

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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March 6, 2015

In reply refer to: NPS_2014_1211_001

Woody Smeck
Superintendent
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Re: Wilderness Stewardship Plan, Sequoia and Kings Canyon National Parks

Dear Mr. Smeck:

Thank you for your December 3, 2014, letter initiating consultation with regard to the proposed undertaking at Sequoia and Kings Canyon National Parks. The National Park Service (NPS) is consulting with the State Historic Preservation Officer (SHPO) in order to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation at 36 CFR Part 800. Several enclosures were also submitted, as was a draft Wilderness Stewardship Plan and Draft Environmental Impact Statement, dated June 2014. Subsequent correspondence between NPS and SHPO staff has resulted in modified versions of the enclosures related to the Section 106 consultation for the plan.

The proposed undertaking, as described, is the creation and implementation of a plan to manage visitor use and administrative activities within wilderness areas in the Parks, which encompass approximately 97% of the Parks' total areas. The primary actions associated with the plan with the potential to affect historic properties is the implementation of a Trails Management Plan, management of visitor use and access to wilderness areas, and management of existing front- and back-country facilities such as ranger stations and camp areas.

NPS has identified an Area of Potential Effect (APE) that includes the entire area of both Sequoia and Kings Canyon National Parks. NPS has surveyed approximately 7 % of the area in the Parks, and intends to conduct ongoing identification and evaluation efforts as funding becomes available and as the Wilderness Stewardship Plan is implemented. NPS has identified a single resource that may be eligible for listing in the National Register of Historic Places (NRHP), the Bearpaw Meadow Ranger Station, and a determination of eligibility will be submitted to the SHPO for this property.

The Wilderness Stewardship Plan will create a program for managing wilderness areas that will be implemented over a number of years. Because incomplete identification efforts prevent a full assessment of adverse effects, NPS proposes to consult with the SHPO, Advisory Council on Historic Preservation, Native American Tribes, and other interested parties to develop a Programmatic Agreement to conclude the Section 106 consultation for the Plan.

After reviewing the information submitted, the SHPO offers the following comments:

- The SHPO concurs that developing and implementing the Wilderness Stewardship Plan constitutes an undertaking.
- The APE appears to be sufficient to take both direct and indirect effects into account.
- The SHPO agrees that a Programmatic Agreement is an appropriate method to take effects of the undertaking into account and complete the Section 106 process.

The SHPO looks forward to continuing consultation on the Programmatic Agreement. Thank you for seeking SHPO comments and considering historic properties as part of your project planning. If you have any questions or concerns, please contact Mark Beason, Project Review Unit Historian, at (916) 445-4047 or mark.beason@parks.ca.gov.

Sincerely,

A handwritten signature in black ink, reading "Carol Roland-Nawi, Ph.D." in a cursive script.

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer