colorado 80225-0287

Dear Ms. Spain:

Re: Draft GMP for Sequoia and Kings Canyon National Parks

We are pleased with some of your plans for the Parks, such as more shuttle bus service and also more educational programs, especially at Wuksachi and Dillonwood. We are quite concerned about the legislation by Congressman Nunes regarding the private cabins at Mineral King. When Mineral King Valley was included in the Park by legislation they agreed to a limited use over time. This valley is in the public domain and the cabins should become public. After, each winter they have to have some rehabilitation to keep them useable and many of our members think they should be removed to present more natural, open vista of the beauty of the Valley. Also, the septic systems from the cabins are a threat to the cleanliness of the ground water in the area. Future growth in population will provide more visitors to this majestic area despite of your plan not to maintain the road to city standards.

Your offer of an agreement with the owners gives them some priority for reservations over the general public. This is public land and not private property. Although the cabins have been in their families for generations they accepted the agreement in the legislation that made Mineral King part of the Parks to give up their exclusive use of the cabins that have been in their families for generations. However by accepting special use permits on public land they have acknowledged that it is public land and not their private property. We realize that some of the cabins can be considered historic and that protection of our historical, cultural resources in the park adds to the visitor enjoyment.

(cont.)

Kern-Kaweah Chapter
P.O. Box 3357
Bakersfield, CA 93385
http://kernkaweah.sierraclub.org/

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P 2

We are quite interested in the implementation of the shuttle system you have proposed for serving the public in the Giant Forest area. We hope that low emission vehicles will be utilized in light of the air quality problems of the Parks and also the San Joaquin Valley. Some sort of public transit service from surrounding towns would permit more folks to use the parks on foot and also permit back-packers to leave their vehicles outside the park. We appreciate that your air quality representative attends San Joaquin Valley Air Pollution Control District meetings. We hope that other employees are funded to work on your air quality difficulties.

We favor low impact use in terms of lodging. That includes camping opportunities and perhaps tent cabins but not many motel type units. The 1998 Visitor Satisfaction Survey shows the public were mostly pleased about your interpretative services but not too pleased (60%) with the Parks. We've been told that the emphasis is on policing now that more visitors live nearer the parks. Of course a group such as ours wants more interpretation of natural resources and hopefully less need for controlling your visitors. We feel that most commercial services, other than food and emergency services should be sited outside of the park. Visitor commercial services should be kept to a minimum, as the natural attributes of the parks are the main visitor focus rather than recreational opportunities that can be provided in more urbanized settings.

We know that visitation is increasing due to rapid population growth in California. Demographics are changing particularly in view of the explosive growth of the Hispanic population. Our Chapter of the Sierra Club is part of a group called Central California Environmental Justice Network (CCEJN). Several health and environmental organizations are based in the Fresno area. We are available to assist in any outreach efforts you might make toward these groups.

We are generally in favor of many of the proposals in the Alternatives but felt that the Mineral King cabin issue was closest to the feelings of our members.
Sincerely,

Lorraine L'Herrou Unger
Chair

31

THE WILDERNESS SOCIETY

1615 M Street, NW, Washington D.C. 20036 (202) 429-2676

October 5, 2004

Park GMP Coordinator
Dr. David Graber, Senior Scientists
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Dear Dr. Graber:

The Wilderness Society is pleased to offer comments on the Draft General Management Plan (GMP) and Environmental Impact Statement (EIS) for Sequoia and Kings Canyon National Parks (NP).

The Wilderness Society, representing over 200,00 Americans nation wide, is a not-for-profit public interest membership organization headquartered in Washington, D.C. with eight regional offices, including a Northwest office in Seattle, WA. Founded in 1935, the Society and its members work to protect America's wilderness and to develop a nationwide network of wild lands through public education, scientific analysis, and advocacy. Our goal is to ensure that future generations enjoy the clean air and water, beauty, wildlife, and opportunities for recreation and spiritual renewal provided by the nation's pristine forests, rivers, deserts, and mountains. TWS has a long history of involvement and commitment to the protection of natural resources and the wilderness character of our National Parks.

General Comments

The Wilderness Society endorses Alternative A as the choice that best protects the resources of Sequoia and Kings Canyon National Parks unimpaired for the enjoyment of present and future generations. The Wilderness Society believes that Alternative A represents the "Environmentally Preferred Alternative."

We disagree with the conclusion of the Draft GMP (page 74) that the preferred alternative is the environmentally preferred choice. The environmentally preferred alternative "(O)rdinarily…means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources." 46 Fed. Reg. 18026, as amended.

The Preferred Alternative would allow more development, more growth in park facilities, less restoration of sites with existing structures and less designated wilderness than Alternative A or No-Action Alternative. In short, the preferred alternative offers less protection to the biological and physical environment of the parks than does Alternative A. The National Park Service (NPS) appears to deem its preferred alternative as the "environmentally preferred alternative" only on the basis that the alternative offers more balancing between population and resource use. While balancing such factors is one of several general goals of the National Environmental Policy Act (NEPA), it does not render an alternative as the "environmentally preferred" alternative. Nor is such balancing the mission of the NPS, which rests instead on an unequivocal commitment to preserving resources first, and allowing for their enjoyment second, in an unimpaired way. The Wilderness Society hopes that the NPS will adopt changes in the Final GMP/EIS that will improve the document and afford greater protection to the resources of Sequoia and Kings Canyon National Parks for future generations.

Specific Comments on theDraft GMP and EIS for Sequoia and Kings Canyon NP

1. Discrepancies Regarding Wilderness

a. Calculating Acreage of Existing Wilderness in the Parks

Beginning on page xv of the summary, and in several other places, the Draft GMP rarely describes the exact acreage of wilderness within the parks. Instead, the Draft states that 83.5% of the parks are "designated wilderness." According to the Official Index of the National Park Service (2001-2003), Sequoia and Kings Canyon National Parks comprise 859,062 acres. The Index does not appear to include the addition of the 1518 acre Dillonwood Grove in 2000. Thus, we calculate that the parks now contain c. 860,580 acres.

On September 28, 1984 Congress designated approximately 736,980 acres as wilderness within the two parks. That would constitute 85.6% of the parks. On the other hand, the Draft's percentage (83.5%) would constitute only 718,584 acres of designated wilderness. This difference represents 18,400 fewer acres of designated wilderness than the number cited by the 1984 act. The Draft (p.23) states that approximately 723,000 acres of the parks are wilderness. Even that figure is nearly 14,000 acres less wilderness than the acreage cited in the 1984 statute. These discrepancies need to be clarified in the Final Plan.

TWS asks:

- What is the exact number of acres of designated wilderness in the parks and how does that number differ from the number that Congress designated in 1984?
- If there is a significant difference, e.g. more than a thousand acres, why is there a difference?
- If the acreage difference has a geographic manifestation, please provide maps that shows the wilderness boundary on the map cited by Congress (numbered 102-20,003-E, and dated July 1980) and the wilderness boundary that the NPS believes exist.

For a park with 85% wilderness, the absence of precise wilderness boundary maps is a shortcoming that the Final Plan needs to correct, either in the text or in an appendix.

b. Wilderness Maps and Legal Description

On September 28, 1984 the President signed Public Law 98-425, the California Wilderness Act of 1984. Section 106 of that law established, among other things, wilderness in Sequoia-Kings Canyon National Parks. Congress cited the map entitled "Wilderness Plan –Sequoia-Kings Canyon National Parks – California", numbered 102-20,003-E and dated July 1980," as the basis for the new wilderness. Congress said that the wilderness comprised "approximately" 736,980 acres and potential wilderness "approximately" 100 acres.

Public Law 98-425 also required that "as soon as practicable after this title takes effect, maps of the wilderness areas and descriptions of their boundaries shall be filed..." with Congress. On September 17, 2002 the NPS Pacific West Regional Office submitted these documents to the Washington Office of NPS for submittal to Congress. TWS does not know for certain, but believes that NPS Office of Legislative Affairs submitted the maps and legal descriptions to Congress during the first quarter of 2003.
We request that the Final Draft of the GMP contain these documents in an Appendix.

c. Discrepancy of Potential Wilderness

In 1984 Congress designated potential wilderness in Sequoia-Kings Canyon of "approximately" 100 acres. The House Report accompanying the bill (Report 98-40, March 8, 1983) describes among the potential wilderness areas Bearpaw Meadow (30 acres) and Pear Lake (30 acres). But in disturbing contrast, the Draft GMP (pp. 23, 39, 112) lists the ONLY two areas designated by Congress as potential wilderness areas as Oriole Lake and Bearpaw Meadow.

The potential wilderness in the Draft GMP totals 130 acres (Volume 2, p. 32). This total reflects a discrepancy of 30 acres from the congressional report. This discrepancy is made more glaring by the reduction of the 30-acre Pear Lake potential wilderness specified in the congressional report to only 5 acres in the Draft GMP (ibid.). Thus, somehow, NPS' draft finds 55 acres of potential wilderness more than Congress estimated. We believe that part of the discrepancy is explained by how NPS treats Oriole Lake.

Congress did not designate Oriole Lake as a "potential wilderness" of 25 acres as the Draft states (Volume 2, page 32). Rather, Oriole Lake is fully designated wilderness as it lies within the boundaries of designated wilderness depicted on the 1980 map that Congress cited. The privately held lands (c. 10 acres) around Oriole Lake are not wilderness (since they are not an area of Federal land) BUT are an inholding that lies within wilderness. The status of nonfederal lands that lie within a wilderness boundary (inholdings) is not the same as a designation by Congress as "potential wilderness." These terms are not interchangeable. Thus, the NPS and the Draft GMP have committed a grave legal error.

It appears NPS has attempted to downgrade from designated wilderness at Oriole Lake to "potential wilderness" by map-making or planning processes. NPS does not have the authority to administratively change the wilderness status. This is a Congressional prerogative. We can only speculated at the possible reason for this attempt. Is it possible that NPS would like to enable access across Federal wilderness parkland to the four inholders and five cabins at Oriole Lake?

Congress has not designated Oriole Lake as potential wilderness. If NPS believes Congress designated Oriole Lake as "potential wilderness" then it needs to specify exactly when and how Congress did so. If NPS cannot point to congressional designation of Oriole Lake as potential wilderness, then it must cease describing Oriole Lake as "potential wilderness" in the Final Plan. Oriole Lake lies in wilderness and contains 10.3 acres of nonfederal land that would become wilderness upon acquisition. That is not the same as "potential wilderness" as Congress and NPS have employed that term since the 1970's.

The submittal of maps and legal descriptions to Congress in 2003 that declared Oriole Lake as "potential wilderness" is not a valid act. It is contrary to the Wilderness Act provisions that place the power to designate wilderness (or potential wilderness) solely in the hands of Congress.

What happened to the status of the 1984 designated potential wilderness at Pear Lake? Congress stated in the House Report that the area was 30 acres. But the Draft (volume 2, p. 32) states that it is five acres. A search of the Federal Register shows that NPS never published a notice of conversion to full wilderness as required by section 108 of the California Wilderness Act of 1984. The Draft GMP mentions Pear Lake only once as a "potential wilderness."

The Final GMP must reflect the areas of potential wilderness that Congress actually designated in 1984 and not the areas of potential wilderness the NPS wished that Congress should have designated.

d. Bearpaw Meadow

We agree with NPS that the Bearpaw Meadow area is "potential wilderness." The House Report accompanying the California Wilderness Act so designated the area. Potential Wilderness means that Congress intends the area to become wilderness when "all uses thereon prohibited by the Wilderness Act have ceased..." 98 Stat. 1627. Bearpaw Meadow contains a ranger patrol cabin, a water system (5,000-gallon tank), and a High Sierra Camp (six guest tents, 3 toilets, kitchen/dining tent and storage cabin). The sole use currently at Bearpaw Meadow prohibited by the Wilderness Act is the High Sierra Camp.

Twenty years after Congress made clear that it intends Bearpaw Meadow to become wilderness when NPS removes the nonconforming uses, NPS has yet to address this issue. Section 6.3.1 of the Park Service Management Policies 2000 states: "The NPS will seek to remove from potential wilderness the temporary non-conforming conditions that preclude wilderness designation". The GMP even hints that removal of the offending use may never occur. The GMP states "These areas would become wilderness when and IF the facilities are removed." (p. 23) emphasis added. NPS is expected to remove the facilities at Bearpaw Meadow that prevent the conversion of the "potential wilderness" to wilderness. NPS is not free to decide to retain the facilities forever and thus frustrate the ultimate wilderness status of the 30-acre enclave. The ranger station may remain since that is an administrative facility necessary to administer the wilderness area under section 4(c) of the Wilderness Act.

We request that the final document states that Bearpaw Meadow would become wilderness "WHEN" the offending facilities were removed. We also request that the GMP lay out the timeframe for the ultimate removal of the High Sierra Camp from Bearpaw Meadow so that the lands designated by Congress as potential wilderness may become the wilderness that Congress intended.

The removal of the facilities is compatible with NPS' goal to reduce its backlog of maintenance work. According to the GMP, the water line to the camp is aboveground and the gathering area for the water system is insufficient. Therefore, NPS could be tempted to expend its limited dollars to correct these situations if the camp remains. But when the camp is removed, NPS will be able to dedicate its limited funds to other, more appropriate maintenance projects. In 2001 NPS expended funds to fell hazard trees in the camp area and to buck up the logs to provide free firewood for the camp use. This work illustrates that the existence of the camp will require small but continual expenditure of NPS funds to administer and protect it.

In the interim, any NPS activity to make the Bearpaw Meadow High Sierra Camp more permanent conflicts with NPS' obligation to remove those uses in the potential wilderness that are prohibited by the Wilderness Act.

e. Milk Ranch Road

The Draft GMP makes no mention of the Milk Ranch Road. Congress designated the road and the Milk Ranch fire tower as wilderness (reference the 1980 map cited by

Congress). The road is therefore closed to motor vehicles. The NPS has drawn a map that excludes the road corridor, the fire tower and a buffer zone around it from wilderness. NPS' rationale is that fire towers cannot be in wilderness. However, fire towers exist in wilderness throughout the nation. The fire tower itself is acceptable in wilderness under the minimum requirement exception of the Wilderness Act, section 4(c). Roads cannot be in wilderness. Instead of closing the Milk Ranch Road, NPS has instead selected to kept it open to the operation of motor vehicles.

Therefore, it appears that NPS administratively attempted to create a Milk Ranch Road wilderness exclusion 6800' long and sixty feet wide through wilderness, i.e. over a mile long (10 acres). NPS has prioritized the operation of motor vehicles on the road to gain access to BLM lands outside of the park than protecting the lands be administered as wilderness as directed by law and on cited the map.

The NPS appears to have once again substituted its judgement for that of the Congress. In the late 1970's Sequoia park superintendent David Thompson recommended that the Milk Ranch Road be excluded from wilderness. (See: Important Issues Concerning Wilderness Recommendations for Sequoia and Kings Canyon National Parks) However, contrary to this recommendation, Congress did not exclude the Milk Ranch Road from wilderness in the 1984 designation act.

TWS believes that it is illegal for NPS to administratively de-designate lands designated by Congress as wilderness. The submission of maps and legal descriptions to Congress that declared Milk Lake Ranch Road outside of "wilderness" such a map and description is not a valid process to change this designation. NPS' ability to make final maps and legal descriptions of wilderness boundaries does not provide it the capability to alter those boundaries to achieve a new management goal. Recreationists who wish to gain access across park wilderness on the Milk Ranch Road to BLM lands to the west of the park can do so by foot or horseback. NPS must manage what Congress designates.

2. Recommended Wilderness and Backcountry

NPS must continue to manage the three roadless areas (Redwood Canyon, North Fork of the Kaweah and the Hockett Plateau) as recommended wilderness as NPS currently manages these lands as represented the No-Action Alternative. The other alternatives are unacceptable, including NPS' Preferred Alternative which uses a classification of "Compatible with Wilderness Management." It is unknown where this classification is derived. We find no statute, NPS Management Policies or Guidelines that define this term. Further, it is not clear how that classification differs from Alternative D – manage as "nonwilderness backcountry." The Final Plan must explain exactly what this term means..

TWS opposes any effort to introduce off-road bicycling to any of the trails of the parks that lie outside of the developed zone. The establishment of such use in undeveloped park zones, even non-wilderness, requires a heightened level of scrutiny due to the potential impacts on resources and conflicts with traditional forms of park enjoyment.

Thus, NPS regulations now require the promulgation of a special regulation. We note the absence of any discussion in the Draft and presume that any proposed special rule for bike use on trails outside of developed areas will require a new, and stand-alone, NEPA analysis.

TWS opposes the construction of yet another High Sierra camp, this time on the Hockett Plateau as proposed in the Preferred Alternative (p. 112). The Hockett Meadow cross-country ski shelter was first conceived when Mineral King was proposed for a major ski development. When that proposal was terminated and Mineral King included in the park, the NPS concluded that the Hockett Meadow facility was not needed. The NPS opposed a development in Hockett Meadow its 1970's documents for the parks. The NPS does not need to add further infrastructure to its burgeoning backlog, in particular if that infrastructure (buildings, water and waste treatment facilities, etc.) would destroy the wild character of wilderness recommended lands.

3. Jennie Lakes Addition

TWS is pleased that the NPS has conducted the study of the Jennie Lakes addition, mandated by Congress in 1984. TWS is also pleased that the NPS that determined that the 1756 acres of the addition are "suitable for wilderness." (p. 24). We would like to be informed if the regional director has transmitted the memo of suitability to the NPS Director. We would also like to know if NPS has published the notice of suitability in the Federal Register as prescribed by NPS Policies and Guidelines and what the timetable is to get this proposal to Congress.

4. Mineral King Addition

a. Wilderness

Page 23 of the Draft GMP states that "Mineral King has been found suitable for wilderness (except for the road corridor and present development)." TWS endorses this conclusion. The Draft GMP then proposes to conduct a public process of wilderness study for Mineral King. TWS does not believe that a study is necessary.

In 1978 Congress added the 16,200-acre Mineral King Valley to Sequoia and required the Secretary to develop a comprehensive management plan for Mineral King by November 10, 1980. The plan, dated September 1980, recommended that all lands above 8,000 feet in elevation be wilderness. That Plan should suffice as a study for purposes of wilderness review under NPS policies. Thus, the next step is for the NPS to arrange a public hearing on the wilderness proposal, as required by the Wilderness Act, and forward a proposal to the Secretary.

If the NPS disagrees with this assessment and believes that another study is necessary for Mineral King, then the NPS must explain why and provide a timetable. Twenty-four years have passed since the NPS adopted the Comprehensive Plan for Mineral King and further delay of the wilderness proposal is no longer excusable.

b. Cabins

NPS' preferred alternative proposes converting existing cabins in Mineral King to public use as the reserved occupancy rights expire (pp. ix, 68). TWS does not support this alternative. Instead we support Alternative A that would remove federally owned cabins as the reserved occupancies expire and return the sites to natural conditions.

The cabins were purchased by the American taxpayers. The NPS proposal purports to retain the cabins for "public lodging or other public use," including limited use by the former owners whose rights have expired. This appears to be an attempt to allow the former cabin owners to continue to enjoy publicly owned cabins that they no longer possess and this is not acceptable. "Limited use" is not defined and has the potential to grow to be a substantial portion of the year.

Alternative A is the only alternative that conforms to the 1978 act of Congress that included Mineral King within Sequoia National Park. The GMP itself acknowledges this on page 70. Congress imposed explicit and firm limits on retained rights of occupancy on Mineral King structures purchased by the United States. The purpose of such limits was to prepare the cabins for ultimate removal. The subsequent listing of the cabins by the NPS as a site on the National Register of Historic Places does not alter congressional intent regarding the cabins. Nor does listing mandate their preservation. Listing on the national register mandates only that the NPS conform to section 106 of the National Historic Preservation Act of 1966 prior to taking any action that may affect the cabins, Included in such actions would be demolition.

The 1916 Organic Act charge that the NPS conserve historic objects in parks does not overrule the site specific provisions and intent of the 1978 Mineral King addition law. Were it otherwise, the 1916 Act would be read to negate the provisions of park specific legislation throughout the nation. We know that not to be true both under the provisions of statutory construction and logic. Moreover, Congress itself declared that provisions of the Organic Act of 1916, among other laws, applies to all parks "to the extent that such provisions are not in conflict with any such specific provision..." 84 Stat. 825. At Mineral King, Congress intended that the cabins be removed. Retention of the structures is at odds with the NPS mission as laid out in the Mineral King statute and its legislative history.

The GMP itself states that "...Congress...set expiration limits for the cabins by prohibiting the transfer of permits from the permittees of record in 1978, and it allowed permits to be renewed in five-year increments until the death of the permittee, *at which time the cabins were to be removed.*" (p. 25) emphasis added. Thus, the NPS acknowledges the clear congressional intent. We would like to be informed of NPS' rationale for selecting a preferred alternative that retains the cabins.

4. Boundary Adjustments

TWS endorses NPS proposal to adjust the park boundary to acquire the Alley property (p. 41).

5. No Wilderness Management Plan

The Draft lists several other plans the NPS is undertaking. Notably absent from current plans is a Wilderness Management Plan. Twenty years after Congress designated wilderness in Sequoia and Kings Canyon National Parks, the NPS has failed to produce a plan for how the agency will manage that wilderness to ensure preservation of its wilderness character, and implement the minimum requirement exception.

We appreciate the opportunity to comment on wilderness and related issues for the Draft GMP and EIS for Sequoia and Kings Canyon NP.

Sincerely,

Susan H. Gunn, Ph.D.
Director National Parks Program

4

Wilsonia Historic District Trust

13503 View Dr., Orange Cove, CA 93646
Ph: (559) 626-4301 Cabin (559) 335-2993
E mail: gus@viewdrive.com

August 6, 2004

WHDT BOARD OF DIRECTORS

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David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Dear Dave:

The entire Board of Directors of the Wilsonia Historic District Trust wishes to express its deep appreciation for the excellent work you and your staff have done on the Sequoia and Kings Canyon National Parks Draft General Management Plan.

We strongly support your Preferred Alternative and wish you all great success in getting it adopted.

With specific reference to Wilsonia Village, we are well aware of the NPS financial limitations and very much wish to work with you folks to preserve and restore to productive use the NPS-owned officially designated historic structures within Wilsonia Village. We are prepared to assist in targeted fund raising and we may be able to provide some direct assistance in the form of labor and materials.

We believe that at least one of these historic structures might be used as an "Educational Center" for a joint NPS+WHDT educational program focusing on the flora, fauna, and history of the entire Grant Grove area.

Many thanks for a job WELL DONE.

Cordially,

H.A. "Gus" Collin III
President

INDIVIDUALS

1331

WILLIAM ALSUP
1120 ASHMOUNT AVENUE
OAKLAND, CALIFORNIA 94610

June 3, 2004

Richard H. Martin, Superintendent
Sequoia and Kings Canyon National Parks
c/o Park GMP Coordinator
47050 Generals Highway
Three Rivers, California 93271-9651

Dear Superintendent Martin:

In response to your request for comments on the wilderness plan, I wish to say that I have made more than 100 backcountry trips into the Sierra in the last thirty years and continue to do so (this year four trips are planned). Almost half of them have been in SEKI. In 1991, for example, I led a ten-day hike for the cooperating association entitled *In the Footsteps of King and Cotter*. We climbed Brewer and Tyndall and many cross-country passes along the way. I am also the author of *Missing In The Minarets* and *Such A Landscape!* Both are historical accounts of Sierra events. I respect the Sierra and know it well.

The single biggest problem for the Sierra is pack-train over-use. This is especially so in the higher and more sensitive regions. In the mid 1980's, I wrote one of your predecessor a note from above East Lake, deploring the extensive manure deposits there, all washing into the water resource and generating clouds of flies. The meadow above East Lake was then heavily grazed and probably still is. One of my suggestions then was to remove pack trains altogether from the higher regions, both from a health perspective and trail/meadow preservation. There is no point in repeating all the reasons, which you must know well.

If you are going at all to continue allowing pack trains in areas above 9000 feet, then they should be restricted in length and weight. There is no justification for hauling in large beer coolers, ice, steaks and so forth when each extra pound and each extra animal inflicts damage. Beer drinkers should be limited to those lakes nearer the trailheads. Beyond them, only light-weight pack trains should be permitted, if you must permit them at all. I know the concession pressure you face on this issue and, realistically, doubt that the National Park Service will ever be able to right this problem.

A second wilderness problem is damage from campfires and fire rings. They mar the landscape. The scars last for years. They promote filth and flies. They encourage campers to toss metal foil and plastic into the flames but, of course, they are not consumed. Fires and fire rings should be outlawed altogether. This does not even count the fire hazard risk and health risk from smoke.

On the positive side, I think SEKI has done a good job with trail and bridge building/maintenance, bear boxes, and signage (except for unmaintained trails, which you should sign but warn, are unmaintained). SEKI has done a good job regulating backpacker usage. Your rangers have always been most professional with me and my small groups.

I can be reached at William_Alsup@cand.uscourts.gov.

Sincerely yours,

William Alsup

WHA/ky

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"John T. Austin" <john_t_austin@yahoo.com>
10/06/2004 07:33 AM MST

To: susan_spain@nps.gov, david_graber@nps.gov
cc:
Subject: SEKI GMP Comments

I have reviewed the *Draft General Management Plan EIS* for Sequoia and <?xml:namespace prefix = st1 ns = "urn:schemas-microsoft-com:office:smarttags" />Kings Canyon National Parks. It is difficult to figure out what actions are being proposed and how the alternatives differ. It isn't just the jargon and vague language. The document, especially the alternatives matrix, fails to describe alternatives using parallel language; that's a big no-no for a NEPA document. As you delve into the document deeper, you find a number of contradictory statements; an alternative will propose one thing in one place and something quite different in another. For example, does the park really intend to eventually develop sustainable water treatment systems as the Mineral King cabins are acquired? If so, this should be clearly stated and the impacts fully assessed.
<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
The document is misleading in places, appearing to propose something when it really isn't. Some of the prescriptive language is open to broad interpretation. A particularly glaring example is the promise to limit dry-season water withdrawals to current levels. That promise is repeated in various ways many times in the document, but each time it is with vague and ambiguous language. The commitment should be stated using precise language so that the meaning is clear.

Two reasonable readers could come away from reading the document believing that it said two entirely different things. When it comes time to apply the document, it will be hard to determine intent. And how can you accurately describe impacts if you can't identify the proposed actions that might precipitate those impacts?

The visitor use projections are a rather spectacular mess by any standard. The document contains two different sections that project visitation. The two sections are based on different methodologies and come up with dramatically different projections. The document makes no attempt to resolve these glaring discrepancies. Neither projection fully takes into account the changes happening around the park: population growth, road improvements, and proposed development of the adjacent national monument. Just as bad, the document establishes a planning timeframe of 2025 (or 2030 as stated in the public meetings) but the projections go only to 2005 and 2010. To add insult to injury, some of the impact discussions are written as if there were a third and undocumented visitor use projection. This is an outlandish situation for a NEPA document. It is as if the proposed actions and their associated impacts have no direct linkage to the projected visitation. The visitation projections should be at the heart of many of the actions and they should be critical to assessing many of the impacts.

The document establishes public use limits (crowding) for three popular areas of the park. These limits stand out like a sore thumb. There's no effort to justify them or even to explain how they were derived. It is as if they came from a dart board. Worse yet, they look precise but aren't; they don't even have units attached. You cannot look at the numbers and conjure up a picture of the situation being described. For example, what does 450 look like at the Sherman Tree? Is that 450

people at one time in the immediate vicinity? Such a level of crowding would be inconsistent with maintaining a quality visitor experience. The document draws no connection between current/projected use and the prescribed use limits. The reader doesn't know whether the park is brushing up against the limits now or whether the population of California will have to double before we get there. There's no context for evaluating the impacts. That's a very serious goof for a NEPA document.

In places, the EIS comes across as an advocacy document rather than as an unbiased evaluation of the alternatives. Some of the impact sections read like the authors were wearing rose-colored glasses; or blinders. There's a tendency to emphasize the positive impacts of an alternative and minimize or ignore the negative impacts. Nowhere is this more apparent than in describing the impacts on visitors. We read over and over that the preferred alternative will fix the problems that were bothering visitors in the past. But what about the negative impacts to visitors? Visitation is expected to rise rather dramatically. For example, Alternative D is projecting nearly a 50% increase just by 2010; it must at least double by 2025. The document is establishing (supposedly) specific limits on how many visitors will be accommodated. In vaguer language, the alternatives talk repeatedly about limiting visitation or otherwise not being able to accommodate all the visitors who want to come. Although the document never comes out and admits it, visitors are going to be turned away in at least some of the alternatives. This impact is not fully assessed. That is a big error for a NEPA document.

It gets worse. The document assumes that these large projected frontcountry visitation levels can generally be accommodated in all alternatives without adverse resource impacts. Come on now, visitation is going to double in Alternative D without adverse resource impacts? The document proposes to handle crowding in part by redirecting visitors to the shoulder seasons and to the low-use frontcountry areas. Although the document fails to disclose this, these low-use areas and seasons are going to see much higher use both as a result of this redirection and as a result of the forecast visitation increase. The document acknowledges that the public places a high value on the current low-use frontcountry areas; they value the visitor experience. Yet the document makes the barefaced assumption that the low-use frontcountry areas have the capacity to absorb more visitation without any negative impact to the visitor experience. That is an inconsistent and undocumented statement, to put it mildly. It misrepresents the impact and misleads the public. This simply is not allowed in a NEPA document.

The GMP is required to address carrying capacity. At the least, the management prescriptions have to establish the desired resource and visitor experience conditions. This GMP does have a section in each management prescription that lists desired future conditions. But the conditions that are included in those sections are all but useless. In general, they do not describe – even in conceptual terms – a measurable future condition. Instead, they tend to list resource actions that management will or might choose to undertake. This part of the document is woefully inadequate. The management prescriptions must establish measurable desired future conditions, if only by reference to the parks' *Resources Management Plan*.

The no-action alternative inappropriately incorporates a number of actions. As a result, it isn't a no-action alternative; it fails to establish a baseline that the action alternatives can be compared

against. For example, the no-action alternative establishes crowding limits at some of the popular attractions; that is clearly not a continuation of present management actions. The no-action alternative proposes developing new water sources; an action that I don't think has ever been described in an approved plan, much less in a compliance document. The no-action alternative incorporates various plans that have yet to be fully implemented. For example, it proposes building out of all the DCPs and implementing the full transportation system in Giant Forest. I'll grant that the park does have these plans on the shelf. But some parts of these plans have yet to be implemented and won't be implemented for at least a couple years. The park has adequate time to rethink those actions. A NEPA document must have a true no-action alternative.

There are a number of glaring problems with the environmental consequences section. One of those is the inadequate treatment of cumulative impacts. For example, the cumulative impact that population increases, highway improvements, and national monument plans will have on visitation. Or the cumulative impact that private wells and septic systems within the park will have on water quality and availability. A NEPA document must fully address such cumulative impacts.

It is so hard to determine what this document is really proposing. There are qualifiers, double-speak, and weasel words aplenty. But if a representative cross-section of the public were to read the alternatives, they would come away with at least an impression of what actions are being proposed. A number of those apparently proposed actions are not fully assessed in the EIS. Call it segmentation, pre-decisional, an oversight, or just poor writing; but it's not right. A NEPA document should assess all of the actions that it proposes. This document does not do that. For instance, it calls for a major transportation system in the Giant Forest area. You can't operate such a system without a major support facility in the general area. To my knowledge, no NEPA document has ever assessed the impact of such a facility or even said where it would be located. The GMP/EIS blithely ignores this issue. It doesn't identify possible impacts, it doesn't identify possible locations, it doesn't even acknowledge that the facility will be required. It gets back to the rose-colored glasses attitude. The document talks about all the positive impacts of the transportation system but tends to gloss over the negative impacts.

John Austin
40977 Grouse Dr.
Three Rivers, CA 93271

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"Chris Avery" <tech@averyweb.net>
10/06/2004 01:11 PM MST
Please respond to "Chris Avery"

To: <david_graber@nps.gov>
cc: <susan_spain@nps.gov>
Subject: Topic #6, Mineral King Special Use Permit Cabins

October 5, 2004

Chris and Linda Avery
5881 Balboa Drive
Oakland, California 94611
Phone: (510) 339-125

e-mail: chris@averyweb.net

Park GMP Coordinator
David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651
Phone (559) 565-3173

Re: Draft General Management Plan and Comprehensive River Management Plan / Environmental Impact Statement for the Sequoia and Kings Canyon National Parks, Middle and South Forks of the Kings River and North Fork of the Kern River, **specifically regarding Mineral King Valley and Topic #6, Mineral King Special Use Permit Cabins**

Dear Mr. Graber,

We write to express our opinions on the Draft General Management Plan and Comprehensive River Management Plan / Environmental Impact Statement for the Sequoia and Kings Canyon National Parks, Middle and South Forks of the Kings River and North Fork of the Kern River, and most specifically, regarding the Preferred Alternative's treatment of the Mineral King Valley.

This email lists our specific areas of concern.

1. The destruction of a community.

The loss of the community in Mineral King due to the elimination of the Special Use Permits is mentioned in your draft, but is not addressed. This is a serious omission.

The Park Service has failed to consider the valuable resource that exists within the park itself – its residents. The National Register of Historic Places listing of the Mineral King Road

Cultural Landscape District includes not just the structures within the district, but also the community.

This is important because "community" means people not just the buildings. The lineage and lore of Mineral King exists today ONLY in a living body of people who are dedicated to its preservation. This community and its "cultural content" can be fairly compared to the oral traditions of Native Americans. Your recommended alternative will destroy that.

You have an alternative. The Park could take unique and thoughtful action: allow the permit holders to remain as joint stewards of the land with the Park Service. The Park Service can and should take a position that recognizes the value of the Mineral King community - it is an important resource to the Park.

2. Inadequate Maintenance of Historic Resources.

Under the Preferred Alternative, as Special Use Permits expire, the permit cabins would be acquired and "adaptively reused for public purposes" under the stewardship of an unnamed nonprofit or commercial services organization to provide public lodging or other public use.

The statement that the Preferred Alternative meets the goal of "Preserving important historic, cultural, and natural aspects of our national heritage and maintain[s], wherever possible, an environment that supports diversity and variety of individual choice" is unsupportable. Park budget constraints make it quite unlikely that the heritage resources can be maintained.

The plan talks about ""acquir[ing] and adaptively reus[ing] private historic structures" at Mineral King, but that would in fact sterilize a cultural jewel in the crown of the Sierra Nevada range.

Your plan ignores a crucial resource: The cabin owners have the talent, resources and the wherewithal to properly care for the historic cabins; the National Park Service does not.

We believe you should select Alternative C on this issue, and recognize the likelihood that the cabins will be lost if they fall under Park Service purview. To not do so would be irresponsible. If you continue to issue permits to cabin owners they will be careful caretakers and guardians for years to come - as they have for the last century. Century!

3. Inadequate Decision Making.

The elimination of the permit cabins and the dams will result in the loss of significant cultural and historic resources, cultural and community lore and knowledge, recreational opportunities, and the unique character of the old-time Mineral King mining

community. You therefore have a duty - a responsibility in fact - to recognize the unique circumstances of this valley and community, and to protect and honor the heritage of this distinctive place. Failure to take a clear position on this would be an abdication of your core responsibility.

4. Wilderness Designation in Mineral King.

Maps at the end of the first volume of the Draft GMP indicate that under the Preferred Alternative (and others except the No-Action Alternative), portions of Mineral King would be "studied" for possible designation as a wilderness area. Certain areas are designated as "compatible with wilderness management."

These areas do not appear to include the Special Use Permit cabin areas, including those in West and East Mineral King (although they do appear to include the special use permit hydroelectric dam facilities in Mineral King).

Given the significance of the possible designation of these areas as wilderness management areas in terms of the impacts on the cabins, the permit holders, and the Mineral King Cultural Road Historic District, this topic has not been adequately addressed in the plan and in the planning process. It is simply inadequate to indicate that this topic would be studied after the plan is put in place, because the topic will have significant bearing on land uses within the area.

This study must be completed as part of the General Management Plan planning process, and should be completed prior to the completion of the plan in order for the impacts of such a designation to be properly considered by the public and the Park Service.

5. Handling of Public Comments is Inadequate.

At public meetings, Susan Spain (cc'd on this email) indicated that the Responses to Comments document to the Draft GMP would address "representative comments" rather than addressing specific individual comments.

Susan Spain's suggested process is flawed, and may invalidate the Draft Plan.

Her process cannot adequately address representative comments on such a complex document, particularly when there are controversial concerns involved such as the Special Use Permits in Mineral King. Instead it allows the public's comments to be neutered, watered-down, and the impact, importance, and fine detail of specific ideas and concerns to be overlooked, de-emphasized, and disregarded.

Each individual (distinct) comment will have to be addressed if this plan is to reflect a fair public record of the dialogue on this Draft Plan and the planning process.

6. Inadequate Traffic Counts.

The traffic counts indicated for Mineral King are inadequately documented and suspect.

No specific indication of where the traffic counts were taken is provided, nor are any dates indicated. More detail and adequate documentation must be provided to ensure that these counts are in fact representative of the AVERAGE daily traffic volume in Mineral King.

It is highly unlikely that 230 cars travel the full length of the Mineral King Road DAILY under AVERAGE traffic conditions throughout the summer. This from the perspective of sixty years of visiting and residing at Mineral King.

Moreover, the definition of "peak-hour" in the Park in lacking. Historic entrance data from the Lookout Point Ranger Station/Mineral King Entrance should be provided and averaged for several summer periods, from when the road is opened in May to when it is closed in October, in order to accurately gauge the number of cars entering and exiting the Mineral King area. "Peak" data could also be provided. This is important information because it indicates a great deal about use patterns in the valley.

7. Inadequate Mapping.

The Draft GMP does not provide adequate mapping of areas of concern, including but not limited to inholding areas, sensitive and endangered species, historic resources including hydroelectric facilities and historic districts, pack station facilities, and backcountry facilities. This makes the Draft Plan impossible for the average reader to assess, and improperly limits understanding by the public of the impacts of the alternatives proposed.

8. Mitigation Measures Poorly Indicated.

Proposed mitigation measures are difficult to locate in the Draft Plan, and should be clearly indicated along with the impacts in Volume 2 of the Draft GMP under "Environmental Consequences." It appears that little or no thought has been given to environmental impacts or adequate mitigation, particularly in the case of the hydroelectric facilities within the Park (see 9, below).

9. Dams Removal in Mineral King Poorly Studied and Mitigated.

The Preferred Alternative recommends the removal of dams at Eagle, Franklin, Monarch, and Crystal Lakes. These dams are listed on the National Register of Historic Places. Congressional authorization is required for their continued use every ten years.

The recommended mitigation for the removal of the dams is inadequate. HABS/HAER/HALS standards (essentially creating drawings that record the structure) are a token effort at best.

There is no indication in the plan that the environmental consequences of the dam removal have been considered - as may be required by law.

Impacts may include increased sedimentation in downstream areas and impacts on sensitive species. These are not addressed.

Additionally, the loss of four significant recreation opportunities in the Mineral King Valley would be a substantial loss both in terms of fishing, camping, and other recreational activities and scenic beauty. Eagle, Franklin, Monarch, and Crystal Lakes are exquisite lakes that your recommended Alternative would destroy.

We believe the deconstruction and removal of the dams would have a great impact on the sensitive environment as well as indicated in the Draft GMP. Alternative C, if selected on this issue, would allow the dams to remain and continue to operate. As indicated, this would have the additional benefit of providing income from permits to the Park and discounts on electric power.

10. Stock Pack Station Location Not Indicated.

In most of the proposed Alternatives, including the Preferred Alternative, the Pack Station in Mineral King is proposed for relocation "to a more suitable location" and to "improve resource conditions." (These terms used without definition).

However, no proposed indication of where the pack station would be located is provided, nor is any process for designating such a location specified. More information must be provided on these issues before this document can be considered to be complete.

11. Support for Stock Pack Station Use in the Park.

We support the Preferred Alternative to continue to allow the use

of stock in the Park. This practice is both an historic and useful means for people to access the backcountry, including those who might be otherwise unable to do so.

Sincerely,

Chris and Linda Avery

Cc. NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service - DSC
12795 W. Alameda Parkway
Denver, CO 80225-0287
Phone (303) 969-2280

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"Linda Avery" <linda@physical-therapy.com>
10/06/2004 10:33 PM MST

To: <david_graber@nps.gov>
cc: <susan_spain@nps.gov>
Subject: Mineral King Cabins

October 6, 2004

Re: Topic #6, Mineral King Special Use Permit Cabins, in the Draft General Management Plan

Dear Mr. Graber,

The cabins in Mineral King, CA. are now designated in the National Register of Historic Places as the Mineral King Road Cultural Historic District. It is my understanding that in order to fulfill this plan the physical cabins as well as the community of cabin owners and residents must be preserved and protected.

The Park Service, at this time, does not appear to have the financial or staffing resources to properly tend to these tempermental cabins. I believe that it is in everyone's best interest to retain the cabin owners as custodians of this valuable resource for our future.

It is my sincere hope that the Draft Plan will be revised to continue the use of the permit cabins by the current owners and their heirs.

Sincerely,

Linda L. Avery
3031 Telegraph Ave., #144
Berkeley, CA. 94705

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To Whom It May Concern,
I have read much of your Draft General Management Plan and would like to express my preferences as per your proposals for the Mineral King area.

I would like to see the current law enforced, as was legislated, combined with the preferred alternative - ie. when the current use permittee dies, the park acquires the cabins and selectively maintains some for public and park use. Also some additional campgrounds would be nice.

It seems preposterous to me that a few privileged descendants of special use permittees would get continued use of the cabins in perpetuity. This is not private property. This is government subsidizing the rich. In the not to distant future, Mineral King should be returned to public use only.
Thank you,
Richard Badgley

43812 Sierra Drive
Three Rivers, California 93271
559-561-4823

Larry Baucroft

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COMMENTS ON THE

Draft General Management Plan and Comprehensive River Management Plan/ Environmental Impact Statement for Sequoia and Kings Canyon National Parks and Middle and South Forks of the Kings River and North Fork of the Kern River

Miscellaneous Comments

Throughout the document impacts are referred to as minor, moderate, major, or negligible. In general, there is no analysis of the impacts and they are generally not quantified. It is also not clear the impacts will be mitigated. Where is the mitigation matrix? For example, in Volume 2, page 108, under the conclusion for the No Action Alternative, in states that "On a cumulative basis, the no-action alternative would contribute to localized, incremental, minor to moderate, adverse effects and minor beneficial effects on vegetation and soils". Specifically what is the localized, incremental, minor to moderate adverse effects? How much soil would be lost/degraded? The GMP/EIS misses the boat and quantifying the environmental impacts and what specific measures that would be used to mitigate the impacts.

The impacts of fire on the landscape are not covered in the GMP/EIS. The GMP/EIS should discuss these impacts, even though the *Fire and Fuels Management Plan* covers fire.

Volume I

Purpose and Need for the Plan

Page 43 – It states that soundscape/night sky would not be affected by any of the alternatives. What about impacts of expansion of Wuksachi and other development projects. Construction projects do impact the soundscape.

Alternatives, Including the Preferred Alternative

Page 52 – Paragraph seven states that "Crowding begins to adversely affect visitor enjoyment at popular park features when approximately 400-500 people visit the Grant Tree, 400-450 people visit the Sherman Tree and 125-150 people visit Moro Rock". How were these figures determined? Was a scientific study done? Are the figures for a 24-hour period, during peak visitation times of the day, or some other timeframe? Were visitors asked how many people adversely affect their visit?

Page 53 - Management prescriptions seem long zones/areas. It says that "management prescriptions and applied to geographic areas, which are refereed to as zones". Zones/prescriptions are confusing. I think of prescriptions like prescriptions for a prescribed burn.

Page 72 and 73 – Why were there mitigation measures only for wetlands/floodplains, threatened, endangered, and sensitive species, caves, increased water withdrawals,

facility construction, and cultural resources? Does the GMP/EIS assume that impacts to the other natural resources are minimal enough that they do not need to be included?

Alternatives Matrix

Page 80 – How were the categories for natural resources determined? Why were fire and sensitive species singled out? What about other critical resources issues e.g. air quality?

Page 112 to 152 – Why were important natural resources issues not covered in specific areas of the parks? Specific cultural resources issues were addressed?

Page 116 - What happens to the former gas station at Cedar Grove?

Page 124, Number 215 and 216 – What measures will be taken if studies indicate that current water usage impairs resources?

Page 126, Number 224 – Why not conduct and study to determine potential impacts to natural resources from a pack station/stock stable? That should be the first study accomplished, before and economic analysis is done.

Page 132 – The picnic area along the Marble Fork at the junction to Lodgepole Campground is not mentioned. Will it be retained as a picnic area or restored?

Page 136, Number 282 – What does "permit Boy Scout as possible mean?

Page 138 – What about Crescent Meadow picnic area? Will it be retained as a picnic area or restored to "natural conditions"? I don't see it mentioned anywhere. Will the road to Moro Rock and Crescent Meadow be upgraded?

Page 140, Number 308 – I thought the wastewater facility at Crystal Cave did not meet state standards? Has it been upgraded? What standards will it be upgraded to?

Page 142, Historic Resources – What about the Colony Mill Ranger Station? Was it designated as an historic resource or torn down?

Page 144, Number 326 - Allowing bicycles on the Generals Highway does not seem to be prudent idea. There is a major safety issue. Bicycles should not be permitted on the Generals Highway.

Page 146, Number 336 – What administrative/managerial functions would be relocated outside the park? Where would they be relocated? Whatever happened to the Hammond Fire Station site?

Page 146 – North Fork of the Kaweah – No mention is made off bicycles. Will they be allowed on the North Fork Road?

Page 146, Number 337 – What does it mean to "sustain some native species"? Are some native species better than others?

. **Page 150, Number 361** – Where will the pack station be relocated? I though we did a study and found there were no feasible places/

Page 152, Number 365 – Where will trailhead campsites for backpackers be located?

Page 156, Number 378 – Are these minimal state standards"? **Page 150, Number 361 –** Where will the pack station be relocated? I though we did a study and found there were no feasible places.

Page 186 (Top of Page) – What does "No park resources or park values related to the natural or cultural environment, or to wild and scenic rivers or wilderness areas, would be impaired under any alternative" mean? What criteria were used to determine this e.g. loss of species, alteration of habitat, spread of exotic plant species, or other criteria? I assume that if natural and cultural resources are impaired then not mitigation matrix is needed? Is that assumption correct?

Page 186 – What about paleoentological, geological, and night sky resources?

Volume II

Page 11 – It mentions there are 1,200 vascular plant species. On page 17 it says there are over 1,400 vascular plant species. Which is it?

Page 16 – What about invertebrate species? Why were they not included?

Page 80 - Why was scenic/aesthetic resources not included?

Page 97 – What about the impacts of fire, both positive and negative on water resources?

Page 107 – What about tree hazards removal impacts?

Page 158 – Why was ozone not discussed? Is it because it is caused by off site impacts?

Page 196 - It would be helpful to summarize the environmental impacts to include the analysis, cumulative impacts, and conclusion in a table as was done for the alternatives in Volume I. Also, where is the impact mitigation matrix? I thought CEQ regulations and *Director's Order Number* 12 required a matrix?

Miscellaneous – What about impacts form marijuana sites in the foothills?

Page 366 – Where did the elaboration of the Mission Goals come from? Are these the long-term goals in the Strategic Plan? If they are, the Plan should be referenced?

Pages 366, 368, 369, and 370 are duplicated

SEQUOIA AND KINGS CANYON NATIONAL PARKS GMP/EIS REVIEW COMMENTS
WATER WITHDRAWALS
SEPTEMBER 2, 2004

MAGNITUDE OF WATER WITHDRAWAL IMPACTS

The Draft Sequoia and Kings Canyon National Parks GMP/EIS acknowledges that water withdrawals have altered natural water flows and hydrology, adversely stressed meadows, impacted the biological resources, and may be contributing to moisture stress within sequoia groves (Volume 1, page 188 and Volume 2, pages 12, 96, and 128). In drought years, the parks' water withdrawals significantly reduce the flow in a number of creeks, especially Silliman, Wolverton, and Alder. These impacts are particularly significant when several drought years occur in a row. This is the most significant resource impact resulting from the proposals in the Draft GMP/EIS. The Final GMP/EIS/ROD must take action to limit this impact.

The Draft GMP/EIS acknowledges that even under the no-action alternative, continued use and development along with increased visitation would have adverse long-term impacts on water quality, hydrologic processes, and biological communities (Volume 2, pages 98 and 99). The preferred alternative would also have continued use and development along with even more visitation than in the no-action alternative.

The Draft GMP/EIS fails to make a persuasive case that the preferred alternative would have significantly less impact than the no-action alternative. Yet the document concludes that the preferred alternative would result in beneficial effects to the free-flowing conditions of park rivers, floodplains, water quality, and biological communities (Volume 2, page 101). This is a very misleading statement, completely glossing over the impacts of water withdrawals. It does not compare the impacts of the preferred alternative against the baseline conditions of the no-action alternative. Because of statements like this, the EIS coming across as an advocacy document rather than as an unbiased evaluation of the alternatives.

COMMITMENT TO LIMIT WATER WITHDRAWALS

The Draft GMP/EIS attempts to avoid further water quality impacts by saying that all of the action alternatives would limit water withdrawals to current levels to protect resources (Volume 1, pages 88-89, reference 35 and elsewhere). It also says that future studies will be completed, and a monitoring program will be implemented to determine potential impacts from increased water withdrawals before any new facilities for additional visitor use are undertaken (Volume 1, page 73). This is a good start, but just studying a problem is not enough; there must be a commitment to follow through on the results of those studies. The Final GMP/EIS/ROD should say that new facilities for additional visitor use will not be undertaken if the studies or the monitoring program indicate that there are or will be potential impacts.

The Draft GMP/EIS says that the preferred alternative uses management prescriptions as a framework for responding to problems and visitor needs, with limits for water use (Volume 1, page 77, NEPA Goal #1). Those limits should be expressed in clear, precise, measurable terms. For example, the reader is told that total drought production at Grant Grove is 31,824 gallons/day (Volume 2, page 381, Table E-1) and that the preferred alternative limits dry season water withdrawals at Grant Grove to current levels (Volume 1, page 124, reference 215). That establishes a limit but doesn't express it clearly; the limit could be interpreted in a variety of ways. Possibly the intent is: *Maximum total water withdrawal for the Grant Grove area from May through October will be limited to 31,824 gallons for any one day.* Whatever the limit is, the Final GMP/EIS/ROD should express it in clear, precise, measurable terms. Similar statements should be made for each of the other areas (Lodgepole, Ash Mountain, etc.) where water withdrawals are being limited.

Almost any limit is better than letting resource conditions continue to deteriorate. But vague, imprecise, conceptually stated limits are meaningless. They may look good, but they have no substance. They are subject to alternative interpretations. They can lead to confusion, litigation, inaction, and ultimately to deterioration of the resource. To be effective, limits must be stated in terms that are clear, precise, and measurable. They must be clearly communicated to both the reader and to the park staff that will have to implement them.

In discussing water withdrawals, the document sometimes speaks in language so imprecise that it is difficult for the reader to know what is being proposed. For example, the document says in several places (Volume 1, pages 88-89, reference 35 and elsewhere) that all of the action alternatives would limit water withdrawals to current levels to protect resources. But in describing *when* water withdrawals would be limited, sometimes the document says only dry season withdrawals (Volume 1, page 88, reference 35), sometimes it says summertime withdrawals (Volume 1, page 188), sometimes net average withdrawals during the low-flow season (Volume 2, page 99), sometimes peak-season withdrawals (Volume 1, page 188), and sometimes it implies all water withdrawals (Volume 1, page 186). Which is it, dry-season, summertime, net average withdrawals during the low-flow season, peak-season, or all-season? The Final GMP/EIS/ROD should settle on one term and use it consistently.

Terms should be defined so that the parks' intent is clearly communicated to the reader. What does "current levels" mean? Is it based on actual withdrawals for 2004 or for some other year? Does it mean that there will be a specific daily cap on water withdrawals at each of the frontcountry water systems or is it proposing cap and trade across watersheds? When prescribing limits, it's best not to use imprecise language. The Final GMP/EIS/ROD should clearly limit daily water withdrawals at each of the frontcountry water systems to the actual average daily withdrawals for May through October of 2004.

IMPROBABLE CONCLUSION

Existing water withdrawals at Grant Grove average 33,500 gallons/day during the peak use season. Drought production is 31,824 gallons/day (Volume 2, page 381, Table E-1). Grant Grove peak water consumption is expected to increase to 53,650 gallons/day under the preferred alternative. However, water withdrawals would not be increased beyond 35,500 gallons/day (Volume 2, page 116). As presented, this describes an unsustainable situation. During drought years, consumption would exceed withdrawal by at least 18,150 gallons/day. Even in the most optimistic scenario, there would be insufficient storage to maintain this overdraft for the entire peak-use season, especially since the park has to maintain a reserve for fighting fires. Where does the preferred alternative propose to get the rest? The data and analyses presented do not substantiate the conclusions reached. The Draft GMP/EIS fails to demonstrate that full buildout can occur without increasing dry season water withdrawals. Similar problems exist with the other alternatives.

CORRECTIONS REQUIRED

The Draft GMP/EIS fails to make a persuasive case that visitor use capacity can be increased without impacting the parks' water resources and desired future conditions. Therefore, the Final GMP/EIS/ROD should, at a minimum, do at least the following:

- Clearly and precisely state the commitment to limit water withdrawals to 2004 levels to protect resources. State precisely how much water can be withdrawn per day at each of the frontcountry water systems.
- Commit to not increasing visitor use capacity (transportation, parking lots, overnight accommodations, etc.) in any area until it can be reasonably demonstrated that the proposed increase can be accommodated without exceeding allowable water withdrawals for that area.
- For each frontcountry water system, call for an in-depth study of the impacts of water withdrawals, including creation of a monitoring program. Commit to completing at least half these studies and implementing the associated monitoring programs within five years from signing the ROD.
- Fully assess the cumulative impacts of water withdrawals. Specifically include the impacts of withdrawals at private systems, including the potential for buildout of lots in Wilsonia.

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JIM BARTON

P.O. BOX 205 • THREE RIVERS, CA 93271 • 559.561.4205

October 5, 2004

Re: Comments on selected items from Draft General Management Plan, Volume 1

PURPOSE The intent of these remarks is to support retention of the Mineral King summer home tract, extension of the special-use permits and to offer constructive suggestions regarding management of other SEKI areas.

During 80 years in, near, and around Sequoia, Kings Canyon, Mineral King, and Three Rivers, I have developed deep respect for the natural and cultural values of the area. My concern for historical preservation in these parks has increased due to threats and recent actions against historic properties, not only in Mineral King, but around Giant Forest, Grant Grove, and Cedar Grove as well. Fifteen seasons of ranger service (protective division, it was called) including entrance station, road and campground patrol, fire suppression, and backcountry search and rescue have contributed to what I feel to be solid knowledge of these parks and their management through the years. Incidentally, I have known all the superintendents here from Walter Fry through Dick Martin.

VOLUME 1 The following remarks are identified by page or item number in the order that they appear:

xv: The plan states removal of dams would restore natural flow. As of this date, Mosquito Creek in the Mineral King area is extremely low if not dry. The four creeks with lakes and dams are seen to have good flow due to previously impounded water. And water taken directly from the three Edison Company flumes has been used advantageously for fire suppression in and out of the park.

xvi: Hockett camp would a positive, not adverse, impact on recreational activities due to increased accessibility.

Keep the hydroelectric system in operation. The need for renewable non-polluting sources of energy is well known and indisputable.

Page 39: At this point, the plan fails to also state that 89 percent of those workshop respondents who mention Mineral King cabins were in favor of retention or that this historic remnant of the 19th century is now listed in the *National Register of Historic Places*. The 89-percent figure is compiled from FOI documents supplied by Donna

Drebick, Public Affairs Specialist, Denver Service Center (Feb. 5, 2001).

Item no. 21 Restore abandoned front-country trails such as Lost Grove to Dorst Campground; Halstead Meadow to Colony Meadow, Cabin Meadow and Lost Grove; Halstead Meadow to Suwanee Grove and Crystal Cave Road (near Marble Fork Bridge); Dorst Camp to Little Baldy Saddle and Suwanee Grove. These trails were excellent day and shorter hikes in the now little-known front country.

Item no. 38 Retain employee housing inside the park and establish new housing at Wolverton pack station area (for instance) and other locations in both parks where infrastructure already exists. Advantage: Reducing air pollution and traffic congestion from forced commuting. It would also increase incentive to seek employment in the parks. The policy to phase out employee housing is shortsighted in view of those stated problems. In emergency situations, it does not make sense that key personnel must be called from Three Rivers, Squaw Valley or farther. There have been recent emergency situations on weekends when lack of readily available trained personnel has hindered proper response and delayed actions to protect park visitors. One instance was two separate cars off of or blocking the Generals Highway in the Potwisha area. There have also been situations where people on duty did not have or know where to find keys to emergency vehicles or supplies and action was delayed.

Item nos. 103-105 Retain hydropower diversions and flumes. As previously stated, the value of renewable energy sources in our economy is well known. The visual impact from the Generals Highway between Ash Mountain and Potwisha is certainly negligible; it's likely that very few park visitors notice the facilities at all.

Item no. 108 The dams are not in the defined "wild and scenic river" zone since they are all above 9,000 feet.

Item nos. 113, 131 It is not possible for downstream water resource activity outside the park to degrade wild and scenic river values inside the park.

Item no. 154 Historical note: The Mattoon cabin in west Mineral King was once occupied (and perhaps built) by Shorty Lovelace and his brother.

Item no. 193 Retain both roads to Hume Lake for visitor convenience and as escape routes in case of fire, landslide, or other disruptions.

Item no. 223 See comment: Item no. 21.

Item no. 224 Pack station at Dorst/Cabin Creek/Halstead is not viable because of distance to trailheads. Retain the Wolverton Pack Station and relocate the stock trail crossing southerly of the new Sherman Tree parking area. This would eliminate horse/vehicle traffic confrontation. Or establish a new facility in the Wolverton Meadow area.

Item no. 226 Retain dump station for visitor convenience and to avoid effluent discharge on the ground somewhere. Encourage USFS to establish one at Stony Creek.

Item no. 241 Use Lodgepole gas station for light maintenance of the shuttles and for the proposed self-service gas pump(s). It was designed and built for that use and it exists right now.

Item no. 247 Please state what historic buildings still exist on the south side of the river at Lodgepole.

Item no. 265 Put self-service gas at gas station! Market parking is crowded now and quality of nearby campsites and amphitheater would be impacted. There has to be space for lines at the gas pump(s). When there was a gas station in Giant Forest, there were lineups clear past the barbershop and sometimes the coffee shop, causing total gridlock.

Item no. 282 Multiple use of the camp is fine, but don't close out Boy Scout use. I knew many boys in Santa Monica (Crescent Bay Area Council) who spent great times at the Wolverton camp and, as adults, are strong supporters of the park and its values.

Item no. 285 Locate light maintenance of shuttles at Lodgepole gas station. The facility was made for it.

Item no. 336 Administration facilities outside the park will adversely affect air quality and increase traffic congestion in the corridor. Former Ash Mountain CCC camp area near the rec. hall has possibilities.

Item no. 350 Not feasible to adapt the cabins for public use. Very few, if any, would satisfy present regulations — handicap accessibility, for instance. To bring them up to code would require modifications that would destroy historical integrity. Such a project will satisfy only the ideology that the historic community should not be there at all.

One experienced mountain resort operator calculates a $400,000 annual loss to operate the 60-some cabins as a public resort considering current room prices and

cost of operation. The historic community, in partnership with the NPS, will maintain itself at no cost to the government. If some families wish to discontinue use of a cabin let them sell to private parties who agree to follow the Secretary's "Guidelines for Historic Preservation." Park Service takeover will ultimately lead to neglect, abandonment, and destruction as demonstrated by the record of past treatment of historic properties in Wilsonia and elsewhere in Sequoia and Kings Canyon National Parks.

Item no. 352 The intent to "emphasize the variety of historical themes, ..." is commendable and recognizes the mandate from Congress to do so. The most effective and least costly means to achieve this goal is to have the families in place who have lived this history to describe and portray it. In Mineral King, "national park evolution" is mostly U.S. Forest Service history and management. The cabins are official contributing elements in a recognized national historic district and, therefore, will be preserved.

Item no. 354 Cabin number 2 in Cabin Cove is a historic property (owned by the Park Service) and would also be preserved under the preferred alternative.

Item no. 361 Retain the pack station. It is a traditional and historical operation that park visitors should have the opportunity to observe and use. There are few places where an interested visitor can see horseshoeing or the "throwing" of a diamond hitch.

Item no.364 Previously stated goals in Section 350 and others call for removal of historic cabins and restoration of "natural appearance" (natural appearance sounds like a Disney approach; natural conditions would seem more appropriate). That natural appearance would suffer severe adverse impact under the preferred alternative proposed here. The proposed campground(s) or pack station cannot come close to the comfortable-with-its-environment and serene appearance of the historic cabin community.

Note that Section 258 specifies no additional camping facilities in the Giant Forest area where there are currently fewer campsites than there were 50 years ago. Changing demographics, which this plan is deemed to account for, may well show the need for more campsites there in the future. It is difficult to follow the rationale to destroy a historical resource (ideology again?) in one part of the park for more camping and not do so where there is now much higher demand and would be no such adverse impact on historic resources. Mineral King-area campgrounds are rarely filled, even on holiday weekends, but people are frequently turned away, even on weekdays, at Lodgepole and Dorst.

Item no. 367 See comment on Sections 103-105.

Item no. 372 The NPS should approve legislation and implement Alternative C, which offers the most feasible, practical, and economical means to preserve the National Historic District structures. The preferred alternative proposes complex procedures that would be marginally feasible, if at all, with the aging structures. The TLC required to preserve and maintain this unique cultural resource would not likely be provided by a commercial enterprise or government bureaucracy. Provision should be made to transfer permits if a family cannot or wishes not to retain use of their property.

Page 201 Alternative C, regarding special use permits in Mineral King, might have adverse impacts on ideology, but not on the environment, which is revered and well protected now.

Pages 202-203 Economic loss to the NPS of more than $52,000 annually would occur if the permits are withdrawn. Private insurance companies would lose a significant sum as well.

— END OF COMMENTS —

Thanks to the GMP planning team for the opportunity to offer these constructive suggestions.

Jim Barton 10/5/04

Jim Barton
Three Rivers, California

305-1

244 MONTE VERDE DR.
WEST COVINA, CA 91791
SEPT. 30, 2004

Dear Dr. Graber,

As a cabin owner in Mineral King I am naturally interested in the future of these cabins. I was at the July 16, 2004 meeting held at the Los Angeles library and was very impressed with the amount of detailed study that the park people had made.

These are some thoughts that I have had about the future of the cabins. If the NPS took over the cabins to be rented out, they would have the following things to face besides bringing the cabins up to code.

1. Refurnish the cabin - appliances, drapes, beds, dishes, pots and pans etc.
2. Repair any damage from marmots, bear, or mice.
3. Prepare for winter conditions by putting up supports for snow load, closing shutters, drain water system etc.

It seems like the best way to preserve the cabins in their present condition is to let the present owners, who care the most

and would try the hardest to keep the Cabins in good condition, continue to be responsible for the cabins upkeep. Most owners are from the original families that have been maintaining the cabins for over 75 years.

The rangers get to know some of the cabin owners and when they need help it is often easier to go to a cabin owner. I recall one time after dark quite a few years ago, a ranger came and asked another cabin owner and myself, since we knew the territory, to go up with him to the first Mosquito Lake where there was a heavy lady who had broken her leg and needed to be brought out on a stretcher.

I feel the only way to preserve the historical community as it now exists would be to continue to have the present cabin owners responsible for the cabin maintenance.

Thank you for all your work on this problem.

Sincerely,
Stuart Bates
Cabin WMK #15

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Park GMP Coordinator
Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
Dear Dr. Graber,

Below is the e-mail comment on the SEKI GMP that I sent to Susan Spain on July 18th. I am sending it to you as backup:

Dear Ms. Spain,

I attended the DGMP community meeting at Three Rivers on the 14th. (I'm the fellow who thinks Park Service people are heroes, along with teachers.)

I don't remember the exact details of each aspect of the preferred alternative, but I do have a couple of comments regarding the Mineral King management portion that I think are well in the ballpark:

First, as regards any of the old dams on the high lakes in Mineral King: I see no problem with leaving them there. They are not particularly intrusive, and they do make for nice camping and fishing spots. They could also represent, in a way, one historic aspect of the Mineral King area. Finally, even though they don't produce a lot of power, in the coming period every source of environmentally friendly power will be very important. I assume that you at NPS are aware of the coming oil crisis, so perhaps you can see your way clear to leaving the high dams alone. (Also, am I not correct that those lakes still have many productive years ahead of them, because so little sediment is produced by the granite talus through which the snowmelt passes.)

Second, I seem to recall that there is some plan to keep the old cabins, and to grant the historic permit holders and their progeny some sort of special privilege in using them. While I may be wrong in that specific, I want to be on record as opposing **any kind of special privilege whatever** for the existing permit holders and their heirs regarding the cabins. If the cabins are to be preserved for any use by the public, then they should be availalbe to **everyone on an equal basis**. Any "connection" to a former permit holder should have no bearing on it.

It is a simple matter of fairness, which I want to emphasise even though dear friends of mine have a permit for a cabin at Faculty Flat, at which cabin I and my family spent many happy weeks over the years.

I can think of no compelling argument of any sort that would justify the great-grandchild, say, of an existing permit holder, to be able to use the "family" cabin on a privileged basis. There is no compelling argument that this same great-grandchild would be **harmed in any way** if that privilege did not exist. I consider the argument that the cabins have historic or "cultural" value to be invalid in light of the fact that they were originally nothing more than summer get-aways. The cabins did indeed provide many delightful summers for the original lease-holders, but in light of the conversion of the original

leases to provisional permits with the incorporation of MK into SNP, they can be considered to have fulfilled their purpose entirely. Certainly the money that went into the cabins has been more than repaid by the pleasure they afforded over all those years.

I also oppose a scenario wherein the cabins might be preserved **just because** they would be maintained by some sort of private "historical" society. If the cabins cannot be maintained at government expense, and made to pay for themselves through a **fair visitor rental scheme**, then I think they should be torn down, and the land returned to its natural state. In fact, that is **my** preferred alternative. I am unalterably opposed to private use of public land. I am more interested in seeing that the animals have their environment back than in perpetuating an artifical "cultural" icon that has fulfilled its purpose.

In 1957 or so, on my first backpack trip in the Sierras, I carved my name in the rail of the old store. That store has been gone for quite some years now, and current Mineral King visitors do not in any way sense that "something is missing" as they head out on the various trails. I certainly shed no tears when I drove up years ago and saw that it was missing. Nor will anyone miss the cabins if they are not there.

I'm sure that I am a minority of one as regards this issue.

Sincerely,

Bill Becker
43791 Washburn Drive
Three Rivers, CA 93271
559.561.4602
ivanklives@earthlink.net

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Logistics Manager

Thomas K. Betts **Tel/FAX: (909) 864 4492**

7279 Deerwood Place / Highland, CA 92346-5407 **CELL: (909) 317-8973**
tkbetts@aol.com

Ms. Susan Spain, Landscape Architect
National Park Service – DSC
12795 W. Alameda Parkway
Denver, CO, 80225-0287

Wednesday, July 21, 2004

Dear Ms. Spain,

I am writing this letter out of concern for the potential harm that could be inflicted if part of the draft Master Plan for Sequoia National Park is implemented. The Boy Scout Camp Wolverton exists with the recurring Special Use Permit that has been continuously approved since 1939. The Camp has provided a unique (one of a kind) experience for hundreds of thousands of young Boy Scouts as well as other special groups. The benefits Camp Wolverton provide to the Boy Scouts, the Park, and the public have been special and wide ranging.

I first visited Boy Scout Camp Wolverton in 1958 as a young "camper" and immediately recognized the unique opportunities this camp had in Sequoia. I successfully competed with hundreds of youths in the early 1960's for an opportunity to serve as a Camp Counselor between 1964 and 1970. After Camp Wolverton's use was down-scaled to a lower profile operation in the 1970's, Mr. Richard Stowell and Mr. Michael Robins organized a group of about 100 former Boy Scout Camp Wolverton Staff into a cadre of volunteers who maintain and run the camp every summer. This group of dedicated volunteers includes Doctors, Business Owners, Government Professionals, Scientists, Law Enforcement Officers, Educators, and other professionals – each of which benefited immensely by their experiences as youths at this unique camp. During my career as a Colonel in the Air Force, I always found time to volunteer each summer to operate Camp Wolverton.

In its current configuration, Camp Wolverton provides a base camp for Scouts and other youth groups to prepare for backcountry hikes and day hikes within the Park. For the last 65 years, the program at BSA Camp Wolverton has been the single most successful opportunity to teach wildlife and nature appreciation to youths. In 1958, the Camp's "Wildlife, Soil and Water Conservation" program led my interest in Biology, Ecology, and preservation of wilderness areas. Prior to military service, I followed this keen interest in nature to earn a B.A. and M.S. in Biology.

The "service projects" performed within Sequoia National Park by campers at BSA Camp Wolverton are an example of the continuing emphasis we place on being active participants in Park operations. Volunteers and researchers doing studies and work in the Park also use Camp Wolverton to support their efforts.

I urge you and the other influential planners involved in the draft Master Plan to continue to issue Special Use Permits for the operation of BSA Camp Wolverton so that continuing generations of youths can experience this unique opportunity.

As I have 46 years of experience in operating in Sequoia National Park and possess a post-graduate education in areas affecting the Master Plan, I can try to make myself available to any future studies or groups regarding the use and operation of BSA Camp Wolverton within Sequoia National Park. Please contact me if you think my assistance would be of benefit during the planning process.

Sincerely,

Tom Betts
Lt Col, USAF, (Retired)

365-1

Web comment

This Comment was Created on 10/07/2004

Name: Daniel Boiano
Address: 45622 Sierra Drive
City: Three Rivers
State: CA
Zip: 93271
Telephone: 559-561-4750
Email: dannyb1968@juno.com
Comments: Review Comments to SEKI Draft GMP/EIS Daniel Boiano October 6, 2004 The Sequoia and Kings Canyon National Parks (SEKI) Draft GMP/EIS does a great job of describing the Parks' enabling legislation, purposes, significance, mission and mission goals as well as the laws, regulations and servicewide mandates and policies that guide management of park lands. The document also does a great job of describing the special congressional designations and authorizations, adjacent land uses and ecosystem stressors that affect management of park lands. The information contained in these introductory sections is comprehensive, interesting and educational, and exists as an excellent summary of the Parks' significance, uniqueness, long and special history, and the ecosystem stressors that are affecting the integrity of its natural resources. As a planning and compliance document, however, the SEKI Draft GMP/EIS has several inadequacies that need to be remedied in order to create a clear and effective plan that will protect the Parks' resources over the approximate 15-25 year life of the plan. The most significant inadequacies of the SEKI Draft GMP/EIS are: Topic 1 • The document is painstakingly long and contains contradictory statements, making it very difficult for the average reader, and challenging even for an experienced planner, to understand and comment on the significant issues facing these Parks. • Much of the language describing the proposed actions is vague rather than clear, and the alternatives are not described in parallel language, which makes it hard to understand exactly what is being proposed and how the alternatives truly differ. • The document does not do a good job of citing the studies that are supposed to support many of the conclusions in the EIS, which makes those conclusions appear questionable and open to varying interpretation. • In many places the document downplays or does not include reasonable negative impacts resulting from actions in the preferred alternative, but does describe the benefits of those actions. This makes the document appear misleading and biased. • There are several actions in the no-action alternative that should instead be part of one or more of the preferred alternatives. Because of this design problem, the no-action alternative is not an accurate baseline to which we can compare the proposed alternatives. • The final GMP/EIS/ROD should clearly state that the plan is intended to guide park management for up to 25 years, and thus the environmental consequences of the plan should be projected until 2030. Topic 2 • The Draft GMP/EIS does not clearly define desired and measurable visitor experiences and resource conditions that are necessary to implement the NPS mandate to provide for public enjoyment while preserving the Parks' resources "unimpaired for future generations." Meanwhile, the document proposes to allow significant increases in visitor

use capacity. This action will require increased levels of water withdrawals and wastewater treatment that easily could negatively affect water resources and desired future conditions. The document does not adequately explain how visitor use capacity can be increased without adversely impacting the Parks' water resources and desired future conditions. • Therefore, the Final GMP/EIS should commit to limiting all of the Parks' water withdrawals and wastewater treatment system capacities to 2004 levels, which will protect water resources from being further stressed. The document also should explicitly state the maximum gallons of water that can be withdrawn per day from each of the Parks' water supply systems. • Do not increase visitor use capacity (infrastructure) in any park area unless it is ensured that the proposed increase will not exceed allowable water withdrawals and will not prevent the attainment of state water quality objectives. • Require and implement detailed studies at each of the Parks' water supply systems to 1) determine the impacts of water withdrawals and 2) establish baseline conditions. Also implement a plan to monitor environmental conditions at these sites over time. • The document does not adequately analyze cumulative impacts, such as those relating not only to existing levels of administrative and private water withdrawals and wastewater discharge but also to their increased levels due to projected increases in visitation and buildouts of park inholdings. The Parks need to adequately analyze these current and projected cumulative impacts. • The document does not state how we will manage 1) water treatment issues when we acquire properties in Mineral King and Wilsonia and 2) pollution caused from private septic systems. The Final GMP/EIS should clearly state the Parks' plan for water and wastewater treatments in acquired and private sites and adequately assess the associated impacts. • The preferred alternative does not describe how increased levels of water withdrawals and wastewater disposal will impact streams, groundwater and water quality, while it does say that water resources will be positively impacted. This appears misleading and biased. Topic 4 • The Draft GMP/EIS does not clearly define desired and measurable resource conditions and visitor experiences that are necessary to implement the NPS mandate to provide for public enjoyment while preserving the Parks' resources "unimpaired for future generations." Meanwhile, the document proposes to allow significant increases in visitation and traffic that easily could negatively affect desired future conditions. It is unclear how visitor use capacity can be increased, in the form of trailhead quotas, transportation, parking, lodging, etc., without adversely impacting the Parks' resources and desired resource conditions. Instead, carrying capacity should be determined and implemented before any increase in visitor capacity is proposed. • To make this section clearer, the Final GMP/EIS should project the maximum number of visitors and the maximum number of vehicles that we expect to visit the Parks in 2030. Then, within each alternative, state the maximum number of visitors and vehicles that will be allowed into the Parks versus the number that will not be allowed into the Parks. The same should be done for each of the major developed frontcountry areas. • The Final GMP/EIS should state the maximum number of visitors that will be allowed to be present at the same time in the immediate vicinity of high use areas, such as Moro Rock, the General Sherman Tree and the General Grant Trees. The document should cite the method used to calculate these limits, and the Environmental Consequences sections should be edited to incorporate these projections. • Most importantly, increases in visitor capacity at any of the Parks' destinations should only be allowed if it will not threaten the desired future conditions of resources and/or visitor

experience. • There are three large actions that are present in one or more of the alternatives that should be given more compliance evaluation in the Final GMP/EIS, including the bus operation in the Giant Forest area, the shuttle service to Moro Rock and Crescent Meadow and the redesign or relocation of Big Stump. All of these situations will require significant actions in the near future that have not been fully assessed in the Draft GMP/EIS. The bus operation likely will require the construction of a bus storage and maintenance facility and bus stops, and perhaps administrative office space. The shuttle service to Moro Rock and Crescent Meadow likely will require significant improvements to the Crescent Meadow Road to handle the heavier weight of shuttle buses. There are big differences in environmental impact from redesign versus relocation of Big Stump, and the Draft GMP/EIS inadequately assesses impacts that would result from either redesign or relocation. All three of these major actions should be given full compliance evaluations in the Final GMP/EIS.

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Topic 6: Special Use Permits on Park Service Lands Mineral King Special Use Permit Cabins

Dear Sir/Miss:

The interest and editorial comment on the Mineral King Cabin Issue has had an obvious pro-cabin weighting lately. Out of I suppose good manners or avoiding a conflict, we on the opposite side of the argument have remained much too quiet for too long.

I'm a 64 yr. old retired advertising director who has returned to Three Rivers where I was born. And the same pointless argument that was going on in the 1950's has been raised to a new volume on the rhetoric dial today. The difference then was the cabin people would remind everyone that question the existence of private cabins on public land "we have a lease with a future date certain time table." So everyone went back to their fishing and hiking and forgot about this very unusual privilege they possessed. Things have clearly evolved since then. First, the property these desperate cabins sit on is now in a National Park. Second, the date certain contracts they drew up much earlier have now expired. As I understand it, the families were then allowed to designate a member of the family as owner where upon this member's death, the lease/permit would revert back to the National

Park, creating a quit claim on the structure they had possessed. That's akin to designating a grandchild one's Social Security and Medicare privileges so they simply last longer after one's death. But such as that is, it's still not enough for them. They petition endlessly for permanent use status.

Long before there was an East Fork Mineral King road to whisk one up to this alpine valley in comfort, there were various trails to take one into the valley. Jacob Epperson, my great-great grandfather, missing his earlier gold mining days, would spend summer days in the cool of Mineral King. Using the South Fork trail from his homestead on Cherokee Flats, he could each summer enter from what is now the Farewell Gap end of the valley. Turning his pack animals loose on the valley floor, he would set up camp in the trees between avalanche shoots.

As the summer heat rose over the Epperson's maturing winter wheat back on Cherokee Flats, great-great grandmother Sara Epperson would tie the milk cow behind the saddle horse, put one child on the saddle in front, one child behind her and set off for the same destination. The route took them up South Fork trail, cutting over through what is now Hockett Meadow and they would spend the night on the East Fork at the then Flapjack Flat, arriving in the valley the next day. One can easily find the many camp sites of the cool weather seeking miners from the cleared out spaces in the trees on the upper western side of the valley not yet named Mineral King.

Should my family claim historic status to these sites every year and chase off the other park visitors? Can we bring back our milk cows and pack animals to graze untethered until all the grasses and wild flowers are gone? My family and many others would historically trump any of the small lean-to cabins that were haphazardly erected many years later at what was to be known as Faculty Flats or Mineral King. The present day cabin people's claim to ownership, if successful, would be a shame and a fraud. The property belongs to the people of the United States in the form of a National Park and not the property of a privileged few tasteless souls willing to clutter up this pristine alpine valley with large deposits of architectural refuse. In the 1870's, the Alles', the late coming side of our family, arrived in the area. One brother, Philip Alles, owned and operated Atwell Mill with the help of Grace Alles, his wife, and his brothers. In later years, the transfer of this property to the Park Service ownership served as a good example of how to do business with a National Park. Upon the transfer of the mill to the Park, Phil & Grace Alles requested the continued use of the cabin in summer and did so up until her death several years later. No one in our extended families came back to the Park to make any further claims on this obvious cultural and historic site. Yet, letting go for these few cabin people of what they never

owned has been almost impossible. Please remind them that no matter how many times one gets away with sleeping in the White House rose garden, it will never make it your children's private, privileged domain in later years.

Please remove all structures from the Mineral King valley floor and restore it to it's former natural glory.

Thank You.

Paul R. Boley
43185 South Fork Dr.
Three Rivers, CA 93271

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1-8

Donn Bree, Ph.D.
Mineral King Ranch
POB 188
Santa Ysabel, CA 92070
800-371-6669
donn@donn.com

Wednesday, July 07, 2004

National Park Service
United States Department of the Interior

Park GMP Coordinator
Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651
(559) 565-3173
E-mail: david_graber@nps.gov

NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service – DSC
12795 W. Alameda Parkway
Denver, Colorado 80225-0287
(303) 969-2280
E-mail: susan_spain@nps.gov

Response to the Draft Proposal of the General Management Plan for the Sequoia and Kings Canyon National Parks (undated)

Cabin 47, Mineral King, Ca. – For more than 25 years, cabin owners in the mountain community of Mineral King, located in the southern-most section of Sequoia Park, have anxiously awaited a decision from the U.S. Department of the Interior that would seal the fate of this timeless community. This important decision is forthcoming in the guise of the National Park Service General Management Plan for the Sequoia and Kings Canyon National Parks, an unwieldy document setting forth the action plan that will determine the future of this area for, in words taken from the document, "the next 15-20 years." The purpose of this letter is to respond to that portion of the Draft Proposal of the General Management Plan for the Sequoia-Kings National Park area affecting the private ownership of cabins on public lands in the Mineral King area. In this discussion, I will attempt to clarify a couple of key terms, offer an opinion based on my 50 years of experience in the area as to the impact any decision will likely have on this historic community, and propose an alternative to the action plans contained in the Draft Proposal of the General Management Plan. References for my citations (contained in parentheses) append this letter.

Mineral King, a spectacular glaciated valley gracing the western slope of the Great Western Divide, is the site of a long and varied cultural history, most notably dating back to the 1860's when the 16,000+ acre valley was first visited by a colorful character named Harry Parole. Parole's discovery would eventually lead to a flourishing mining community in the 1870's, which is well-documented in Dr. S. Thomas Porter's master's thesis, *The Silver Rush at Mineral King, California 1873-1882*. In fact, Dr. Porter acknowledges an impressive list of San Joaquin Valley surnames as contributors to his thesis, many of whom are still represented in the Mineral King community. Dr. Porter's thesis was penned nearly 45 years ago. Since Dr. Porter's work, several excellent publications describing the historical development of Mineral King have emerged, including: *Mineral King Country – Visalia to Mt. Whitney*, by Henry Brown; *Mineral King Historic District – Contextual History and Description*, by John Elliot; and the highly acclaimed book written by Crowley descendant Louise Jackson, *Beulah – A Biography of the Mineral King Valley*.

Crucial to the development of the *Mineral King Road Cultural Landscape District*, is the notorious road leading from Three Rivers to the valley, which is carved into steep canyon walls for a distance of about 25 miles. Initially a private toll road intended to provide access for mining operations, this remarkable engineering achievement generally follows the course of the East Fork of the Kaweah River from State Highway 198 upward nearly 7000 feet in elevation to just past the Crowley cabin, a summer residence for descendants of two men responsible for constructing the road, John and, his son, Arthur Crowley. This amazing road, little improved during the past 100+ years, is the ground over which many people have pursued economic dreams, inner peace, and forged life-long relationships with families making Mineral King their summer residence. To the present day, there are few cabins, if any, owned by families whose ancestry cannot be traced to the original cabin owner. This cultural tradition involves several generations from community families imparting a lifestyle from one generation to the next wherein relatively little has changed over the past 80 to 100 years. There are few places remaining in our nation where culture is as timeless, well-preserved, and sustainable than in Mineral King, California.

On Friday, 24 October 2003, the *Mineral King Road Cultural Landscape District* was officially listed in the National Register of Historic Places *(Mineral King)*. Before proceeding, I believe it is necessary to establish my interpretation of what the designation "Mineral King Road Cultural Landscape District" means. My interpretation of this important designation begins with the following statement from the National Park Service's *National Register of Historic Places* WEB site:

> *"The National Register of Historic Places is the Nation's official list of cultural resources worthy of preservation. Authorized under the National Historic Preservation Act of 1966, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect our historic and archeological resources. Properties listed in the Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture. The National Register is administered by the National Park Service, which is part of the U.S. Department of the Interior (National Historic Register)."*

Further resolution of my interpretation of what this historical designation means was found by examining the concept of culture *(Culture; Crystal)*:

> *"The way of life of a group of people, consisting of learned patterns of behavior and thought passed on from one generation to the next. The notion includes the group's beliefs, values, language, political organization, and economic activity, as well as its equipment, techniques, and art forms..."*

Consequently, I am of the opinion that the definitions provided by the National Park Service describing what is to be preserved as a result of the National Preservation Act of 1966 includes "culture," and that the concept of culture, in this context, would certainly include the living community that is inextricably tied to the Mineral King Road Cultural Landscape District by virtue of having been the caretakers/preservationists of this community for a period of time that easily exceeds the criteria required by the National Preservation Act of 1966 *(National Historic Register, g)*. It must be understood that, if not for generations of cabin owners and caretakers, it is highly unlikely that any structure in the district would be intact for preservation. Moreover, significant and important historical and cultural literature now available to the general public describing the Mineral King Road Cultural Landscape District has, in fact, been compiled and published by the community of cabin owners and caretakers *(Mineral King)*. The current generation of cabin owners and caretakers are no less significant in the context of preserving and sustaining the preservation of the Mineral King Road Cultural Landscape District than the road, cabins, mining sites and artifacts, and other tangible evidence of this historical area.

What has been negligently overlooked by the authors of the Draft Proposal is the concept of culture. This is likely an honest oversight, inasmuch as the authors do not appear to be knowledgeable in the area of culture, as the concept of culture is seldom addressed in the document; particularly when it is the culture that continues to emanate from such a lengthy and diverse history that makes Mineral King very unique. Few are the places listed on the National Register of Historical Places where contemporary residential heritage can be traced to the origin of the existing structures protected by in the National Preservation Act of 1966. In this regard, Mineral King is very rare, indeed. To consider the "*sites, buildings, structures, and objects...*" in the absence of culture, is a serious dereliction of duty by the government, particularly when

the culture is still intact, thriving, and sustainable. Moreover, the National Park Service can not offer any substitute for heritage, information, preservation, and manpower that the community of cabin owners and caretakers contribute to the Mineral King Road Cultural Landscape District. To remove the cabin owners and caretakers from the context of what the National Preservation Act of 1966 intends to preserve is analogous to removing a sustainable Native American tribe from their community, or relocating Amish residents from their settlement for the purpose of preserving only the "*sites, buildings, structures, and objects...*", i.e. the physical artifacts, as representing what is most real and valuable in their culture. It should obvious that such artifacts are merely manifestations of the people that create and sustain them through time, as is the case in Mineral King. I strongly urge the National Park Service to exercise patience for the purpose of developing a more forward-thinking perspective regarding the situation in Mineral King. If this requires more time, take more time. Once the decision to destroy a culture is made and implemented, the consequences are irreversible.

As an alternative to the "The Alternatives" to the General Management Plan, I suggest that the U. S. Department of the Interior and the National Park Service consider forming a committee of cabin owners and caretakers with park officials qualified in the disciplines of anthropology, historical communities, and the like, for the purpose of establishing a model demonstrating how the public can participate in conjunction with the National Park Service to the benefit of park patrons in areas where historical culture still thrives and the community has significantly more to offer the general public than the National Park Service, as is the case in Mineral King. Benefits are many for all concerned. For example:

- Cabin owners and caretakers are encouraged to perpetuate the living history and culture of the area to future generations, including the skills it takes to live without electricity and other modern amenities that obscure the understanding of what life was like when the Mineral King Road Cultural Landscape District originated;
- The National Park Service continues to collect revenue for cabins in the form of permit fees, which is more significant and more stable than campground and other use fees;
- National Park Service interpreters would not be needed, as knowledge in the community far exceeds that of the park service in the areas of natural history, history, etc., thus lowering overhead;
- The National Park Service can ask the cabin owners and caretakers, as a condition of their use permit, to participate in the maintenance of the park, which is already being carried out by the community without being required by the National Park Service;
- And there are many other tasks in which the National Park Service can reduce expenses, enhance the experience of park patrons, and, most importantly, comply with the intent of the National Preservation Act of 1966.

There are no losers with this cooperative approach. All parties involved derive a benefit, with the general public being the primary beneficiary, while a national treasure is preserved in a sustainable manner that can serve as a model for future generations faced with the problem of how to preserve and perpetuate a viable contemporary cultural within the context of a historical district. Furthermore, it is my opinion that the National Park Service is not equipped with the resources required to manage the situation in Mineral King while complying with the National Preservation Act of 1966 without a contribution from the cabin owners and caretakers representing the community. I agree that it is a great public asset to have nice restroom structures, good picnic tables, trail crews, and rescue helicopters, but there is much more to experience in Mineral King than the extraordinary natural history. Cooperation is required in this situation, and I am happy to be the first to volunteer my services toward creating a cooperative effort with the National Park Service to comply with the National Preservation Act of 1966 and enhance the experience of all park visitors.

I ask that a representative of the National Park Service acknowledge and respond to my letter prior to any decision impacting Mineral King being finalized.

Respectfully,

Page: 3 of 8

Donn Bree, Ph.D.

EDITOR'S NOTE: References have not bee reprinted. The original letter is on file at park headquarters.

Understanding the *Real* Mineral King Controversy

by

Aubrey Cairns

It is hard to think of a place that has been inhabited for over a century by the same group of families, but this is the case for the Mineral King Valley. Mineral King is tucked in the hills of Tulare County, California and if one has ever been to Mineral King, it would be impossible to erase the majestic sight of the rolling hills, rapid waterfalls, flowing streams, and staggering mountain peaks. Mineral King appeals to all ages, young and old. Children play in streams, teenagers and adults hike the rigorous mountain trails, and elderly relax on log porches playing cards. There is one single lane road, there is no electricity, but there is a hope that a community of cabin owners will last another century in Mineral King. The National Park Service and the National Parks and Conservation Association want to eradicate the Mineral King community because they do not believe cabins belong in the valley. On the other hand, the Mineral King District Association is a proponent of cabin owners and they believe the cabins should be preserved because of their historical significance. Not surprisingly the Mineral King District Association is comprised mostly of cabin owners. I believe another proponent of the cabin owners is philosopher John Locke because of his beliefs towards man's natural right to protect his possessions. I believe Mineral King should be open to private use of federal land for cabin owners.

To clearly understand the controversy, I must summarize the occurrence of events leading up the present day decision to not allow inheritance of the cabins which reside in Mineral King. Thousands of years ago, Mineral King was inhabited by local Native American tribes. In the 1850's European-American settlers explored the area and about a decade later hunters and families would be making their way up to Mineral King. The first cabin was built in the 1870's, and Mineral King was occupied by mostly miners. A

small mining town was erected, consisting of six two-story hotels, restaurants, saloons, barbers, and post offices. In the mid 1880's the miners moved out, and it would be left to the women and children to occupy Mineral King. The National Forest Service was erected in 1905 and issued permits to all buildings in the Mineral King area. Many of the cabins erected shortly after 1905 are the ones still standing today. Around 50 cabins were constructed between 1915 and 1942. The Forest Service implemented strict guidelines for the cabins, calling for them to be simple and "rustic," not spending more than $2000. Mineral King requested to be apart of the Sequoia National Park when the National Park Service was first erected in 1890, however it was denied. Propositions to include Mineral King in the National Park Service had been excluded many times over the years, but in 1978 President Jimmy Carter included Mineral King in the Park Service because of a proposition by *Walt Disney* to turn the valley into a ski resort. When the Park Service came into power, they terminated any plans for a ski resort and implemented a plan to renew permits for the cabin owners every 5 years, until the current cabin owners or their spouse decease. The question now remains, will legislation change to allow the Mineral King community to survive, or will it die out with its current inhabitants? (The Preservation of Mineral King).

Mineral King should be open to private use of federal land for cabin owners because it is a living historic community that positively contributes to Mineral King. The community does no harm to the valley. Its members help first time visitors to become familiar with the area and the community provides for a trash disposal service. The community has purposefully kept the valley clean and has repainted the main bridge a few times. The community has been raised in the valley, which means it has acquired

amazing amounts of knowledge about the area which it can readily pass on to visitors. Because the community positively contributes to Mineral King, the Mineral King District Association argues there is no reason to eradicate it (The Preservation of Mineral King).

Besides that it is a positively contributing community, Mineral King also has historical significance. Many of the cabin owners are direct descendents of the cabin's builders, including myself. A community of historical significance is extremely rare to come by and destroying it would be destroying a part of America's history. Every cabin owner has a deep bond to Mineral King, and most likely has the same close bond to the residing towns located just below Mineral King in Lemon Cove, Exeter, and Visalia. In Lemon Cove streets are named after cabin owners, such as Pogue and Moffett. To most, these are just names stuck on a small country street not having any historic significance; to descendents it symbolizes the men and their families who pioneered the foothills. The same symbolism can be seen when looking at the cabins, but it is the Sequoia National Park Service who looks at the cabin names as if they were just a name stuck on a building without any historic significance about how the land was pioneered and maintained. The families of cabin owners are the ones who have protected and inhabited the area prior to any national or group interest. Therefore, Mineral King should be open to private use of federal land for cabin owners because the cabins are a reflection of pioneers whose descendents maintain the living historic community.

On the other hand, the National Parks and Conservation Association argue that "the living community is gone" because avalanches destroyed much of the buildings built by the mining era (Understanding the Mineral King Controversy). Granted some of the buildings were destroyed, many buildings are still standing today. It was because of the

families which reside in Mineral King today that allowed miners to have such an elaborate retirement while working hard in the hills. The families are the ones who built the hotels, who ran the General stores, and who cooked in the restaurants. Descendents of these same families still reside in Mineral King today, and just because buildings were not built in the mining era does not mean they do not have any historical significance. Mineral King should be open to private use of federal land for cabin owners because the living historic community still survives even though avalanches destroyed many mining buildings.

Just as the historic community survives in Mineral King, the Declaration of Independence survives as the foundation of out country. The Declaration of Independence was concocted by Thomas Jefferson. While Jefferson's name is written as the author on the document, his ideas were extracted from works of the famous philosopher John Locke. Therefore, the foundation of our country is based on many philosophies of John Locke. Locke argues about man's natural rights in his *Second Treatises of Government*, and it is in this piece that I find the most prominent argument for cabin owners in Mineral King. Mineral King should be open to private use of federal land for cabin owners because according to Locke, the government is suppose to protect our natural rights of "life, health, liberty, [and] possessions" (Locke, 484). The National Parks and Conservation Association argues that "by supporting Mineral King's inclusion in Sequoia National Park, the cabin owners acknowledged the National Park Service as the appropriate protector, steward, and administrator of the area's natural and cultural resources" (Understand the Mineral King Controversy). I wholeheartedly agree and the Sequoia National Park Service, a government agency, is supposed to fulfill these duties

as protector, steward, and administrator. These duties are a reflection of sovereignty through Congress. Congress is *not* sovereign under the Untied States government; the people are sovereign, the cabin owners are sovereign, and the cabin owners expected with the inclusion of Mineral King into the Park that the government would protect their natural rights of life, health, liberty and possessions.

But as it happens the government is not protecting the cabin owner's natural rights; their possessions are being taken away. In the Park Service, one cannot take any of the Park's possessions such as flowers. The Park Service puts up signs saying not to pick flowers, because pulling them from their roots kills them. Ironically, this is exactly what the Park Service is doing to cabin owners; they are uprooting families from their cabins, killing a community, and taking away cabin owners' possession. This type of uprooting is exactly what John Locke argues against in his *Second Treatise of Government*. While cabin owners do not "own" the land on which their cabins reside, they do own the cabins, which gives them the right to have the government protect their possessions, or cabins, according to Locke. If therefore, the government is not protecting the people's right to possessions, the government should be corrected. The "civil government exists for the well-being of civil society and a government which seriously jeopardizes social interests is rightly changed" (Dolhenty). A cabin being taken away from an owner, without any type of compensation, seriously jeopardizes social interests because it violates the natural rights of citizens in the United States. Therefore, the government should change to allow private use of federal land for cabin owners in Mineral King because the government should protect the cabin owners' natural right of possessions.

It is because of the federal bureaucracy that the government has not changed to meet the accurate needs of the public in the Mineral King community. Mineral King should be open to private use of federal land for cabin owners, because it is only because of the malfunction of the federal bureaucracy that cabins are not allowed to be used in Mineral King. The National Park Service is a member of the federal bureaucracy. A bureaucracy has developed to help the government run efficiently by assigning specialization to departments which the government cannot afford to spend time on. Therefore, agencies like the National Park Service are given discretion to make proper judgments about their department and to deal with every day problems. "Bureaucratic jobs are governed by rules rather than by bureaucrats' own feelings or judgments about how the job should be done" (Barbour et al, 345). The National Park Service has developed policies because of its own feelings and judgments about how the job should be done. They feel cabins do not belong in Mineral King, but there are no laws to justify this feeling.

Mineral King should be open to private use of federal land for cabin owners because it is a living historic community, it is the cabin owners natural right to protect their possessions, and it is only because of federal bureaucracy that it is not open to private use of federal land. These and these arguments alone should be reason enough to allow the Mineral King community to thrive. The solution to the controversy over whether or not cabins should be allowed to stay indefinitely is to allow cabin owners to maintain permits indefinitely while implementing plans to preserve the original structure of all the cabins. Mineral King's beauty is not only defined by its glorious nature but by the surviving community which has been there since the early 1900's. Mineral King has

and always will be accessible to all people, but this does not mean it should be inaccessible to cabins and cabin owners. Mineral King is unforgettable to most and most definitely will be unforgettable in my heart.

EDITOR'S NOTE: Works cited have not been included. The original letter is on file at park headquarters.

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Alan F. Carpenter
501 Portola Rd., box 8065
Portola Valley, CA 94028

October 2, 2004

Subject: the draft General Management Plan for Sequoia and Kings Canyon National Park.

I have been a backpacker in the Kings Canyon – Sequoia National Parks for 50 years, winter and summer. I also treasure my frequent backpacks into the John Muir Wilderness and the Blackcap Basin areas. With this as background I urge you to at least limit, if not completely eliminate, stock grazing, mule and horse and donkey pack trips, and other commercial activities in the National Parks and designated Wilderness areas.

My personal testimonial is 1) that wilderness permits are restricted for backpackers but not for commercial stock packing outfits. This is wrong; 2) That stock off trail are destructive to mountain meadows, stream side vegetation, and wet areas in particular; and 3) that stock-supported parties are more likely to be noisy, intemperate, and disrespectful of wilderness values resulting in their neighborhood being undesirable for hikers seeking a wilderness experience.

The GMP should retain the key language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At the absolute minimum, the GMP should allow no grazing or off-trail travel by stock animals above 10,000 feet elevation throughout Sequoia-Kings Canyon NPs. These are park-wide issues that must be addressed now, not put off to some future planning process.

Thank you for considering my views. Alan F. Carpenter

Cari Church, L.Ac.
601 Dover Drive Suite I
Newport Beach, CA 92663

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Park GMP Coordinator
Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651

September 27, 2004

Subject: Mineral King Special Use Permits

Dear Dr. Graber,

I visited the Mineral King area for the first time in my life this past year. I stayed with a local family and was educated on the issues they face. After my experience in Mineral King, I feel compelled to comment on your Draft General Management Plan.

Clearly, the subject of these historic cabins presents a significant problem for the Park. In fact, history shows that the management of these cabins has been an ongoing issue. However, the one thing that remains constant is the cabin owners and their clear dedication to preserve and maintain not only their cabins but the area surrounding them.

After reading the draft General Management Plan, it seems the Park wants to eliminate all of the family structures. On the other hand, they are now listed as a National Historic District in the National Register. This requires that they be maintained as they are. The Park, in their "Preferred Alternative" has addressed this subject by suggesting that the cabins be given to an outside contractor to use as rental units and offers current residents a weekend in the summer to hold a reunion. This concept is totally unreasonable and indicates to me a complete lack of understanding of the typical Mineral King cabin on the part of the Park.

As someone who has fresh eyes given my recent visit, I learned that these cabins were built as early as 1890. Current building codes were not in effect at that time. Requirements for public housing, such as plumbing, utilities, ADA access, heating, did not exist then. The thought that an outside concessionaire could or would take these over is outrageous.

Let me tell you what I was "taught" while staying in the cabin. First, the cabin I stayed in has a small septic tank and hence we cannot put any toilet paper in the toilet, you put it in a trash bag, to be carried down the hill when you leave. Additionally, you only flush when you do a #2 to make sure there is no environmental impact (they

have never had any but are very cautious because they don' t want anything to disrupt the ecosystem). Hot water is provided by a small propane water heater that is finicky at best and takes a major process to keep it lit. Cooking is on a propane stove that you have to constantly check to make sure the pilot light has not blown out. Lighting is by propane gas lights that I lit incorrectly and ended up disintegrating the mantle inside the light. Then, while I was there the propane refrigerator went out. Of course we had no phone so we used the pay phone in the campground to call the propane people. If they were to make a special trip up the road to fix the refrigerator, the service call fee would have been in the hundreds! If we could wait two weeks, the fee was more reasonable but still stiff. I am a sample of the general public. They have no experience in recognizing and utilizing this type of equipment. Many people would not want to deal with many of these inconveniences. Even if they did, how many would want to pay the costs needed to maintain and preserve these structures? I would argue very few.

Then I learn that maintenance is an on-going and costly item. Animal damage (particularly marmots), falling trees, foundation settling, snow damage, painting, water supply repairs, are some of the problems now addressed by residents. All of these issues require money to keep the cabin going. This is yearly and on-going. The present cabin owners now perform the required upkeep to maintain the cabins and satisfy the requirements of the Historic District. I think this is a monumental task and I cannot picture the Park taking this over for 60 plus cabins.

The Historic District includes not only the cabins but also the community of cabin owners. They create the historical context with their generations of stories, traditions and long time usage. As a visitor to the area I can say that I wholeheartedly support these cabin owners staying and doing what they have done for 100 years. No one else is better positioned or more motivated to do so. The ambiance that is created by these rustic cabins and these pioneer spirits is unmatched and something that must be preserved for the public to experience. It is invaluable.

Your Alternative C provides for this and I would hope that you would support the current legislative process to help solve this problem not only for the cabin owners but for the National Park Service. Keeping them as stewards of the land and this historic district makes sense. Anything else is a pipe dream at best.

Regards,

Cari Church

9/4 88

David Graber, GMP Coordinator
Sequoia Kings Canyon Natl. Park
47050 Generals Highway
Three Rivers, Ca. 93271

re: Comments to General Management Plan

I find your report does not consider the most likely of cases needed to protect the environment.

1. there should be a no grazing alternative where all stock must carry their own feed. I speak from personal experience when I relate a time at Lake South America where a commercial stock group had their animals grazing right at the lake shore ,breaking the lake side bank and dropping manure in the lake polluting the water. When I asked the wrangler if he could keep his animals back from the lake, he stated they were permitted to graze there. I enjoy wildflowers but the stock animals eat all the flowers before they have a chance to bloom.

2. The 1971 Master Plan states that because of various environmental damages and conflict with foot travelers that use of stock at higher elevations should be phased out. This wording must be included in any new plan and an evaluation made to determine what should be phased out at this time. I can personally attest to the fact that my trip has been ruined by the huge amount of dust created by stock animals. And I must walk thru wet and dried manure and breathe this manure dust. IF THIS WERE A CONSTRUCTION PROJECT CREATING THIS DUST OSHA WOULD SHUT IT DOWN.

3. The wilderness act prohibits commercial activity in wilderness areas. Why do you not make efforts to eliminate commercial activity rather than promote it.

4. Privat cabins at Mineral King were to be removed as the owners of record in 1978 died. Why are you not following the act and phasing these out??

5. the commercial camp at BearPaw should be removed from the wilderness. NPS must follow the law--not skirt around it. No new commercial camps should be created.

Because of the above reasons and personal experience backpacking in the wilderness I find your GMP inadequate.

Yours truly,

Tom

Thomas Clohessy
P.O. Box 845
Sonoma CA. 95476

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September 30, 2004

To Whom It May Concern:

I have been encouraged in my travels across the United States, visiting National Parks and National Monuments, at the emphasis on preserving historical sites in our nation. The National Park Service has become the guardian of our history in many places and it is my hope that Mineral King continues to be one of them.

The uniqueness of Mineral King's geology combined with its mining history is a precious resource. The human community within the Cabin Cove, Silver City, Faculty Flat, and East Mineral King areas is also a vast resource worth consideration and preservation. Cabin families are considerably more knowledgeable about the history of Mineral King than NPS staff that come and go through the years. These cabin families share their knowledge through conversation on the trails, serving as volunteers for various Park programs, contributing to the written history of Mineral King, and safekeeping the ongoing history through photographs and documents. Drawing on their years of experience many watch over the welfare of infrequent visitors and hikers by offering advice regarding trail difficulty and conditions, first aid supplies after an accident or injury, food or water to those ill prepared, and even trips up or down the road for emergency situations. They encourage proper response to wildlife encounters, and by example and sometimes instruction, teach new visitors to drive the road in a safe and cautious manner. In these changing times they are even eyes and ears for illegal activity taking place within the park boundaries. These families are Mineral King's goodwill ambassadors and they and their cabins are inseparably woven together.

Since the cabins and living community have been included in the National Register of Historic Places there has been a resurgence of desire and action by the cabin permittees to level, repair, strengthen, and maintain their cabins according to the architectural standards already developed. These rustic cabins will never be brought up to current building codes or be liability-free for rental to the public unless they are completely rebuilt with just the façade of the current cabin, which would obliterate their historical integrity. Many permittees are willing to maintain and preserve these historical structures.

Provision needs to be made within the General Management Plan to allow the permittees to continue to use their cabins and maintain them at their expense. By accomplishing this not only would the preservation of the cabins and this historical community be guaranteed, but also Mineral King's ambassadors of good will would continue to provide the personal touch to visitors each year.

Sincerely,

RoseMary Cluck

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Dear Dr. Graber,

We want to take this opportunity to submit the following comments to the Sequoia and Kings Canyon Draft General Management Plan (GMP):

A. RECOMMENDATIONS

1. VISION: For the Mineral King Valley Vision (Reference No. 350) it is recommended that Alternate C be implemented with the present permittees and the heirs of formers permittees insuring the maintenance of the dwellings, as well as the historical and cultural nature of the valley. To that end it is further recommended that the superintendent continue to issue permits to the heirs of former permittees, at his discretion, as long as the cabins are properly maintained and the conditions of the permit are met. See Discussion of Recommendations, paragraph B.1, below.
2. VIP PROGRAM: For the Mineral King Valley it is recommended that an Memorandum of Understanding (MOU) be developed with the Mineral King District Association (MKDA) to formally provide personnel for the VIP Program. The personnel would come from the families of permittees and of the heirs of former permittees. See Discussion of Recommendations, paragraph B.2, below.
3. ATWELL MILL CAMPGROUND (Reference 363): It is recommended that the current Management Plan (i.e. No Action) be taken. See Discussion of Recommendations, paragraph B.3, below.

B. DISCUSSION OF RECOMMENDATIONS

1. VISION: Only the present permittees and the heirs of formers permitees understand the ideosynchracies of the historic dwellings, maintain them, and operate the installed systems in a safe and cost effective manner. It is neither practical nor cost effective to ask an outside entity to try to take over the historic cabins and to make them code compliant, as mentioned in the GMP. In some cases bringing the historic cabins up to code would destroy their historical integrity. Similarly the preferred alternative could result in the destruction of some of the historic cabins. Also it does not seem practical to ask an outside entity to "take over" cabins piecemeal (i.e. one in Cabin Cove, one in West Mineral King, one in East Mineral King, etc.), as the permittees of record die. This would be very difficult to control as a business by any operator. The GMP speaks of no other use for the areas presently occupied by the cabins, except to make "some" available for public use. Notwithstanding the present law, the historic community can only be preserved is by the present occupants. See OBSERVATIONS AND COMMENTARY, paragraphs C.3. and C.4. below.
2. VIP PROGRAM: For many years there has been an informal cooperation between the "cabin dwellers" and the NPS. This has taken the form of participating in camp fire programs, minor maintenance, involvement in historical and nature programs, etc. An MOU with the MKDA will insure that the needs of the NPS will be met. This year the semi-formal use of VIPs from the "cabin community"

has been very successful. The volunteers worked at the Mineral King Ranger station, participated in camp fire programs, led hikes, were docents at the Alles cabin, and did some maintenance for public access. The duties could be expanded, under an MOU, to include trail survey and campground monitoring, etc.

3. ATWELL MILL CAMPGROUND (Reference 363): This campground should be retained. Some families, especially those with children, prefer the Atwell Mill campground, because of its distance from the river. The preferred alternative to close this campground represents an unnecessary cost. The need to expand this campground (Alternative C.) is also an added cost and must only be contemplated, should there be an increased public usage in the future. See OBSERVATIONS AND COMMENTARY, paragraph C.1., GENERAL PUBLIC ACCESS and USAGE below.

C. OBSERVATIONS AND COMMENTARY

1. GENERAL PUBLIC ACCESS and USAGE: The public usage of the Mineral King in recent years (1992 through 2002) has slightly declined at an average rate of about 1% per year. The GMP only discusses adding some paving (Reference 357) to the access. The GMP makes no mention of any plan or recommendation to upgrade to the Mineral King road by the NPS and Tulare County. There is no reason to expect any real growth in public usage. The existing campground facilities in the Mineral King area are seldom full, except on a couple of long holiday weekends. If this "no growth" trend continues, it would not be prudent for the NPS to expend resources for any large expansion of facilities in the Mineral King area. The GMP does discuss a recommendation to procure some of the land at the end of the Mineral King road primarily for backpacker parking.
2. PUBLIC ACCEPTANCE OF CABINS: In both formal and informal surveys, it has been clearly indicated that less than approximately 5% of the public visitors object to the cabins in the Mineral King Valley.
3. PUBLIC ACCESS TO CABINS: It is unclear that there is really a need for public access to the existing cabins. Many years ago there were cabins and a dining room at East Mineral King. There was little demand at that time. At the Silver City Resort there are accommodations, but it is understood the occupancy level in the summer season averages somewhere just above 50%. If the cabin for public use must meet all the various codes, as mentioned in the GMP, then it would probably be simpler to build a new resort with the proper facilities. The land that the GMP considers purchasing, might be a good location for this. It was the original location of the East Mineral King store, cabins, and dining room.
4. MINERAL KING CABIN COMMUNITY: The dwellings and their inhabitants comprise a unique community that dates back, in some cases, over one hundred (100) years. All cabins should be retained. This sense of community and knowledge of the area has been passed to the public for many years through formal campfire programs, nature walks, sportsmen groups, literature, etc. Also this history and area knowledge has been informally passed to the members of the public by members of the community. The community has worked well with the NPS to promote cooperation in the past. Examples include; the MOU with the water district in West Mineral King, the VIP participation, etc. It does not seem prudent that members of the community be excluded, when permittees of record die, and that historic cabins be destroyed. The community with its culture and history will be destroyed.

We want to thank you for your consideration of our comments.

Mary and Larry Cochrun

#29

David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Dear Dr. Graber:

I am writing to comment on the draft General Management Plan (Plan) for Sequoia and Kings Canyon National Parks (SEKI).

I see that the plan includes a "no stock" alternative. This would prohibit stock use for essential administrative functions, such as trail crew support, ranger patrols, and search and rescue operations. With all due respect, this is plainly and simply nuts. It is hard not to be cynical in speculating as to the motives for proposing this. It seems even more cynical that a "no stock" alternative was proposed, while a reasonable "no grazing" alternative was not. One cannot help but think the Plan was drafted in this manner so that any limitations on stock use would not receive serious consideration from the NPS.

I urge that the include a "no grazing" alternative instead. This would require stock users to carry feed for their animals, just as hikers must do for themselves. This alternative would eliminate many of the ongoing and substantial impacts of stock grazing and trampling of meadows, wetlands, and lakeshores.

The Plan should include provisions that protect the parks from the serious, adverse impacts of stock use (i.e., overgrazing, trampling of sensitive areas, stock manure & urine in campsites). These impacts are **not** minor, despite the assertion in the Plan. Almost all of the hikers I talk to in the backcountry complain about this. Perhaps people feel resigned to it, just as they do to pollution and litter in their cities. However, the NPS can and should improve this intolerable situation.

Yours very truly,

Lawrence C. Conn

3752 Ocean View Ave.

Los Angeles, California 90066

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Keith H. Cosart
26204 Road 212
Exeter, CA 93221
(559) 592-5642

September 30, 2004

Dr. David Graber
Sequoia & Kings Canyon National Parks
47050 General's Highway
Three Rivers, CA 93271

Dear Dr. Graber

The National Park Service has listed many alternatives for the Mineral King area: all but the right one. Mineral King is perhaps the most historic place in Tulare County and it deserves to be preserved. Where else is there such a long list of pioneer families still fighting to preserve a community and environment after over 120 years? These families, the cabin owners, have collectively spent hundreds of thousands of dollars over the last 30 years trying to hang onto the right to keep Mineral King just as it is.

I feel the best alternative would be for the Park Service to enter into an agreement with those whom have always cared for Mineral King and its historic structures – the people who own them. Cabin owners would be expected to preserve the historic structures and pay an annual fee for the use of the lot on which their cabin rests. For those families who can no longer care for their historic structure the cabin could be sold to a family willing to enter into this agreement with the National Park Service.

Please don't let Mineral King suffer the same fate as that of Elkmont Historic District in the Great Smokey Mountain National Park. We still have a chance to save this special place without cost to our financially strapped Park system.

Thank you for your consideration.

Sincerely,

Keith Cosart

Keith H. Cosart

108

MGCrowe@aol.com
10/06/2004 05:21 PM EDT

To: susan_spain@nps.gov
cc:
Subject: SEKI GMP - Comments on Mineral King Special Use Permit Cabins

SEKI GMP - Comments on Mineral King Special Use Permit Cabins

The following comments apply to the proposed treatment of the Mineral King Special Use Permit Cabins, in Topic 6 of the Draft General Management Plan for Sequoia and Kings Canyon National Parks, and outline an approach which would address the interests of the government and of the public at large (including the cabin owners).

The Draft GMP begins with a false premise -- frequently stated in the plan -- that the 1978 law requires that the cabins be removed after the deaths of the 1978 permittees of record. That law provides for the issuance of permits to the 1978 permittees of record for the balance of their lifetimes, but says nothing whatsoever about the treatment of the cabins thereafter.

In fact, the Preferred Alternative infers that the cabins need not be removed, as it would retain at least some of them for rental and other purposes.

The 1978 law also authorizes the Secretary of the Interior to purchase land or interests in land in order to further its purposes -- although to date no effort has been made to purchase any of the cabins, which remain the property of the 1978 permit holders or their descendants. By seeking donations of cabins for tax purposes, the Park Service is acknowledging that they have value and are in fact private property, even if located on public land.

Of course, since the 1978 law was enacted one very significant change has occurred -- the listing of the Mineral King cabins and community on the National Register of Historic Places. That listing finds them to be of cultural value, and imposes upon the Park Service a duty to protect and preserve them.

While the Draft GMP does acknowledge that the Park Service is obliged to preserve cultural as well as natural values, it appears to treat the cabins as mere buildings -- when in fact they are part of a community which has been an essential feature of the Mineral King Valley for over a century now. Just as you would not preserve the Amish community by evicting the people and preserving their homes, neither can you preserve the Mineral King community by evicting the people and preserving the cabins.

The Mineral King community, in addition to building and maintaining the cabins, has provided services to the public for generations. The cabin owners, who are more accessible and far more knowledgeable on local history than the rangers, have provided directions, emergency services, and information and advice on trails, weather, facilities, wildlife, fishing, camping, local history, and a host of other topics to visitors to the park for more than a century -- and they are doing so now, even manning the Mineral King Ranger Station as Volunteers in the Park. In the latter capacity, they have provided the equivalent of two seasonal employees this summer alone.

The cabins themselves are of course a part of the unique scenery of the Mineral King valley -- complimenting its great natural beauty with just a touch of century-old California history. Most repeat visitors regard them as an essential part of the Mineral King experience, and savor the fact that so little has changed over the years.

Campers in particular enjoy their proximity to the cabins and access to the cabin owners -- both for the scenic value of the cabins and for the availability of advice and assistance on a variety of matters. And by definition, they would not be interested in rental facilities.

Day visitors to the Park would not benefit from the availability of rental cabins, but do enjoy the same scenic values and help from the cabin owners as do campers.

For those who use Mineral King as a trailhead, the cabins are both the last vestige of civilization as they head out of the valley, and a welcome back as they return – and the cabins certainly do not interfere with their enjoyment of the Park. (Nor would they benefit from any increase in the number of rental units available, as their purpose is to enjoy the back country.)

There is relatively little demand for rental cabins, as evidenced by the low occupancy rates at Silver City; and there is room for additional development there – at no cost to the government – should the demand for such facilities grow.

Finally, the cabin owners themselves are also members of the public, and are both frequent visitors to the Park and the traditional users of the cabins – and their interests (and, for the reasons stated below, those of the public at large) can best be served by allowing them to continue to use and maintain their cabins.

There is therefore no real reason either to remove the cabins or to take them over for others to manage – and in fact to do so would be a disservice to the public and to the Park Service itself (which would lose the volunteer service now provided by the cabin owners). The cabins occupy less than 50 of the 680,000 acres of land within Sequoia and Kings Canyon National Parks – but they are every bit as unique and irreplaceable as some of the natural wonders found in other parts of the Parks.

Any alternative which would remove the cabin owners from the valley would ultimately lead to the destruction of nearly all of the cabins. Most of the cabin owners have spent much of their lives in Mineral King, and regard their neighbors as extended family. They generally have keys to their neighbors' cabins, have or know which neighbor has the tools and materials for any necessary repairs, and share the work on major projects. They spend a good deal of each summer repairing the damage caused by animals, falling limbs, the harsh winter environment and the simple aging of their very old cabins – and they alone know the unique attributes of those cabins (such as how the storm shutters are attached, and the steps required to secure them for the winter and reopen them the following summer).

As the 1978 permittees include both young and old, were the Park Service to take over their cabins as they passed away it would be many years before all of the cabins were acquired. But with the departure of each family, the memories, knowledge, tools and assistance which its members provided to the community would be lost. Over time the cabins would take on the aura of a ghost town – and even if some were rented to the public, they would not and could not be maintained with the loving care now given them.

Even if all of the cabins were immediately available, it would be economically impossible for anyone to operate them as rental units. It is hard enough to manage contiguous, comparable units – but to manage and maintain sixty cabins, no two of which are alike, scattered along five miles of road and accessible for less than six months of the year, in such a harsh environment, boggles the mind. And to expect anyone to undertake that responsibility when only a few cabins might become available each year is preposterous. To break even, the rental rates would have to be prohibitively high, and very few people would be willing or able to pay such prices.

But perhaps even more important would be the loss of the community, which is an extraordinary example of the way pioneering men and women lived a century ago. Visitors to Mineral King can now interface with people who have spent a lifetime there, and are eager to share their experiences with others. No ranger, naturalist, lecturer or museum could replace that experience – and it is for that reason that preserving the community itself is even more important than preserving the cabins.

There is a simple way to ensure the preservation of the cabins and the community – one which would involve elements of both the Preferred Alternative and Alternative C but would not require any enabling legislation. Federal agencies are already authorized by the National Historic Preservation Act to lease historic properties to any person or organization which will adequately ensure the preservation of that historic property, and to enter into contracts for the management of such property.

If, as the law requires, the Park Service truly intends to preserve the cabins and the cultural values of

which they are a part, then it may properly determine that the cabin owners themselves are the people best qualified to undertake that task – at their own expense – for the benefit of the public. That would not mean a renewal of the existing permits; rather, it would be an entirely new arrangement, for the benefit of the public, the Park Service and the cabin owners alike.

The terms would differ from those of the existing permits in several ways. They should include some provisions permitting the cabins to be rented out to others (which would provide for at least some public use), and would require the owners to maintain the cabins in accordance with historic standards. The interests of the cabin owners would have to be transferrable, to justify the expense of major repairs, but terminable for any failure to maintain the cabins in accordance with the appropriate standards.

The government owns the land and the cabin owners the cabins. That would not have to change. New leases or permits could allow the cabins owners to use the land but include specific requirements with respect to the cabins, crafted to reflect the intent that they be preserved for the benefit of the public as well as the cabin owners.

Incidentally, the Mineral King Preservation Society is an appropriate body to work with the Park Service in establishing architectural standards, but is not in a position to manage the cabins – as it has no interest in them. Were the Park Service to acquire them – and compensate the cabin owners for them – then in theory anyone could manage them for the Park Service; but there has been no suggestion that the government is considering any means of acquiring the cabins other than by donation. That option has been available for the past 26 years, and only a single cabin has been donated (the Filcher Cabin, given to the government by Paul Jordan, a retired Park Ranger); and it is unrealistic to think that any significant number of cabin owners would now voluntarily make such a donation.

To proceed on the presumption that the Park Service would acquire title by default upon the expiration of the permits, without compensating the heirs of the 1978 permittees, would invite lengthy and expensive litigation, and certainly bitterness on the part of both the heirs and the surviving 1978 permittees – none of which would enhance the experience of visitors to the Park.

It would, however, be possible for the Mineral King District Association, which represents the cabin owners, to manage the cabins should the Park Service prefer not to deal with individual cabin owners.

This solution may be adopted without legislation, under existing law. If, however, the Park Service truly believes that the 1978 law somehow overrides the National Historic Preservation Act, then it should actively support an amendment to that law, such as H.R. 4508, in order to protect and preserve for future generations both the cabins and the community – which have already been determined to be of great cultural significance – all at no cost to the government.

Respectfully submitted,

John T. Crowe
3939 West School Avenue
Visalia, California 93291

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JOHN T. CROWE
ATTORNEY AT LAW
3939 WEST SCHOOL AVENUE
VISALIA, CALIFORNIA 93291
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(559) 734-0747

October 6, 2004

NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service - DSC
12795 West Alameda Parkway
Denver, Colorado 80225-0287

Re: SEKI GMP - Wild
And Scenic Rivers

Dear Ms. Spain:

Thank you for the opportunity to comment on the Draft General Management Plan for Sequoia and Kings Canyon National Parks. These comments relate to Topic 2, Wild and Scenic Rivers, and specifically to the proposed inclusion of the middle segment of the East Fork of the Kaweah River in the Wild and Scenic Rivers System.

The segment of that river in question, from the 8,000 foot contour to the Atwell Mill trail bridge, runs through the private inholdings at Mineral King, the Cold Spring campground, the cabins at Mineral King, and Kaweah Han – all of which have been in place for generations.

The Draft GMP proposes to include that segment of the river in the Wild and Scenic Rivers System, under the recreational category; and the proposed boundary would extend 0.25 miles on either side of the river. That boundary would include the Mineral King Ranger Station and all of the other public and private structures now standing in the Mineral King area.

My concern is that such a designation could ultimately lead to attempts to remove some or all of those structures, most of which are now listed in the National Register of Historic Places, and/or to curtail the activities in which the campers, cabin owners and visitors to the park have traditionally engaged in that area.

If the intent is to prevent any further development or additional uses along that segment of river, that would probably be acceptable. But unless the present structures and uses can be grandfathered, so that there is no danger of the designation being used as a means of changing the existing uses along the river, then this segment of the East Fork should not be included in the Wild and Scenic Rivers System.

As the stated management objectives include the preservation of the scenic and historic features of the rivers, this should not present a problem – but the final GMP should clearly protect the existing structures and uses along this segment of the East Fork of the Kaweah River.

Yours very truly,

John T. Crowe

JTC:jfg

cc: Superintendent Martin

303

L. Laile Di Silvestro
130 Big Bear Place NW, Issaquah WA 98027

3 October 2004

Dr. David Graber, Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Dear Dr. Graber:

I am writing to comment upon the proposed alternatives for management of Mineral King in the Draft General Management Plan at www.nps.gov/seki. I have concerns about all the proposed alternatives, however I consider Alternative C with some critical modifications to be the alternative that is most likely to preserve the cultural resources of Mineral King for the enjoyment of all visitors to the park.

Before continuing, I should divulge that my opinions are far from objective. I am a 5th generation member of the Mineral King community. My children (9 and 17) belong to the 6th generation of Crowleys to live in Mineral King (as summer residents), and are descendents of the men and women who built much of the current road; who ran the store, post office, and resort; who dug in the mountains for gold, silver, and copper; who led pack trips into the back country; and who have maintained a tradition of stewardship of the land and community since the 1870s. This is a community in which many of the current members were born and have spent some of our most cherished days. Many of us have ancestors, including my grandfather, who spent their last living moments in one of the cabins that dot the valley. It is natural that emotions would color all discussion of this cultural resource.

Since the mid 1960s (when Disney was planning the ski resort), I have feared that the Mineral King community would not be permitted to persist indefinitely. I have treasured each summer in my Mineral King home, knowing that it could be my last. Over the last decade, I have shifted my focus from preservation of the community as it currently exists to preservation of the structures, their history, and the history of the people that built and inhabited them so that they will not be lost to future generations. It is in keeping with that effort that I respectfully submit the following comments.

Plan for Preservation of the Historic District: I am not certain that the Mineral King Historic District was listed in the National Register of Historic Places when the draft plan was penned. I do not believe that the proposed alternatives adequately address the preservation requirements, and feel that Alternative C should be modified to take these requirements into account.

In particular, I would like to see details on how the park will acquire the funding and resources necessary to maintain the cabins according to specific architectural standards. If such funding and resources are not available, I strongly encourage continued partnership with the existing cabin owners to maintain the cabins.

There are 66 structures that must be maintained. It typically takes two days each season to 'close' each cabin so that it can survive the heavy winters. It typically takes several days each season to 'open' the cabin, a process that involves removal of supports and repair of damage that occurred over the winter. There is also ongoing maintenance and repair required throughout the season. The cabin owners have demonstrated the willingness and the ability to maintain the historic integrity of the cabins, and would be ideal partners in preserving these cultural resources for future generations of park visitors.

Plan for Historic Interpretation: One of the special characteristics of Mineral King, and one of the aspects of Mineral King that is appreciated by visitors, is its long and interesting history of human habitation. The history of the area is as valuable as its beauty. Visitors to the park have commented very favorably on fireside chats and walks covering historic topics. Members of the Mineral King community include historians, and are valuable resources in building and delivering history programs. The park system has a unique and wonderful opportunity to draw from a sizeable community of people who have strong connections to the area dating back over 100 years and have demonstrated a desire to share that history with visitors for decades. I would like to see a plan that includes a way to preserve the non-structural historic heritage of the area and share it with visitors. I believe that the cabin owners have demonstrated that they can play a valuable role in such a plan.

I thank you for your attention to my comments, and look forward to hearing and reading about the input you have received and your conclusions.

Regards,



L. Laile Di Silvestro
laile@mindspring.com
425.557.2805

212

Oct 5, 2004
Karl Diederich
P.O. Box 7587
Incline Village, NV 89452

David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Dear Dr. Graber:

I am writing to comment on the draft General Management Plan (Plan) for Sequoia and Kings Canyon National Parks. I have back-packed in these two parks numerous times, over different areas, such as entering from the west and the east side of both parks.

It is nice that the Plan includes a "no stock" alternative, but it would be better if an alternative was included that was between "no stock" and the preferred alternative.

In particular, please add a "no grazing" alternative. This alternative should also include critical language from the 1971 Master Plan to phase out non-essential stock use in the most sensitive high-elevation areas. In fact, please also add this critical language to the preferred alternative.

Further, I would like to emphasize that some of the conclusions in the preferred alternative are not correct. For example, the draft preferred alternative states that, "...impacts of horse use (feces, eroded trails, dust) would continue to cause minor, adverse, long-term impacts on a small number of backcountry hikers." I would dispute this, and nearly every hiker I've met using your parks would as well. I suggest you undertake scientific appropriate polling of your backcountry hikers by an independent agency to verify this. The impacts are not minor, but major, in that they significantly detract from the sought-after wilderness experience. Second, the impact affects a large, not a small, number of backcountry hikers.

Also, the environmental impact of stock use is great:
- trail erosion, muddy trails
- dust
- stench of urine and manure
- proliferation of brown-headed cowbirds, which displace native song birds
- damage of sensitive lake shore environments
- damage of sensitive meadows, particularly at higher elevations

Please:
* Add a no-grazing alternative
* Add the non-essential phase-out language to the preferred alternative

I also support:
* The removal of all commercial pack stations
* The removal of the cabins at Mineral King
* The removal of the commercial camp at Bearpaw

Sincerely,

Karl Diederich

Karl Diederich
PO Box 7587, Incline Village NV 89452

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Barbara Doyle
<gregnbarbara@yahoo.com>

To: david_graber@nps.gov, susan_spain@nps.gov
cc:
Subject: SEKI GMP

10/06/2004 04:09 PM
MST

Dear Mr. Graber and Ms. Spain:

Thank you for the opportunity to provide comment on the proposed General Management Plan for Sequoia and Kings Canyon National Parks. My husband and I are cabin owners in Silver City which, as you know, is located in the Mineral King area of the parks. My comments bear exclusively on your plans for that area.

Your "preferred alternative" plan appears to provide for and encourage increase use of the facilities in this area. That plan suggests that Mineral King cabins will either be removed and replaced by large, multi-group campsites or rented on a regular basis. Your plan also suggests that increased visitor demand will be accommodated by enhanced of facilities at the Silver City Resort. I take exception to these proposals for the following reasons:

1. The road from Three Rivers to Mineral King cannot support increased traffic. The road's twists, turns and narrowness in parts makes the drive challenging at best. How will additional cars be accommodated? Do you have some plans to inprove the road not discussed in the GMP?

2. Water supply to Silver City. As you are no doubt aware, these was a limited snow pack this year. The water supply to Silver City, Silver City Creek, is a mere trickle. There is no "extra" water to supply any additional facilties at the Silver City Resort. Was the Park planning to drill wells or somehow otherwise secure additional water supplies not discussed in the GMP?

3. Front and back country facilities. If multi-group campgrounds replaced the MK cabins, it stands to reason that more people will be in the area and that more people will want to take not only day hikes but also travel into the backcountry. There has not been a packstation in MK for two years now. How will you ensure that visitors have access other than by foot? And, once they are in the backcountry, are there provisions for composting toilets so that the area does not suffer long-term environmental damage?

I appreciate your attention to my concerns and look forward to receiving further information as you proceed with the development of the GMP.

Sincerely,

Barbara Doyle and Greg White
Cabin #72, Silver City OR
1566 Muir Street, Fillmore, CA 93015

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DON E. DUNHAM **P. O. BOX 127** **WAUCONDA, WA 98859**

September 10, 2004

GMP Coordinator: Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Comments: Final General Management Plan (GMP)

Dear Mr. Graber:

To understand my views on the management of SEKI National Park and the GMP, I'll state my background. I was raised in Lemoncove and worked in the late forties as a packer for Ray Buckman in Mineral King and then worked as a trail crew packer during my college years in the early fifties. I then alternately worked occasionally for Bill DeCarteret as a packer or cook (vacation time) and recreating with my family in the back country through 1974. In 1974 I moved to Wyoming, but made two trips back to Kern Canyon in 1984 and 1993 via Cottonwood Creek trailhead and trail pass. It was in 1984 that I joined the High Sierra Stock Users.

I applaud the park services effort in a job well done on the GMP and its involvement of the public in this plan.

I agree with most of the front country proposals for Cedar Grove, General Grant, Lodge Pole-Wuksachi, Giant Forest and Ash Mountain foothill areas as outlined in the preferred alternate

I feel that the management for the Mineral King corridor and valley should be preserving of the traditional character and retaining the feel of yesteryear as outlined in alternate C.

As our family owned a cabin in the east Mineral King group until the mid seventies, I would like to see both inholdings and permitted cabins given continuing status into the future. I have many good memories of growing up at Mineral King and hope succeeding generations can have the same opportunities. I feel the same opportunities should be provided to cabin owners in the Wilsonia area.

Over the years and particularly in 1984 and 1993 I noticed that historic horse use, in the Kern Canyon Back Country seemed to be down. This may be due in part to the increased restrictions and quotas over that of the pre 1974 era.

I have many good memories of back country trips, over the years with family and friends, first as a individual horse user, then as a High Sierra stock user and currently as BCHC (High Sierra Unit) and a similar unit in Wyoming. Again I hope my family down through my grandchildren and other Back Country Stock users will have this opportunity in the future.

For this reason, I feel the management of the back country stock use should be a continuation of current management (no action alternative) and no further reduction in quotas or party sizes. Some value or credit should also be given to the education effort of the BCHC in low impact horse use (gentle on the land ethic) and similar effort by other users.

Sincerely,

Don E. Dunham

Don E. Dunham

David Gaber, GMP Coordinator
SEKI
47050 Generals Hwy
Three Rivers CA 93271

2941-1

I, Perry Eaton, as an ~~not~~ active back packer, fly fisher, and wilderness lover would like to comment on the DGP for SEKI.

I have witnessed destruction by Stock users to many trails, camps and lake shores. Extensive off-trail damage by Stock to many places such as Big Five Basin, Furguson drainage, Rowell Mdw has also been observed by myself. My 45 years expevience in the mountains has taught me that the present philosophy of stock usage is absolutly ~~the~~ most serious threat, on ground, to the wilderness of SEKI.

The draft GMP for SEKI is clearly anti-environmen and pro-commerical stock. Other national parks have implemented requirements that stock parties carry all feed for their animals, a good idea! Why is "no-grazing" not even a considered alternative. Heavy-handed, abusive commercial activities of all kinds are prohibited by the wilderness act yet SEKI promotes just such destructive stock activities.

Also this abuse would include such operations as Bearpaw Camp. Bearpaw is ugly, out of place and illegal under the spirit of the wilderness act. It should be closed and cleaned up.

(over)

Pack Station activities should be stopped with in Park boundaries. They can travel to trail heads just like back packers do. Also in-holdings such a the Mineral King cabins should be removed when the permitte die as the law provides.

Back packers have for years been required to toe the line of regulations that protect the wilderness, It's high time the stock industry be brought to task for long-standing unfair, illegal and unnecessary damage they cause. How about large stock-free drainages? or horse diapers? Stop the damage. Now!

Thank You

Perry Eaton
1805 S. Villa Av
Palermo CA 95968-9609

P.S.

Be brave, things can change.

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David Graber, GMP Coordinator
Sequoia and Kings National Parks
47050 Generals Highway
Three Rivers CA 93271

Dear David Graber,

This letter contains my comments on the Draft GMP for Sequoia and Kings Canyon National Parks.

A congressional act requires that private cabins at Mineral King Valley be torn down and restored to natural conditions after the lifetimes of permitees of record in 1978. The National Park Service should follow this law and not try to work around the law to benefit a few influential people.

The NPS should use the wording of the present Sequoia and Kings National Parks Master Plan (1971) which stated that "...Livestock may be used in the lower elevations **and around** developed areas where it can be stabled and fed without open grazing on park lands."...in the new plan. (Underlines are mine.)

The Bearpaw Meadow High Sierra Camp is ugly and should be removed to reduce the environmentally negative impacts of noise, scenery impairment, sewage disposal, helicopter use, stock use and food storage. Under no conditions should a new High Sierra camp be built on the Hockett Plateau.

The Draft GMP for Sequoia and Kings Canyon National Parks should have a requirement that stock parties be required to carry feed for their animals. This is needed to reduce the highly negative impact of grazing on meadows and lakeshores. This draft should have a No Grazing Alternative. Please rewrite the Draft GMP to make it less pro-commercial and anti-environmental and more pro-private (for backpackers) and more environmentally friendly.

Thank you for your serious consideration of these comments.

Best Regards, David M Edlund

David M. Edlund
1922 Tioga Blvd
New Brighton MN 55112-7273

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SARAH BARTON ELLIOTT

PUBLISHER / EDITOR

P.O. BOX 728 • THREE RIVERS, CA 93271 • 559.561.4843

October 5, 2004

Re: Response to the "Sequoia-Kings Canyon National Parks Draft General Management Plan"

The purpose of this correspondence is to submit a response to the draft GMP in support of the preservation of the Mineral King cabin community and to offer an alternative solution relative to the draft GMP's Preferred Alternative. If the federal process insists that one alternative be selected, then Alternative C: Preserve Traditional Character and Retain the Feel of Yesteryear; Guide Growth is my selection.

My family has been intimately associated with the Mineral King area since the 1870s and for six generations. I have spent much of my life in these parks, physically residing in Kings Canyon, Sequoia, and the Mineral King area, prior to and after it became a part of a national park. These experiences have shaped who I am today. With this lifetime (46 years) of experience in the Mineral King area and Sequoia and Kings Canyon National Parks, I propose a viable alternative to the alternatives that will assist in the management, visitor enhancement, and preservation of this unique living-history community.

The historical significance of Mineral King

As a fifth-generation Mineral King cabin resident with children, I feel it is imperative to preserve this important living-history community. It is stated in the mission of the National Park Service that historical resources must be preserved "unimpaired." The fine line here, however, seems to be in the eye of the beholder — "historical resource" versus "privately owned."

In the history of the West, and more specifically, Tulare County, because so little has been preserved, we cannot wait another 100 years to make the decision to save the last vestiges of the 19th century. As we while away the years debating whether preservation or evacuation should be policy, development continues to rapidly encroach as the New West buries the Old West.

The history of Mineral King begins the way so many western tales start, with men seeking their fortune — a dream of a financial empire built on mining — or simply a way to make a living by ranching or lumbering. And despite its isolation, Mineral King was a social hub of the southern Sierra. An elevation of nearly 8,000 feet meant the Mineral King valley was not a typical boom town, but instead one of the most challenging environments in all of California in which to live and work.

The mining boom was a mere moment in Mineral King's history, but this is how the cabins began and now continue as a living link and architectural timeline. The original windowless four walls of logs or rough-hewn lumber soon were adapted through additions and new construction that included kitchens and porches, making them more hospitable to families of the early 1900s who migrated to the Sierra in the summer to escape the scorching Central Valley heat. Outhouses made way for primitive indoor plumbing and propane gas, as this technology became available. Cabin life evolved from summer necessity to family vacations, making Mineral King a microcosm of how an entire nation changed the way it lived, worked, and spent leisure time.

In the meantime, avalanches, fallen trees, and other whims of nature have also determined when the cabins were upgraded and improved. But, this is where time stands still. Electricity is a concept that has not yet found its way to this remote region and telephones number less than a dozen. The cabins remain today as symbols of self-reliance and a declaration of the settling of Tulare County and the West.

"Visiting historic and cultural sites is one of the most popular tourist activities today. Families, seniors, groups, and even international visitors choose to frequent historic attractions when on vacation." —*Cultural Resource Management* magazine, U.S. Department of the Interior, 2002

Revising the "Preferred Alternative": A Mineral King solution

It is not feasible — economically or historically — to revert the Mineral King cabins to public-lodging facilities. The cabins are without electricity, insulation, or other modern-day conveniences. They are dusty and sometimes infested with rodents or insects. They require constant upkeep and maintenance, which for the past 26 years since their inclusion into Sequoia National Park has been a difficult dilemma. To invest summer after summer of time and money for repairs or upgrades is a risky investment for permittees because the Park Service has been ever-looming with its threat of razing the cabins and/or evicting the residents.

The cabins are not turn-key ready for any visitor. To arrive at our cabin, for instance, shutters are removed, the water is turned on from outside, the propane tank activated, the water heater filled, and more. Then it's time to check for rodents, dead or alive, chop wood, build a fire in the woodstove, light the temperamental refrigerator, sweep the porches and the roof free of pine needles and branches, and more. It's labor-intensive and high maintenance; in this day and age, not most people's idea of a relaxing vacation. But this is how and where my grandparents, great-grandparents, and great-great-grandparents lived each summer, it is where I spent my summers, and it is now my responsibility to carry on this humble tradition and pass it on to my children.

Equally as unrealistic an alternative is to revert the cabin areas to pack station property or campgrounds. The Mineral King Pack Station sits abandoned due to the lack of a concessioner. The current Mineral King-area campgrounds rarely fill to capacity (in the summer of 2004, they were not full on any of the three holiday weekends — Memorial Day, Fourth of July, Labor Day). In contrast, public demand suggests that more campgrounds and picnic areas are needed in and around Sequoia's Giant Forest area, but it's highly unlikely that this will cause additional visitor amenities to be proposed.

With any new, courageous, or unprecedented movement comes compromise. The Mineral King community is made up of hundreds of diverse, independent individuals. It is the responsibility of the National Park Service to recognize the cultural value of the Mineral King community and to make the bold decision to preserve these cabins while uniting the cabin owners and keeping the living-history link intact. This would allow the Park Service to better understand and interpret the considerable influence of the Mineral King landscape on the fate of the mining era and, 100 years later, a Disney ski resort. This, in turn, would enhance, not detract from, the visitor experience by sustaining a historic community.

A suggestion is that this be done via a nonprofit cooperative foundation made up of both man-

datory (cabin permittees) and supporting volunteer members, managed by, but at no cost to, the National Park Service. Strict guidelines regarding the cabins, their integrity, and use would be in place under a federal lease. Funding would be through annual dues, grants, and other available resources that would pay for general upkeep, safety, and maintenance of the district, insurance, mailing and administrative costs, and other expenses. A board of directors will ensure adherence of the bylaws, covenants, codes, and restrictions. They will also be functionally responsible for regular meetings, overseeing various comprehensive committees (design, outreach, sustainable use, interpretation and education, publications, exhibits, events, programs), and communicating with the members at large. The National Park Service would continue to provide the oversight for cultural resources, including developing plans to advance historical research and cultural landscape preservation objectives.

If this does not fit into the agenda of the current or future management of Sequoia and Kings Canyon National Parks, then a separate district should be formed that, with its very name, will state the mission of management of the Mineral King area — national conservation district, national recreation area, national historic site, or national historical park. As is Devil's Postpile National Monument, the area would continue to be managed under an arm of Sequoia and Kings Canyon National Parks.

"The potential is huge, not only to attract visitors to lesser-known sites but also to increase the monies generated from existing or new visitors." —*Cultural Resource Management* magazine, U.S. Department of the Interior, 2002

Sequoia's lack of historical preservation:
The park's first ranger station at the original entrance to Sequoia National Park is in a perpetual state of deterioration. Interpretation at various cultural sites is noticeably absent, leaving many visitors with questions, not answers, about the history and prehistory of the area. Structures listed on the *National Register of Historic Places* are not identified to the public.

To turn my back and walk away from the Mineral King area is an unthinkable act. The area contains a history that is the very roots of the formation of Tulare County and many of its communities, including Three Rivers. It would be, at the very least, irresponsible to allow the Park Service to erase this community. I would be handing a 135-year heritage away to those who show no interest that the struggles, the milestones, and the accomplishments of the pioneer settlers of Tulare County ever be told.

"Last year, visiting historic and cultural sites ranked second to shopping in the list of activities engaged in while on holiday." —*Cultural Resource Management* magazine, U.S. Department of the Interior, 2002

Ideals and priorities
I agree with the National Park Service that Mineral King belongs to all Americans. That's why a powerful, ideological minority of the NPS at Sequoia and Kings Canyon National Parks should not be able to override the American people's interest in protecting the historical resources of this area.

The cabins of Mineral King are a tangible connection to the past and a humble legacy that have

been passed on to subsequent generations. The cabin permittees and their descendants are the living history and dedicated stewards of Mineral King who are eager and willing to educate the public on the extensive prehistory, the Sierra ecosystem, the environmentally-sensitive land management, and the history of the evolution of humanity in this remote place while continuing a way of life about which the majority of the population will someday only be able to read about in history books or if allowed access into an Ash Mountain vault.

It's time to begin a new chapter of the West with Sequoia National Park wearing the proverbial white hat at the fore of an effort that would set a forward-thinking standard, rather than an irreversible setback, for cultural-resource protection nationwide. Instead of condemning the region's significance to survive in name only as a foothills subdivision or golf course, the legend, lore, and history will continue to be personally experienced for many generations to come.

Signed:
Sarah Barton Elliott
October 5, 2004

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John F. Elliott

HISTORIAN / PUBLISHER

JFE

October 6, 2004

Re: SEKI General Plan Comments

In general, the issues as scoped for the current draft of the GMP have very little to dislike. Park planners have done a credible job in assembling volumes of information on a variety of issues and concerns.

However, there are several areas currently being managed in the parks related to the treatment of cultural resources that get very little consideration.

Among the most critical needs of the new GMP is a concerted effort to correct this long-standing disparity relative to the effort and budget devoted to the management of natural resources. Not only the obvious and most visible, but some of the not so obvious cultural resources need more staff attention as well as additional budgetary considerations.

The best opportunity in the current GMP to accomplish this "affirmative" action is in the Mineral King Road Cultural Landscape District. The draft's "Preferred Alternative" is correct in that this effort needs to address the cabins and its attendant community. The Preferred Alternative strives to create a partnership and I agree that is the best way to proceed in terms of the district's preservation. But it is unworkable if each family of users is evicted in order take possession of a cabin immediately after the death of the permittee of record.

As you know, there is a great deal of caring involved in the use and upkeep of Mineral King and its cabins, especially among the many families who have been associated with the community for several generations. To be aware that the clock is ticking on one's tenure within a particular cabin and that the NPS and its partner are waiting in the wings to take possession, is at cross purposes with historic preservation — the desired goal.

At the root of the management problem for the NPS is the fact that privately-owned property exists in the national park. A workable solution must be offered that vests the property in the partnership, but does not end the tenure of those community members willing to use the cabins within a more defined context of the historic district.

After a partnership is created, the entire cabin community must be evaluated on a case-by-case basis. To think that sweeping the present owners/users out and making some sort of generic rustic district is in the best interest of the public is an error in judgment. The resources will decay while budget requests and the futures of certain properties remain in limbo.

P.O. BOX 806 • THREE RIVERS, CA 93271 • 559/260-2909

To achieve preservation, a more proactive approach is needed rather than a reactive one as suggested in the preferred alternative. To receive each property as permittees die undermines collective action by Mineral King preservationists and ignores the living-history aspect of the community. Why not directly involve the present users as caretakers and preservationists, but not necessarily as owners of each cabin?

Cabin trustees/users would be required to follow regulations that would govern use, establish fees, and ensure that each property would be maintained as a part of the historic district. Those cabins, whose previous owners no longer wish to maintain their former property as a part of the district, could be potentially acquired by the partnership and used by members of the public who wish to experience cabin accommodations and contribute to the preservation of a living-history community.

The above proposal preserves the essence of historic Mineral King by doing the following:

(1) It creates a non-profit public benefit partnership to assume ownership of all private property within the district; and (2) This historical trust would enforce maintenance standards of all historic properties and determines a responsible user group for all cabins.

Signed: John Elliott

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Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Dear Dr. Graber,

We are a group of people who are acquainted with a cabin permit owner in Mineral King, California. We are in favor of the passage of HR 4508. Your support is crucial. We endorse the following reasons for passing this bill and the important points it contains:

<The government does not have the resources, manpower or money to support the takeover of this community.

<If the Park Service assumes control of this community, they will either tear down the cabins or rent them out. Either way, it would be more costly than beneficial. Razing the cabins would ruin the historical value of the community. Much of California history is connected with the Mineral King Valley. Having the Park Rangers become rental agents would diminish their usefulness.

<The history of the settlement can still be seen because the cabins are maintained by families who have had the permits for generations and have a vested interest in keeping them just as they were in the days of John Muir and John C. Fremont, among others.

<These families have proven that they can maintain and preserve the cabins. If something works, don't mess with it. The concern that they could lose the right to the permits might cause them to delay repairs, so we would like them to be allowed to have their permits in perpetuity and to be able to pass them to their heirs or others who have the interest in keeping this piece of history.

<The cabin permittees have shown their loyalty to the area by helping the Park Rangers guide visitors, recount the park regulations, clean up litter, and volunteer in the office.

For all these reasons we ask you to assist in passing HR 4508. Thank you.

Sincerely,

Donna K. Elsas

100

Climbertwe@aol.com
07/06/2004 06:21 PM EDT

To: susan_spain@nps.gov, david_graber@nps.gov
cc:
Subject: D18(DSC-P) SEKI 286---Public Comment

July 6, 2004

NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service–DSC
12795 W. Alameda Parkway
Denver, Colorado 80225

Park GMP Coordinator
Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93721

Re: D18 (DSC-P)
SEKI 286

Draft General Management Plan, Sequoia and Kings Canyon National Parks.....

Dear Ms Spain and Dr. Graber:

I am in receipt of the above captioned plan, and would offer the following brief comments, organized as suggested in your May 7, 2004 letter.

Miscellaneous Comments: I am a landowner in Silver City. I paid full market price for my property when I purchased it, and I am a frequent visitor to Mineral King. I am very familiar with all of the trails, roads, facilities (and lack thereof) in this area. I believe that these factors make my comments worthy of notice.

Comments related to Transportation and Visitor Experience: The Plan envisions a large increase in visitation to the Mineral King area. The trail heads, parking areas and day hike destinations are already crowded during the summer and on all weekends during good weather. Many sites–specifically Monarch Lakes and Eagle Lakes-- are severely damaged by overuse and camping. The trail to Farewell Pass is criss-crossed by "volunteer" shortcuts. If you add more people, there will be no place to park (the rangers issue tickets daily to illegally parked vehicles already) and there will inevitably be the increased environmental degradation that more people always bring. Increased visitation will inevitably require larger parking areas and bigger trails, more train maintenance and more dedicated law enforcement rangers. I strongly oppose this.

Closing Atwell Mills Campground is not necessary; the sequoia grove there is healthy. One need only look. Opening another campground is an unnecessary expense, and will further crowd people towards the end of the road, whereas now they are spread out along the road. Plus, I understand that the new campground and "improvements" at Cold Springs Campground would add total sites to accommodate additional visitor usage. The area will not tolerate this without environmental damage.

Comments on Special Use Permits: I understand that stock usage will continue, but somehow will be relocated or modified. How? The stock yards currently drain directly into the Kaweah River, forming a point source of water pollution. Is this going to continue under the new plan? Is there a permit issued to allow this water pollution? If so, why?

As to the Forest Service Permit cabins, I must state that I admire the political organization of the permit holders and the pressure they have brought to bear on the Park Service. A few points should however be

made. Forest Service Permit cabins used to exist all over the nation. They are almost all gone now–except here. Why? The answer is obvious–the value of these free inholdings is huge, and the permit holders' families' want them to continue forever. That is very understandable from their perspective. And in the plan you are granting these families a permanent property right by preferring them in reservation and usage policy. They did not pay for this. The idea that these cabins have historic value is merely a justification for the desired conclusion. They have no value to the public at large. Their value is to the permit families, period.

Finally, to in effect open a new National Park Service Resort in this area based on the permit cabins will flood the area with people (has the number been calculated?) who will need to be accommodated–with a central lodge of some kind, visitor and reservation services, gasoline, more and better trails, visitor centers, ranger stations, food service–and last but not least a decent road. All of these things are likely to be wildly expensive and environmentally destructive. Has the Park Service contemplated these necessities--specifically---and what they would do to the Mineral King area?

In summary, I strongly oppose additional development of the Mineral King Area. There are enough people there already. Let the Forest Service Permits expire as they were intended to do. The permit holders are not "entitled" to anything more. Development as you contemplate will ruin this small, limited capacity valley for everyone.

Thomas W. Engelhardt
4 N 194 Wildrose Road
St. Charles, Illinois 60174

Received by
SEP 2

Beverly G. Foltz
1414 Brandt Road, Unit C19
Vancouver, Washington 98661

September 8, 2004

Dr. David Graber, Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Dear Dr. Graber,

Re: Draft General Management Plan
Topic #6: Mineral King Special Use Permit Cabins Topic

I won't try to hide my prejudice: I own a 1/8 share of one of the Mineral King cabins. I have loved this valley passionately my whole life. Mineral King is in my blood. I absolutely live for the precious 2 weeks each summer that my family is able to enjoy our cabin.

I am also a committed environmentalist, and although an avid skier, I was gratified and relieved when inclusion into Sequoia National Park preserved Mineral King from the onslaught and destruction that development would have brought upon it.

BUT – the Preferred Alternative, which could bring about the eventual destruction of the cabins, is no way to plan for Mineral King's future! Mineral King's recent listing on the National Register of Historic Sites brings with it the mandate for the Park to maintain the cultural and historical integrity of this unique community. But the cabin owners are the very heart and soul of the community. We provide a vital historical link to Mineral King's colorful past. We're ready, willing, eager, and able to share this history with the public, whom we readily acknowledge as the true owners of Mineral King.

It's no secret that the National Park Service is tragically short of funding, and not likely to receive a federal windfall any time soon. How does NPS plan to fulfill its mandate to maintain this historic site? I, my friends and relatives have painted bridges, picked up litter, sold postcards in the Rangers Station, led guided trail hikes, and conducted campfire talks. Not only do we have the financial resources and manpower to give the Park management some significant assistance, we have the unique love and understanding of the landscape and its history that only comes with the deep ancestral routes that most of us share.

I've held countless conversations with visitors at the Rangers Station, on the trail, or at various trailheads. I've pointed many in the right direction when they've been headed up

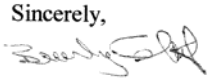
the wrong trail, and on a few occasions given assistance to backpackers injured or in need of water or supplies. But the most frequent conversation is in answer to their questions: who lives here? How do you get these charming cabins? Where did you all come from? Invariably, visitors are fascinated to hear our story. When learning of the imperiled status of our tenure in Mineral King, the typical response is deep sympathy and heartfelt support for our place in this valley. They love learning the valley's history and especially of our link to it. Never have I heard a remark that would even hint that our presence smacks of unmerited private use of public land. It's obvious that the presence of the cabins and its owners in no way diminishes the public's access to or enjoyment of the Mineral King experience. On the contrary, it enhances their experience by making available to them our knowledge, experience, and unique perspective as a living link to Mineral King's colorful past.

Taking over the cabins for rental purposes would most likely be an unfortunate economic undertaking. An economic study of this has been made by the management of Silver City, and it was determined that the cost of bringing these rustic (to put it mildly!) and ramshackle dwellings up to code would be exorbitant and certainly not cost-effective. Furthermore, it's doubtful that the necessary renovations would be consistent with the community's architectural integrity, which must be preserved to remain in conformity with the standards of the National Register.

I am urging that another alternative to the GMP be developed – one which will assure the continued issuance of permits to preserve the Mineral King community. Legislation has been introduced in Congress (HR 4508) to allow for this option; please support it. It is a win/win/win solution, benefiting alike the cabin owners, the National Park Service, and the public.

Thank you.

Sincerely,



Beverly G. Foltz

CC: Superintendent Dick Martin
Susan Spain

91

PO Box 307
Tehachapi, CA 93581
August 3, 2004

Susan Spain
NPS GMP Team Leader

Dr. David Graber
Park GMP Leader

These are my personal comments on the Draft GMP for Sequoia and Kings Canyon National Parks recently released to the public for comment.

I find little I can disagree with in the preferred alternative for the GMP. I would like to emphasize some of the proposals I particularly support.

My biggest concern is that you do not back off from your proposal to no longer renew the special use permits for the private cabins at Mineral King. I was deeply involved in supporting the legislation that added the Mineral King area to Sequoia National Park in 1978. I feel the provisions of that legislation treated the families and individuals who held the special use permits for those cabins at the time quite fairly. They were allowed to renew their permits for a limited time spelled out in the legislation. We are now at the point in time where the provisions in the legislation prevent further renewal of those permits. Your proposal to call for donation of the cabins to the Park Service and to make those that are suitable available for public use is certainly in the public interest, particularly in view of the fact that they are on public land. Increased visitation to the Park underscores the need to serve an ever expanding public demand for use of their land.

Your proposal includes a further concession to the cabin owners by giving them a priority over the general public in reserving the cabins for future use. I believe that is fair. I fully understand the reluctance of the cabin owners to give up their exclusive use of the cabins that have been in their families for generations. However by accepting special use permits on public land they have acknowledged that it is public land and not their private property. Furthermore the language of the legislation that added Mineral King to the Park extended those special privileges. But today it is time to acknowledge the public's right to use their land without the interference of special privileges for private parties.

I look forward to implementation of the shuttle system you have proposed for serving the public in the Giant Forest area. I understand that many of the details must still be worked out but now is the time to move forward on this proposal and get ahead of the curve of increased visitation. In addition I support the efforts that are being made to establish public transportation from the Visalia area. Although plans for this project are just starting I am very supportive and would like to participate in efforts to get such a service started. Please do not delay efforts to provide public transportation and allow the problems to become acute as they have at Yosemite. It would be a mistake to

procrastinate and allow such proposals to become controversial.

Even though you have already adopted a fuels management plan using prescribed burning I would like to offer a comment supporting that program. I was recently part of a group given a tour in Giant Forest and was impressed with the results. The fuels in the Giant Forest area had been reduced to a manageable level and regeneration of giant sequoia was impressive. You are to be congratulated.

Finally I would like to make a comment on the future of the Parks. Visitation is increasing due to rapid population growth in California. Demographics are changing particularly in view of the explosive growth of the Hispanic population. I know you are fully aware of this and are trying accommodate these ever increasing impacts. I do not have any particular wisdom on just how to deal with these problems. However there are numerous environmental organizations I belong to who would like to help. In particular some of those groups have been reaching out to Hispanic groups and have established contacts with them as they pursue their environmental interests. I would suggest that you take advantage of the contacts that have been made with the Hispanic community and involve them in a dialog about the future of the Parks. I would be glad to help promote those contacts if you like. Of course you may have already made contacts with some of the ethnic communities but obviously meeting the needs of those groups is certainly a challenge for future management of the Parks.

Although I have not commented on all of the issues dealt with in the preferred alternative in the draft GMP I am supportive of your proposal as a whole. Thank you for doing such a good job in meeting the public interest and for the opportunity to comment. Please keep me on your list for announcing further steps in this process.

Sincerely,

Joe Fontaine

#12

Dear Dave,

I sent some comments on the SEKI draft GMP in August to meet the original comment deadline. I have a few more comments I would like to submit to supplement those.

I did not comment on Wilderness issues because it was my understanding that the management details for designated Wilderness and back country areas would be dealt with following completion of a final GMP. However I would like to flag a few of those issues now.

I believe all of the areas in Sequoia/Kings Canyon National Park that qualify for Wilderness designation should be recommended to Congress for designation. Specifically I am referring to the Mineral King area, the Hockett Plateau, the area west of Giant Forest and north of the General's Highway sometimes referred to as Yucca Mountain, and the area south of Redwood Mountain added to the park in the 1984 legislation.

The use of helicopters should be much more restrictive than I interpret the decision tree for helicopter use to be.

Meadows used by stock should be carefully monitored and those meadows receiving heavy impacts should be closed to stock grazing.

I am opposed to the $15 fee charged to groups which use Wilderness or the back country. Fees like that should be included in the entrance fee to the Park. I would not oppose an increase in the entrance fee if it is justified by increased costs.

The area around Bearpaw Meadow should be monitored to make sure there are only insignificant impacts on the surrounding Wilderness. Corrective action should be taken if non-trivial impacts are found. I do not believe the suggestion of a similar facility in the Hockett Meadow area is a good idea.

Of course there are many more issues that must be addressed when you renew your Wilderness and back country management plan. These are just a few I would like to mention now.

I would like to repeat my strong support for your proposals in the draft GMP to deal with the cabins at Mineral King and your prescribed burning program.

Thank you for adding these comments to my earlier comments. Please keep me informed as the process to adopt a final GMP proceeds and you begin to work on updating your plans for Wilderness and back country management.

Sincerely,

Joe Fontaine
PO Box 307
Tehachapi, CA 93581
phone 661 821 2055

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2264 Brittany Street
Eugene, Oregon 97405-1376
September 20, 2004

David Graber, GMP Coordinator
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271

Dear Mr. Graber:

Thank you for the opportunity to offer comments on the draft General Management Plan for Sequoia and Kings Canyon National Parks. Please address the following concerns to preserve the natural scene that Congress intended when it set these areas aside.

Blatant overuse by stock is the major concern. It appears that commercial pack outfits have preferential treatment, and make a mockery of wilderness preservation. When I have camped the past four years at Charlotte lake in a no fire zone at 3165 meters, I commonly observe stock camps set up with wood fires right at or above 3050 meters or 10,000 feet. When I inquired about the last group I saw in 2003, they were doing the John Muir Trail in style, with stock, requiring hundreds of horse days use in the backcountry. Such overuse is disgraceful.

If I were managing Sequoia-Kings, I would eliminate all backcountry use of animals, period. They are just too destructive, and public use has skyrocketed over the past fifty years. I see too many people with lots of money destroying the image of wilderness. I commonly see able-bodied people riding horseback into the so-called wilderness followed by a packtrain of six or more pack animals, and a paid camp attendant to set up camp and cook their meals.

Horses leave their manure with seeds of foreign plants. Only where horses travel do I find non-native thistle growing. Packers and other stock users should have to pay for environmental cleanup of their debris. I have also observed stock urinating on streambanks and lakeshores.

Stock in the backcountry should be allowed only on trails. They should be tethered away from streams and other water sources. They should not be allowed to graze, but be required to carry feed for their stock.

On another note, when Mineral King was added to Sequoia National Park, Congress intended that any cabins there would be removed when the 1978 permittees died. Any exception or extenuation of that decree would be outrageous.

The High Sierra Camp at Bearpaw Meadow should be eliminated. The negative impacts on the environment are too great- sewage disposal, helicopter use, food storage, stock use and pervasive noise impair the scenery.

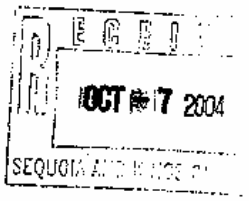
As a footnote, I have logged thousands of miles on high Sierra trails, including hiking the John Muir Trail three times. The first time I saw Yosemite in 1957, I hiked there starting at Springville and returning on the John Muir Trail, a trip of 715 miles and 75 days.

Thank you for the opportunity to offer comments

Respectfully yours,

William H. Gardiner
(541) 344-4069

333



1444 Sacramento Street
San Francisco, CA 94109

October 5, 2004

Richard H. Martin
Superintendent
Sequoia/Kings Canyon Nat'l Parks
47050 Generals Highway
Three Rivers, CA 93271

Re: **Draft General Management Plan for SEKI**

Dear Superintendent Martin:

I have received and reviewed the above-referenced draft document.

I have been a steady user of Sequoia/Kings Canyon parks over the last 20 years. Some of my best back-country memories are set in the wonderful natural environs of the High Sierra. Besides containing national treasures such as Mt. Whitney, Grant Grove, Kings Canyon, Kern River Canyon and Evolution Meadow, our parks provide ample recreational and scenic resources for users of all interests and physical abilities.

However, the backcountry of the parks is a unique and special area which deserves our BEST efforts to preserve and protect so that future generations of Americans may enjoy the wonders of the pristine High Sierra.

For that reason, I find the draft General Management Plan and its "preferred alternative" falls far, far short of protecting this national treasure.

Any High Sierra user knows full well the heavy and irreversible impacts caused by unfettered and unmonitored pack stock use of these fragile areas. Unrestricted grazing in seasonal wetlands, grazing above 10,000 feet, large groups (over 5) of stock animals, and maintenance of commercial pack stations on park land are NOT wise uses of our National Park. Your draft GMP, by continuing these uses in the "preferred alternative", does not sufficiently protect these invaluable and irreplaceable wildlands.

The 1971 Master Plan for SEKI promised a phase-out of nonessential pack stock use in fragile high altitude areas. More than 30 years later, we are still seeing these packs of hoofed invaders and their inconsiderate riders/owners and their impacts over the vast area of the parks that are over 9,000 feet. The new GMP provides an opportunity to address the problem for once and for all. Your draft GMP does NOT do this. The issue needs to be resolved.

Similarly, we were promised long ago that the Mineral King area would be preserved and protected, and all of this high alpine valley would be accessible to ordinary citizens. Continuing to maintain and preserve the private cabins built there, albeit under the aegis of a "commercial lodge", is to encourage destructive and inaccessible-to-the-public use of the area. In fact, this alternative would probably be *less* protective than continuing to allow private parties to own/operate these cabins, since existing owners are probably more sensitized to the ecology of the area than the legions of tour groups and high-maintenance overnighters who would flock to a new lodging facility up there. The "preferred alternative" also does not address water and sewage issues, which are considerable. Didn't the NPS learn anything from the necessary reconstruction of lodging facilities in the grove areas of Sequoia?

For these reasons, as well as a myriad of others that time and space limitations do not permit mention of, the draft GMP needs to be reconsidered.

Thank you for your consideration, and my compliments to your staff whom have drafted, prepared and published this document in such an exemplary fashion.

Sincerely,

Irving L. Girshman
Park User, not Abuser

Received DSC-P
JUL 16 2004

Frank L. Glick
3141 Two Rivers Drive
Sacramento, CA 95833
Days at Office (916) 323-8928
Evenings at Home (916) 359-6763

July 12, 2004

Dear Susan Spain, Landscape Architect:

This letter is to let you know that I believe that the Boy Scout Camp at Wolverton should be allowed to remain in Sequoia National Park. It is my understanding that the Scout Camp's future is currently being debated in Topic 6 of the Special Use Permits, as part of the draft Master Plan for the Park. I hope you and others in the National Park Service do whatever you can to keep Camp Wolverton in the Park. The Camp has so many benefits to the Park and the public, some of which I will describe below.

But first, let me take a moment to tell you who I am. My first visit to Sequoia National Park was 36 years ago in 1968 as Boy Scout at Camp Wolverton. I have gone to Sequoia several times every year since then as a Scout, as a Camp Staff member, and as a regular Park visitor. In total, I have spent over one year of my life in the Park. I still perform volunteer work at the Scout Camp and in the Park every summer. I am also a member of the Sequoia Natural History Association.

The Scout Camp has been at Wolverton since 1939 and has shown thousands of people the beauty of Sequoia. Many of these people have developed life-long love, respect, and support for the Park as a result of the Scout Camp. That will continue to grow in the future as the Scout Camp brings people into the Park.

For the last 20 years or so, the Scout Camp has provided a public service by also being available for use by all youth groups and not just the Boy Scouts. Also, volunteers and researches doing work in the Park have frequently stayed at the Camp. While these people are staying at Camp Wolverton, they are not taking up the limited spaces at other camp sites such as those in Lodgepole. It is very common for the Scouts and youth groups who stay at Camp Wolverton to quietly perform "service projects" while in the Park such as picking up litter and trail maintenance.

The Scouts and other youth groups frequently use Camp Wolverton as a base camp to prepare for backcountry hikes. The Scout Camp has a policy to teach all groups that when in the backcountry, they should leave their surroundings better than they found them. Doing that is another benefit to the Park. The groups are also educated on bear behavior.

In closing, I hope I have shown you that Sequoia National Park is a better place with the Boy Scout Camp at Wolverton than without it. Please continue to issue special use permits to the Boy Scouts so the Camp can continue to serve our youth and the Park into the future. Thank you.

Sincerely,



226

Michael E. Gordon
114 Euclid Avenue
Long Beach, CA 90803

michael e. gordon

22 September, 2004

David Graber, GMP Coordinator
Sequoia and Kings Canyon Nat'l Parks
47050 Generals Highway
Three Rivers, CA 93271

re: *Draft GMP*

Dear Mr. Graber:
The Draft GMP for Sequoia and Kings Canyons National Parks contains some very serious deficiencies. It appears to me as a strongly pro-commercial and anti-environmental document, and I think that the administration at SEKI must reevaluate and amend the draft GMP.

In other national parks, stock parties are required to carry feed for their animals so as to eliminate the severe and damaging impact on meadows and lakeshores that are caused by grazing animals. Why isn't SEKI requiring the same? *And why doesn't SEKI even have a no-grazing alternative in this management plan*? Stock use should be banned from National Parks unless stock users can create ways to greatly lessen stock impacts. The Wilderness Act forbids commercial activity in Wilderness areas, so why does SEKI actively promote and encourage commercial stock activity?

The Bearpaw commercial camp is ugly, polluting, and contrary to what is allowed in national park wilderness. It's absurd to even think of building a new camp on the Hockett Plateau – or anywhere else. Wilderness should be just that – territory where there are no human habitations (as defined by the 1964 Wilderness Act). The Bearpaw camp should be removed, and there should be no provision in *any* alternative of the GMP to consider or build any new backcountry camps.

The private cabins at Mineral King remain from a pre-SEKI NP Forest Service program, and should be removed when the present permittees die. That is what is in the present law. Why is the NPS evading the law in order for the benefit of a small group of people?

Best Regards,

Michael Gordon
Michael_gordon@verizon.net

315-1

October 4 '04 (C)

OCT – 7 2004
SEQUOIA AND KINGS CANYON

To: United States Department of the Interior
Natl Park Service
Sequoia and Kings Canyon Natl Parks
re: Draft General Management Plan

Culture happens. Culture is. We don't have to think about it; the components of that which we call culture are always in process wherever there is ongoing group habitat. Sometimes there are ~~notable~~ flowerings that we (or someone) take note of and are then defined as real and valuable. Especially in our age there are numerous microcultures tied into the dominant cultures; some spring forth independent of the dominant culture or even opposing it, yet are possibly of real value as the seed of the new.

For me one main component of our living Mineral King ~~Family~~ ... Home is what I experience as

(2) 315

the romance of Mineral King. It is indeed a bonafide historical and still living romance, much of which is within the memory of us and our forbears who have had the unique experience of having a longtime toehold in this beautiful place.

Fascinating documentation by our own resident writers and artists are continuing to be brought forth. This is that flowering which denotes a culture still alive and growing. Our Mineral King Preservation Society is a big part of our living community culture, as is our cabin owner associat

We cabin owners come to Mineral King every summer to live out a purity and simplicity found only rarely in modern life. Campers who

315-3 (3)

have been coming here for 20, 30, and 40 years come for the same experience. Park employees are part of our cultural mix as well. Anyone who arrives in our community experiences the harmonious blending of our modest cabins and the natural world.

M.K. families

It should be noted that many of us residents of Mineral King chose the sacrificial role and helped nudge Disney out and the Park in. We knew that Disney would decimate the simplicity and purity found here; we chose to help save the place as is. It doesn't need improvement.

Volunteerism seems to be a growing component

of our romance with the (4)
Mineral King that we all
love. I would like to foster
an art experience at my
cabin site. There may be
others who will offer the same.
Amongst us are teachers of
other subjects — experts in their
own fields. Let us share
learning in the beautiful
out of doors!

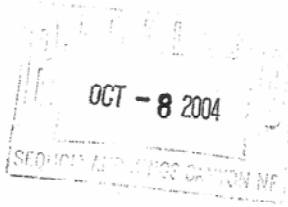
I have given years
of thought to the above. I
would like to share some of
these ideas with National
Park educators.

Sincerely yours

D. Adrian Green

42403 Sierra Drive
Three Rivers Ca 93271

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Karen Hack
10 Maryland Ave.
Berkeley, CA 94707

October 1, 2004

Dr. David Graber
SEKI
47050 Generals Highway
Three Rivers, CA 93271-9651

RE: SEKI Draft General Management Plan

Dear Dr. Graber:

Alternative C in the SEKI Draft GMP is by far the best plan regarding Topic #6, the Mineral King Special Use Permit Cabins. It acknowledges the value of retaining the historic Mineral King cabin community and recognizes the National Park Service's mandate to preserve both natural and historic resources unimpaired for the enjoyment of future generations. The plan for the cabins as outlined in Alternative C provides a foundation upon which to develop a plan that truly ensures that this historic community will be enjoyed by generations to come.

One important park resource that was discussed in comments submitted during the GMP process, but is not reflected in the Draft GMP is the existence of the Mineral King living historic community and its value as a tremendous asset and resource to both the NPS and to the public. This living historic community is comprised of families that have a wealth of knowledge, historical information, and general expertise about the Mineral King area. It is a community of individuals, many of whom represent their family's sixth generation, who are dedicated and committed to Mineral King and willing to devote time, money and effort to its preservation. These individuals already are helping the NPS out in a variety of ways, including leading interpretive hikes, giving campfire talks and programs, doing maintenance projects, and even staffing the ranger station. This past summer, numerous park rangers recognized and appreciated the benefit to themselves and to the Park from the volunteer efforts of this historic community. Through these efforts, the NPS can offer stronger educational, outreach and interpretive programs for the public. Under the Draft GMP's Preferred Alternative, all of this would be lost.

The Draft GMP states that the NPS may not have the resources necessary to preserve the historic structures it currently owns despite its mandate to preserve them unimpaired. Leaving the Mineral King cabins in the caring hands of the community that knows how to care for them will ensure that the community is truly preserved. Each Mineral King cabin is a unique structure which requires a lot of loving care to maintain and keep structurally sound while preserving its historical integrity. The families who occupy them know them inside and out and have the proven track record that will ensure their longevity. A profit-making commercial entity would no doubt find it extremely challenging to do the kind of annual upkeep and repairs on all of the cabins. Turning the cabins over to a concessionaire as outlined in the Draft GMP's Preferred

Alternative, would unnecessarily risk the integrity of the historic landscape and the buildings themselves.

The cabins are an integral part of a nationally recognized cultural landscape, The Mineral King Road Cultural Landscape District, which derives its value as a whole and thus must be kept as a whole. Together it forms a context within which to understand the history of human adaptation to Mineral King. If the use of these cabins is changed or only some cabins are preserved, as the Preferred Alternative calls for, the integrity – the very essence – of the cultural landscape will be adversely altered.

The major thrust of the argument in the Draft GMP for taking control of the Mineral King cabins is the perceived benefit from the public enjoying 65 more acres of public land in a park that contains approximately 864,000 acres. That perceived benefit, whether valid or not, needs to be weighed against the loss of the living historic community and the cabin volunteers, which as outlined above, represent a major, long-term benefit to the public and Park staff. The Draft GMP even states: "Because developed areas are very small, under any alternative, the natural environment predominates over the rustic character of the parks." And yet, the plan under the Preferred Alternative threatens to permanently impair this small living historic community that only occupies 0.008% of SEKI.

The Mineral King cabin community has thrived since the days of the mining boom. The NPS needs to ensure its longevity by continuing to support and preserve the occupancy of the cabin community in their historic cabins. If the issuance of special use permits has become problematic for the NPS, then together a different mechanism can be found which preserves this unique historic cabin community and its families, such as through a partnership between the Mineral King Preservation Society and the NPS.

Mineral King is a very special and unique spot in the southern Sierras. One of the resources that makes it so unique is the living historic community. This community already has a proven track record of working effectively with NPS staff to the benefit of the Park staff and the public. The community members have proven over many generations to be excellent stewards of their historic cabins and the historic resources of Mineral King. The destruction of the Mineral King living historic community under the Preferred Alternative would result in a major, long-term adverse impact for the NPS, park visitors, and our future generations. In contrast, the preservation of the Mineral King living historic community would result in a major, long-term, beneficial impact for the public, the NPS and the community. This vision of Mineral King is one of reaching the NPS' goals of cultural and natural resource preservation and increased educational and interpretive opportunities for park visitors through a strong partnership between the Mineral King cabin community and the NPS.

Sincerely,

Karen Hack

cc: Mr. Dick Martin, SEKI
Ms. Susan Spain, NPS DSC

329.

Comments on the Draft General Management Plan
For Sequoia and Kings Canyon National Parks

SEKI's mission statement, based on the NPS 1916 Organic Act, mandates the preservation of "natural and historic objects ....in such manner...as will leave them unimpaired for the enjoyment of future generations". This draft GMP adequately addresses the conservation of the scenic and natural resources, which with over 95% of the parks under wilderness management and the magnificence of the backcountry, is of utmost importance. However, the historical resources are not given equal emphasis or adequate protection. The National Register listed districts and structures should be considered major benefits and assets to the public's enjoyment of the parks. Cultural resources, being non-renewable, need in many instances additional preservation over natural resources.

Alternative C contains the best preservation of cultural resources for Mineral King and is the best alternative, with some changes and additions. It should be noted that inclusion of a National Register listed cultural landscape within SEKI is of major beneficial impact on public use, providing historical interpretation and the conservation of these resources for future generations. The historic cabins are the prime components in the cultural landscape and should be mentioned as such and their value to the parks emphasized. I suggest the NPS implement Congressional legislation to provide for continued issuing of special use permits to cabin owner families as the best alternative to ensure the preservation of these structures, which NPS is now mandated to protect and preserve. Current lack of staff and funds within the NPS do not make the maintenance of 66 additional historic structures feasible. Currently owned NPS historic sites and structures are seriously degraded. Continuation of the current agreement with the Mineral King Community is the way to provide maintenance of the cabins at the expense of the families and at no cost to the public. The families are familiar with the idiosyncrasies of their individual cabins and would be responsible for maintaining the cabins in clean, safe conditions and in accordance with the prepared architectural guidelines. The GMP outlines many improvements, expanded services and upgrading of aging infrastructure, but provides for no funding or additional staffing to implement them. Continuation of special use permits for current cabin owners allows the NPS to fulfill its mandated mission to preserve cultural resources, as well as provides a willing community of volunteers to assist the park in historic interpretation and other activities.

The loss of revenue from Mineral King cabin special use permits, which is greater than that received from camping fees, would be of major adverse impact on the parks. The cabins do not deprive the public of access to the natural wonders of the Mineral King valley but rather provide the park visitor with knowledge of important historic resources. Each cabin within the National Register cultural landscape district is an important resource to the visual impact. The two historic cabins on private land should be preserved in accordance with NPS historic preservation mandates and missions. The parks have featured pictures of one historic cabin in their publications numerous times.

The four historic Mineral King dams should be retained. They should be listed in the National Register. The lakes are a valuable scenic and recreational public benefit. The removal of the dams would have serious adverse impact on the environment and natural resources. The permit with Southern California Edison should be renewed to continue the clean energy and reduced energy cost to the parks. With California energy rates at an all-time high, every clean source should be continued. The water flow in the flumes is an important resource for fire-fighting as has been proved several times. Its loss would put the area at risk for fire control.

The Atwell Mill Campground should be retained. It doesn't get enough use to damage the Sequoias and does provide a camping experience in that environment and for the few holiday weekends when Coldspring campground is full. Atwell Mill and the Allies cabin should be included in the historic district, along with the mining sites and historic trails.

The Mineral King pack station should remain in its present location to reduce the frequency of stock using the road and mixing with automobile traffic. This can be dangerous, especially for pack trains. The continued use of stock in the backcountry serves the public well for those individuals unable to backpack. The Bearpaw Meadow high Sierra Camp should be retained. The Wolverton Pack Station should be relocated. Sight seeing flights should not be allowed over the parks to invade the peace and solitude.

Nadine Hack
42 Honey Hill Rd
Orinda, CA 94563
nadinehack@earthlink.net

Nadine Hack

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October 5, 2004

2043 Berryman Street
Berkeley, CA 94709

Mr. David Graber
GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

SUBJECT: SEKI Draft General Management Plan
Removal of Private Cabins at Mineral King

Dear Mr. Graber:

The removal of the private cabins at Mineral King must be included in the SEKI General Management Plan. Allowing a cabin to remain as long as the then-current permitee is alive is entirely reasonable. However, it is not reasonable to allow these permits to be passed on in perpetuity.

It is time to start removing the private cabins at Mineral King.

Thank you for considering my views.

Sincerely,

David W. Halligan

#34

I would like to make the following comments on the proposed SEKI management plan.

I definitely support the removal of the private cabins at Mineral King.

I support NONE of the proposals designed to restrict or eliminate the use of horses in the back country. Those who advocate this are members of a small eletist group who believe that the use of horses impacts their back country experience, and that foot travel is somehow "sacred", and is the only way the backcountry should be visited.

Our family is in a situation where we are no longer able to carry packs into the backcountry, so eliminating horse travel would eliminate our chance to have any back country experience in the parks. The advocates of these proposals are, in my opinion, very selfish. Perhaps they never think they'll be too old to not carry a 50-pound pack. Well, they should think again.

The only anti-horse proposal which seems to be half-way reasonable is the "no grazing" alternative, because I have seen small meadows wrecked by one night of horse grazing, and realize that irresponsible stock users can cause such problems.

It should be kept in mind that this same high-minded group of eletists is in full support of removing 18 small rock dams in the Emigrant Wilderness. Therefore they have to take at least partial responsibility for the occasional "work party" which has visited these dams and attempted to illegally demolish some of them. Again, all I can say is they are a very selfish group of individuals who care little about the people who, for one reason or another, like to use horses in the backcountry or who make their living from pack stations.

Thank you for taking our input.

John F. Helms
Julie R. Helms
Moraga, CA



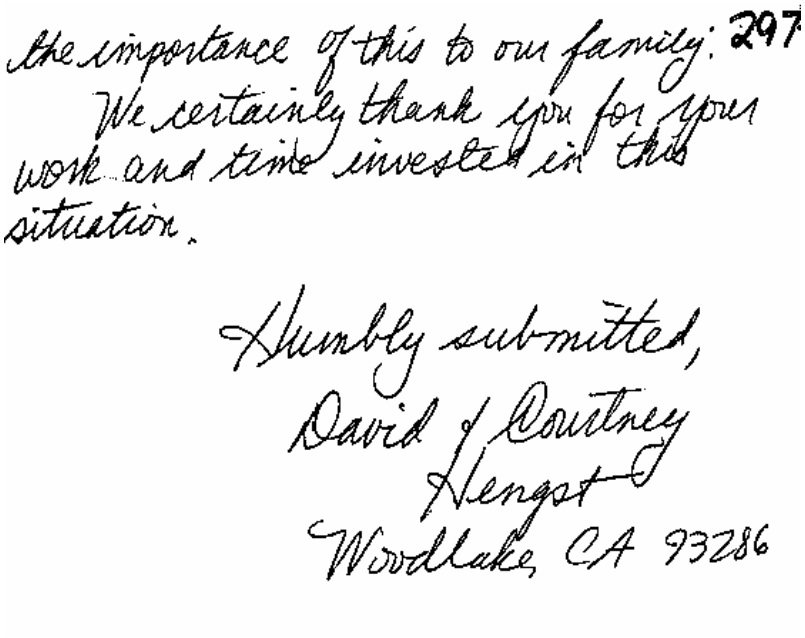
10/4/04

Hello to
Dr. David Graber, 297-1

We have enclosed some letters our kids wrote about our family cabin at Mineral King.

We do know it's a complicated issue, but we are humbly asking that we would be allowed to keep our spartan cabin that my husband's great-grandfather built. We always work to maintain the area around the cabin and we don't feel we are depriving anyone in the public from enjoying the gorgeous Mineral King area.

Truly, it can be a "win-win" situation in that we will maintain our cabin & enjoy the history of our family there, and at the same time not hamper anyone else wanting to visit the area. I certainly wouldn't presume any ownership of a cabin in someone else's family. Please understand



the importance of this to our family. 297
We certainly thank you for your work and time invested in this situation.

Humbly submitted,
David & Courtney
Hengst
Woodlake, CA 93286

EDITOR'S NOTE: The attached letters have not been reprinted. The original letter is on file at park headquarters.

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Richard H. Martin, Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271

Dear Superintendent Martin:

Thank you for this opportunity to comment on the draft General Management Plan for Sequoia and Kings Canyon National Parks. We have the following comments:

The draft GMP needs to be re-written to include and fully consider a "no grazing" alternative. A "no grazing" alternative is both feasible and reasonable, and was requested by numerous respondents. If recreational stock use is to be continued in the fragile, high elevation areas of Sequoia-Kings Canyon, then stock users should be required to carry feed for their animals, as is done in many other national parks, to avoid the extensive and considerable impacts caused by stock animals foraging for food (i.e., overgrazing, trampling of sensitive wetlands and lakeshores, etc.). High, rocky trails pose safety issues with regard to pack trains passing hikers. The hikers must get off the trail onto steep talus slopes because those pack trains just keep coming and the packers often demand that hikers get off on the steep downhill side so they won't frighten their animals.

The authors of the draft GMP have improperly concluded that the "preferred alternative" is environmentally superior to the "no stock" alternative. Eliminating recreational stock use from Sequoia-Kings Canyon would avoid the many major impacts caused by stock animals. They have already done grave damage to the areas where they have been allowed. When we began hiking in the Sierra 40 years ago, all the water was safe to drink without treatment. It is hard to believe that pack stock, whose droppings are everywhere on trails where they are allowed, have not been the primary cause of the spread of giardia in the Sierra. Their erosion damage is great, particularly in meadows, where there are often 3 or 4 parallel trails carved deep. The packers are either unable or unwilling to keep their animals on the trails, as evidenced by their droppings in the campsite we occupied along the John Muir Trail in the Bear Creek drainage on the nights of 8/17 and 8/18 of this year. We also noticed that there were droppings right next to the creek!

In our hike up Bear Creek from Bear Diversion Dam 8/16-8/20, we found the lower portion of the trail, which is not used by stock, much more pleasant than the John Muir Trail, which is. We had to get off the JMT to allow passage of a typical pack train - 5 tourists plus packers using a total of 13 stock - and then we had to walk amidst the manure. This seems a disproportionate impact on the fragile wilderness. Their impact on the Wilderness per visitor is many times that of hikers who carry their own packs and do not try to bring all the trappings of civilization with them.

We believe your duty is to the people of this country who are the principal users of the Wilderness, and not to the packers. We also resent the expenditure of taxpayer funds to benefit commercial outfits while degrading the wilderness experience of the general public. A "no stock" alternative would without any doubt be environmentally superior to current stock management practices, which would be continued by the "preferred

alternative."

The GMP should retain the key language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At the absolute minimum, the GMP should allow no grazing or off-trail travel by stock animals above 10,000 feet elevation throughout Sequoia-Kings Canyon NPs. These are park-wide issues that must be addressed now, not put off to some future planning process.

The commercial camp at Bearpaw Meadow should be removed, the site restored, and the area designated as wilderness, as envisioned by the House Committee Report for the California Wilderness Act.

All of the commercial pack stations should be removed from park lands. They could be relocated outside the parks, if the operators so desire.

The cabins at Mineral King should be removed when the permittee-of-record dies, and the sites restored to their natural condition, as envisioned by Congress when it added Mineral King to Sequoia National Park.

Thank you for considering our views.

Sincerely,

Nancy and Bill Homeyer
2025 Avila Court
La Jolla, CA 92037-6912

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Richard Judd
51 Parkside Drive
Berkeley, CA 94705

October 5, 2004

David Graber
GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Dear Mr. Graber:

Please consider these comments on the draft General Management Plan for Kings Canyon and Sequoia National Parks.

My concerns are that the Plan will allow stock to continue to damage the backcountry, and also that damage caused by stock use will inevitably lead to otherwise unnecessary limits on hiking access. The net effect will be to keep many people out of the wilderness in order to make up for the disproportionate damage caused by packtrain access for a few.

In August 2000 my family backpacked over Piute Pass, down Piute Creek, up Evolution Creek and, one rainy afternoon, hurried into Colby Meadow looking for a place to put up tents before the rain got worse. When the rain partly cleared off after dinner, we had spectacular views of the surrounding slopes and mountains through the shifting mist and clouds.

The next day, in the morning light we discovered that in the large clearing where we had camped, there was not a patch more than 3 or 4 feet square that was free of mule or horse excrement, of varying ages and consistencies. Much of the area had been swept in an effort to clean things up, but the overall effect was of a farmyard—a depressing contrast to the spectacular preceding evening. Where both tents were pitched, all around the large fire ring left in the center of the clearing, and in the area where we had cooked and eaten, grass and pine needles had been replaced by droppings and their fragments.

The Plan needs to consider realistic alternatives to give places like Colby Meadow a chance to recover, and to keep other spots from suffering the same consequences. Permit quotas regularly turn hikers away from most points of entry into this part of the backcountry. Trailhead quotas might be doubled if pack trips' effects on the backcountry.did not have to be taken into account. The damage Colby Meadow has suffered from pack stock is out of all proportion to the number of backcountry visitors who rode in, magnified something like ten times by the stock necessary to carry not only the visitors themselves but their dunnage, packers and the packers' food and equipment.

Colby Meadow is certainly not the only environment degraded by pack stock. For instance, the Piute Pass trail itself toward the end of that summer was chewed up, full of exposed, trip-hazard rocks and dust churned up by stock traffic, turning into a slog what should largely be a pleasant climb up an attractive drainage.

The common justification for allowing packers in the backcountry is to make possible a wilderness experience for those who cannot hike in, because they are too old, too young or have a disability. In more than 30 years of visiting the High Sierra, I have yet to see a party using stock which lived up to this justification. My younger son, age 11 during the summer of 2000, carried his pack with us, including hiking out over Lamarck Col. My wife and I are now both over 50. Most pack train visitors I have ever seen are between those ages, neither old enough nor young enough to justify a need for assistance based on age. Likewise, I have never seen an overnight stock party in the wilderness which included individuals with apparent disabilities. The vast majority of stock travelers choose to ride as a matter of preference.

Backpacking aches, pains and fatigue are real enough, and I would not outlaw alternatives to hiking on some high moral ground. All other things being equal, getting more people a chance to experience the backcountry is a good thing. However, allowing access by pack train inevitably has the opposite effect when wilderness management requires limiting entry overall, reducing the overall number of people who can spend time in the mountains, as well as routinely causing damage beyond the capacity of hikers at their worst, to meadows, trails, and streams.

One alternative that should be considered, if pack trains are to be permitted as a means to allow access to those unable to hike, is limiting stock access to trips with young children, those over 60 and people with disabilities. In mixed groups, able individuals could hike. This would intrude into visitors' privacy and freedom of choice, but that seems preferable to having to deny wilderness permits to many others so that a few have the freedom to choose to use mules or horses.

Another alternative that should be considered is to require packers either to bury or to collect and carry out their animals' defecations. Humans, who leave behind a fraction of what mules or horses do, are now strictly admonished to deposit waste at least 100 feet from water, buried at least 6 inches deep, or to carry it out. Mules and horses, in contrast, foul trails, stream crossings, camps and meadows indiscriminately, burying nothing. Their leavings are then inevitably spread by those who must walk through after them.

Another alternative worthy of consideration would be to regulate what stock carry. This past summer I spent a night at Fifth Lake on the North Fork of Big Pine Creek.* Three men who had been packed in to a campsite a few hundred feet away were enjoying the comforts of a full-sized two-burner Coleman stove, a folding aluminum camp table and cold beers, among other things. I don't know how many extra animals are used over the course of a season to transport creature comforts, but even one animal weighs many times what a human does, and does corresponding damage. Over the years my consistent impression has been that pack trips

* Big Pine Creek and the Piute Pass trail aren't in the national parks, but they are park entry points. The same issues that affect next-door Forest Service wilderness exist in Kings Canyon and Sequoia.

enable their passengers to achieve a standard of living which requires more weight, and more animals, than needed to enjoy the backcountry.

One thing stock could usefully be required to carry is their own feed. This would protect grass and meadows.

Finally, most important, the Park Service should consider phasing out pack stations. In reality, pack trains persist largely because horse and mule packers are a Sierra tradition, and provide a livelihood for a handful of owners and work for their employees. However, times have changed, and will keep changing. Demands on the backcountry have grown, and a steady tide of new or newly recognized impacts has curtailed once seemingly essential features of High Sierra trips, like campfires and drinking from streams. The environmental damage caused by pack trips, and the otherwise avoidable limits they cause on the number of people who can get into the wilderness, will only worsen and lead to greater conflicts in the future. The Plan should provide now for phasing out or at least scaling back permits as they expire, allowing owners and employees a transition.

Steve Roper foresaw in 1976 (in the Climber's Guide to the High Sierra, p. 26) much of what packtrains have caused since. It has become obvious that his concerns were more than the "rantings of an anti-packtrain fanatic" which he called them. I hope that it will not take another 30 years to bring this problem under better control.

Sincerely,

Richard Judd

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I did not have time to review the entire document, so I focused on reading sections which are most important to me. I also focused on the preferred alternative, because, as I understand it, this is the alternative which will be implemented or modified to make the final GMP.

In the preferred alternative the park would move administrative facilities out of the park. It was not clear whether this was intended for admin, maintenance, resources, research, fire and rangers, or only for a portion of these. I am concerned about this on several levels. Impacts to park operations, from having to drive further to and from projects were not considered. Employees having to drive through the entrance station in the middle of the day will also impact traffic and congestion. It may be possible to make this work in Ash Mountain, but I do not think it is safe or ecologically ethical to do that in Grant Grove or any other part of the park. The nearest land that the park could use on 180 is a long way down the highway so employees would spend a lot more of their time commuting to the park from their shop or office.

It was unclear to me the reasoning behind wanting to buy out Wilsonia, or what the park plans to do with historic structures if they buy them. Can these properties be used to supplement the inadequate employee housing situation in Grant Grove? Could they be used for more office space? It is my understanding that the park has allowed the historic structures which they own in Wilsonia to slide into disrepair. What do we plan to do with them?

Why does the plan say that the park will have no pack station at Wolverton? This is not good for the High Sierra Camp at Bearpaw, who need weekly resupplies to operate. It also has impacts on the backcountry resource. When Cedar grove pack station does the resupply they have to stay overnight in the backcountry rather than being able get in and out in one day. Impacts to the backcountry from this extra overnight stock use was not considered.

All of the alternatives state that seasons in Cedar Grove are "extended fall and spring" What does this mean and what will the impacts be to park operations and to staff and visitor safety? The road is dangerous when it is icy. It can easily start snowing in October, and it would be a lot of work to try to keep the road clear through the winter. Visitors could become stranded if there were a large storm. Rocks fall on the road continuously throughout the rainy and snowy season and it could be hazardous to keep the road open when there is a lot of rock fall.

Catie Karplus
49580 Whitaker Forest Dr #9
Badger, CA. 93603

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Topic 1: Misc. comments and ideas
Having just returned from a week of backpacking in SEKI out of Lodgepole, I felt compelled to respond to the Draft GMP. I have been hiking in SEKI for 52 years, going back to when it was safe to drink the water. Obviously, I am very prejudiced against stock use; this last hike was the worst - trails and campsites (within 30 ft of Ranger Lake were littered with manure, the trail from Orwell Meadows to Ranger churned to dust, and the Bear Box totally filled by one party. The only idea I have, if you must continue it, is to require manure catchers on the stock and at least limit the number of stock to 3 or 4. This is done as a matter of practice in Charleston, N. C. where they have a multitude of commercial horse and buggy tour companies. Lastly, can you limit what comes in from the national Forest?

Topic 2: Comments on alternatives related to Nat. Res. and Back Country/Wilderness
It was stated that Wilderness Studies & Recommendations were not part of the GMT - Ridiculous!
Support previous public comments re. Additional Wilderness
Alternative A is by far the best
Am appalled at Alt. D serving as the base for pfd
" " " " D and the Pfd claimed to be supporting changing user groups and "enhanced by more diverse backcountry use." Like what: motor bike, nudity, rock bands, etc.?
Am appalled that Alt. D and Pfd are claimed to not impair Resources or Values
Am appalled that Alt. A is claimed to only partially meet NEPA Goal 101 (b) "responsibility of each generation as trustee of the environment," and safe, healthful, productive environment because it bans stock use," thus hampering resource protection efforts." Outrageous! A is the only one that does. What about impact of horse manure on health and safety?
Pfd is all right on "Backcountry Use and Trail System," so-so on "Commercial Stock Operations," terrible on "Stock Operations."
Good idea to provide campsite for backpackers.
Can't believe that D was rated so highly in the CBA process. As an engineer I've done a lot of systems evaluation and comparisons and do not feel that your evaluators wereaccurate and unbiased.
To me, bsackpacking in the wilderness is all about solitude with nature. When I hike, I live in dread of large groups - should be limited to no more than 6.

Topic 6 Special Use Permits
Support keeping the Scout camp at Wolverton

Walt Keller, Ph.D.

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Subj:	**Draft General Management Plan---------Environmental Impact Statement**
Date:	10/4/04 11:19:58 AM Pacific Daylight Time
From:	Otrkennedy
To:	david_graber@nps.gov
CC:	susan_@nps.gov, Otrkennedy

Respondent:
Ronald D. Kennedy
4741 Sleeping Indian RD.
Fallbrook CA. 92029
760-723-4357
otrkennedy@aol.com

(West Mineral King # 17)

MY DRAFT COMMENTS 10-4-04

Regarding: Sequoia And Kings County National Parks and Middle And South Forks of The Kings River And North Fork Of The Kern River, Tulare and Fresno Counties. California.

General Management Plan And Comprehensive River Management Plan / Environmental Impact Statement. EIS

TO:
Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651

Forward: After reviewing EIRs on the "Environmental Quality Action Committee" for the City of Newport Beach CA. I find this draft reads like a puzzle, trying to figure what the true options are is confused: in it's design and approach for the reader. On the Comity I would have made a Motion to reject a EIR of this quality against the Applicant, for the above findings.

A. CABIN RIGHTS

V.2, P.299, "'At one time the U.S. Forest Service had a program that permitted privately owned cabins on public land through 99-year leases.---there are examples of privately owned recreational cabin communities at -- Mineral King -- Recreation cabin communities are not unique to Sequoia and Kings Canyon National Parks, their surroundings, or the Sierra Nevada."

V.2, P.293 " NPS 2000a). In this case a special use permit is defined as a "privilege," not a "right"* Director's Order #53: Special Use Permits has procedures to be followed for special park uses (NPS 2000a). Discontinuing special use permits beyond the current permit period would be consistent with NPS policy and would result in the achievement of the core mission for Sequoia National Park."

V.2, P.355 "Permit cabins at Mineral King would be removed in accordance with PL 95-625, section 314. About two-thirds of the 60+ cabins contribute to the Mineral King Road Cultural Landscape District. Removal would result in the irreversible and irretrievable loss of cultural recourse in terms of the cultural landscape district"

V.1, P. 39 "The 1978 Law that add Mineral King to Sequoia National Park provided the National Park Service with limited authority--- In accordance with Public Law 95_625, the permits are non-transferable and can be revoked by the National Park Service at any time if the service determines that continued use of the cabins by private parties is incompatible with park purposes or if the land is needed for park purposes."

Comment: Regarding the "99-year leases" This original binding "Lease" Contract with the Federal Government has not been signed away by cabin owners of record, Nor was it signed away in the transfer of the area from the Forest Service to the Park service in 1978 in the "§ 45f. Mineral King Valley addition authorized." And therefor it is still in force. How does Director's Order # 53 (NPS 2000a) Cancel the original terms of the original Federal Lease, And Congressional Legislation of 45f ?

---

§ 45f. Mineral King Valley addition authorized (as shown below)
As drafted by Congress, Giving Rights to the Secretary, And giving protective rights to the holders of Land and Leases. Also giving guidelines for compatible uses in the Mineral King Valley after the ("(b) (2) The Sequoia National Game Refuge is hereby abolished and the Secretary of Agriculture shall transfer,") transfer to the Park Service, Department of the Interior.

The above legislation does not Recognize or call out "Directors Order # 53" as sited in the EIS. page V.2, P. 293. But in fact this legislation gives rights to holders of Leases,

(2) "Such rights of use and occupancy shall be for not more than twenty-five years or a term ending at the death of the owner or his or her spouse, which eve is later."

(7) (d) Leases" (A) "any leases or permit on Federal Land within the area added to the park under this section which is in effect immediately before November 10, 1978, shall continue in effect pursuant to its terms and conditions

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following the expansion of the park under this section."

My recommendations are for Alternative C.
:V.1, P. 70-1. "Alternative C: Preserve Traditional Character and Retain the Feel of Yesteryear; Guide Growth," p.71 Mineral King---"Special use permit cabins are preserved to exemplify a recreation community in Sequoia National Park,"

B. DISNEY OWNED PROPERTIES
V.2, P.69 "Mineral King Valley Private Properties (Sequoia National Park)"
Comments: these 29 Acres of land should be identified as Disney, and listed in the reference index as Disney.
V.2, P.247 " The parking capacity at trailhead lots has not been measured, but park staff report parking demand has exceeded supply"
V.2, P.301. "Mineral King" This Trail Head Parking also should be called out as Disney, and listed in the reference index as Disney

V.2, P.339 and 345 have this call out, Regarding Disney Property "The purchase of land (on a willing-buyer / willing-seller basis) by the Federal Government"
V.2, P 301 "Since this action would involve a Willing Seller" (of trail Head Parking).
Comment: On looking at "§ 45f. Mineral King Valley addition authorized." There are no call outs of a "WILLING SELLER"
or any restrictions on acquiring in holdings. This Willing Seller addition is not called out by Congress and should be totally deleted from this Environmental Impact Statement.
In fact § 45f. states:
(1) "Within the boundaries of the area added to the park pursuant to this section, the Secretary may acquire lands and interests in lands by donation, purchase with donated or appropriated funds, exchange, or transfer from other Federal departments or agencies."
(4) "Nothing in this section, or in any other provision of law, shall prevent the Secretary from exercising his authority to acquire property"

C. COMMERCIAL USE IN MINERAL KING
V.1, P.200 "Private Land and special Use Permits on Park Land" "the preferred alternative would result in major, beneficial,---acquiring and adaptively using special use permit cabins for public use,"
"Park Management Operations, and Facilities" "The preferred alternative would generally have moderate, beneficial impacts on park operations---commercial or incidental business permit holders, and partners-would be minor to major and beneficial"
V.1, P.201 "Park Management Operations, and Facilities" "Alternative A" ---

commercial or incidental business permit holders, and partners-would be minor to major and beneficial"
V2, P. 202 "Historic structures, districts, and landscapes would be preserved, restored, rehabilitated, and adaptively used in accordance with the Secretaries Standards"-----"Numerous adverse historic facilities would be preserved and adaptively reused"
V.2, P 204, 213, 218 "Mineral King"---"The National Park Service would acquire special use permit cabins for public use."-------"(1) appropriate sustainable public uses for acquired cabins; (2) cabins to be retained for public uses; (3) a strategy to ensure that cabins and related utilities meet appropriate codes; (4) a viable management / maintenance strategy,
V.2, P.339 Under the preferred alternative some cabins would be made available for public use or park administrative purposes. Permit holders would be given the opportunity to donate structures in lieu of required removal, providing a major, beneficial, short-term impact for these individuals because they would be relived of the legal requirement to remove their structures and rehabilitate the sites, and they would not have to pay for the cost of removal or rehabilitation."
V.2, P.303 A cultural resource management plan for the Mineral King Road Cultural District would be developed in consultation with the California historic preservation officer to make decisions related to contributing and non-contributing cabins, appropriate public uses and adaptive reuses, and the management of acquired cabins. This would result in major, beneficial long-term impacts on public use of park land"----"The operator would have to ensure that utilities met applicable health, safety, and environmental standards in order to accommodate long-term public use."---"Eventually over 60 permit holders and their families would no longer own private cabins on public land."---"and historic resources would be adaptively reused. Making cabins available for public use would have a moderate, beneficial, long-term impact on public recreational use in the Mineral King area"
V.2,P.321 "With the acquisition of Mineral King permit cabins for public use, individual utility systems would be assessed and sustainable utility systems developed for the level and location of self-supporting public use. The system would be managed by a partnership group, resulting in moderate, beneficial, long-term impacts to park operations."
V.2,P323 "Partners. Partnerships would be pursued to provide education and other operations, including the management and operation of the Mineral King permit cabin area, Which would be acquired for public use."
V.2, P.333* Partners. Partnerships would be pursued to provide educational and other operations, including management of the Mineral King area, resulting in a moderate, beneficial, long-term impact on park operations."
Comments: In the past the Mineral King cabin owners have opposed any type of Commercializing of the Mineral King Game Refuge. Now that the game refugee has been 'abolished" and placed in Sequoia National Park, Our

stewardship of keeping this Alpine Valley free of: Commercializing. Partners, Partnerships groups, and Operators, will not be Abandoned. Do you really believe current Cabin Lease Permittees will sign there Leases & Cabins over to the Park to allow the "start" of Commercializing rental units on a seasonal or year around basis in Mineral King? "No, we will not help Commercialize Mineral King." This Development plan should be Denied.

On looking at "§ 45f. Mineral King Valley addition authorized." "(3) The commercial use of such property subsequent to November 10, 1978, shall be treated as incompatible with the purposes of this section. In the case of any property which was used for commercial purposes at any time during the ten calendar years immediately preceding November 10, 1978, any substantial change or expansion of such commercial use subsequent to November 10.1978, without the express approval of the Secretary shall be treated as incompatible with such purposes."

Note: The Disney land at (the old Dump site) needs to be Mitigated for there is loose Asbestos on the ground and affixed to old: stoves and water heaters. And it is not a safe place for children to play, or adults to look for souvenirs. OSHA has many directives which all state "there is no safe exposer level for breathing Asbestos."

Sincerely.

Ronald Douglas Kennedy

ENCLOSURE:

EDITOR'S NOTE: The enclosure (16 USC 45f) has not been reprinted. The original letter is on file at park headquarters.

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David,

I feel that preservation of the Mineral King District is a beautiful thing. The people who live there are part of the WHOLE and add that certain character to the area. They have the background and feel for the area whereas the Park people do not. As long as the homes stay maintained, no new building to take place while loving people with the "right energy" own these cabins, i am good with it. Heck, i would love to have one of the cabins up there!!!! it would make a great retreat with gorgeous scenery.

Thanks for your time

Barry "Sequoia" Klein

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2125 Ames St.
Los Angeles, CA 90027
October 4, 2004

Dr. David Graber
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Dear Dr. Garber:

We are writing in response to the Draft General Management Plan for Sequoia and Kings Canyon National Parks. Our particular concern is Topic # 6 and the cabins at Mineral King. We favor Alternative C of this plan. Since Mineral King is now part of a National Historic District, it is incumbent upon the Park Service to make sure the cabins remain as the historic structures that they are. And since the cabins have been maintained by the heirs and successors of the pioneer families who built them and since no two of them are alike and each has its own idiosyncrasies and quirks, no one is better able to preserve them than the family members who have the ability and the incentive to do so. No commercial operator could afford to bring the cabins up to code and rent them out and maintain the historic integrity of the buildings. And we would hope the Park Service would not destroy the cabins and erect plaques to indicate the locations of historic structures.

We strongly recommend that the Park Service and the cabin owners continue to work together to maintain Mineral King as a family-friendly historic district. Since the cabin owners have begun working with the Park Service in the VIP program (helping in the ranger station, leading campfire programs, leading nature walks, painting park tables and benches and acting as docents for some of the historic cabins) the relationship between them and the Park Service personnel has strengthened. We anticipate that this program will grow in ensuing summers. The cabin owners have also been asked by park rangers to be alert to the operations of marijuana farms with armed guards adjacent to the Mineral King road and to report any suspicious activities. Since cabin owners drive the road often, they can notice any irregularities more easily than the average person and report them.

The cabin owners are good for the Park and for Tulare County. They not only pay nearly $900 per year apiece for permit fees, they also pay taxes to Tulare County.

These are just a few of the reason we support Alternative C to Topic 6 of the proposed Management Plan. Thank you for giving us the opportunity to respond.

Sincerely,

Richard Koch

Richard Koch, M.D.

Jean Holt Koch

Jean Holt Koch

1991 6 June 2004

Dr. David Graber, Senior Scientist
quoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651

General Management Plan, Sequoia and Kings Canyon Parks

We have reviewed, from our standpoint, what we believe are salient parts of the extensive CD file information on the Draft General Management Plan you mailed to us.

In our opinion, alternative C is clearly the best of the options currently listed in the Draft plan. Obviously, as you will note, additional work or a new alternative will be needed.

The "Preferred" alternative fails to consider the interests of the average citizen because they have not been identified. The "No action" alternative is a misnomer because it does not represent all conditions as they exist today. It assumes that certain things will happen which might not, such as the removal of special use cabins in the Mineral King Historic area.

Alternative C preserves the history, continuity, and security of the Mineral King Valley by retaining the special use permit cabins. Many of us senior citizens have had the opportunity to share the Valley experience over many years, due to the many gracious permittees who have allowed us and our families and our guests to use their cabins year after year. In my case, this started in 1935, when I was but 4 years old! In our opinion, the cabin permit holders and all of their repeat guests lend the real continuity and security to the Valley and should be recognized as a very powerful asset by the National Park Service. These people are the true stewards of the Valley and the Valley will be adversely impacted, should they no longer be a part of it. They are among the most respectful groups of visitors this wonderful mountain area will ever see.

The cover letter, dated May 7, mentions "adapt to changing user groups." What has changed? The implication is that the old user groups may now be obsolete.

Topic 1: It appears that no listed alternative has been prepared strictly from the standpoint of the average citizen as an interest group. Average people rarely organize as a group to speak out strongly as to their interests or concerns. It appears to us that all of the alternatives presented in the Draft General Management Plan reflect the significant input of special

interest groups. Special interest groups are generally outspoken and politically forceful. These groups include the environmentalists such as the Sierra Club, and other organizations such as those of private owners and permittees. The Draft plan should be expanded to include an alternative that would represent the interests of the "average citizen" as a group. This would allow a direct comparison with each of the currently listed alternatives. The ultimately adopted plan should address the interests of all interest groups.

Topic 2: What interest does the "average citizen" have in wild and scenic rivers, or the backcountry and wilderness? We do not know.

The historic hydroelectric facilities should be preserved. The old masonry dams, constructed as parts of the original power projects, must be maintained. Has the California Division of Safety of Dams indicated what would be required to improve resistance to seismic activity? Has an hydrologist performed competent computer analyses on possible flood damage if any of these dams were to fail?

Topic 3: The Mineral King long-time cabin permittees and their guests are an important cultural resource, some with ancestors dating clear back to the mining days in the 1800s. They give needed continuity to the Mineral King Valley. This is in marked contrast to the practice of the Forest Service and, more recently, the National Park Service, where employees, dedicated as they always are, are necessarily rotated in and out of the valley at frequent intervals to broaden their work experiences.

These private cabin owners (permittees) were instrumental in the defeat of the Forest Service's Mineral King plan involving Disney and the subsequent transfer of the area into Sequoia National Park. It is obvious to us that these people are the true stewards of the Mineral King Valley and its rich history.

What does the "average citizen" have to say about the permittee cabins?

Topic 4: Because of the 23 +/- miles of difficult road leading to Mineral King, round-trip day visits will be limited for most drivers. They will want to be able to spend at least a night or two in the area before returning. This is especially true for seniors, many of whom visit Mineral King almost annually. This, coupled with the general knowledge that camping sites are often limited, will discourage many drivers from trying to make the drive on a chance that a camp

site might be available. Our experience is that many non-cabin owners do, in fact, use the private permittee cabins at the invitation the cabin owners, allowing them to enjoy the rustic atmosphere of the Valley for multi-day visits. All the alternatives, except C, would effectively remove those cabins from private ownership, and therefore would further restrict access to the Mineral King Valley. Because the group impacted would probably consist of many seniors, the removal of the cabins would severely discourage seniors from using the Valley, thus these alternatives would actually discriminate against older people.

Topic 5: Most of the private land inside the Park is part of the wonderful heritage of the park going way back to the 1800s and the huge mining operations that have forever left their print on the area. The store at Silver City is a good example of a neat rustic feature remaining nearby and below the Mineral King Valley. We feel these lands should be retained as private lands in the adopted plan.

Topic 6: Special use permits on the private Mineral King cabins. Several of the alternatives view some public use of the former private cabins. In our opinion this is pie-in-the-sky thinking. The National Park Service will never have funds nor be able to find competent informed help to maintain the idiosyncrasies of each individual cabin. Certainly no former owner is going to want to visit his old cabin in a run-down condition. Our experience suggests that each old cabin has many peculiarities that only a permanent resident could possibly be aware of, or understand. No standard electrical power is available. Propane feeds gas lighting fixtures, manual water heaters, and old Carnot cycle refrigerators. The alternatives that propose to utilize these old cabins as public facilities appear to us to be misrepresenting the true picture, apparently in an effort to add credence to the plan to remove them from private ownership.

Thank you,

Charles D. Leighton Marianne A. Leighton

Charles D. Leighton
Marianne A. Leighton

462 Santa Alicia
Solana Beach, CA 92075

Tel (858) 755-8111

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Oct. 1, 2004
58 Coyote Rd.
Chalfant Valley, CA 93514

To Whom It May Concern:
Below are my comments on the Draft General Management Plan.

Concerns
Action # 372: Mineral King Cabins:
While I understand the NPS' desire to placate and appease the Mineral King cabin owners, I strongly disagree with the proposed actions described in the draft GNP. The intent of the original legislation assigning management of the Mineral King area to the NPS was to return this area to a natural state. There is no reason to depart from the legislation. While I understand that it will be hard for the families of the cabin owners to lose the privileges they've enjoyed, there is *no* reason for anyone to enjoy privileges in a national park that aren't shared by all. Furthermore, there is no *true* historic value to the cabins. There are countless locations throughout California and the west where anyone wishing to view similar cabins in similar settings may do so. People who don't wish to camp or backpack can be accommodated at Silver City. There should be *no* development of commercial facilities in the Mineral King area, including in "historic" cabins.

Mineral King is a special and unique frontcountry area in Sequoia: not crowded by RVs, not dominated by a commercial flavor, quiet and rustic. Having worked in the area, I know that many, if not most, people who use the area come specifically because of these values. There are many other areas of the park that offer a more developed setting for those who seek that experience. There is absolutely *no* reason that every park area has to offer every possible visitor experience. It is incumbent on the NPS to preserve and enhance the undeveloped uniqueness of Mineral King rather than catering to the desires of an extremely small group. As current cabin owners die, the cabins should be removed and the area naturalized, as intended by the original legislation.

Action # 162: High Sierra Camps
The stated reason for the NPS continuing to allow a commercial operation in the backcountry has been to provide a backcountry experience for those who otherwise would not be able to enjoy the backcountry. This is a fallacious argument. During the time I worked at Bearpaw ranger station, I did an informal survey of users of the facility. The majority were well-heeled, middle-aged, and perfectly capable of backpacking. Though I haven't been in the area recently, I frequently day-hike in Yosemite, and observe the same phenomenon with the YOSE camps.

Backcountry camps are a luxury for the elite who can afford them: an undemocratic holdover from days of yore when parks were far less heavily used. In the case of the Bearpaw camp, backpackers are relegated to a dark, ugly campground, while those who pay the price get to "camp" on a promontory with an exceptional view. Heavy and unacceptable impacts are associated with this kind of operation (stock and helicopters for supplies and maintenance, diversion of spring flows, septic systems that frequently

malfunction releasing sewage into the surrounding areas, etc.). The Bearpaw area has been excluded from wilderness designation because of the camp; it is, however, absolutely worthy in all respects – other than the camp – of that designation.

As far as the idea of establishing another camp on the Hockett Plateau, I am absolutely opposed to that for the reasons outlined above.

I would like to see the preferred alternative be the one outlined in Alternative A, the removal of the Bearpaw camp *and* no feasibility study for any other such camps. Given that I have always heard that the concessioner *loses* money on the Bearpaw camp, I can see no good reasons whatsoever for continuing to support this high-impact activity.

Action # 161: (and other related actions): Pack Stations
The commercial pack operations at Wolverton and Mineral King (at least) should be removed and not replaced. A national park is not an amusement park and doesn't need to provide day rides. There are ample opportunities on the outskirts of our parks for this kind of activity. With a pack station at every major eastside trailhead, people who want a backcountry pack trip also have ample choices. Given that the Wolverton pack station will have to be relocated (more development and impacts), that the Mineral King pack station is currently vacant, and that typically it's hard to find people to run these concessions and even harder to find people to run them *well*, I see no valid and defensible reasons to keep the operations running.

Action #160: Backcountry Stock Use
In the previous Master Plan and in subsequent years there was a commitment to evaluating stock use in the higher, most fragile areas of the backcountry with a goal of removing stock and their impacts from these areas. None of the alternatives even considers this possibility, which I believe to be a gross oversight.

Commendations
Action #12: Transit Systems
I believe that the provision of a transit system for the Giant Forest area will enhance visitors' experience in the area, relieving congestion and encouraging people to get out of their cars and walk.

Action #18: Educational Outreach
Increasing outreach efforts is a mandatory step toward protecting park resources. Since the Parks are increasingly used by "local" visitors, it makes good sense to teach these users how to care for the parks in their "backyard".

Action #30, 335, 367: Hydroelectric Facilities
I strongly support the removal of all hydroelectric facilities from the Parks.

Thanks— I don't need a response!
Yours— Lo Lyness

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September 27, 2004

David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Susan Spain, Landscape Architect
12795 W. Alameda Pkwy.
Denver, CO 80225-0287

Subject: Draft GMP Comments for Sequoia and Kings Canyon National Parks

Dear Dave Graber and Susan Spain:

I am writing to comment on the Draft General Management Plan and the Comprehensive River Management Plan for Sequoia and Kings Canyon National Parks. What follows are my concerns about the plan, and what I feel should be added to the plan.

NPS Development Issues

I have four comments that relate to NPS development issues. First and foremost, I believe that as we move into the 21st century, the National Park Service should, and must, act as a role model for the public by reducing the impact of our daily activities on the environment. If we focus on conserving land, but don't reduce our contribution to the local ozone problem, we are being short-sighted. If we provide educational programs with the hope of encouraging visitors to reduce their environmental impact while continuing our heavy use of fossil fuels, we are being blatantly hypocritical. It is therefore critical that the GMP take a strong stance on "greening up". By this, I mean using double (or even triple) paned windows in all facilities, installing solar panels, and encouraging the GSA to provide more appropriate and fuel efficient (hybrid) vehicles. There should be bike paths in all sub-districts. While the shuttle system is a good start, it is just one element of what needs to happen. Light pollution may also be mentioned here. With our desire to reduce bright lights, why did the NPS put lights into the foothills campgrounds that are so bright that one can see one's own shadow at camp?

Second, there should be a greater emphasis on planning new developments and recreating old developments in such a way that protects natural resources. For example, if developments are to be created in phases, so should the logging and paving that precedes them. Wuksachi doesn't seem to be expanding to anywhere near the size of its designated footprint and in the meantime, many mature trees have already been cut. On that note, it turns out Wuksachi might not even be able to expand due to recently discovered water limitations. This would be less of a problem if we had considered greener alternatives to begin with, such as a youth hostel. Another example of improved planning is in the decision process of when to keep developments in operation. If Cedar Grove is kept open longer, what will be gained? It isn't cost effective and it doesn't serve many visitors. At the same time, Cedar Grove will lose buffer time before and after winter when it normally heals from impacts. This is also the time that wildlife moves down from higher elevations into the Cedar Grove area, where they are free from intrusions from humans. Then there is also the issue of planning where to put new developments. The new Sherman Tree lot is surrounded by sugar pines, an important fall food for bears. One can easily predict the human-black bear interactions that will occur at the new lot – it will likely be much like the Pinewood Picnic area.

A third concern with development issues is that only one alternative discusses the idea of making facilities more rustic-looking. The other alternatives hardly mention aesthetics. We need to face it, the Mission 66 style of buildings, the enormous parking lot at Lodgepole campground, and the Grant Grove developed area are just plain ugly. There is nothing about them that says wilderness, beauty, or respect for nature. Let's move toward improving the situation.

Finally, I believe that the employee housing issues were not adequately addressed. There are certainly many appropriate reasons for locating employee housing outside of the parks. It encourages mixing with the local community and reduces impacts on natural resources. What is important to remember that there are also many reasons we do need housing in the parks. Housing in the local community is expensive and therefore many employees are moving up to an hour away. What problems does this create? Air pollution, enormous safety issues with driving – especially for those employees working far from towns at Lodgepole and Grant Grove, employees who have little connection with the resource, and perhaps most importantly, employees who live too far away to respond to emergencies after hours. When seasonal employees live in the park without permanent employees, the culture can become out-of-control with drinking, etc. Also, the lack of permanent employees in communities effectively eliminates the "park service family" that is supposed to make us a cohesive unit. If we do not expand housing, but retain what we have, it also must be stated that the housing that does exist in Lodgepole and Grant Grove is, in many cases, both limited and unacceptable. Employees sleep in trucks in the parking lots, and supervisors' homes, and in the campgrounds. Some facilities are not bear-proof. Some facilities are just awful.

