

**Final Supplemental Information Report  
Sequoia and Kings Canyon National Parks  
Wilderness Stewardship Plan/Final Environmental Impact Statement**

**I. Introduction and Background**

In May 2015, a record of decision (ROD) was approved by the National Park Service (NPS) Pacific West Regional Director for the Sequoia and Kings Canyon National Parks Wilderness Stewardship Plan and Final Environmental Impact Statement (WSP/FEIS). The ROD describes the Selected Action, alternative 2, and the rationale for its selection.

The WSP/FEIS establishes a framework for managing wilderness and areas managed as wilderness within Sequoia and Kings Canyon National Parks (SEKI) in order to preserve wilderness character, provide opportunities for and encourage public use and enjoyment of wilderness in accordance with the Wilderness Act and other laws and policies, improve conditions in areas where there may be unacceptable levels of impacts on wilderness character, and protect the natural and cultural resources within the SEKI wilderness.

The analysis of commercial services in the WSP/FEIS was informed by an extent necessary determination (END) which was conducted in accordance with the Wilderness Act. The requirement for an END derives from Section 4(d)(5) of the Wilderness Act which states that, “[C]ommercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.” The “purposes” referred to in §4(d)(5) are those enumerated in §4(b), which states that “...wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”

Implementation of the Selected Action from the WSP/FEIS will result in the issuance of commercial use authorizations for those commercial services determined consistent with the Wilderness Act, and necessary and appropriate in wilderness, per the END. The Selected Action caps the number of allowable “commercial service days” (CSDs) wilderness wide and reduces the number of allowable commercial service days in the Mount Whitney Management Area (MWMA), a management area established through the WSP/FEIS. The cap and limits are one of the approved methods in the WSP/FEIS that would be implemented in the next 15-20 years to protect wilderness character.

In preparation for the issuance of commercial use authorizations, the NPS conducted a post-ROD analysis of the data included in the END. During that process, park staff discovered several data errors that led to inaccuracies in the CSD figures presented in the END and WSP/FEIS. Park staff corrected these errors and prepared new calculations which are discussed below. The revised calculations indicate that the NPS could allow an increase in the allocation to the number of commercial service days above the amount identified through the END process for Selected Action, while maintaining the same total number of Visitor Use Days.

The purpose of this report is to make a recommendation to the Superintendent on whether new information in the form of revised CSD totals triggers the need for additional analysis under the National Environmental Policy Act (NEPA). The report also addresses whether the authorization of additional CSDs would preserve wilderness character.

## **II. Summary of Data Presented in the WSP/FEIS and END and Explanation of Revised Calculations**

The numeric limits on commercial services analyzed in the END and carried forward into the WSP/EIS were developed through the following process. The NPS calculated the average annual number of commercial service days over a four-year period using data compiled from visitor use statistics, commercial use reports, wilderness permit data (including Inyo National Forest permit data for those visitors who plan to enter Sequoia and Kings Canyon National Parks), and wilderness ranger reports from 2010 through 2013. As explained on pages B-37 and 38 of the END, the raw data was increased slightly (by 12%) to account for under reporting, and because the four-year period analyzed for the END had relatively low commercial services (as compared with previous years) due to a very heavy snow year in 2010, followed by three years of drought, which shortened the primary visitor use season. This adjustment to the raw data, applied to the high-year CSD figure of 7,474, resulted in a final allocation of 8,400 for the Selected Action, a figure referred to as the 'baseline' in the END.

For each alternative considered in the WSP/EIS and END, the number of CSDs was equal to, increased or decreased from the baseline of 8,400 CSD in order to achieve the desired resource and visitor experience conditions for each alternative.<sup>1</sup> Each alternative also prescribes a total number of Visitor Use Days (VUDs). Because analysis in the WSP/FEIS indicates that wilderness character was being preserved in most parts of the parks' wilderness under current conditions, the Selected Action retains existing types and levels of visitor use in those areas, and to allow commercial services to be performed in similar proportions to current conditions (based on percentage of CSDs allotted relative to the average VUDs per year).

In areas where opportunities for solitude are not being provided adequately due to high levels of visitor use or other impacts, the Selected Action calls for reductions in visitor use levels. Specifically, the Selected Action authorizes a maximum of 8,400 CSD per year wilderness wide but imposes reduced CSD levels in the Mount Whitney Management Area (MWMA), which is a new management area established by the Selected Action. In the MWMA, the Selected Action reduces commercial service levels by 10% (from 1,583 CSDs to 1,425 CSDs) as one of the methods to better protect wilderness character, primarily by improving opportunities for solitude by addressing the high visitor encounters in the MWMA, and protecting the natural quality of wilderness by reducing impacts associated with high use (e.g., campsite impacts). The Selected Action also prescribes a maximum of 134,000 VUDs per year.

---

<sup>1</sup> The alternatives consider five different ways to provide appropriate types and levels of access for visitors and authorized users, preserve wilderness character, protect cultural and natural resources, and adhere to legally required management and preservation objectives. Each of the alternatives presented in the WSP/FEIS emphasizes particular visitor experiences associated with different wilderness qualities. Each one meets applicable laws, as well as the goals, objectives, and desired conditions described in chapter 1. The high standard for natural resource preservation required by the 1964 Wilderness Act means there is little variation across the alternatives in terms of how natural resources are addressed. The main differences between these alternatives lie in the key elements of wilderness management – use levels, access and trails, stock use and grazing, and infrastructure, both recreational and administrative. These differences are driven by the different approach to management that each alternative offers.

**Table 1. Commercial Service Day Allocations: No Action (Alternative 1) and Selected Action (Alternative 2) from WSP/FEIS and Extent Necessary Determination**

	<b>No Action per WSP/FEIS (pg. 80)</b>  <i>Existing Average Amount of Visitor Use in Wilderness Supported by Commercial Services</i>	<b>Selected Action per WSP/FEIS</b>
Wilderness-wide Average	Annual Average Total CSDs: 6,550 Non-stock: 4,063 Stock: 2,487	Annual <i>Allocation Cap</i> CSDs: 8,400 Non-stock: 5,040 Stock: 3,360
Mount Whitney Management Area Average	Annual Average Total CSDs: 1,583 Non-stock: 1,062 Stock: 521	Annual <i>Allocation Cap</i> CSDs: 1,425 Non-stock: 930 (rounded from 926) Stock: 500 (rounded from 499)

During the preparation of the END, the NPS recognized there were challenges working with the raw data used to calculate the actual commercial services use levels during the reporting period from 2010 to 2013. Corresponding wilderness permits could not always be located for trip reports. Many commercial trips were not assigned a travel zone within the parks, thus exact trip locations could not be determined. Due to reporting inconsistencies, it was difficult to accurately identify distinct trips, and client numbers reported were often inaccurate. Stock spot and dunnage trips were likely under-reported. Finally, the commercial use reports and wilderness permit database were not created to track commercial use days; thus, the information had to be revised using fairly complex Microsoft Access queries and commands to determine the final actual commercial use levels.

In preparation for the issuance of commercial use authorizations for the summer of 2018, the NPS conducted a post-ROD analysis of the reported raw data and the actual commercial use levels derived from these data. During the analysis, park staff discovered an error for non-stock commercial service days related to the types of trip providers considered in the data. In addition, for stock-related commercial service days, there were syntax errors in the commands that were used to identify the commercial service day numbers. Upon further review, the NPS discovered that the criteria for determining the levels of stock-related commercial nights in wilderness were not applied consistently, resulting in an underestimate of the 2010-2013 actual commercial use levels in the analysis. Thus, while the underlying raw data still applies, the actual commercial use levels presented in the END, WSP/FEIS, and ROD did not accurately represent the underlying data. And since those actual commercial use levels were used to establish the Selected Alternative CSD baseline of 8,400, that figure also did not accurately represent the underlying data.

The NPS has prepared this report to document the inconsistencies in the data analysis, provide a technical correction of the data analysis, and to evaluate the Selected Action to determine if the inconsistency rises to a level that would warrant additional analysis in accordance with the National Environmental Policy Act (NEPA). In making a determination on the need for additional analysis under NEPA, the NPS considered relevant guidance and regulations from the Council on Environmental Quality (CEQ). The CEQ regulations state “[a]gencies shall prepare supplements to either draft or final environmental impact statements if: (i) the agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.” (40 C.F.R. § 1502.09(c)). In addition, the NPS has considered CEQ’s “significance” criteria at 40 C.F.R. § 1508.27 and the criteria

relied upon for the 2015 ROD to determine whether any new circumstances or information are “significant,” thereby requiring supplementation of the 2015 EIS.

This report explains the following: (1) how the actual commercial use levels in the WSP/FEIS END were generated, (2) the errors that occurred in the analysis, (3) the results of the new analysis, and, (4) an evaluation of the effects of the revised analysis to determine if additional NEPA analysis is warranted. This report is included in NPS’s project file and posted to the project website for public review and comment.

#### **A. Commercial Service Days as Presented in the END and WSP/FEIS**

The commercial service day numbers in the WSP/FEIS and END were derived from two databases, one for commercial stock use and one for non-stock commercial services. The years included in the analysis were 2010, 2011, 2012, and 2013 (note: 2013 data was not included in the draft WSP/EIS; it was added to the analysis for the WSP/FEIS due to commenter requests).

##### **1. Commercial Service Days - Stock**

As stated previously, data for the analysis was compiled from commercial use reports, wilderness permit data (including Inyo National Forest permit data for those visitors who planned to enter Sequoia and Kings Canyon National Parks), and wilderness ranger reports from 2010 through 2013. There were challenges due to the adequacy of the data and this was taken into account in the preparation of the END. However, converting the stock trip reports, which were previously recorded as stock use nights, to commercial service days required the use of fairly complex Microsoft Access queries and commands. Upon reanalyzing the CSD figures in preparation for implementing the Selected Action from the WSP/FEIS, NPS staff identified five specific syntax errors.

- a) An extra day for converting stock nights to stock commercial service days was included in the wilderness-wide stock query syntax, but not in the MWMA-specific query syntax, deflating stock CSDs in the MWMA.
- b) Trip data with null values in the comment field were mistakenly excluded from the wilderness-wide and MWMA queries, deflating stock CSDs wilderness-wide and in the MWMA.
- c) Two non-MWMA locations were included in the MWMA data, slightly inflating stock CSDs in the MWMA.
- d) Some resupply records for the Bearpaw Meadow High Sierra Camp were mistakenly included in the original queries, slightly inflating wilderness-wide stock CSDs.
- e) The client per animal ratio used to estimate null or zero client values was incorrectly derived and applied, slightly inflating overall stock CSDs (wilderness-wide and in the MWMA).

The net effect of these errors resulted in understating the annual average stock CSDs wilderness wide for 2010 through 2013 by 190 CSDs, or by 7.1%. The effect was compounded in the MWMA, where the errors resulted in understating the annual average stock CSD use for 2010 through 2013 by 219 CSDs, or by 29.6%. If uncorrected, the levels and types of stock-based commercial services to be performed wilderness wide would be reduced from current conditions instead of similar to current conditions (which was the intent of the Selected Action in areas where wilderness character standards are being achieved). Furthermore, the intent to reduce stock-related CSDs by approximately 10% in

the MWMA would actually result in a reduction of 32.4% if the errors are not corrected, thereby reducing use levels below that needed to restore desired wilderness conditions in the MWMA. Resolving the stock CSD numbers requires correcting the aforementioned syntax errors in the Microsoft Access commands, re-running the revised queries against the original Access dataset, and then using the query output to update the END with technical corrections to both the wilderness-wide and MWMA stock CSDs.

## **2. Commercial Service Days – Non-Stock**

Converting the non-stock trip reports to commercial service days was a more straightforward process. The non-stock CSD data was derived entirely from monthly commercial use reports, cross-checked against wilderness permit data and wilderness ranger reports. However, the post-ROD analysis found that the underlying data did not include *commercial* wilderness trips organized and led by the Sequoia Parks Conservancy (SPC). The WSP indicated that non-profit organizations that charge participant fees that exceed actual trip costs, such as SPC, would be considered commercial providers and would be subject to limits established through the END, unless they fall within the educational exemption. Thus, SPC's commercial wilderness trips from 2010 through 2013 should have been included in the overall total in order to accurately capture the amount of commercial use during that period.

Resolving the non-stock CSD number requires adding the SPC commercial wilderness use data to the 2010 through 2013 non-stock commercial use data, and updating the END with a technical correction to the wilderness-wide CSDs (no SPC commercial use occurred in the MWMA).

## **B. Revisions to Commercial Service Data for Extent Necessary Determination and WSP/FEIS**

Table 2 shows the wilderness-wide CSDs for stock and non-stock commercial services in the Selected Action alongside the revised wilderness-wide CSDs per the information provided above. The numbers for the 4-year average would update Table 12 in the WSP/FEIS and Table B-5 in the END.

**Table 2. Wilderness-wide CSDs (2010 – 2013)**

<b>Wilderness-Wide CSDs</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>4-year average CSDs</b>
Stock – Original Syntax	3,110	2,121	2,801	1,917	2,487
Stock – New Syntax	3,102	1,960	2,756	2,890*	2,677
TOTAL CHANGE	-8	-161	-45	+973	+190
Non-Stock – Original Syntax	4,364	3,333	3,879	4,675	4,063
Non-Stock – New Syntax	4,453	3,459	3,938	4,787	4,159
TOTAL CHANGE	+89	+126	+59	+112	+96
<b>Total CSDs Wilderness Wide</b>					
Total Original Syntax	7,474	5,454	6,680	6,592	6,550
Total New Syntax	7,555	5,419	6,694	7,677	6,836
TOTAL CHANGE	+81	-35	+14	+1,085	+286

\*The way the 2013 data was entered exacerbated the effects of the mistakes in the syntax. Specifically, the 2013 data had many null values in the comment field.

Table 3 shows the original MWMA CSDs for stock and non-stock commercial services alongside the revised numbers per the information provided above. (The MWMA CSDs are a subset of the wilderness-wide CSDs). This information would update Tables 12 in the WSP/FEIS and B-5 in the END.

**Table 3. Mount Whitney Management Area CSDs (2010 – 2013)**

<b>Mount Whitney Management Area CSDs</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>4-year average CSDs</b>
Stock – Original Syntax	565	452	635	275	482/521*
Stock – New Syntax	671	589	907	791	740
<b>TOTAL CHANGE</b>	<b>+106</b>	<b>+137</b>	<b>+272</b>	<b>+516</b>	<b>+258/219*</b>
Non-Stock – Original Syntax	826	859	1,216	1,346	1,062
Non-Stock – New Syntax	826	859	1,216	1,346	1,062
<b>TOTAL CHANGE</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total CSDs MWMA</b>					
Total Original Syntax	1,391	1,311	1,851	1,621	1544
Total New Syntax	1,497	1,448	2,123	2,137	1801
<b>TOTAL CHANGE</b>	<b>+106</b>	<b>+137</b>	<b>+272</b>	<b>+516</b>	<b>+257</b>

\*The 4-year averages for CSDs for stock in the MWMA were compiled using a 65/35 ratio calculated using total average CSDs based on the best available information at that time, with a slight adjustment for assumed low year reporting from 2013, which resulted in a reported 4-year average of 521 in the WSP, which is slightly higher than the 4-year average derived from the original syntax, 482.