Concessions Development Issues

I have a few comments relating to concessions development issues. First, the employee housing areas at both Wormwood and Wuksachi are shameful. They are so bad that employees commute daily from Three Rivers – through winter storms – to get to work without living there. Historic or not, these facilities need to be enlarged, updated, made bear-proof, and given communal areas. The terrible housing may also be a factor in why it is nearly impossible for them to attract and retain a cadre of good employees. As it is, concessions employees are often just at the parks to party and cause numerous problems for bear management and law enforcement throughout the summer.

Second, it seems that the park is at one time encouraging visitors to come in the winter, while increasingly limiting services that visitors need. For example, if a group rents a room in Wuksachi during the winter and it rains the whole time, what can they do? The hotel rooms are far from the restaurant so it is difficult for elderly people to get back and forth and the main lobby has the only communal area. There should be communal rooms with puzzles and games and a fireplace like the lodge at Grant Grove. Also, if one is staying for a week, there is only one eating option – Wuksachi. This is boring and expensive. I imagine the situation could be fairly easily improved.

Land Classification, Use, and Aquisitions

I have some concerns on the classification of various land types. For example, Rock Creek-Miter Basin is classified as cross-country, meaning remote and largely untouched. This is far from a description I would use for that area. Ever since quotas were placed on Mt. Whitney, there has been a huge increase in the use of the Rock-Creek-Miter Basin area. My suggestions therefore are to put quotas on wilderness cross-country use and note that even remote areas may quickly become crowded. Also, there seems to be a lack of regional planning. It makes more sense to make plans for wilderness on the scale of the southern Sierra with other agencies than to work alone with limited partnerships.

The proposal to use the Hockett area for another high sierra camp is going to impact the use of the area (mainly stock users) and the meadows. I recommend against it.

The plan for land acquisitions needs to be expanded. Areas that are being managed by other agencies bordering the park are not being preserved for the values in the GMP. For example, Case Mountain is constantly grazed and full of exotic plants. Also, why not try to acquire more foothill land? It is a unique and valuable resource.

Wild and Scenic Rivers
Please add into this section the danger of heavy human use along the river corridors as relates to erosion, trash, and trails. These impacts are already noticeable in the foothills area where we also now have many bear problems that start at the river.

Mineral King Historic District
If the Mineral King cabin issue was a new one regarding eminent domain, I would side with the cabin owners. That, however, is not the case, and the cabins need to be removed. They are a fire hazard, and a safety hazard, they impact wildlife, and they add more unnatural light and noise to the valley.

Devil's Postpile
SEKI should turn management of DEPO over to YOSE. The six-hour drive to DEPO necessitates a large investment of time and money to send experts over to manage the area. It would be more convenient for YOSE managers to take on the management.

The Purpose of SEKI
Shouldn't one of SEKI's purposes be to "Protect and preserve natural resources – especially native flora and fauna"?

Wildlife Effects
The GMP notes impacts to wildlife from the parks such as roadkill and habituation and then classifies them as negligible. In 2003, two fishers were hit and killed on the highway – how can that be considered negligible? In recent years, dozens of bears have been hit by cars, a handful killed by management, and thousands of hours of employee and volunteer time have gone into reducing incidents – is that negligible? Air pollution is potentially a factor in the rapid spread of the fungus that is killing the mountain yellow-legged frog – how about that?

Superlatives
Isn't the General Grant tree now the second largest tree?

* *

Thank you for the opportunity to comment on this important plan.

Sincerely,

/Rachel Mazur/

Rachel Mazur

Susan B. Merrill, CPA (ret.)
Arthur Q. Merrill
30007 Road 158,
Visalia, CA 93292

559-625-1314
Sbaqmerril@aol.com
cell 559-679-7186
FAX 559-625-1303

October 5, 2004

Richard Martin, Superintendent
C/o Dr. David Graber, Senior Scientist
C/o Susan Spain, Landscape Architect
Sequoia & Kings Canyon National Parks
47050 Generals highway
Three Rivers, CA 93271-9651
david_graber@nps.gov

Re: General Management Plan (GMP), Sequoia and Kings Canyon National Parks

Dear Sirs and Madams,

These are my comments on the GMP and they are arranged according to your requested format. Please be patient if they are not quite in the order you requested.

Topic 2: Natural Resources, Wild and Scenic Backcountry, Wilderness

1. **Wild and Scenic River Consideration of the East Fork of the Kaweah River (Mineral King)**

   Response: The East Fork of the Kaweah River should not be designated as a "Wild and Scenic River" due to the multiple uses from its headwaters down past Atwell Bridge. The hydroelectric facilities and stock use are two examples that preclude this designation. Both of these uses should remain and there should be no change in the river's designation

2. **Wilderness Designation of Mineral King and surrounding areas.**

   Response: Wilderness Status should not be considered for the Mineral King or Oriole Lake areas. These areas are not suitable as

they have had habitation for over 100 years and the whole area presently has multiple uses. These areas should not be restricted. Oriole Lake in-holders should be allowed to remain and not be condemned. Bearpaw Meadows High Sierra Camp is a wonderful resource and should be allowed to remain.

3. **Air Quality**

Response: We support the continued control burn program of the National Parks with the cooperation of the Air Pollution Control Board to reduce air pollution. As indicated on Page xiv, air quality should improve over time, as it desperately needs to be better than it is presently. This past year has been better but it is probably due to a milder summer. The Air Pollution Board needs to be more responsive to the long time frame of the Parks once a burn has been established.

Topic 4: Transportation, Visitor Experience

1. **Visitor Experience, Stock**

Response: Pack stock should be allowed throughout the Park and not eliminated. They should be allowed in the backcountry on established trails as is presently done. Major trails out of the Mineral King Lake basins should be maintained as one of the three backcountry prescriptives. Secondary trails should also be enhanced and maintained. The 1971 Master Plan calling for the phasing out of stock should be shelved and eliminated and Pack Stock use should be continued in the backcountry.

2. **Visitor Experience, Hockett High Sierra Camp**

Response: A new High Sierra Camp at the Hockett Plateau would be a positive impact on the educational level of the High Southern Sierra ecosystem and therefore Hockett Meadows should NOT be included in any wilderness designation and a High Sierra Camp should be considered.

3. **Transportation**

Response: Mineral King road should not be improved to become a high scenic drawing experience. The only suggestion would be to provide some type of pavement or chip seal on the road to keep the dust down on the dirt part of the road to help in the air quality.

There needs to be an internal shuttle within the Parks to the Big Trees to reduce dependence on individual transportation. The City of Visalia is in the process of trying to coordinate a Gateway Shuttle from Visalia to the Parks to facilitate the out of State and Foreign visitors, but it would not be feasible without the internal shuttle. Fee increases to accommodate this internal shuttle should be of the utmost importance.

Topic 5: Private Lands

1. **Silver City Status Quo**

Response: Private use of private lands such as Silver City should be allowed to continue as stated in the Preferred Alternative. Only a willing seller of property through donation would be allowed to occur. Removal of private property from the property tax rolls of Tulare County would be detrimental.

2. **Enhanced Facilities at Silver City**

Response: There is a suggestion of Enhanced Facilities at the Silver City Resort (Page 152), to expand services. This suggestion should be researched carefully and thoroughly. The existing utilities (water) are being used to the maximum presently in this drought year to provide the necessary flow of potable water to the owners. This is also after upgrading the system. The Silver City Mutual Water Corporation is owned by 61 members and at this time provides water to its members. New regulations governing water delivery and training is expanding and more demanding and it could require extensive new infrastructure and management to develop any additional services for the Park. It seems the system can only provide existing flow without extensive new infrastructure and more intense daily management.

3. **Oriole lake**

Response: Oriole Lake access should be improved to provide public access to the foothill lake environment. The in-holdings should remain.

Topic 6: Special Use Permits

1. **Mineral King Special Use Permits**

   Response: Mineral King and Cabin Cove cabins permits should be allowed to be renewed. As special use permits expire, permit cabins should be allowed to renew their permits and transfer them to future generations. Special use permit cabins should not be removed as suggested. They exemplify a recreation community in Sequoia National Park that is unique as their Historical Designation implies. Present proposed bills by our representatives in Congress could help solve the problem with Congress approving legislation that allowed the special use permits to continue. This is the best alternative. These cabins were originally under the US Forest Service and their legacy should remain. It is unfair and not in the best interests to change the policy and laws midstream in 1978 after over 60 years.

2. **Hydroelectric Facilities**

   Response: Hydroelectric Facility permits should be renewed after September 8, 2006 and should be renewed indefinitely. The Parks purpose should be superceded for clean electrical generation. The water diversions on the mountain lakes are minimal and are negligible to the river system and have been in operation for over 100 years and cause no negative impact. This action of not renewing the permits would increase costs of electricity to the Park due to existing discounts and permit fees.

Sincerely,

Susan and Arthur Merrill, Owners
Homer Cabin #97, Silver City
Financial Consultant, City of Visalia

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October 4, 2004

Dr. David Graber, Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Re: Continued use of Mineral King cabins by lease holders

Dear Dr. Graber,

I am 23 years old and have grown up going to Mineral King every summer of my life. My family has had our cabin for over 50 years. All my brothers, cousins, aunts, uncles, parents and grandparents have spent their summer time in Mineral King, because we have a cabin there. All I know about life, I learned at our cabin in Mineral King. I learned how to fish, catch and release fly fishing; I learned how to respect the forest flora and fauna, even the marmots; I learned to hike and back pack, and eat jerky and dried oatmeal on the trial. I also learned that Mineral King is a very special place in the United States, a place that is worth fighting to keep. I look forward to raising my children in Mineral King at the cabin, where Grandma Meyer cooked pancakes on the wood stove, and Dad showed us how to clean the fish we kept.

The cabin owners and their families are people who care about the environment and take seriously the warning to stay on trails, don't pick the flowers, but do pick up trash (I earned my Blue Jay award when I was a little boy).

I am for the continued use of the cabins by the lease holders in Mineral King.

Sincerely, Jacob Meyer

Jacob Meyer
405 West Camino Fairhaven
Tucson, AZ 85704

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October 4, 2004

Dr. David Graber, Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Re: Continued use of Mineral King cabins by lease holders

Dear Dr. Graber,

The cabin owners of Mineral King are pioneers whose families had vision and gumption back in the day when the road was mostly an unpaved trail to paradise. The road keeps many people from coming to the top of Mineral King, and it's paved these days!

My family has been coming to Mineral King since my dad was a little boy. Grandpa and Grandma Meyer and my dad came up to camp at Sunnyside for years before there was ever a cabin to buy. God was gracious to make a way for them to buy our cabin in 1953.

I want to raise my family the way Dad and Mom raised us boys, coming to Mineral King every summer. We know how to fish, hike, camp in the back country, cook on a wood stove, roast marshmallows, and to chop wood with an axe, because we have a cabin at Mineral King.

I pray we will have the continued use of our Mineral King cabin in the future, as lease holders will be granted permits.

Thank you,

Sincerely,

D. Christian Meyer
405 W. Camino Fairhaven
Tucson, AZ 85704

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October 3, 2004

Dr. David Graber, Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Re: In support of continuing to issue permits to Cabin Owners

Dear Dr. Graber,

My family has had a cabin in Mineral King since 1953 and my grandchildren represent the 4th generation of those who have enjoyed the Mineral King Valley in Sequoia National Park. We have seen a lot of things change since we became involved with NPS, mostly political, and your study (the General Management Plan) has really only pointed out that Mineral King is pretty much the same. We support the continued use of the cabins and the permit holders to maintain the use of the cabins. The permit holders and their families are a big part of what makes Mineral King so unique and their efforts have upgraded the Mineral King experience. The National Park Service has missed a real opportunity to use and apply the talent the cabin owners represent. They have been there and experienced many adventures that are interesting and represent a great portion of "The Real History" of Mineral King. The people and the cabins are one wonderful opportunity to enhance the story of Mineral King and the surrounding country. Your rangers and support staff are brought in from far away places and are supposed to share their knowledge of Mineral King. How foolish when your Ranger Station is surrounded by individuals who have been raised over the summer years in Mineral King and have many rich stories and experiences yet untold.

Once again we support the preservation of the cabins by the lease holder families and by continuing to issue permits to cabin owners.

Sincerely,

Earl D. Meyer

Earl D. Meyer
405 West Camino Fairhaven
Tucson, AZ 85704

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David,

Hard copy with enclosures on the way.
John Modin

Subject: Public Comment Draft General Management Plan
Sequoia Kings Canyon National Parks

August 2, 2004

Park GMP Coordinator
Dr. David Graber, Senior Scientist
Sequoia Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA. 93271-9651

Dear Dr. Graber:

Among the many issues presented in the Sequoia and Kings Canyon General Management Plan none is more important than resolving some long standing problems at Mineral King.

On November 10th 1978 President Carter signed into law the National Parks and Recreation Act containing a provision to transfer Mineral King from Sequoia National Forest into Sequoia National Park. The legislation marked the end of a 13-year battle to prevent the development of a hideous winter and summer recreational complex in the tiny scenic valley and environmentalist were ecstatic with the outcome.

Unfortunately, this legislation did not resolve serious impacts the existing pack station and trailhead parking lots were having on the visual quality in the Mineral King Valley. In October of 1976 I wrote in Bonanza, a Sierra Club Newsletter, article enclosed, "In its present location the lot and accompanying assemblage of vehicles result in an incredible insult to the visual qualities of Mineral King." After 28 years and a new management plan forthcoming its time to relocate the lots and pack station to a more suitable site in the Faculty Flat area. The new GMP should emphasize this as an essential goal for Mineral King directing efforts to accomplish this task as special use permits for private cabins expire and additional siting for trailhead parking and pack station become available according to provisions under the 1978 legislation.

As the use permits expire, architecturally suitable and structurally sound historic cabins could be used adaptively for public purposes as described in the preferred alternative so long as their use would not interfere with the higher priority of relocating the environmentally damaging and visually intrusive pack station and trailhead parking lots out of the valley,

and so long as their continued presence does not impact scenic or wildlife values or public access to public lands. We cannot wait another 15 or 20 years and another General Management Plan to resolve this problem. We must begin these important relocations now.

Other issues are important as well; wilderness management, transportation, fuels management, fees for backcountry use etc., should be considered with maximum concern for resource protection and restoration. Determining user capacity and resource limits should be given the highest priority in the decision making process, to ensure that excessive visitation and use does not degrade the resource we are trying to preserve. With a rapidly increasing population encroaching on these Parks this may prove to be a difficult challenge.

Other Points of Issue:

1. Maintain only the lowest level of use in the Dillonwood area. A small campground without recreational vehicle access might be suitable.

2. To prevent further erosion and widening of the Mineral King road pave
remaining unpaved sections.

3. Do not consider new High Sierra camps in existing or proposed
wilderness areas. The High Sierra camp proposal at Hockett Meadow
is an excellent example of the inexorable, incremental degradation of the natural world that we are trying to preserve in our National Parks. This proposal should not be considered in the GMP.

4. Any fees imposed for backcountry use should be used only for maintenance and restoration purposes and not for new "improvements". There are enough trails already and restrooms and other amenities only attract more use. There is too much use already.

Thanks for listening,

John and Chris Modin
El Dorado Hills California

Cc: Assistant Superintendent Russ Wilson
Chief of Interpretation Bill Tweed

242

11512 Chapman Ave.
Garden Grove, CA 92840
September 18, 2004

Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
4705 Generals Highway
Three River, CA 93271-9651

Dear Dr. Graber:

I am writing you in response to the Draft General Management Plan for Sequoia and Kings Canyon National Parks. Thank you for the opportunity to have an input on this important plan.

I want to respond specifically to Topic # 6 regarding the cabins at Mineral King. I have enjoyed vacationing at Mineral King my whole life. My parents first took me camping there when I was 18 months old. I favor Alternative C of this plan. Since Mineral King is now part of The National Historic Registry and since many of the cabins are historic structures, these cabins should be preserved. The logical people to care for them with all their idiosyncrasies are the families who have done so throughout the years for many generations. Economically, this is a win-win plan for the Park. The owners of the cabins, not only pay nearly $900 a year to the Park Service in "user fees", they also pay taxes to Tulare County. They have also become part of the VIP (Volunteers in the Park) program in Sequoia National Park, in which they help in the Ranger Station, relieving the rangers for other duties, they lead nature hikes, act as docents for some of the historic cabins, help with the campfire programs and help with maintenance, such as painting camp tables and benches, etc.

In addition to maintaining the Mineral King district, the cabin owners can be helpful to the Park personnel in vigilance against the armed marijuana farms, which still exist in hidden areas of the Park. The cabin owners probably go up and down the road more often than others. They are aware of the problem and have been asked by the rangers at Mineral King to report any suspicious activity.

I do not believe additional camping space is needed at Mineral King. The total number of visitors has declined 4 % annually from 1995 to 2000 and the rental cabins at Silver City operate at only 50 % capacity. It obvious the cabin owners are not enjoying special privileges.

The cabins owners and their friends love Mineral King and want to work with the Park Service to see it preserved for future generations to enjoy.

Sincerely,

Helen L. Mueller

Helen L. Mueller

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James Murphy
1462 Paseo Manzana
San Dimas, CA 91773

September 7, 2004

David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

This letter is commenting on the Draft General Management Plan ("GMP") for Sequoia and Kings Canyon National Parks.

I view your service as the spokes person for the forest, after all, if you don't, who will? Your job is to speak on behalf of the forest in response to political and economic pressures. The forest can only loose its wilderness characteristic once, and then it is gone forever; so speaking on its behalf is a voice of preservation.

The Preferred Alternative appears to allow stock, commercial or personal, use on a business as usual basis. Commercial pack companies should not be allowed to have permanent facilities within Park boundaries. These facilities should be located outside of the Parks where they can come into the park, only when permitted, just like any other user. The permits available for packers, including commercial operators, should be as restrictive or more than those that apply to human use. This discrimination is quite justified since pack stock results in wider and degraded trails, enlarged campsites, dust, trampling, compaction, erosion, and to urinate or defecate in or near waterways. Additionally, these animals have so far been allowed to each the flora, which is quite valuable for a whole host of nature's insects and mammals. I also believe that you should impose a no grazing, and have a required stabling rule should be applied to all pack animals. This practice is in effect in other National Parks and should be in effect in your National Parks. Stables and a carry your own feed rule would allow the permitted stock to operate at high elevation.

Although I'd prefer to have no stock animals in the wilderness, I recognize this is impractical, but giving it equal weight to other recreational users makes sense.

Since I like to visit wilderness to look at butterflies, I am particularly shocked to see stock eat plants and walk on meadows and other flora areas. Walking (stomping) on meadow and other flora is viewed as disturbing the soil, which is considered quite bad to the health of native plants, which for the most part, have a limited growing season each year.

I believe that the Park Service should use horses for supervision and safety purposes and that its use of horses be covered in a separate section of the GMP. I've seen such use in Toulumne Meadows and found it to be quite effective. I hope the attractive horses they use are fed high energy grain, and not just let out to the local meadow when not in service.

My other observations about the GMP are not as wordy, but certainly strongly felt. The commercial camp at Bearpaw should be removed and not replaced. Environmental attitudes and outdoor use technology have changed over the past decades and which means this kind of facility is no longer needed. The private cabins in Mineral King should be removed when the permittee-of-record as of 1978 dies, as was intended by Congress when Congress added Mineral King to the National Park.

Please protect these National Parks.

Sincerely,

James Murph

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To Dr. David Graber, Park GMP Coordinator
and
Susan Spain, NPS GMP Team Leader

From [redacted]

Re Personal Responses to GMP Draft :
Mineral King environment and
future use of cabins

This is to Request that my name and address be with-held from public scrutiny

I hope that the GMP is finalized soon and will reflect these hopes:

ABOUT PERMITTED USE OF CABINS
IN THE MINERAL KING HISTORIC DISTRICT

EACH present permittee and his/her family, (the "Class of '78,") under terms of present occupancy, excepting date of eviction, will be allowed:

To stay another 100 years, at least...mebbee 200 !

In the scree of continuing controversies about permits and Park goals, NPS has 26 years of experience managing the Area and dealing with permittees, and has done very well with those tasks. Mineral King is not yet within a designated Wilderness Area, however, and summer occupancy of forty or so cabins, by people who understand and respect the need to protect the valley's environment has had minimal impact on it. And plans and decisions about Mineral King's future are tangled with the contentious, broad-scope, highly politicized discussions at the national level about wilderness designation, access, and level of use outside of Mineral King.

Obviously, the NPS Mineral King planners feel that heat, but disappoint me, because they appear to have stayed within a small box as they managed the planning process, interpreting private use of cabins as violation of the policy which speaks to public use of public lands, so: evict the Class of '78.

Private AND public use of the area and overnight lodging there does not seem to have been considered, (although NPS manages several places with that combination in other parts of the country.) Overnight summer accomodations which are available for public AND private use becomes a legal option, does it not? and gives some satisfaction to each group....even if the arrangement were also put on an eventual phase-out schedule? *Such a position would be attractive to the several different constituencies at this time?* (See "C", below.)

Although "occupancy forever," is an unlikely option at this time, then I suggest three others, also left out of the plan:

THREE OTHER ALTERNATIVES in regard to PERMITS
are attractive to me but are not listed as NPS Draft Plan:

A) Allow present permittees to stay until 2030, with permits renewed until then, even if NPS needs congressional authorization, or directive, to do that.(And perhaps to combine with "C", below?)

B) Allow present permittees to stay until the time that sellers/owners of the MK Trailhead Parking Area are willing , and do sell it to NPS, and NPS is able to, and does buy it. (In this Option "B," I presume that planning might take another turn.) (Remember to remove the gas tanks under the parking spaces!)

OR

C) Perhaps a reasonable alternative , which might interest many of the different constituencies at this time, would be a motel , to echo the historic buildings and preserve the "village concept," and *satisfy the perceived need for public use?* And, perhaps, through volountary agreements,such a plan could capture some of present cabins for public use (if volunteered by present owners) to be managed by the venders who would manage new motel

ABOUT PUBLIC USE OF CABINS

I am pleased that the area now has historic designation but find the suggestions of public use of all , or most of the present cabins are impractical and absurd. In particular, the plan is disrespectful of the families who have been the best of stewards of the cabins, as well as the area, for nearly 100 years. It is unlikely that a succession of "strangers,"(the new cabin occupants,) will understand that kind of stewardship , ("touching the ground lightly".) Unless the terrain and environment of Mineral King is greatly controlled by the NPS with asphalt paths, fences, etc. (which would automatically destroy the "historic village" dimension,) environmental damage to the valley will surely occur if present tenants are all evicted .Protection of natural features of the area is as important a priority to some of us as it was in the '70's.

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[redacted]

To: Susan_Spain@nps.gov, David_Graber@nps.gov
cc:
Subject: Comments on SEKI Draft GMP

08/05/2004 10:16 PM
MST

I attended one of the July 20th presentations on the draft GMP for Sequoia and Kings Canyon National Parks. I have a few comments on the draft General Management Plan. I have organized my comments around the alternatives matrix which starts on page 79 and am using the reference numbers in that matrix.

1. Park Education / Interpretative Programs, reference number 17: There should be some specifics about responding to the increase in Hispanic population surrounding the parks. For example, should rangers be bilingual? Should there be more Spanish language materials, such as maps and ranger-led interpretative programs? Do the nearby residents of the area want a different set of services than the visitors from other states and countries? During my visit I saw much more evidence of visitors from Germany than I did of Hispanic visitors, which is surprising given the growth in local Hispanic population and makes me wonder why the parks isn't attracting the local community.

2. Adjoining Lands, reference number 31: With the intent of moving to a 50/50 day use for the parks, I think the GMP should be much more specific about working with the Forest Service in areas where NPS and Forest Service missions overlap, particularly in the coordination of plans for trails and campgrounds. Those who want to hike and camp in the area should be able to get consolidated information on what the campground options are throughout all areas managed federally. Trails should be able to cross park, monument, and forest boundaries without regard to the different organizations responsible for their maintenance. As day use increases in the parks, NPS should work with the Forest Service to publicize their existing campgrounds as options and even encourage the development of more forest service and national monument campgrounds.

3. Outstanding Remarkable Values, reference number 46: This section mentions the existence of remarkable stands of sugar pine. When I stumbled on such stands, I too found them remarkable, and don't understand why the park doesn't highlight them as an attraction, both in and of themselves as well as with respect to their role and relationships to sequoias. I would hope that the GMP could study how to help visitors better appreciate the sugar pine.

4. Trails, reference number 223: Lost Grove is a beautiful part of the park, and I would hope it could be developed and protected as an example of a more natural form of a sequoia grove. The trails there are ill-defined, which means hikers don't know which way to go as they explore the area.

Thank you for the presentation and for the opportunity to comment on the draft GMP. Please include me on any mailing list about the parks and the progress of the GMP.

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Web comment

This Comment was Created on 09/16/2004

Name: john nelson
Address: p.o. box 37
City: kaweah
State: ca
Zip: 93237
Telephone: 559-561-3696
Email: johnnelson1@charter.net
Comments: Topics 1 and 2 are where my comments will be concerned. Colony Mill Road/Trail. Should be opened up Bikes as an alternative for access of non motorized vehicles to enter the park. The trail is hardly used by anyone at all right now and bikers are very unsafe trying to negotiate the Generals Highway. Many people bring bikes to the park and are very disappointed when they find no where they can feel safe to ride. The stock users have almost unlimited access to park trails and do significantly more damage to trails than do bikes. Mineral King-Winter Access. Opening the Mineral King area in the winter to visitors would be taking advantage of a valuable resource with no adverse impact. No plowing needed but use the existing sno cat to ferry skiers from roads end up through Silver City and out to the Valley floor. A schedule of ride times with a shuttle charge could offset the expense. Cabin leasers would also take advantage of this service. Coincides with the development of the shuttle service that is being implemented within the Giant Forest to Lodgepole. The Pear Lake Ski Hut is a very popular program and many people are being turned away now because of its limited capacity, opening up the Mineral King area for winter recreation could lead to some sort of lodging to begin in that area. I do realize that my comments affect only a tiny percentage of the visitors who utilize the park each year. But they are visitors who are exceptionally passionate about remote places and love to experience them. They are also repeat visitors who will return to the park for these spectacular opportunities again. Thank you for accepting my comments. John Nelson

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"Brian or Judy Newton" <xchiker@lightspeed.net>

10/01/2004 11:51 PM MST

To: <susan_spain@nps.gov>, <david_graber@nps.gov>
cc:
Subject: Possibly Spam: GMP comments

Dear Susan and Dave,
Regarding the SEKI NP GMP:
I think the Mineral King cabin owners should not have their lease permit extended. They agreed to the initial arrangement of having the cabins for the life of the owner and now that those owners are aging, they want to renege on the deal so they can pass their cabins on to their heirs.

I do not think all the cabins in the MK valley should be razed but I also think the NPS does not have the resources (money, time, or manpower) to properly manage these cabins with the required upkeep.

Therefore I believe an acceptable compromise would be to allow the present owners to be the caretakers and occasional users of the cabins with ownership turned over to the NPS. Since a major concern is that an exclusive minority has access to part of a magnificent national park valley that the public does not, I suggest the cabins be opened to public use. The particular details and arrangements would be negotiated. The risks would not be very different from how the public is now using the cabins in Yosemite, Grant Grove, or the former cabins in Giant Forest.

If my experiences in MK are a factor in what is decided I will tell you that I have taken dozens of day hikes, 5-10 backpack trips, and camped at Cold Springs and Atwell Mill repeatedly. I have climbed Sawtooth Pk 6x, Hengst 4x and all of the other 10 peaks that form the MK rim 1-3x each. I have also skied there twice, once from the gate at mile 18 to the top of Timber Gap and back in one day.

I would like to give one other comment about the plan. Since the park should be open to the public, I think it is wrong that the road be locked 7 miles before the valley floor in the winter, yet cabin owners are given the key (or combination) to pass freely.
Thank you and best wishes.
Sincerely, Brian Newton

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September 30, 2004

Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Dear Dr. Graber:

Regarding the "Preferred Plan" for the future of Mineral King, I would like to offer a reasonable and inexpensive alternative to taking the privately owned cabins in the valley.

It has been stated that the cabins are needed for rental to other park visitors who would like to have a "cabin experience". In many of the parks in Oregon and Washington states, the parks have added, in addition to their camping facilities, "Yurts". Yurts are pre-manufactured housekeeping facilities with wooden floors and doors, beds, cooking and heating equipment that are similar in nature, but far superior to the wooden platform tent cabins that are found in many of our National parks. One of the nearest examples that I am aware of is located in Bullard's Beach State Park on Highway 101 in Bandon Oregon. The Yurts are very popular with non tent camping visitors there are several that are set up for individual family use and others for large or median groups use and activities. I feel that these types of structures or the traditional tent platform that I have seen in many of our National parks would be safer and better for use by people who are not familiar with the differences between a "cabin" and a home.

Silver City has rental cabins very nearly and I understand that they often are utilized to full occupancy. Mineral King has basically a short occupancy season with the road conditions and altitudes and long winder and early spring cold making it not suitable for use for more than 6 months of each year.

The privately owned cabins are each unique with delicate fixtures, such as; gas lights, and refrigerator that are easily damaged. They are old and require frequent and expensive maintenance and repairs to keep them useable. It should be much more for the park to continue to collect rent from the cabin owners and allow Tulare County to collect taxes. Let the owners remain responsible for the expense of maintenance as well as continue to contribute to the visitor experience, as in the past. Cabin owners could continue to lead nature walks and historical programs, man the ranger station, issue permits, and continue as strong volunteers in the park program. We are anxious to help with making visitors experience pleasant.

Our cabins and most of us have been here for much longer than the park has and we offer a wealth of knowledge and experience that we are more than willing to share. For years before the park took over, we were involved in search and rescue missions, fire control, Natural History interpretation, and a myriad of other activities.

When the park took over ownership of Mineral King, I spent the better part of a day with William Tweed and led him to the area that was ideal for the Park Developed Cold Springs Walk in campsites. I also showed him another site that could be very easily developed into the suggested tent platform or Yurt rental site for additional visit or housing. There is already an access road that leads to the repeater station.

Just to the east of this repeater is an area that could easily be developed. Gentle slops, deep granite soil, a white fir forested area, and very close to an easily available water source. Due to the location, it would have no visual impact and minimal biological impact.

It is within easy hiking distance to the entire Mineral King area. I will be very happy to lead any individual or team to this area and as a cabin owner, and would also be happy to help with development there.

Sincerely,

James N. Parks

James N. Parks
2060 Short Drive
Hanford CA 93230

cc: Superintendent Dick Martin
Senator Diane Feinstein
Congressman Calvin Dooley
Congressman George Radanovich
Congressman Devin Nunes
Congressman Richard Pombo
Congressman Dennis Cardoza

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As an aerospace engineer during the race to the moon, the many many rejuvenating weekends and vacations I spent at Mineral King with family and friends back packing around MK/ Sequoia National Park always fulfilled needs for Shangri-La like recoveries to return to projects completely refreshed.

Just watching Sputnik passing over MK showed the challenges we overcame.
In the years packed to the hilt with time spent becoming friends with the historic old cabins at MK and Silver City, it seemed we captured and blended in with our heritages along with the local summer inhabitants plus hordes of campers/hikers/backpackers like my family and me.

We triggered the "Save Mineral King" from the attempted assaults of corporate planners to place the area into over built, over managed, over crowded, over polluted atmosphere, over artificial arenas as with far to many of our national parks. Just imagine a Knotts' Berry Farm or Disneyland like developments with needs for paid docents demonstrating our heritages when MK already has a century and more already there without turning the place into something like Yosemite. The old cabin holders ever remain as most delightful co-lovers for MK.
The delightful twenty-seven mile road zig zagging up to MK fortunately restricts traffic and despoilers. G. Peters , PE(IE) retired back to my Chicagoland roots with a heartfelt of MK ever present.

63

I am Edward F. Peterson and I am a partner in Cabin 16 of East Mineral King. I feel that the Park would not be able to maintain the cabins due to the financial requirements of maintaining an old historic cabin as most of these cabins are. Also, the cabins are fragile and would not take the use of persons who did not know or really care about them. Therefore rental to visitors would be out of the question. We have a good working arrangement with the NPS and would be able to work with the Park to maintain and show these cabins to the public as a partnership. Mineral King is an historic place and deserves to be preserved and maintained. The presence of the cabins has assured visitors of care in emergencies that the Park would not have been able to provide. I took a young boy off the trail one time with a collapsed lung and was able to care for him till his parents came to get him. With oxygen in the cabin at all times I have been able to help heart victims, and I have lost count of the stitches I have placed in small wounds. We Have been able to care for hikers who were wet, tired, and hungry, and have even cared for and fed some visitors over night. I have not mentioned the fractures that have been treated by myself or guests in our cabin. My brother-in-law, a Medical Doctor, who has been a frequent visitor has been of valuable assistance in several occasions.

In conclusion I would like to see a working arrangement with the National Park Service whereby the cabin owners would remain and would care for the cabins in accordance with the requirements of the Park in the maintence of these historic treasures.

87

Dear Mr. Graber, I am writing to you to voice my opposition to the pro-commercial, anti-environment Draft GMP. I believe the NPS must include a 'no grazing' alternative. Many other national parks require stock users to carry feed for their animals which would minimize the impact on meadows, wetlands, and lakeshores. All alternatives of the GMP should retain the language from the 1971 Master Plan to phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. The commercial horse/mule pack stations based within SEKI should be removed as well as the commercial camp at Bearpaw. No new backcountry camps should be built. The private cabins at Mineral King should be removed when the permittee-of-record dies, as was intended by congress when it added Mineral King to the national park. Please protect our environment so that generations to come may enjoy the beauty. Sincerely, Barbara Sholle 4166 Clark Ave Long Beach, CA 90808

79.

09/10/04

TO: NPS GMP Team, SEKI

FR: Greg and Laurie Schwaller, Three Rivers

RE: Comments on the SEKI Draft GMP

Parkwide

While we strongly favor many aspects of Alternative C (Preserve Traditional Character and Retain the Feel of Yesteryear; Guide Growth), we understand that broad-based public support of the National Parks is important to their survival and funding, and it appears that actively promoting and increasing such support through stronger educational and outreach programs underlies the actions and advantages of the Preferred Alternative; thus, we support the Preferred Alternative (especially because it is the environmentally preferred alternative), with the provisos that, truly, resource integrity must be paramount, as without the resource there is no point to the park, and that sustainable growth and development to meet the needs of diverse user groups must be carried out only while bearing always in mind that the parks cannot and should not be all things to all people. Indeed, perhaps the greatest value and greatest good of the parks is that they are so increasingly and irreplaceably different from what we have made of most of the rest of the planet, to the great detriment of the future of most life forms upon it.

Therefore, efforts to meet the needs of diverse user groups should be made on the parks' terms, directed at enabling users to be aware of and to wish to enjoy the limitless opportunities which the parks offer them to experience physical, mental, emotional, and spiritual engagement, uplift, and growth. In this profound sense, parks do have a great deal to offer every visitor, and the offer is repeated with every visit, as long as we don't think we can do a better job of this than the parks themselves can. Our efforts should lead the visitor, by a path inviting to that visitor, to the resource itself; and the resource should speak for itself, if we have prepared that visitor to listen, hear, and grow in understanding and appreciation.

Also, the outreach and educational activities and messages must convey the critical importance of the parks as irreplaceable, literally invaluable sources of the good life; even if you never physically visit the parks, much of the quality of your life depends on them: as watersheds, airsheds, viewsheds, soil banks, wildlife habitat, open space, as wellsprings, benchmarks, beacons, retreats, preserves, symbols, sources, sanctuaries, safety valves, laboratories, museums, teachers, measures, roots, reminders, and as all we have left of our true, original home, before we started with the home "improvements."

When we talk about appealing to diverse user groups, are we talking about categories such as age, sex, education, cultural background, physical ability, and language preference? Certainly we can present the parks so that anyone in any of these categories who is interested in beauty, science, animals, exercise, adventure, scenery, discovery, family fun, their own self-interest (learn how these trees clean your air, how these mountains provide your water, etc.), history, archeology, etc. can see their attraction; but it is important not to over-package, or trivialize the introduction to the point that the visitor or potential visitor loses the joy of his/her own unique contact with and connection to the giant sequoias and the other marvelous features and inhabitants of these parks.

We strongly agree that basic, natural, and rustic are key criteria in the parks' built environment, which ould be as harmonious as possible with its setting, while at the same time showing visitors that sustainable structures can be beautiful, functional, and appropriate in any setting. Displays should explain the

energy-efficient, "green" features of the buildings (solar power, natural heating and cooling, native plants only for landscaping, etc.), giving visitors ideas they can use at home.

Many park visitors want to see the world's biggest tree, grab a snack and a souvenir, and get back to the freeway. Others want to be properly introduced to these noble trees and to make their acquaintance in peace and solitude. Some visitors are here for the physical challenge – hard and fast hikers and climbers. Some are here to travel the backroads. And some are here to escape from the valley or the city, to be in a cool, green place where water flows free, trees grow, the sky still looks blue, and a deer could walk right past your picnic table.

If only these people could leave their cars in a hidden parking structure and take an educational shuttle ride to the area in the parks best suited to their desires and abilities.

Most visitors have less than a day to spend in these parks. Therefore, regardless of their interests and abilities, time alone will restrict them to a main road and just a few stops. However, many of these visitors are Californians, and a positive experience in the parks will incline them to return and sample more. California's constantly growing population provides an ever-expanding pool of potential visitors. How do we help this population to become aware of, enjoy, care about, and protect their parks without loving the parks to death, through ignorance, carelessness, or sheer numbers?

To enable enjoyment and understanding on a brief visit, we need to focus on who our visitors are, what they're looking for, what infrastructure (human and otherwise) needs to be provided to help them find it, and how we can quickly enhance their understanding and appreciation of the resource. For most people, this means human contact. But we don't want an endless line of polluting vehicles inching their way toward an entrance kiosk where one or two harried attendants are trying to answer all these questions. So we need an intake structure, potentially an automated one: you pull up, pay your entrance fee, and receive with your pass written directions and an automated voice message telling you where to go to get parking, detailed information, and a free (or low-cost) ride into the parks.

If you don't require information, and you want to drive yourself, you drive on. If you need information, or you would like someone to do the driving for you or you're driving a vehicle too big to go up the switchbacks after Hospital Rock, you come quickly to a visitor center with a LOT of parking, where you can get orientation, direction, information, food, a movie, and public transportation to your in-park destination. You can walk some foothill trails and access the river directly from here, and you can picnic here also. Zion National Park is a good model of this. Ash Mountain might be converted to such a center. Or it might better be even closer to Three Rivers (maybe where the Edison plant is, by the park entrance?) to reduce vehicle traffic into the parks and to make it easy for those staying in Three Rivers to hop a shuttle that circulates through the town and takes employees and visitors to the orientation/administration area (this also happens at Zion and its gateway town). Another shuttle would loop to Visalia. The shuttles are quiet, fuel-efficient, all-weather vehicles. They are only about the size of airport shuttles, so they can easily navigate the worst of Generals Highway and Moro Rock and Crystal Cave roads. Relatively small, they fill up and unload quickly, so their turnaround times are quick and they can be flexibly scheduled.

At this main center, information is available in many languages, and there is sufficient staff (Rangers, SNHA, volunteers) to guide and inform a highly diverse visitor population. Those focused on General Sherman are directed to the express shuttle that stops only at the Giant Forest Museum and at General Sherman. Those touring Crystal Cave board the Cave Shuttle. Those staying at Wuksachi take the Lodge Shuttle. On all shuttles, the driver or a recorded speech provides the passengers with an introduction to park resources, activities, and values. Shuttle drivers are knowledgeable and can answer many of the passengers'

questions. All shuttles have easy-access storage compartments so that passengers can stow picnic gear, luggage, and backpacks. Most shuttles have a bike rack at the rear.

To meet the needs of diverse user groups, short, easy, paved, educational loop trails accommodate the very young, the old, the infirm, and anyone who appreciates an easy, convenient way to see and enjoy the various park environments. The Round Meadow Trail is an excellent example of this approach. Most park shuttles stop at all of these trailheads, enabling visitors to come back on many different days to experience each time a new doorway or window into the parks. Interpreters staff each of these environments, to answer questions, assure safety of the resource and the visitors, and provide educational experiences.

Moving park administrative facilities outside the parks may not be desirable because it would separate administrators from regular in-person contact with the majority of park employees and would put administrators "off-site," away from the parks they serve and protect. Too often decision-makers seem too distant, in every way, from the resources, human and otherwise, they're supposed to be serving. Also, a large are in the park has already been "developed" for this administrative purpose; buying and developing land outside the park would be expensive. Wouldn't it be better to modify the existing structures to enhance sustainability energy efficiency (which would also serve as a good example for visitors), and shuttle the employees to work (using public transportation being another good example)?

Backcountry

Keep the wilderness as big as possible and as wild as possible. Any additional facilities in the non-wilderness backcountry should be carefully designed to blend into their surroundings so that the backcountry doesn't start look ing like the front country. Such facilities should be accessible only by non-motorized means (except maybe emergency helicopters), should be self-sufficient in terms of power and water, and should use the best composting technology to avoid concentration and build-up of human waste. Such a facility could be a great demonstration project and learning station.

Wuksachi

It would be nice to have a picnic area at Wuksachi, near the trailhead. This would be a quiet area, secluded from Generals Highway.

Cedar Grove and Floor of Kings Canyon

How can you include more spring and fall time in Kings Canyon without having to plow that road? Can you afford to plow that road? We'd love to see the Canyon in the winter, but we also love the thought that it gets to rest from human activity for a period of each year. Most of the rest of the easily-accessible park is protected in winter by snow, but not the Canyon floor. We are strongly opposed to Kings Canyon becoming as developed as Grant Grove and Giant Forest. Fortunately, there are many easy trails that can lead one quickly away from crowds and into wonderful groves of Big Trees, but the floor of Kings Canyon is so restricted and the walls are so steep that it's easy to feel crowded. We *need* a "quiet Yosemite." Please minimize any additional development in Kings Canyon.

Wolverton

Wolverton is the best spot near Giant Forest to locate winter recreation because its slopes are good for snow play, miniature downhill skiing, and sledding, and it already has a good building to serve as a warming hut and snack bar. The meadow is a fine place for cross-country skiing and snowshoeing, and it's not visible

from Generals Highway. There should be a winter Snow Shuttle from Visalia and Three Rivers to Wolverton, stopping at Giant Forest Museum also. This would reduce pollution and road blockages. Too many visitors have trouble putting on chains and driving on snow.

Giant Forest

We definitely agree with the plan for peak time road closures and shuttle access. The remodeled Round Meadow Trail is excellent. We are expecting equally good results at Hazelwood, but hope it can continue to be a less-traveled path.

Please keep a few parking areas in winter at Hazelwood and also by the Giant Forest Museum so that cross-country skiers can access those areas without having to cross the highway carrying their gear.

Crystal Cave

It would be good to have shuttle service to Crystal Cave. This would reduce pollution, might deter vandalism, and would allow the visitors who come in motorhomes to get to the cave.

Ash Mountain/Foothills

It would be good to have more foothills trails for fall-spring use. A great one would run along the river (on the non-highway side) from Ash Mountain to the Potwisha area; access to Potwisha would be via the suspension bridge (another suspension bridge would have to be built below Ash Mountain). This trail would be small and not open to stock. The trail would continue up to the Buckeye area, crossing the river on the existing bridge above Buckeye. The road to Buckeye (or to just above the campground) should be kept open year-round to facilitate hiker access to the Middle Fork trail also. A little bridge crossing the creek at the beginning would be very helpful in good rain years.

Mineral King

We agree that the permit cabins should be used for public purposes (and NOT for private purposes). They could house a small historical and natural history museum, trail and environmental displays, and marmot information; they could provide a contact point for interpretive staff, a weather shelter for hikers, a shuttle stop shelter, or rustic lodging. They could also become models of how to remodel/rehabilitate existing structures using green materials for sustainable use. One could remain as an open, working exhibit, with displays and literature available. Probably not all the cabins would be needed at Mineral King; perhaps only the farthest up ones should be preserved there, as they are the least conspicuous and are not in the fragile meadow area. The rest might be moved to be used at other areas in the park, as shelters for hikers and shuttle riders, information areas, and contact points for interpretive personnel (along the lines of the little ranger station at Roads End in Kings Canyon). We are definitely opposed to leaving the permit cabins in private hands on public land; anyone interest in seeing a private historical recreation community in a national park can do so at Cabin Cove, Silver City, Faculty Flat, and Wilsonia. A daily shuttle to Mineral King (up in the morning, down in the evening, or two round-trips per day) could reduce pollution and wear and tear on that road (especially if there's going to be a High Sierra camp at Hockett). But where would shuttle-users park their cars?

Dillonwood

Could Dillonwood have a campground? It's a long drive for day-use only. Perhaps a Mineral King cabin

could be moved to Dillonwood to house interpretive/campground host personnel.

Mitigation for Increased Water Withdrawals

Wastewater should be cleaned (filtered) and recycled for irrigationuse if possible. Could solar-powered composting toilets be used? Water should not be served at dining facilities unless requested. In lodgings, bed linens and towels should not be washed daily during a visitor's stay, but only at the end of the stay. Water table levels must be carefully and regularly monitored.

Impacts on Backcountry and Wilderness

Keep as much of it as wild as possible. Let it alone as much as possible. Let nature manage the resource. If a High Sierra camp is added at Hockett, where would the access points be? Where would the trailhead parking be? Would the Mineral King road be improved to accommodate more traffic? Would there be a shuttle to the trailhead(s)? What about having the High Sierra camp up the Pear Lake Trail? There's lots of parking area at Wolverton already.
What are the "adverse permanent impacts" of removing the hydro facilities in the park? Loss of electricity?

Thanks for listening.

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August 2004
Response to D18 (DSC-P) SEKI 286

Draft General Management Plan and Comprehensive River Management Plan /Environmental Impact Statement for Sequoia and Kings Canyon National Parks and Middle and South Forks of the Kings River and North Fork of the Kern River.

NOTE on these comments: statements in italics are direct quotations from the Draft General Management Plan, all other comments are my personal opinions. If no objection is stated to the Draft quotation it indicates support for that alternative.

Topic 4. *Comment on Alternatives or analysis related to Transportation, Visitor Experience,*
Visitor Experience: *Impacts of the Preferred* Alternative
BACKCOUNTRY ACCESS: (Vol. 2, pg. 56) *While the backcountry still comprises about 97 % of the land in the parks, backcountry use accounts for only 2%-3% of the visitation.*

My father before us and our extended family have had the privilege of spending considerable time in the backcountry of the parks. My son and nephews have worked as pack trip guides out of Mineral King and my son was a east side back country seasonal ranger. We all treasure our experiences in the back country which have been a significant influence on our lives and we would hope these experiences might be available to more people. On hearing of these trips, many people have expressed their desire to participate but have been reluctant to do so because they lack the expertise and experience to undertake them on their own.

We have observed, and the NPS knows better than anyone else, that many of the people going into the back country are ill prepared for the experience and we would like to make a suggestion that might 1) allow more people to safely access the back country and 2) to enjoy and appreciate the experience they have there. We would like to see the NPS facilitate and promote GUIDED backcountry back packing trips. Perhaps some services of this kind are presently available but should be encouraged and expanded. These guides would be private concessionaires operating under NPS supervision and direction. Experienced guides would lead a small group of back packers who would have been previously informed as to appropriate equipment, the route, terrain and altitude and would spend a day of education, orientation and acclimatization at the trail head before heading out into the backcountry.

This kind of trip would help to implement the emphasis placed on the backcountry usage in the Preferred Alternative and enhance the *Impact of the Preferred Alternative* (Analysis, Vol 2, Pgs. 190 and 191) *Under the proposed alternative visitor education would focus on resource protection, stewardship, and leave-no-trace backcountry skills, potentially making more visitors aware of wilderness designation and wilderness values. These wilderness recreational opportunities and values are highly valued by park visitors. Opportunities for recreation in protected wilderness, along with opportunities to experience areas of solitude by participating in primitive or unconfined recreation, would expand, resulting in minor, beneficial, long term impacts because more visitors would be aware of wilderness characteristics, values, and recreational opportunities.* Guided backcountry back packing trips would contribute to these goals, would result in additional protection for the natural resource, would result in enhances visitor experiences, would safely provide access to Secondary trails and cross country areas which are presently underused, would relieve the NPS of distress and rescue calls and allow many people who would otherwise be discouraged from entering the backcountry to safely enjoy it. The NPS would have a role in the training and education of the guides. With appropriate marketing these trips would be financially viable and attract qualified persons to the program. They have been successful in Europe and elsewhere.

Page 2

AIRTOURS(Vol.2. Pgs. 260, 265, 273, 280) Fixed wing airtours should be encouraged and managed in accordance with the National Parks Airtour Management Act of 2000 These tours would provide a non invasive means for people who would not otherwise be able to at least SEE the 96% of the Park which is wilderness. Fixed wing aircraft would be minimally disturbing to recreationist on the ground in the backcountry since they would be flying at some elevation above the terrain and most people are accustomed to fixed wing aircraft flying over head. Recreational helicopter flights should be discouraged since they are extremely invasive, noisy and disturbing. NPS helicopter flights should be kept to a minimum.

STOCK USE (Vol.2, Pgs. 273, 274 etc.) *Opportunities for Stock use. Under the preferred alternative, horses and other stock use would continue with reasonable regulation and enhanced monitoring.* Stock use provides traditional opportunities to enjoy the Park and should be encouraged and expanded. As the population ages, stock use provides the only means of access to the back country for a large portion of the population including those with disabilities.

STABLES, CORRALS, PACKSTATIONS *would continue providing day and overnight trips* ..... Since pack stations are usually financially marginal the NPS should provide some support for these facilities by providing infrastructures, i.e. access roads, corrals, buildings, to ensure the continuing existence of these important and desired facilities to serve the public. The Wolverton pack station should be relocated and operative as soon as possible. The NPS restrictions on stock use have contributed to the financial instability of these concessionaires and to reduced stock usage in the back country and should be relaxed in areas where stock use has been found to be not detrimental.

Topic 5. *Comment on alternatives or analysis related to Private Lands inside the parks (primarily Wilsonia, Oriole Lake, Silver City)*

. **Oriole Lake:** Acquire the Oriole Lake inholdings from willing sellers and provide public access to *this uncommon, foothill lake environment.* (Vol.1, pg. 38) The terrain lends itself to some campground facilities and parking. If drive in access is not feasible then hiking in would be available. This would provide additional accessible frontcountry experiences for visitors who are unable to handle the more rugged backcountry, would help to relieve over crowding in other frontcountry areas, would be easy for the NPS to maintain and could be managed to have minimal environmental impact on the area and is not visible from the Mineral King road. It is not wilderness and should not be included in the wilderness area.

Silver City: *"Private inholdings continue thereby perpetuating recreation communities."* (Vol.1 pgs. 38, 60, 86, 152, etc.) Individual properties within the subdivision at Silver City should not be acquired by donation or purchase by the NPS since this would result in a mixed matrix of public and private holdings deemed undesirable by the NPS and the community. Individual properties in Silver City should be freely exchanged in the private sector.

Develop a partnership with the Silver City resort to provide expanded services within the scenic easement constraints; inholdings and services remain. Such a partnership should enhance and not limit the financial viability of the resort and thus insure its' continuing presence to serve the public.

Page 3

Kaweah Han: (Vol. 1, pgs. 38, 108, 152) Continue private ownership for personal use. Develop a scenic easement if agreeable to private owner.

Wilsonia:. (Vol. 1 pgs. 38, 86, 120,) *Private inholdings continue at Wilsonia...thereby perpetuating recreation communities. Preserve or adaptively reuse NPS buildings contributing to the historic status.* Water supply and sewage disposal concerns should be addressed by both the private sector and the NPS.

Topic 6: *Special Use Permits on Park Service Lands (Hydroelectric facilities, Boy Scout Camp, and Mineral King Special Use Permit Cabins)*

Hydroelectric facilities: (Vol. 2, pgs. 179, 301, 302). In addition to the loss of power generated, the reduction of pertinent water supplies and the loss of historic structures, the proposed removal of the dams at Lady Franklin, Monarch, Crystal and Eagle Lakes above Mineral King could have a devastating effect on the fisheries in these lakes and the East fork of the Kaweah river all the way to its' confluence with the main fork above Three Rivers. Wildlife of all kinds would be adversary affected throughout the area. Without the control of the dams, in dry years the water levels in the lakes could be reduced to pools unable to sustain fish life and the streams might dry up completely. This would destroy a valuable and heavily used recreational asset not only for fishermen but for hikers and campers as well. Perhaps a free flowing river is not always as desirable as a controlled one? Under present controlled conditions, the fishery in Mineral King is the best it has ever been. The loss of these recreational features would severely limit access to readily accessible day and overnight high country experiences by those who are unable to handle the more rugged backcountry multi day trips and would put additional pressure on other frontcountry areas.

If the dams are to be removed, mitigation provisions must be implemented during the destruction of the dams and there after to insure an adequate year round flow in the East Fork and its' tributaries as well as maintaining minimum pools in the lakes to sustain a healthy and viable fishery. The loss of this valuable asset would be an environmental disaster with far reaching and unintended consequences.

The introduction of House of Representatives bill #3932 which would provide for the issuance of two more 10 year permits for continued use of the hydroelectric facilities in the park under certain conditions and the unanimous do pass recommendation of the Resources Committee to the full House provides needed protection for these facilities. Since the testimony of Donald W. Murphy, Deputy Director of the NPS before the Subcommittee on National Parks, etc, House Committee on Resources on April 29, 2004 stated that "The Department has no objection to enactment of H.R. 3932 if amended in accordance with this testimony"' which was done, the passage of the bill before the full House is virtually assured, the dams will remain and the fisheries will be preserved for the time being. A wise and sensible development for which the NPS is to be commended.

Mineral King Special Use Permit Cabins: .) Alternative C: (Vol.1, pgs.. 71, 155, etc*) "Preserve Traditional Character and Retain the Feel of Yesteryear: Guide Growth"* is the preferred option in regard to the Mineral King cabins with some modifications.

Congress enacts legislation to continue to reissue current use permits to families/heirs of the present permittees. The NPS should withdraw its' objections to the adoption of "House of Representatives 4508 to amend the National Parks and Recreation Act of 1978 to require the

Secretary to permit continued use and occupancy of certain privately owned cabins in the Mineral King Valley in Sequoia National Park" for reasons given below.

Continue to use the Memorandum of Understanding between the NPS and the Mineral King Preservation Society to protect and manage the contributing elements of the Historic District including implementation of informational and educational programs, guided tours, resource management, information sharing, research efforts and volunteer activities. A joint committee consisting of representatives of the Preservation Society, the NPS and the State Historic Preservation Office would be established to provide liaison between all responsible parties, provide resource information to permittees and assure compliance with historical standards.

All cabins would be brought up to and maintained to standards for historical compliance as defined in the "Guide to Repair and Maintenance of Historic Summer Homes within the Mineral King Historic District". by the permittees. Non contributing cabins would be given the opportunity to become contributing if desired and physically possible

Emphasize the theme of an historical recreation community in Sequoia National Park

ADVANTAGES OF THIS ALTERNATIVE: This is the most viable plan to meet the NPS obligation for the preservation of the contributing elements of the Historic District and for interpreting its' significance to the public. The NPS does not have the funds, the personnel nor the historical knowledge to preserve these elements for future generations. The cabin owners are the only ones who have the means, the knowledge, the incentive and the demonstrated ability to maintain the cabins and assist with the preservation of other contributing elements. They have never been a detriment to public use of the area and have not required supervision or assistance; on the contrary, they have been the continuing caretakers and preservers of this historical area. The NPS is well aware of the many other advantages of this alternative which have been demonstrated over the years. The NPS should take advantage of this unique opportunity for assistance in the maintenance of this Historic District and for enhancing its' significance to the public by permitting continued occupancy of the cabins by the present permittees and their families.

RESPONSE TO NPS PREFERRED ALTERNATIVE: *"Accommodate Sustainable Growth and Visitor Enjoyment, Protect Ecosystem Diversity, and Preserve Basic Character While Adapting to Changing User Groups."* (Vol. 1, Pgs.. iii, ix, 68, 148,154,156, 200 etc.) as it relates to Mineral King special use permit cabins.

Vol. 1, pg.ix: *As special use permits expire, permit cabins are acquired and adaptively reused for public purposes.(The NPS would partner with a nonprofit or commercial service organization to provide public lodging or other public use. A plan would be developed for public use, including limited use by former permittees. The plan would address treatment methods to preserve the Mineral King Historic District, sustainable use , code compliance, needed utilities, self-sustaining funding, maintenance and potential hazardous materials mitigation. etc.*

While providing for reissuing of current special use permits in five year increments, the Preferred Alternative does not provide for continuing issuance of permits to heirs/families beyond death of present permittee. See above.

Gives permittees the option of donating cabins in sound condition to the NPS if ownership is no longer desired.

"Develop a cultural resource preservation plan for the Mineral King Historical District in consultation with the state historic preservation officer." The cabin owners should be an equal partner in the formation and implementation of such a plan.

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Preferred Alternative: (Reference # 372, Vol.1, pg. 154 (bottom of column) and pg.156.) *Analyze **IF** operating acquired permit cabins as public lodging would be economically feasible. If feasible, examine various operational approaches (e.g. operation by a partnership, a non profit entity or a commercial service provider)." Subject to NPS review and approval the operator would be responsible for "ensuring that required infrastructure improvements were made to meet applicable health, safety and environmental standards to accommodate long term public use"*

This is a very big **IF.**

The proposed plan to acquire permit cabins (assuming at the end of the present permits) and adopt them for public use, including lodging, and to have them managed by an external operator of any kind who would have sole responsibility for making infrastructure improvements and long term maintenance of the cabins poses many problems.

A. Financial concerns: It would be extremely difficult to obtain an operator who would take the responsibility for bringing the structures up to "applicable health, safety and environmental standards' at its' own expense. The cost of updating these aging structures and their infrastructures would be immense and no operator would perceive a way to earn a return on the capital investment. The NPS is well aware of the difficulty of obtaining qualified permittees/lessees/concessionaires and Mineral King would be a particularly challenging area. No financial feasibility or marketing studies have been done and the return on such an investment is limited by the following factors:

The very short operating season of 90 days. Winter operation would be virtually impossible.

The NPS requirement that the project be financially self sustaining.

The cabins would become available incrementally over a long period of time. The few cabins initially available would require an onsite staff to provide services and maintenance the cost of which would exceed the income generated. Some cabins will be found unfit for public occupancy particularly lodging. It could be many years before enough cabins are available to provide a profit on the annual operation.

While cabins would be acquired in "sound condition", the permittee's families would no doubt want to remove treasured furnishings and accessories and so an operator would have to furnish the cabins for public use at considerable expense.

The annual cost of maintenance of the individual cabins to historic and public safety standards would be very large. All of these cabins are old and, due in part to the extreme winter conditions, require considerable annual maintenance. Each of these cabins has it's own idiosyncratic problems which would require considerable research and experience on the part of a new operator. These cabins will continue to deteriorate over time requiring increasing levels of maintenance. (Vol.2, pg. 202:) *Historic structures could suffer wear and tear from increased visitation, but the carrying capacity of historic structures would be monitored, and visitation levels or constraints could be imposed that would contribute to the integrity of the resources without unduly hindering interpretation for visitors. Unstaffed or minimally staffed structures could be more susceptible to vandalism.* Limiting the occupancy of the cabins to maintain their historic integrity would reduce their availability for rental revenue.

Required mitigation of hazardous materials could prove to be expensive.

The Mineral King road itself is a limiting factor because of its' length and configuration. It is discouraging and dangerous for many Park visitors. In order for this project to be economically feasible, the occupancy of the cabins by the public would have to be markedly increased over the present light usage by the permittees which would result in increased inexperienced traffic on the road.

The cost of liability insurance, if obtainable, would be extremely high but no operator would take the personal responsibility of opening the cabins for public use without it. Fire and structural damage insurance if required and available would be very expensive..

It is unknown how many potential visitors are actually interested in staying in an old cabin with no electricity or other conveniences. Most of the public is used to and expects the usual lodging amenities and while there are some interested in a "rustic" experience their number is limited and will be decreasing as the older generation passes on. The problem of handicapped access would have to be addressed; any solution would add to the expense.

Initially some of the available cabins would have to be committed to personnel housing, storage and maintenance facilities, etc. which would limit the number of cabins available for rental to the public thus reducing income. (Vol. 2. pg. 77 *Mineral King is not considered within a reasonable commute distance due to the terrain and road conditions.)*

In order to make the project financially feasible, rental charges for the use of the cabins would have to be extraordinarily high compared to comparable facilities thus limiting the potential market and denying access to lower income citizens.

B. Management concerns:

The cabins are scattered over a large area making daily services difficult. A central service and supply area would have to be established and transportation provided for workers to service the cabins. Potential guests would have to be personally escorted to their rented cabin since the access roads are unnamed, poorly maintained and unlit. Access after dark would be hazardous.

Each of the cabins has its' own particular idiosyncrasies. None have electricity and each new public occupant would have to be instructed in the use of the fireplace, the wood or propane stove, candles, the propane lights or lanterns, the hot water heater, the propane refrigerator, the water and sewage systems, the fire extinguishers, etc. all of which are potential hazards to inexperienced guests. A maintenance person would have to be available 24/7 to ensure the on going operation and safety of these facilities and the guests. Careful instruction should be given to appropriate responses to contact with wild animals. With no telephones, a contact arrangement with management would have to be provided for guests.

Even though the cabins might be brought up to "health, safety and environmental" standards, many of them have dark interiors, rough and uneven floors, steep stairs and unusual interior configurations. These potential hazards must be revealed to each new tenant and are a continuing concern for any operator.

Education of guests and continuing surveillance would be necessary to insure that all nuisances are abated, noise and light constraints and pet regulations are adhered to so that some guests do not interfere with enjoyment of other guests and the public

Information should be provided about the history and significance of the Historic District to enhance the guests enjoyment of the area.

All of the above concerns are time consuming for the operator, require an unusual amount of staff time and therefore add to the cost of operation of the facilities.

C. Environmental concerns. As has been stated, in order to make the public use of acquired permit cabins economically feasible, occupancy would have to be a substantially increased over the present permittee usage. This would cause increased demands on the water supply, (Vol.1, pgs. 73, 88) adversely impact sewage disposal systems, increase traffic on the road, contribute to

Page 7
overcrowding of the parking facilities, increase use of trails, riverside and meadow off trail tramping, increase demand for public and emergency services, including trash disposal and fire protection and adversely affect the peaceful alpine atmosphere people come to Mineral King to enjoy.

The acquisition of permit cabins over time would result in the mixing of public and private uses which has been termed undesirable by the NPS, poses management problems for the operator and is unacceptable to the private sector. Permittees who still occupy their cabins are not going to be motivated to be of much assistance to the management and operation of the Historic District if they feel their efforts are going to profits of a private operator instead of contributing to the public enjoyment and historical preservation of the area.

CONCLUSION AND QUESTIONS: In my view, the Preferred Alternative is economically and managerially unfeasible for the reasons given above and many other considerations I do not believe the NPS will be able to attract an operator/partner of any kind given the conditions stated. If no operator can be obtained or if an operator fails, how will the NPS discharge it's responsibility for the preservation of the Historic District and its' contributing elements? The care taker permittees will disappear over time and the NPS will have the sole responsibility for the management and maintenance of the Historic District.. HOW WILL IT BE ABLE TO DISCHARGE THIS RESPONSIBILITY? IS IT EQUIPPED TO DO SO? These are challenging questions.

MY RECOMMENDATIONS, AND THOSE OF MY FAMILY, ARE FOR THE NPS TO SUPPORT THE PROPOSED CHANGES IN THE 1978 LAW TO PERMIT THE PERMITTEES AND THEIR FAMILIES TO CONTINUE TO OCCUPY THEIR CABINS AND PARTNER WITH THE NPS IN THE RESPONSIBILITY FOR THEIR CONTINUING MAINTENANCE AND THE MAINTENANCE OF OTHER CONTRIBUTING ELEMENTS TO THE MINERAL KING HISTORIC DISTRICT THUS RELIEVING THE NPS OF THE SOLE RESPONSIBILITY OF DOING SO. SINCE THE CREATION OF THE HISTORIC DISTRICT IS A RECENT DEVELOPMENT WITH WHICH THE NPS HAS HAD NO EXPERIENCE, THE NPS SHOULD DEPEND ON THE PEOPLE WHO HAVE THE EXPERIENCE, EXPERTISE AND MOTIVATION TO CARRY OUT THE RESPONSIBILITIES FOR THE MAINTENANCE AND MANAGEMENT OF THE DISTRICT==THE CABIN OWNERS.

UNDER THE CIRCUMSTANCES THERE SEEMS TO BE NO OTHER VIABLE ALTERNATIVE.

I have generally commented only on the Preferred Alternative and on those areas in which I have some personal knowledge and experience. As the former long time owner and operator of the Silver City Resort and adjacent property I am keenly aware of the difficulties involved in operating a public facility in this remote area. I was a fifty year resident of Three Rivers and until recently spent some time each summer of my 86 years in Mineral King and am the permittee of record for East Mineral King #10 where the fourth generation of our family is enjoying the cabin. I hope my comments will be helpful in the present planning process and we wish you well in your continuing efforts to meet the challenges you face.

Sincerely, Margaret A. Seaborn

Margaret A. Seaborn 55519 Big River Drive, Bend, OR 97707
email: pegsea@starband.net. Telephone: 541 593 5823. FAX: 541 593 5297

54

Richard H. Martin, Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271

Dear Superintendent Martin:

I have been hiking and backpacking in King's Canyon and Sequoia National Parks for over 30 years. I have become disturbed at the severe trail damage as well as damage to trees and other plants in the park by pack animals. The trails in many areas are becoming dangerous, with rocks kicked into the ever-deepening trail by horses. Horse manure is everywhere, and horses are inevitably ruining camping areas with concentrations of manure and urine. Streams also are impacted by these animals.

Please don't cave into the pack animal business pressure and what is right--preserve our little remaining wilderness for the plants and animals living there, and for our future generations to explore and appreciate using minimum impact.

I agree with the more detailed suggestions of the High Sierra Hikers Association, detailed below.

- The draft GMP needs to be re-written to include and fully consider a "no grazing" alternative. A "no grazing" alternative is both feasible and reasonable, and was requested by numerous respondents. If recreational stock use is to be continued in the fragile, high elevation areas of Sequoia-Kings Canyon, then stock users should be required to carry feed for their animals, as is done in many other national parks, to avoid the extensive and considerable impacts caused by stock animals foraging for food (i.e., overgrazing, trampling of sensitive wetlands and lakeshores, etc.).

- The authors of the draft GMP have improperly concluded that the "preferred alternative" is environmentally superior to the "no stock" alternative. Such a conclusion does not make any sense at all, and does not even pass the straight face test. Eliminating recreational stock use from Sequoia-Kings Canyon would avoid the many significant impacts caused by stock animals. A "no stock" alternative would without any doubt be environmentally superior to current stock management practices, which would be continued by the preferred alternative.

- The GMP should retain the key language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At the absolute minimum, the GMP should allow no grazing or off-trail travel by stock animals above 10,000 feet elevation throughout Sequoia-Kings Canyon NPs. These are park-wide issues that must be addressed now, not put off to some future planning process.

- The commercial camp at Bearpaw Meadow should be removed, the site

restored, and the area designated as wilderness, as envisioned by the House Committee Report for the California Wilderness Act.

- All of the commercial pack stations should be removed from park lands. They could be relocated outside the parks, if the operators so desire.

Sincerely,
Donald M. Selcer
928 Alma Place
Oakland, CA 94610

109

Dr. David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271

Re: Draft General Management Plan

Dear Dr. Graber:

Please enter the following comments regarding the draft General Management Plan for Sequoia and Kings Canyon National Parks into the formal record. As someone who has backpacked in Sequoia/Kings Canyon (SEKI) for more than 30 years, I have a keen interest in how the backcountry of SEKI is managed, and my comments are directed primarily toward sections of the draft GMP that directly affect my use and enjoyment of these spectacular wilderness areas.

I confess to being extremely disappointed in the GMP for its failure to substantively address the most critical backcountry management issue facing these parks: that of damage to wilderness resources and aesthetic values caused by recreational livestock and, particularly, commercial stock pack outfits. It is unclear to me whether the Park Service's failure to address this critical issue is a function of a simple lack of understanding on the park planners or a deliberate attempt to favor these commercial operations over the wishes of the vast majority of wilderness users, but the result will predictably be the same if the preferred alternative is selected: continued damage to meadows, trails, and surface waters, and continued degradation of the experience of backpackers, who constitute 90 to 95% of all wilderness users in SEKI.

Particularly telling of the inherent bias on the part of park planners is the comment on Page 274 of Volume 2, where it is concluded that under the preferred alternative

"...Impacts of horse use (feces, eroded trails, dust) would continue to cause minor, adverse, long-term impacts on a small number of backcountry hikers..."

At best, this statement demonstrates a complete lack of understanding of the degree to which stock use negatively affects the experience of wilderness visitors—a fact that is inexcusable given that published studies conducted within these parks (and others) document these social effects (see, for example, Watson et al. 1993). In the 30+ years I have been hiking in these parks, I have talked to countless other hikers and without question, the single most frequently mentioned impact to the backcountry is the stock-generated dust, manure, urine, and flies that are pervasive on so many trails (particularly those departing from commercial pack stations), as well as the trampling and grazing of meadows caused by livestock when they are allowed to graze in park meadows. (Indeed, it is hard for backpackers to take seriously park admonitions to "leave no trace" or to not "pick wildflowers" when twenty horses/mules at a time are allowed to run amok in park meadows, trampling and eating this "fragile" vegetation that, they have been told, cannot

withstand an occasional flower picker.) In the face of this evidence, for the Park Service to conclude that these are "minor" impacts that affect only a "small number" of backpackers is, at best, unsupported by any factual information. At worst, this language is a blatant attempt by park planners to downplay the significance of recreational stock impacts, portraying them as "minor" impacts that are somehow offset by the "positive" impacts of continuing to allow this "traditional" use. (I shouldn't need to remind you that feeding bears at garbage heaps within national parks was once a "tradition" too.)

Further evidence of the Park Service's favoritism toward recreational stock users is the curious conclusion that the "preferred alternative," which by and large allows stock use to continue at current levels, would be "environmentally preferred" over the "no stock" alternative. Again, this absurd conclusion shows that park planners are either oblivious to the many documented ecological and aesthetic impacts of recreational livestock use or are deliberately attempting to downplay these impacts to allow continued excessive use by recreational livestock.

What the draft GMP lacks are two critical elements: 1) an open and honest discussion and disclosure of the many ecological and aesthetic impacts of recreational stock use in the backcountry of these parks (including full citation of the available literature addressing these issues), and 2) evaluation of a range of *reasonable measures* that could be used to reduce or eliminate these impacts. Instead of evaluating a reasonable range of alternatives for managing recreational livestock (including a host of measures that are currently employed at other national parks in the western United States), the Park Service has chosen two extremes with respect to backcountry stock management: the status quo and a no-stock alternative that has no realistic chance of ever being seriously considered.

Specifically, the draft GMP should consider alternatives that contain the following elements:

1. **Prohibition of grazing within the parks**. This is far from a radical concept. In fact, many national parks in the mountainous west—Mt. Rainier, Lassen Volcanic, Rocky Mountain, Glacier, and Crate Lake—currently prohibit grazing by recreational livestock, and other parks (Olympic, North Cascades, Yellowstone) either prohibit grazing in certain areas (including high-elevation meadows), actively discourage grazing, or allow grazing only around designated stock camping sites. In all of these parks, stock users carry pelleted feed to eliminate the need for grazing. The necessity of such regulations to protect wilderness ecosystems is thoroughly documented in the planning documents for these parks. Why has SEKI not considered a "no grazing" alternative when such an alternative is both practicable (as demonstrated by these other parks) and necessary to reduce grazing and trampling impacts?

2. **Prohibition of all cross-country travel by stock.** Again, there is ample scientific evidence that cross-country travel by stock results in rapid damage to vegetation, particularly in sensitive high-elevation areas. Many other parks in the West (Mt. Rainier, Olympic, Lassen Volcanic, Rocky Mountain) prohibit all

cross-country travel by stock, and others limit cross-country travel to a small number of designated areas (North Cascades) or prohibit pack strings off trail (Yellowstone). Although I understand that cross-country travel is currently prohibited in many areas of these parks, a full environmental analysis of a park-wide ban on cross-country travel should be evaluated and is fully appropriate for a programmatic document such as the GMP.

3. **Establishment of a network of foot-travel only trails.** Again, many other national parks (Mt. Rainier, Olympic, North Cascades, Crater Lake, Glacier, Yellostone) have modest networks of foot-travel only trails to allow hikers to enjoy a stock free experience or to protect sensitive areas. Although designation of specific trails as "foot-travel only" is probably best left for analysis in the SEKI Wilderness Management Plan, programmatic direction toward establishing such a network within the parks is both appropriate and supported by a large number of wilderness users.

4. **Revision (lowering) of maximum groups size limits for stock parties.** The current limit of 20 head of stock results in unacceptably high impacts to the vast majority of wilderness users (including most stock users), as evidenced by work conducted in and around these parks (see Cole 1989, Cole 1990, and Watson et al. 1993). Furthermore, these limits exceed maximum group size limits in place in most other parks in the west. Several parks have maximum group-size limits that range from 6 to 16 head of stock (Mt. Rainier, Olympic, North Cascades, Crater Lake, Lassen Volcanic, Rocky Mountain), and those that allow large numbers (20-25 head) do so only on a limited number of trails constructed to high standards. Although the scientifically defensible approach would be to establish area-specific group-size limits that reflect differences in environmental sensitivities and capacities, the Park Service has in the past argued (as part of the effort to establish uniform group-size limits throughout the central and southern Sierra) that uniform group-size limits are desirable from a management standpoint. If that remains the case, then the GMP is the appropriate place to evaluate or at least provide programmatic direction for lowering group-size limits.

5. **Establishment of designated stock camps.** The Park Service should consider and alternative that would provide programmatic direction for the establishment of designated stock camps, as is currently done in many national parks in the mountainous west (e.g., Mt. Rainier, Olympic, North Cascades, Rocky Mountain, Yellowstone). Designation of such sites would help localize stock impacts to certain "hardened" sites, and would allow hikers to avoid areas used by recreational stock, thereby greatly alleviating user conflicts. Again, designation of specific sites, and the associated environmental analysis, is best left to the Wilderness Management Plan for these parks, but programmatic direction for establishing such a network of designated stock sites is clearly appropriate for this document.

The five elements above constitute entirely reasonable and feasible measures to help minimize stock impacts and thereby substantially increase the enjoyment of thousands of wilderness visitors each year. These measures are completely consistent with regulations in place at other national parks—measures that have been demonstrated to be both practical and effective. Such measures would also eliminate the need for costly (and impractical, given current budget constraints) attempts to monitor stock impacts using methods that are of questionable utility (such as the residual biomass method the parks now use) and that fail to address key impacts such as trampling. And final, the Park Service has the legal obligation under NEPA to evaluate such reasonable alternatives in formulating this important plan that will guide management of these parks for perhaps decades to come. Any plan that does not, at a minimum, incorporate these key elements and analysis of their environmental consequences is clearly deficient.

It has been my past experience in commenting on stock use in national parks and forest of the Sierra that wilderness planners have portrayed comments from hikers regarding inadequate stock regulation as being indicative of a desire to see all stock eliminated from the wilderness. The reality is that most hikers are tolerant of a modest level of stock use in the backcountry of these parks. What hikers find objectionable are 1) the clearly inadequate measure in place to manage recreational livestock, which results in clear (and well documented) damage to the wilderness and to the aesthetic experience; 2) the tendency of commercial outfitters to bring in vast amounts of unneeded luxury items into the wilderness to cater to their clientele, when each additional mule needed to carry such items compounds the damage to trails, meadows, and campsites; and 3) which the clear double-standard that exists in management of hikers versus stock users. The measures outlined above would go a long way toward reducing the conflicts between hikers and stock users that have been the source of tension between the two user groups since I started hiking in the 1970s.

In addition to these recommendations regarding backcountry management, I also have the following recommendations.

1. The commercial stock camp at Bearpaw Meadow should be removed, the site restored to its pre-disturbance condition, and the area designated as wilderness.
2. All commercial pack stations should be removed from park boundaries and relocated outside of the parks to eliminate impacts associate with stable, including the attraction of nonnative brown-headed cowbirds, which have adverse impacts on native songbirds in the parks.
3. The private cabins at Mineral King should be removed upon the death of the current permittee. The Park Service's attempt to justify these structures as "historically significant" shows a blatant disregard of Congressional intent when Mineral King was added to Sequoia National Park. What is "historically significant" is not the cabins, but the fact that Congress had the wisdom to recognize Mineral King as a unique and spectacular area worthy of the greatest protections that our land use laws allow.

Thank you for considering my comments, and I look forward to a revised GMP that does a far better job of addressing the serious impacts that these parks face, and that fully discloses the environmental costs and benefits of the elements proposed in this letter.

Sincerely,

Brian C. Spence, Ph.D.
687 36th Ave
Santa Cruz, CA 95062

Dr. Graber:

The follwing references were inadvertantly omitted from my previously transmitted letter. Please add them to the letter.

Watson, A.E., M.J. Niccolucci, and D.R. Williams. 1993. Hikers and recreational stock users: predicting and managing conflicts in three wildernesses. U.S. Forest Service Intermountain Research Station, Research Paper INT-468

Cole, D.N. 1989. Low-impact recreational practices for wilderness and backcountry. U.S. Forest Service Intermountain Research Station. General Technical Report INT-265.

Cole, D.N. 1990. Ecological impacts of wilderness recreation and their management. Pages 425-466, In Hendee et al. (eds.) Wilderness Management. North American Press, Golden, Colorado.

Thank you.

Brian Spence

Peter Stekel ◆ (206) 933-1178 ◆ 3048 62nd Avenue SW ◆ Seattle, WA 98116-2706

July 6, 2004

Susan Spain, Landscape Architect
National Park Service - DSC
12795 W. Alameda Parkway
Denver CO 80225-0287

Dear Susan Spain,

I am writing to comment on the SEKI GMP and topic 6: the Mineral King special use permits.

The whole idea of private in-holdings in a national park is anathema to the entire reason we have parks. Granted, the Mineral King cabins pre-date their inclusion in Sequoia National Park and were granted special use by the USFS. Originally, these permits were to expire with the death of the permitee. This policy must be continued. No extensions. No exceptions. The cabin owners may own their cabins but we, the public, own the land.

There are many problems with continuing to allow the cabins to stand in Sequoia National Park. As a 30+ year visitor to the Park I have seen, first hand, what some of these problems are. Water quality is a big issue. There is no sewage system for the cabins and effluent is not regulated. The east fork of the Kaweah suffers from this lack of oversight.

Cabin water systems are scattered throughout the area with pipes both above and below surface. And I suspect the water systems are not up to any kind of building or health code.

The age of the Mineral King cabins and their general level of benign neglect when it comes to maintenance creates an eyesore. Many of the buildings present safety hazards. More importantly, the buildings are fire hazards as the owners don't seem to do much to create defensible space in this urban-rural interface area.

Please keep me informed on this subject.

Sincerely,

Peter Stekel
email: author@peterstekel.com
http://www.peterstekel.com

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Fri, Apr 8, 1904 4:42 PM

From: s/l stocking <snlsox@earthlink.net>
To: <susan_spain@nps.gov>, <david-graber@nps.gov>, <snlsox@earthlink.net>
Date: Thursday, April 7, 1904 11:09 PM
Subject: SEKI GMP

NPS GMP Team:
I have commented on management plans for various areas of Sequoia-Kings Canyon in the past. This Plan has been more difficult to read and understand due to the way in which it is structured. It appears that each "Alternative" must be discussed completely in relationship to each issue. This led to so much duplication that it was difficult for me to detect how the "Alternatives" differed. This has made it difficult for me to make a well organized response. I will attempt to separate comments by topic and hope that I am successful in the effort although the topics, of necessity, overlap quite a bit.

Topic 1: Miscelaneous Comments:
Vol II

Pg. 9 "Currently several HUNDRED (?) people per year visit park caves."

Pg. 10 Has Park surface water been checked for Giardia, Campylobacter and Cryptosporidium? Have base levels been established? Are there references? Are any studies related to stock use? There was a recent study in Yosemite.

Pg 10-11 Has increase in global warming been correlated with the timing of snowmelt, runoff and extent of 100 year floodplain? This has been done in some Sierran drainage basins. (Mokelumne)

Pg 13. (Stressors) "Park developments at Grant Grove....were constructed in and among the sequoia trees...."Comment: This was true in Giant Forest but how was it true in Grant Grove?

Pg.15. trepass cattle have been reported in both Redwood Canyon and Big Stump areas this summer (and other summers).

Pg. 14 "Spice bush along stream banks". comment: various Salix spp are much MORE typical at most all elevations and locations discussed.

Pg. 17 Pallid bat: "This and following bat species etc" (NONE follow)

Pg.38. No mention of Cedar Grove Ranger Station or "Cache Cabin" at Kanawyers as "Historic". They would seem as "historic" as Knapps Cabin. Have they been proposed for designation?

Pg. 39. There are other Shorty's Cabins. Have they been proposed for inclusion in the historic district? If not, why not?
Pg 46-51 (Possibly better under Transportation) What has been the change in the "Average Daily Traffic" of various areas? (In 6 years a 30% change in some California areas) Has there been a change in the number of busses? This relates to parking and size and number of turnouts.

Pg 63, Table 10 No mention of trail from Wukaschi parking area or Lodgepole to Twin Lakes etc.

Pg. 65 Grant Grove" Crystal Springs Campground has around 6,700 overnight stays and 1,900 R.V. stays. This is certainly good justification to keep this campground open, not to close it as is proposed. (Also C-4)

Pg. 74 "Over 1,400 volunteers serve in the parks in a variety of capacities." This would seem to justify further discussion. Who are they, what do they do, and are they NPS, SNHA or other volunteers? How many hours does this represent?

Pg 113. Stock use (Alt. D and elsewhere) Has the ~~imput~~ impact of stock use on surface water been studied? (see 2nd comment above)

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Pg 119-120 ...."sequoia groves south of the Grant Grove." To which groves does this refer? Are they in the Grant Grove hydrologic area?

pg. 126-131. Relocating and redesigning bridges in Cedar Grove area. Would the location of some or all of the 3 bridges be changed? Would the new bridge (or bridges) continue to impact riparian and bank areas? WOuld the location(s) be changed? Could there be mitigation to banks and wetlands if the locations were not changed?

pg. 128-132 Is background information available for the meadow areas which would be impacted by "increased water demand" caused by concession development at Grant Grove? For example is there now "moisture stress" within and adjacent to the meadows in the Sequoia Groves during drought?

Natural Resources: Wildlife and WIldlife Habitat (The whole section)

I find it very difficult to evaluate statements such as; "Habitat restoration, particularly in riparian arres, would be a minor (or incremental and localized, beneficial and adverse) benefit." How are these impacts determined? Have there been baseline studies made and reported for sensitive areas and populations?

pg. 143-151 etc (Also vol 1, pg 26)

What types of increased management will be carried out to protect special status species?

Will there be increased management actions taken to remove exotic species which impact (or not) native species?

Are these addressed in the Resource Management Plan?

pg. 162-163. The southern San Joaquin Valley has "some of the worst air quality in the United States", Breathing smoke is not healthy. What attention is being paid to strategies for reduction of air pollutants through different management strategies of "prescribed fires"? (Is this addressed in the Fire & Fuel Management Plan?)

a. there were management fires early this summer on Redwood Mt and Buena Vista Peak at a time when air quality in the valley appeared poor. It was impossible to see the adjacent hills.

b. What is being produced by these fires? Are the amounts of PM10 measured? Measured in the foothills? What part of valley pollutants come from park management fires?

c. Legislative changes may impact actions of SJVARCD. (SB 999 Machado) Has this been considered?

d.Are these points considered in the "resource Management Plan or the Fuel and Fire Management Plan or both?

pg. 175 Impacts of various uses on riverbanks and riparian areas. How have these been determined?

Has the carrying capacity of these areas been determined for Cedar Grove ~~areas~~? The lack of such determination was challenged in Yosemite.

pg. 182. Which bridge (of the 3) is to be relocated?

TOPIC 4:

Vol.1, pg 55. "The parks CONTINUE TO LIMIT low-flying aircraft to avoid disturbing the natural setting". I was awakened by a series of back and forth night overflights of the Grant Grove area during the last week of June this year. During the same week there was a low level mid day jet flight down the length of the Kings Canyon at Cedar Grove.

How are flights limitted? Has the base commander at Lemore been asked to control overflights?

pg. 88. "Provide work camp development for staff, partners and volunteers to support ranger activities, interpretation etc." This appears to be a good plan but is it consistant with the following? "A limitted amount of housing is provided in park development for some permanent and seasonal employees." I understand that the N.P.S. policy is to cut back on housing within the parks when possible.

Vol 1, pg 116, Vol 2 pg 269. Provide a Visitor Center at Cedar Grove. Excellent suggestion. Location is critical. Present Ranger Station and Road's End have proven to be less than ideal. How about between Camp 2 & 3, Canyon View or Knapps Cabin areas? Is this the meaning of "adaptively using

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Knapps Cabin? (pg 219 Vol. 2)

pg. 120. "Gas station for a potential visitor facility." Access and visibility of this site is limitted and could add to area congestion. Could be used to increase needed parking for the store, postoffice etc. which is not now adequate. The old comfort station here may be a neglected historic structure which could be updated to eleviate crowding at the visitor center restrooms.

pg ? There is mention of connecting trails in Grant Grove area to those in Sequoia National Monument. Good idea, but WHAT trails exist to connect to in Sequoia National Monument?

pg 122. (etc) Crystal Springs is not viable for conversion to day use. It is not easily seen from the highway or from the village area. It is not close enough to the village area to be useful for parking. It is well used as a camping area> (is comment pg 65 above.)

Picnic areas are quite adequate at this time in Grant Grove. Both Big Stump and Columbine are easily seen and have recently been upgraded. Panaoramic Point Picnic Area is well used but is not mentioned in this GMP. It has a restroom, garbage and recycling containers and several picnic tables as well as adequate parking.

pg. 132-134 and also pg 271 in Vol. 2

What is the proposed use for the old gas station at Lodgepole? Why not remove it and restore the area? Why not relocate the Nature Center to this location? And, or it could be used as the Lodgepole shuttle stop.It could also be used as a selfservice service station with restrooms.

pg 132. Wuksuchi. Possible location for commercial pack station. But where do you want to direct day use horseback rides?

pg 132. "Provide a small picnic area across the Generals Highway." Entrance on a curve near the campground and Visitor Center entrance? Congestion and safety could be a problem here. Location might also increases river bank access and erosion. Possibly better to further develop the picnic area at Wolverton.

pg. 140 Provide transit from parking lot at Lodgepole and from ticket center to Crystal Cave. Has this been investigated?

Shuttle: Has a Giant Forest Shuttle been operating? I saw no evidence of this on a visit this summer. Have I misunderstood what is said here? We have recently used the shuttle in Yosemite National Park, Tuolumne Meadow, and in the Valley... great!

Vol 2 Page 248 Have I missed discussion of such possibilities as having two entry and 2 exit lanes at Big Stump? I know that there are two lanes now but everyone usually stays in one lane. Those with passes and who have no questions could be directed to one lane and those buying passes or with questions to the other. (Similar to a "carpool" designated lane.)

pg. 280. The Wolverton Picnic Area is referenced here. Where is it? I know where the restrooms and parking lots are located. Are there obvious signs? How many tables? Generally the Parks have much better picnic areas than does Yosemite.

pg.304. The way this paragraph is constructed it appears that all areas mentioned may be of the same type. Some U.S.Forest service permitted use areas are mentioned as are private properties and others.

Pg 318-322. Are "stock user groups' the ONLY volunteer groups? Are any volunteer groups or individuals involved in other projects such as the removal of "Weeds"? With so many volunteers (pg 74 vol 2) could not some be involved in such projects?

Socioeconomic:

It is good to see that an increase in park staffing is recommended. This is needed to better serve the public.

Would not increasing the housing of park staff outside the parks

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lead to increases in both air pollution and congestion?
A reduced number of campsites at Grant Grove and Cedar Grove could unequally impact those economic and social groups which use these facilities but could not afford to use the expanded lodging facilities. Has it been found that there is increased demand for lodge facilities and decreased demand for campsites?

Thank you for the opportunity to comment on this General Management Plan.

S.K. Stocking P.O. Box 1259, San Andreas Ca. 95249

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Edward.Sweet@kp.org
09/01/2004 11:55 AM
MST

To: susan_spain@nps.gov, david_graber@nps.gov
cc:
Subject: Draft GMP for Sequoia and Kings Canyon National Parks

I have been an avid user and supporter of Sequoia and Kings Canyon National Parks for more than 30 years and am very disturbed by the Draft GMP which would seem to disregard the 1916 Organic Act and the 1964 Wilderness Act, the mandates which should govern management of the parks. I am particularly concerned about commercial and noncommercial stock use, the private cabins at Mineral King, military overflights, and air pollution. As recently as last month, while backpacking in the lower Kern River Canyon, I witnessed the unacceptable impacts that stock use causes to the wilderness which, according to the 1916 Organic Act, should be left "unimpaired for the enjoyment of future generations." I witnessed trampled meadows and streambeds and spent much of my time avoiding stepping in manure and running away from swarms of flies which thrive on the horse excrement. Needless to say, this hike hardly represented a natural wilderness experience. I find that once again I need to eliminate future visits to a supposed wilderness area which has been ruined by stock use. While I agree with Alternative A (no stock use), I don't believe the NPS would seriously consider this option. But why hasn't a "no grazing" policy, a reasonable compromise alternative, been given consideration? Requiring stock users to carry feed, as occurs in may other national parks, would minimize very damaging grazing impacts. And why not phase out nonessential stock use in the most sensitive high-elevation areas of the parks as suggested in the 1971 Master Plan? What happened to that agreed upon decision anyway? Has an Environmental Impact Statement evaluated and disclosed the impacts of discarding that existing language? If not, why not? Lastly, commercial pack stations based within the parks should be removed. The 1964 Wilderness Act specifies that there shall be no commercial enterprises within wilderness areas "except as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act." Why not site any pack stations outside the parks and limit commercial stock use only to persons who are truly disabled and persons carrying out true administrative needs that can't be accomplished by other, less destructive means? Recreational commercial stock use is not "necessary" under the law. The biases in favor of on-going, and even expanded, stock use under the Preferred Alternative of the Draft GMP conflicts with the desires of the vast majority of the public and the will of Congress as expressed in the 1916 Organic and the 1964 Wilderness Acts. Please rectify this disturbing deficiency.

As concerns the private cabins at Mineral King, they should be removed when the permittee-of-record dies. This was the intention of Congress when Mineral King was added to the national park. The cabin sites should be restored to their natural state as soon as possible. The "culture resource preservation or public lodging plan," part of the Preferred Alternative, is simply a ruse to give private interests on-going control of public lands. The idea of a priority lodging reservation system for former special use permittees is obviously discriminatory. Mineral King is suppose to be part of the national park, not a private holding. Please get rid of the cabins as soon as possible as they represent an affront to the very idea of wilderness.

Anyone who has backpacked in Sequoia Park is well aware of the very frequent and very loud military overflights that severely detract from the wilderness experience. While I understand that the NPS may have limited control over the airspace, it bewilders me why the military must use airspace over national parks. Isn't there enough airspace elsewhere? Are flights over national parks really unavoidable? I encourage the NPS to address this issue with our military

services.

While air pollution is an extremely complicated and difficult problem, a vision for the future of Sequoia and Kings Canyon National Parks that doesn't address the atrocious air quality that plagues the parks isn't much of a vision. I encourage the NPS to further publicize this issue and to work with other government agencies to begin to grapple with the air pollution problem which not only effects the enjoyment and health of visitors but seriously threatens the very existence of the parks by adversely impacting water resources, the flora, and the fauna. I appreciate your consideration of my comments and concerns and hope that Sequoia and Kings Canyon National Parks will be preserved unimpaired for future generations.

Sincerely, Ed Sweet 160 Stonewall RD

Berkeley, CA 94705

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David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Dear Dr. Graber:

I am writing to comment on the draft General Management Plan (DGMP) for Sequoia and Kings Canyon National Parks (SEKI).

My primary concern is that the DGMP fails to consider a "no grazing" alternative. The NPS should back up and fully evaluate a no grazing alternative. Such an alternative is highly feasible and entirely reasonable. It was requested by many commenters during the scoping period for this GMP. It would allow recreational stock use to continue, to serve those who cannot visit the backcountry under their own power. It would require stock users to carry feed for their animals, as is required in many other national parks. It would eliminate nearly all of the ongoing and substantial impacts of stock grazing and trampling of meadows, wetlands, and lakeshores.

The DGMP instead includes a "no stock" alternative, which is a radical notion that will not even receive serious consideration by the NPS decision-makers. It would not even allow stock use for essential administrative functions, such as trail crew support and ranger patrols. It is both unconscionable and illegal for the NPS to include such a radical alternative while ignoring the numerous comments that have asked that you fully evaluate and consider a "no grazing" alternative. It is unconscionable because the public deserves a GMP that addresses the many substantial impacts of ongoing commercial and private recreational stock use. It is illegal because the National Environmental Policy Act (NEPA) requires that you evaluate a range of reasonable alternatives, and that you assess every significant aspect of the environmental impact of a proposed action.

The DGMP should retain the important language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At minimum, the GMP should include replacement language that fully protects the parks from the many substantial impacts of stock use (i.e., overgrazing, trampling of sensitive areas, stock manure & urine in campsites, introduction of non-native plants, proliferation of brown-headed cowbirds, reduction of invertebrate populations in meadows, etc.). The DGMP is fatally flawed because it essentially proposes to continue "business-as-usual" stock management, which has resulted in myriad substantial impacts throughout SEKI.

In addition, I support the removal of all commercial pack stations from SEKI, the removal of the commercial camp at Bearpaw, and the removal of the cabins at Mineral King. These areas should be restored to their natural condition insofar as possible.

Sincerely,

Rob Talbert
481 Osgood Court
Laguna Beach, CA 92651

#9-1

Re: comments on the SEKI GMP

Dear Ms Spain and Mr Graber:

Please accept these comments on the draft General Management Plan (GMP) for the Sequoia and Kings Canyon (SEKI) National Parks. While I support most aspects of the Preferred Alternative, this must be revised to incorporate more aspects of Alternative A. Specifically, Mineral King Permit Cabins should be removed, pack stock should not be allowed in the parks, there should be no gas stations in the parks, there should not be a tent hotel on Hockett Plateau, and all dams, impoundments and diversions within the parks should be removed.

The Preferred Alternative should require the removal of Mineral King Permit Cabins when the original permittee dies, as was stipulated in the original (1978) agreement. Removing the cabins (rather than reuse as public facilities) will have several desirable environmental benefits to the Mineral King area. First, there is already too much development in the Mineral King Area (e.g., Silver City, Kaweah Han); removing the permit cabins will help to alleviate this. Furthermore, removal will eliminate problems from waste disposal including septic systems and it may help reduce habitat fragmentation. These considerations far outweigh the cultural loss resulting from the cabins removal, which could be largely mitigated by carefully photographically recording the cabins prior to removal. Last, discontinuing special use is consistent with NPS policy (part 2, page 299). I regard a "priority reservations" (as described in the Preferred Alternative) as a form of "special use" and hence inconsistent with NPS policy.

As called for in the Preferred Alternative, efforts should be made to acquire the inholdings at Oriole Lake, and after facilities are removed, to turn this area into a wilderness.

The Preferred Alternative should not allow for a new High Sierra tent hotel on the Hockett Plateau. Such a hotel would only negatively impact the environment around the plateau (helicopter noise, increased stock use, crowding, trampling of soils and vegetation loss). The hotel would also prevent the adjacent area from becoming a wilderness, which violates NPS Management Polices 2001 that states the NPS will take no action to diminish the suitability of an area possessing wilderness characteristics (page 187 of Vol. 2 of the DGMP). From a land area perspective, the area near the hotel that would not be included in any wilderness represents a small fraction of the Hockett Plateau region that may be considered as a wilderness (0.07%). However, the sheer numbers are deceptive, because they ignore the qualitative negative impact the hotel would have on a wilderness. I don't want to see a hotel as I hike up through a wilderness area, and indeed, even knowledge that such a hotel exists detracts for my wilderness experience.

As originally called for in the 1971 Master Plan, the Preferred Alternative should eliminate all pack stock use in SEKI National Parks. There are many desirable reasons for this. Pack stock use only benefits a few - approximately 4% of backcountry users (using data from part 1, page 63-64; see also part 2, pg 265-266). However, stock use has

a hugely disproportionate negative environmental impact (part 2, pg 110, 125, 129). One of the most important of these concerns introduced species. As noted on several occasions in the DGMP, one of the most important systemic stressors of the park ecosystems is introduced species. The elimination of stock use in SEKI would eliminate one significant source of introduced species - invasive plants originating from feed and pack stock. This issue is not adequately addressed in the DGMP, and given the importance of invasive plants as a systemic stressor, the conclusion that the impact of eliminating stock use would be 'minor' (part 2, pg 110) is incorrect. This shortcoming is indicated by the long list (which seems to me only partial) of areas favorably impacted by the elimination of stock.

There are other ways that pack stock negatively impact the environment, include fouling of the backcountry and trampling of meadows and riparian areas. These significantly degrade the environment of the parks highly disproportionate to pack stock use. Indeed, as noted in the DGMP (part 2, pg 129), pack stock cause "potentially irreversible impacts to heavily grazed meadows". Given this and that one of the purposes of SEKI is to "protect forever the greater Sierran ecosystem", the only way to achieve this purpose is to eliminate pack stock use and hence prevent the potentially irreversible impacts to meadows.

On a personal note, I have had several bad experiences with pack stock. A campsite I used in Junction Meadow in 2002 was severely polluted with manure and the smell was barely tolerable; not only that but a nearby party of pack stock users was using a chain saw to cut firewood! This would, of course, been impossible without pack stock to carry the chain. In 2000, a stock party I encountered in Dusy Basin proceeded to camp immediately adjacent to a high alpine lake, completely ignoring requirement of camping 100 ft from water; none of the many backpackers here were camped next to the lake.

If the Preferred Alternative does not eliminate the use of pack stock, then it must include several provisions to insure that the environmental impact of pack stock is limited. There should be no grazing of pack stock in the parks; there should be no new pack stations; pack stock should not be allowed on cross-country routes; and pack stock manure should either be buried (as humans must bury their waste) or packed out. These measures will help mitigate some of the environmental impacts caused by pack stock (described in previous few paragraphs), although these will not be as effective of eliminating stock from the parks.

The Preferred Alternative should not allow for any gas stations in the parks, since gas is readily available outside the parks. Any gas station inside the parks will only create unnecessary environmental problems such as increased air pollution due to fumes from filling and to the inevitable gas spills. Gas stations will also lead to even more traffic congestion, because the large gas tankers necessary for filling the stations would have to travel the already crowded park roads.

The Preferred Alternative should ban all snowmobiles from SEKI. Snowmobiles, being motorized equipment, have no place in National Parks and, given the limited winter staffing levels, the NPS will not be able to enforce any rules limiting snowmobile access.

All developed campgrounds should have quite areas reserved for tents only to accommodate those campers wishing a more peaceful camping experience.

As noted in the DGMP, one of the largest systematic stressor to the park ecosystem is anthropogenic climate change: the climate will continue to warm in the future. This warming, and the impact that this will have on reducing water supplies, must be factored into all water use plans. This likely reduction in water supplies will be particularly important when assessing water withdraws near giant Sequoia groves. The likely reduction in water supplies due to climate change should be noted in the Preferred Alternative.

The Preferred Alternative should call for the removal of all dams, impoundments and diversions of free-flowing rivers within the parks. While the presence of some of these constructions does not preclude the inclusion of adjacent river segments in the wild and scenic river system, these constructions do not belong in National Parks: they adversely impact the purpose of protecting forever the greater Sierran ecosystem and its natural evolution. The removal of these would have important environmental impact on soils and vegetation as well as improve visitor experiences: who wants to see a dam in the middle of an otherwise free-flowing river? Any historic sites could be preserved by photographic recording. The loss of recreational activity directly associated with any dams removal is small. The arguments given on part 2, page 298, that the removal of Mineral King dams would result in moderate-major adverse impacts is misleading, because it does not consider that many of the stated recreational activities (e.g., camping, hiking and fishing) could continue even if the dams were removed.

Sincerely,
Dr Michael F Toney
6747 Heathfield Drive
San Jose, CA 95120
mftoney@yahoo.com

338.

October 6, 2004

Susan Spain
NPS GMP Team Leader
12795 W. Alameda Pkwy
Denver, CO 80225-0287
Susan_spain@nps.gov

Ms Spain:

Thank you for giving the public the opportunity to comment on the General Management Plan for Sequoia/Kings Canyon National Parks.

I would like to comment on the area of air quality and the policy of prescribed burning. With the marginal air quality in and around the Park, every attempt should be made to minimize additional factors that contribute to this bad air. While the majority of the bad air is from vehicles, ag burning and metro area incursion into the San Joaquin Valley, there is one source that the Park itself produces, and that is the aggressive policy of Prescribed Burns.

At one time, the Park announced a goal of 20,000 acres of intentional burning each year. With the burning period constrained by weather and other factors, the summer and fall seasons see an intense effort to 'get the job done,' and unfortunately, air quality suffers during these prolonged periods. In communities like Three Rivers, the results are days and weeks of eye stinging events that are unhealthful for residents, particularly the elderly and infants. Many people moved from metro areas to Three Rivers to escape air pollution, only to find an equal problem right in our backyard.

The Park discusses 'Memorandums of Understanding' with Valley ARB's, but burning on no burn days continues, and fuel is added (allowed to burn) during periods that others outside the Park would receive violations for. I believe in fact, that the Park feels it is above local and state air pollution guidelines, and can frankly, do what it wishes. Burns are allowed to grow to a size that control, when air quality is an issue, is impossible.

Loss of control is another issue. In 1997, the residents of Three Rivers were told (by then Superintendent Mike Toffefson) that there would be no more prescribed burns in the center fork drainage in that year (due to previous bad air fire incidents,) and yet, they started the Amphitheater Prescribed burn in September, and promptly lost control of it. The suppression costs were in excess of one million dollars. Another loss-of-control burn happened in the Mineral King area several years ago. Helicopter costs alone to control that one were approximately $345,000. Amazingly, no one was fined, no one lost their job over these incidents. Loss of control of a prescribed fire has residents of Three Rivers concerned. The history lesson of Los Alamos has not been forgotten.

Susan Spain - 2

When residents complain of bad air during prolonged days and weeks of stale air due to the burning of damp and green fuels, the Park tells residents to 'stay inside' and 'keep your windows closed.' Hardly what one would call good public relations efforts.

The Park must balance the aggressive goals of Prescribed Burns with the effects on human health (I think this comes before the health of the forest), the effects on visitor enjoyment of the Park, the reduction on quality of life in neighboring communities, the risk of a catastrophic loss of control event, and the effects of smoke on the trees and other living things in the Park. I bet the deer and bears aren't real happy when these burns occur. I wonder if anyone has done a study on their happiness factor when this happens!

Anyway, to get serious, I think that the policy of 'damn the torpedoes, full speed ahead' has to be reigned in, the burning done in small time envelopes (like maybe 4-5 days out of every month, not to exceed 4 months a year. Mechanical thinning should also be increased, not limited as discussed in the Plan. I think Grand Canyon NP has developed an aggressive thinning plan as to not degrade the already deteriorating visual capabilities at that Park. Sequoia/KC should work on plans to do the same, as the view of Moro Rock and Alta Peak should be as important to us as the canyons are to visitors to that beautiful Park.

Sincerely,

Pete van Gilluwe
43275 Kaweah River Drive
Three Rivers, CA 93271
pvg1@hotmail.com

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Susan et. al,

I want to take this moment to thank you all for what was obviously a lot of hard work on the draft GMP. Your presentation was smooth and relaxed and your demeanor was friendly in spite of the possible inflammatory nature of a couple of the issues. By the way, thanks for the water.

The Natl. Park Service GMP is certainly comprehensive. Though, if you will allow me, in regards to Mineral King, your final analysis is based upon some unsound assumptions. To retrofit those cabins up to code for the public would be a daunting task, if not expensive and could possibly alter the historic significance of the cabins. And, you assume that we would want to rent back our own cabins for a number of days with an annual reunion of cabin owners/stewards. I'm afraid that would be emotionally difficult. No offense, but that won't work.

As you probably noticed, the vast majority of people in attendance were responding to the Mineral King situation, and they were in favor of letting the cabins remain in the hands of the present owners/stewards. You did not include that option in your list of alternatives. And if I remember correctly, that alternative (mentioned above) was the suggestion emphasized by the majority of the participants at the public scoping meetings prior to the draft GMP. Wasn't the purpose of those scoping meetings your attempt at public input for your GMP? I was under the assumption that was the purpose. I surely hope it was an oversight on your part and not purposeful. We want to continue to work in partnership with you.

I have to assume, based on the turnout at the Fresno draft GMP Response session, that the public thinks the Park should direct its resources elsewhere other than to the upkeep of the Mineral King historic district, especially in light of the cabin stewards/owners volunteering to keep them up at their expense. What a deal for the NPS. A proverbial feather in their cap. The NPS gets the cabin stewards/owners to keep them up at their expense and labor, the NPS continues to receive the lease money for the land and the NPS gets to show the cabins off as a victory for historic and cultural preservation and frugal handling of monetary resources. Win-win.

It seems to me that the upkeep of these historic cabins would be best left in the hands of the present owners/stewards who know their many eccentricities, some of which are quite dangerous. No cost to you, really, unless, of course, you would like us to bill you. At the least maybe you could volunteer to work on them periodically as we do for The NPS in the area. I think that that would be a fair trade. I'll be looking for your name(s) on the sign-up sheet for work on the cabins. Be sure to wear old cloths.

Thank you again for all your hard work.

Respectfully,

Dan Voelz
1961 Richert
Clovis, CA. 93611

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September 29, 2004

Park GMP Coordinator, Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651

Topic: Mineral King Special Use Permits

Dear Dr. Graber,

I have read your General Management Plan (GMP) cover to cover. You have certainly taken many hours to compile this document and I applaud the Park Service for their efforts. I would like to take this opportunity to comment on the Mineral King issue specifically.

I was disappointed to see that there were very few references to the fact that this community is now a National Historic District. This designation certainly carries a whole new meaning for the treatment of the cabins and their care. The first thing that comes to mind is the National Preservation Act of 1966. As you know this act requires that Federal agencies pay attention to historic preservation. There are even passages that suggest partnerships with appropriate groups to help achieve this goal. So my first question is why was that not addressed in the GMP? Alternative C suggests that the cabins can stay but alludes to the fact that legislation is needed to make this happen. Are you supporting the current legislation to make this happen?

Second, President Bush has his Preserve America Executive Order #13287 as part of the goals he holds for Federal agencies. As you know this states that agencies such as yourself cooperate with state and local governments and **citizen groups** to promote tourism of historic sites. I did not see any passages of significance addressing this mandate either.

The solution is obvious but not simple. The cabin owners are ready, willing and able to cooperate in a partnership agreement. They have a long and successful history of taking care of their cabins, preserving and maintaining them in a fashion that is appropriate with historic standards. This past summer they had volunteers working at the Mineral King Ranger Station every day and also involved in interpretive hikes, campfires and a variety of park maintenance projects. The cabin owners are doing all the right things in accordance with Preserve America and the National Preservation Act. At this point all they need is for the Park service to formally get on board and make the changes that need to happen so they can remain in their cabins doing what they do best.

Alternative C is the best option you have to offer at this time. Please consider a way to make this partnership between the National Park Service and the Mineral King cabin owners a reality. It is a solution that will be good for the public, the Park Service and the cabin owners.

Sincerely,
Douglas E. Volding

Doug Volding
28122 Somerset Mission Viejo, CA 92692

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James S. Voorhees
13460 Fieldcreek Ln.
Reno, Nevada 89448
(775) 852-8267
jvoorheesnv@charter.net

June 14, 2004

Dr. David Graber
Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651
VIA EMAIL: david_graber@nps.gov

Re: Draft General Management Plan

Dear Dr. Graber:

I am writing regarding the Draft General Management Plan, and specifically the various alternatives for the cabins in the Mineral King Community. I believe that regardless of the language of the 1978 law, one recent development has made a new alternative feasible – one not considered in the Draft Plan. Now that the cabins have been placed on the National Register of Historic Places, there is an obligation for them to be preserved for their historic value.

The alternative that deserves to be included and considered is for the current owners to continue use of the cabins providing that they are maintained according to appropriate guidelines. Such an agreement would benefit the cabin owners and the public at large by providing a way to preserve the cabins. Additionally, the park would continue to benefit by the stewardship of the historic community in the Mineral King Valley.

It is unlikely that the Park Service will receive funds for preservation of the cabins. This coupled with the fact that the current cabin owners are the only ones familiar with the idiosyncrasies of their cabins further supports this approach.

I ask that this alternative receive all due consideration. Thank you.

Sincerely,

James S. Voorhees
Whitney Cabin #20
West Mineral King

JOHN I. WEAVER

July 22, 2004

NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service – DSC
12795 W. Alameda Parkway
Denver, Colorado 80225-0287

Dear Ms Spain:

Thank you for providing a copy of the ***Draft general management plan and comprehensive river management plan / environmental impact statement for Sequoia and Kings Canyon National Parks and Middle and South Forks of the Kings River and North Fork of the Kern River*** for review and comment. The following are recommended for inclusion into the final document.

Topic 1: Miscellaneous comments and ideas.

a. The cover on the Manuals and the CD, should not show a park ranger in uniform, with others, walking on the roots of a Giant Sequoia. It appears this may be a Sequoia tree inside a rail fence, which the Park Service constructed to keep people off the roots. It is my understanding that pedestrian traffic is detrimental to Sequoia root systems.

Topic 4: Comments on alternatives or analysis related to Transportation, Visitor Experience.

a. The traditional range of park activities should be expanded to add mountain biking on some trails in the Sequoia and Kings Canyon National Parks. The trails on which stock animals are presently permitted should be open to bicycles as well. The effect on the landscape and the environment is less with a bicycle than a horse or pack animal.
b. Snowmobiles should be permitted on some trails in the Sequoia and Kings Canyon National Parks. In the late 1960's and early 1970's one such trail was from the intersection of Hazel and Fern lanes in Wilsonia, to the Manzanita Trail in Grant Grove, along the trail to Park Ridge road (which is paved), to the Sequoia National Forest, and on up to the Park Ridge Fire Lookout Station. The route was flagged. Travel was restricted within the National Park to the established, and marked, snowmobile route. This snowmobile route should be re-opened, and extended to the Grant Grove Visitor Center Parking Lot. The route afforded an appropriate Winter Visitor Experience within SEKI parks, and facilitated use of snowmobiles within Sequoia National Forest. It also made this Winter snow experience possible for physically impaired people when they were pulled in a sled behind the snowmobile. The view from the base of the Park Ridge Fire Lookout station, looking at the stars at night, with the area covered with snow is magnificent. It is a very strenuous hike in the snow from the Grant Grove Parking Lot, but in a sled behind a snowmobile can be an inspiring, spiritual experience for a physically impaired person.



2948 EAST JOAQUIN PLACE • FRESNO, CALIFORNIA • 93726-4230
PHONE: (559) 229-3368 • FAX: (559) 222-9768 * E-MAIL: LJWeav@Peoplepc.com

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"John I. Weaver" <LJWeav@peoplepc.com>

10/06/2004 08:26 PM MST

To: <Susan_Spain@nps.gov>, <david_graber@nps.gov>
cc: "John & Lee Weaver" <LJWeav@peoplepc.com>, "Alan I Weaver" <alanw@ci.clovis.ca.us>, "Sally Tripp" <sltripp@sbcglobal.net>, "Gus & Barbara Collins" <Gus3@psnw.com>, "Dennis Patzkowski" <bluejayent@hotmail.com>
Subject: SEKI GMP Oct 6, 2004

October 6, 2004<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service – DSC
12795 W. Alameda Parkway
Denver, Colorado 80225-0287

Dear Ms Spain:

In addition to my previous e-mails concerning the ***Draft general management plan and comprehensive river management plan / environmental impact statement for Sequoia and Kings Canyon National Parks and Middle and South Forks of the Kings River and North Fork of the Kern River,*** please consider the following comments for the final document.

It is difficult to determine which of the alternates these items concern; therefore my references will be to certain pages in the Draft GMP.

Volume 1, Page 33, "Major Decisions to be made":
The GMP should decide that more visitor use is desirable. The appropriate amounts of visitation to the parks should be increased without causing irreparable resource damage, however ***altering the desired experience*** will change as the population and use increases, and therefore should not be a determining item.

Volume 1, Page 35.
The range of activities should be expanded even if the new activities could alter the experiences of other visitors or increase demands on park staff.

Volume 1, page 35.
Bicycling Opportunities should be increased. The NPS policy should be re-considered to permit off-road biking in the parks. A road shared with motor vehicles with bicycles is very dangerous for the bicycle rider.

Sincerely yours,

John I Weaver

John I Weaver

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"Harold Werner" <wernerhw@inreach.com>
10/04/2004 06:17 PM MST

To: "Susan Spain" <susan_spain@nps.gov>, "David Graber" <david_graber@nps.gov>
cc:
Subject: SEKI GMP Comments

While the GMP staff is to be commended for the tremendous amount of hard work, there are some components about it that I find disturbing.

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1) **Unlike all of the other alternatives, the title of the preferred alternative does not present a clear vision of what it represents.** It reads like a grab bag of this and that. I recommend something shorter like: "Sustainable growth to achieve changing visitor and future resource needs".

2) **Changes in the ratio of front country and backcountry under the different alternatives are really artifacts of the way the maps are drawn, not actual differences in visitor use.** Did anyone bother to look up the meaning of backcountry before delineating these boundaries? From a quick search of the web, I came up with: "a generic term that refers to areas that are relatively unmodified and usually accessible only by foot, horse, watercraft, or Off Highway Vehicle (OHV); a term used to describe extremely remote areas; out in the bush; nothing but you, your backpack, and nature; any terrain that isn't in bounds at a resort, very dangerous turf." Unlike wilderness which is a legal status that can come to the edges of development, backcountry requires traveling some significant distance (in our case, by foot or horse) to achieve. The maps for the alternatives show backcountry coming right up to the edges of development, an area that is clearly front country. I recommend that the maps be redrawn (and the areas recalculated) to show the backcountry as "the area beyond the reach of normal day use" or use some distance like "five (or more) miles from the nearest road". With those choices, the term backcountry would mean something. It means nothing as used in this document.

3) **There is no green alternative.** With the park being in one of the dirtiest airsheds in the country and the parks responsibility for protecting natural resources and the emphasis on safety, there should be a green alternative. From the title, I expected Alternative A to be "green", but it fell far short. The document acknowledges a serious air quality problem and the expectation of visitation increasing in the future, but the draft does not do much to address eliminating generation of air pollution within the park. There is the tiny shuttle service in the <?xml:namespace prefix = st1 ns = "urn:schemas-microsoft-com:office:smarttags" />Giant Forest area and some language to explore a more extensive transportation system under some alternatives, but there is nothing that presents a really significant change. The park should have explored one alternative that seriously considered elimination of pollution using known technologies. An example of some components within a "green" alternative might read something like this.

- All public (and maybe some administrative) access would be restricted to a mass transit system utilizing non-polluting technologies. The system would pick up visitors from parking garages in gateway communities (or just inside our park entrances or include major urban areas and airports) and move them within the park. Alternatively, visitors may enter on bicycle or on foot and be excluded from an entrance fee, rewarding them for practicing the cleanest form of transit. DOE expects hydrogen vehicles and refueling infrastructure to have mass-market availability in fifteen years (thus within the scope of this document) and electric and hybrid

busses exist now. Getting further outside the box, consider an electric monorail system. They are noisy (and expensive), but I understand that they are developing some new technology to improve quietness. A monorail would free up the existing road for bicycles, a form of transportation that we should be encouraging.

- The existing draft GMP does virtually nothing for bicycles, the greenest form of transportation (other than hiking). The current draft provides for some local bicycle use in Cedar Grove and considers bicycle use on the Colony Mill Trail in one alternative. That is sad support for a clean, non-polluting form of transportation. We need to give bicyclists the ability to safely travel to all road accessible points within the park, even if it means excluding cars from some areas or building special bicycle paths that parallel some roads.
- Perhaps a green alternative should encourage continued operation of the flume system (However, the Mineral King dams need to go.) to generate electricity. It is clean power; the flume system has some historical value; the system exists; the impacts of building the system have already occurred and are now history; and the environmental impacts from the flume's operation are minimal. This could be carried a step further and the plan could ask Congress for authorization to acquire (rather than dispose) the power plant to support the electric transit system and sell excess power back to the grid to help support the park. Probably not feasible, but has anyone even considered it?
- Sewage would be provided tertiary treatment (or whatever it takes to restore pristine water quality) or be piped (or hauled) out of the park for treatment.

A green alternative would not be looking to reduce visitation, only at virtually eliminating the pollution associated with visitation (and continuing to emphasize recycling). However, this alternative should also consider social and biological carrying capacity.

4) **The alternatives do not give serious consideration to boundary adjustments**. The draft GMP dismisses the need for further consideration because many of the proposed resources are already managed by federal agencies or already were added through the Dillionwood addition. While the adjacent federal agencies are in many cases managing the proposed additions well, I believe the authors of the draft GMP miss the point of the public's comment. The proposed additions would make for a more complete park. The fact that most of it is already federal is what makes boundary adjustment feasible. The existing draft does not ask if existing protected NPS lands are adequate, and it should. Furthermore, I suspect that the list of potential additions is not complete based on casual comments I heard from one or more of the GMP team during the public scoping. For instance, someone told me that a surprising number of people at the workshops drew a boundary adjustment from Grant Grove to the Tehipite area, rounding out the shape of Kings Canyon NP. Of that proposal, only about half (the area south of highway 180) is described in the draft. I know that at least one person proposed addition of BLM land in the Dry Creek drainage and the Volcano Creek area of the Inyo National Forest and those proposals are not listed. Combined, the proposed additions represent a more complete cross-section of the southern Sierra Nevada extending from the San Joaquin Valley to Owens Valley. This seems like an admirable objective to place on one or more of the alternatives, especially within Alternative A.

5) **Wildlife, vegetation, and T&E/sensitive species should have been placed in impact topics dismissed from further analysis.** While those are topics that many readers will want to see, the information is virtually meaningless at the scale of the GMP for alternatives that have such slight differences in the development footprint. The real differences in fauna are related to

how much commitment exists in implementing various laws and policy. For example, the alternative involving the greatest amount of development and visitor use (D) would probably have far less impact on wildlife than the alternative with least development (A) if Alternative D also included a commitment to much more use of natural and prescribed fire than Alternative A (not a likely combination but presented to clarify my point). It is possible that an alternative that encourages increased visitation would result in more funding for staff which in turn results in more successful effort at managing problems like food storage. The point is that wildlife effects are not necessarily a linear function of how much habitat was altered, and the most significant variable (how much real effort is available for managing the stressors) is not addressed by the existing alternatives. I do not consider any of the evaluations of impact to biotic resources meaningful without identifying commitment to managing resources and the public. Within the socio-political world in which we function, less development likely translates into less funding for resource management. It is likely that less funding would be available to implementing natural resources management under an alternative like A than under an alternative like D even though A is intended to enhance natural systems. The real differences in biotic resources under the different alternatives would be affected most by the social and political response to funding resource management under each of those alternatives, not the minor changes in acreage designated for various management prescriptions. Also, the presumption (in Alternative A) that increased emphasis on natural ecosystems and biodiversity comes with reduced use and development is not necessarily true. Sites can be hardened to increase capacity by design (physical barriers), education (increasing respect and voluntary compliance with the 'don't do' activities), and more enforcement. Even solitude can conceivable be improved with some increased use by improving dispersal.

6) **The draft does not address strategies or feasibility for implementation.** A year ago I would not have considered this important, but I don't see much funding in the near future regardless of who runs the administration. Our planning needs to consider the feasibility of implementing every alternative, and allow the public to comment on those plans. While parks are already partnering and raising funds though donations, Congress could give us the authority to raise entrance fees and keep more of the proceeds. Perhaps the alternatives should explore new funding opportunities.

7) **The plan does not give a clear reason for the North Fork Kaweah River not being eligible for "Wild and Scenic River" status.** This river is not just extraordinary, but unique within the park. It is the only park river with its headwaters originating at mid-elevations resulting in it being the warmest river in the park. This coupled with the river's extraordinarily low gradient and deep pools result some unique aquatic habitat. The result is extensive riparian development, the best population of western pond turtle within the park, the only (to my knowledge) park river containing the large mussels (*Margaritifera*), and pools that sometimes show thermal stratification similar to lakes. Not all of the river is low-gradient. Slightly above the confluence with Redwood Creek exists one of the more spectacular waterfalls in the park. While the edges of the river do show evidence of both archeological and historical artifacts, there is no permanent contemporary use, no bridges or trails or equipment. The North Fork is one of the few places to see a wood duck in the park. When you are on the North Fork, you feel like you are in a wild place. The old road that parallels the river is far above it. The North Fork Kaweah is still a wild place where bear and other wildlife dominate the landscape, not people. While it is true that some of the major headwater tributaries flow from private land outside the

park, I don't believe that they have much influence on the river within the park. Yes there are introduced fish in the lowest reaches of the river and it receives contaminants from the sky, but that is true for the other rivers rated as eligible, and some of them are crossed by bridges. It is true that the NPS does not own the west bank, but most of it (maybe all?) is public land. Either the document should provide some clear reason (Perhaps it does, but I could not find it.) for one of the most unique rivers in the Sierra Nevada to not be eligible, or it should be added to the list of eligible wild rivers.

8) Clarify plans for visitor use in the Ash Mountain area. The preferred alternative says "Provide concentrated use areas from Buckeye Flat to Ash Mountain, . . ." What does that mean? Though not acknowledged in the "no Action" alternative, we have concentrated use there now and inadequate facilities or staff to manage the situation. In the summer, day use there is overwhelming. At popular swimming areas, pullouts are often at capacity. The public has created there own trails when the Park failed to provide engineered trails. Some could become erosion nightmares, not to mention safety issues. Litter from picnicking along the river without proper facilities is awful. If we are going to permit the use (and I think we should), then we need to harden the sites with proper parking, trails, restrooms, food-storage, garbage facilities, and staff for public education and enforcement.

Harold Werner
44946 Sierra King Drive
Three Rivers, CA 93271

#3

Richard H. Martin, Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271

Dear Superintendent Martin:

I have these thoughts on the draft General Management Plan for Sequoia and Kings Canyon National Parks.

- A fee structure of AT LEAST $20 PER DAY PER ANIMAL (maybe $30 per day?)needs to be implemented to cover the cost of trail maintenance made necessary by the devastating impact of livestock use on back country trails. The wilderness users really wonder at the wink and nod attitude by the govt at horse and mule interests while sticking it to walkers and hikers with ever increasing and proliferating fees for use of this public resource. Make those who impact it the most pay their fair share.

- The GMP needs to to include and fully consider a "no grazing" alternative. A "no grazing" alternative was requested by numerous respondents. If recreational stock use is to be continued in the fragile, high elevation areas of Sequoia-Kings Canyon, then stock users should be required to carry feed for their animals, as is done in many other national parks, to avoid the extensive and considerable impacts caused by stock animals foraging for food (i.e., overgrazing, trampling of sensitive wetlands and lakeshores, etc.).

- The authors of the draft GMP have improperly concluded that the "preferred alternative" is environmentally superior to the "no stock" alternative. Such a conclusion does not make any sense at all, and does not even pass the straight face test. Eliminating recreational stock use from Sequoia-Kings Canyon would avoid the many significant impacts caused by stock animals. A "no stock" alternative would without any doubt be environmentally superior to current stock management practices, which would be continued by the preferred alternative.

- The GMP should retain the key language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At the absolute minimum, the GMP should allow no grazing or off-trail travel by stock animals above 10,000 feet elevation throughout Sequoia-Kings Canyon NPs. These are park-wide issues that must be addressed now, not put off to some future planning process.

- The commercial camp at Bearpaw Meadow should be removed, the site restored, and the area designated as wilderness, as envisioned by the House Committee Report for the California Wilderness Act.

- All of the commercial pack stations should be removed from park lands. They could be relocated outside the parks, if the operators so desire.

- The cabins at Mineral King should be removed when the permittee-of-record dies, and the sites restored to their natural condition, as envisioned by Congress when it added Mineral King to Sequoia National Park.

Thank you for considering my views.

Sincerely,

Bill West

#37

Date: October 5th, 2004
RE: Topic #6 - Mineral King Special Use Permits

Dear Dr. Graber & NPS,

My name is Wanda Wollenman, and my late husband Joe and I purchased Cabin # 1 in West Mineral King in 1958. Our children were very young then, and we spent many quality days from winter trips in on snowmobiles, through summer months of hiking, fishing, relaxing, and exploring. The many MK families developed life-long friendships as a second neighborhood. My husband and his sons for many years assisted the Forest Service with Snow Surveys, First Aid needs, and Search and Rescue.
My husband was a leader in the installation and upgrades of the West MK water system, and was instrumental in including the Park to partner with our water district in providing quality spring water for the Park and the public campground.

I am asking you to include in the GMP provisions for the continued renewal of private property leases and allow for future transfers of these leases.

Mineral King cabins are more than just buildings. This is a multigenerational community. The cabin owners make up a unique characteristic of Mineral King. Preserving this community and the historic buildings can only be done through continued private ownership of the buildings and Park leases.
(1) Cabin owner will use their own fundings for maintenance of the buildings.
(2) Leasees have been avocates to the public in giving information, working on trails and projects, trash cleanup, helping with car troubles and first aid, and being positive good usage of the area. Cabin owners are an asset to the Park for help and relations.
(3) Having the Park take over the Cabins would not be cost feasible, as operations of the cabins (cleaning, heating, kitchens, bathrooms) and repairs and upkeep would be expenses for an inholder and/or Park.
(4) To leave the cabins empty and make MK a ghost town of historic buildings removes the unique character of the buildings and community of people, as well as reducing the overall usage of the area, which cabin owners usage counts as one of the highest groups within this area.

Please consider changing your plans to include continued Cabin leases.

Sincerely, LaWanda Wollenman
1876 W. Waddell; Lindsay, Ca 93247

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GORDON E. WOOD 5310 Pali Point Lane, La Cañada, CA 91011

September 20, 2004

Dr. David Graber, Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271-9651

Dear Dr. Graber:

I am writing to express my concern that the Sequoia-Kings Canyon General Management Plan may under evaluate the historic and cultural value of the Mineral King community.

Over the years, particularly since 1978 when Mineral King became the responsibility of the National Park Service, I have seen several attempts to minimize its historic heritage and transform Mineral King into a very different locale than has existed in the MK valley for more than 100 years. This has resulted in attempts to evict the permit-holders and their cabins, limit the ability of cabin owners to transfer the equity in their property improvements to third parties, and much greater restrictions on use of the area.

At times the NPS has argued that eviction of the cabin owners is necessary to make room for more campground space for the transient public. But I must remind the NPS that after they assumed responsibility for Mineral King it was the NPS that closed the Sunny Point campground that could accommodate far more campers than Cold Springs. I believe the argument that the need for more campground space is without merit, particularly since Cold Springs campground has vacancies for most of the summer even though it is often erroneously posted as being "full."

There is also a background issue of government credibility since the area was promoted in the 1930's by the Forest Service. At that time it was encouraged that people obtain use permits, build cabins, and make general improvements in the area. So that's what people did. They invested their money and work into making Mineral King the community it has become while preserving the historic sites and legacy of the area. To have the government now reverse that position and advocate the elimination of cabins is a disservice not only to the cabin owners but also threatens the historic heritage of the entire region.

I urge you to take these issues into consideration and document them in the deliberations that will soon occur relative to the General Management Plan.

Thank you for your time and attention.

Sincerely,

Gordon E. Wood

Gordon E. Wood

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Bradley L. Young
Victoria L. Young

Post Office Box 416
Twain Harte, CA 95383
Phone: (209) 586-0776

September 30, 2004

David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Re: Draft General Management Plan

Dear Mr. Graber:

I am writing to express my dismay in regard to certain elements of the proposed Draft General Management Plan ("GMP") for the Sequoia and Kings Canyon National Parks. The GMP, as it currently stands, is obviously anti-environmental and strongly pro-commercial. If this plan is implemented, we are clearly headed in the wrong direction, quite opposite the basic foundational premises of the National Park Service ("NPS"). The 1916 Organic Act, that created the NPS, has as part of its mission statement:

> ". . . to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them *unimpaired for the enjoyment of future generations.*" [Emphasis added)

To wit, blights on these areas include, but are not limited to, the Mineral King Cabins, various high sierra camps, particularly the High Sierra Camp at Bearpaw Meadow, and the virtually unregulated use of stock animals.

The private cabins at Mineral King should be removed when the permittee-of-record dies, as intended by Congress when it added Mineral King to the national park. The cabin sites should then be restored to their natural state.

The commercial horse/mule pack stations based within SEKI should be removed, as should the commercial camp at Bearpaw, with no provision of the GMP to consider, build, or rebuild such backcountry camps. These are exquisite examples of commercial exploitation of public land for private profit, and in no way resembles a "wilderness experience." In particular regard to Bearpaw, the House of Representatives' Committee Report prepared for the California Wilderness Act, specifically directed the NPS to monitor conditions at the Bearpaw camp, to report regularly to Congress on the findings of its monitoring, and to remove the Bearpaw camp if significant problems were ever found. However, the NPS has conveniently never conducted the monitoring requested

by Congress because the concessionaire, the NPS, wants to retain this camp, and any true monitoring would reveal the devastating and ongoing environmental impact of improper sewage disposal, food storage, helicopter use, stock use, noise pollution, and general impairment of the scenery.

It is common knowledge that stock animals severely and negatively impact sensitive meadows, creek beds, wetlands and lakeshores. Grazing and trampling effect root shearing, compaction and soil erosion, as well as the introduction of non-native invasive plants from animal feed. Stock animals can also pollute water sources with the dreadful giardia organism that affects the intestinal tract of both humans and animals. Please keep in mind that the 1964 Wilderness Act forbids commercial activity in wilderness areas – while SEKI is actively promoting and encouraging commercial stock activity. There is no reason why pack stations could not be located outside the parks' boundaries. Commercial stock use should be limited to only those persons who are truly disabled and cannot walk or carry their equipment into the wilderness.

The focus here should be true preservation of our wilderness areas, before there is no wilderness to preserve, not exploitation and profit for a few select, privileged individuals.

Very truly yours,

Bradley L. Young





As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

NPS D-510A September 2006

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