### **C. Potential Changes to Selected Action as a Result of Revised Commercial Service Data**

The effects of the identified syntax errors resulted in understating the annual average total CSDs wilderness wide for stock and non-stock combined by 4.2%, and in the MWMA by approximately 14.3%. The wilderness-wide non-stock CSDs were understated by about 2.3%; there was no error in the MWMA. The average total stock CSDs wilderness wide were understated by 190 CSDs, or by 7.1% wilderness wide, and the average annual stock CSDs in the MWMA, as reported in the WSP, were understated by 219 CSDs, or by about 29.6%.

If approved by the Superintendent, the following changes would be made to the Selected Action:

- The total allocation (cap) of CSDs wilderness wide would be changed from 8,400 to 8,625, following the methodology outlined on page 38 of Appendix B of the WSP/FEIS. This correction will result in a 2.7% increase in the CSD allocation from the figures presented in the Selected Action in the FEIS and falls within the percentage allocation of CSDs based on the average VUDs allowed. Since the intent of the Selected Action was to maintain use levels outside the MWMA similar to the proportions allocated in the No Action level, the adoption of these revised CSD totals is consistent with the planning objectives of the Selected Action. Applying the 60/40 split for non-stock and stock commercial use outlined in the WSP/FEIS would result in the following changes.
  - The total allocation of CSDs for non-stock commercial services wilderness wide would be 5,175 (an increase of 135 non-stock CSDs per year, which equates to 2.6%).
  - The total allocation of CSDs for stock wilderness wide would be 3,450 (an increase of 90 stock CSDs per year, which equates to 2.6%).
  - The total percentage of overall visitor use allocated to commercial use would increase from 7.6% to 7.8%.



- The total allocation of CSDs for the MWMA would be changed from 1,425 to 1,621, resulting in a 13.8% increase from the figures presented in the Selected Action in the FEIS, and a 10% reduction from the revised four-year average of 1,801. This modification is consistent with the planning objectives of the Selected Action, which envisioned a 10% reduction in use levels in the MWMA from baseline use levels. Applying the 60/40 split used for wilderness-wide CSD allocations (which more accurately reflects the revised MWMA commercial use data than the 65/35 split outlined in the WSP/FEIS) results in the following updates:
  - The total allocation of CSDs for non-stock commercial services in the MWMA would be 973 CSDs, rounded to 975 CSDs.
  - The total allocation of CSDs for stock in the MWMA would be 648, rounded to 650 CSDs.

The total number of Visitor Use Days under the Selected Action would not change. There would still be an average of 111,000 VUDs per year with a maximum of 134,000 VUDs. There would be no change to overall visitor use days in the MWMA.

### **III. Analysis of Whether Additional NEPA Compliance is Warranted**

The Council on Environmental Quality (CEQ) has provided guidance to agencies on when supplemental analysis under NEPA is required. CEQ's NEPA regulations provide that supplementation is required when an agency makes

- substantial changes in the proposed action that are relevant to environmental concerns; or
- when there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. (40 CFR Section 1502.9(c)).

Additional guidance from CEQ provides that supplementation is not required if the new alternative is a "minor variation of one of the alternatives discussed in the draft EIS," or the new alternative is "qualitatively within the spectrum of alternatives" that were presented in the agency's draft or final EIS." (Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations publication. (46 Fed. Reg. 18,026, 18,035 (Mar. 23, 1981).))

The revised calculations discussed in Section II constitute new information that, if adopted, would lead to increases in the amount of commercial service days allowed under the Selected Action. The discussion below applies the CEQ's guidance to these potential changes in the context of each WSP/FEIS impact topic.

If the revised CSD totals are adopted for the Selected Action, the updated analysis would result in a small increase of allowable commercial allocations wilderness wide, and a 10% reduction from the baseline to commercial allocations in the MWMA. Although the total number of CSDs allocated is marginally higher than analyzed in the Selected Action, the revised numbers are consistent with the planning objectives of the Selected Action – that around 8% of visitor use in wilderness would be allocated to commercial service providers. Visitors in wilderness who utilize commercial services would continue to comprise a very small portion of total wilderness visitation (approximately 7.8% of all visitor use under the adjusted figures, whereas the END indicated that 7.6% of all visitor use in wilderness would be commercially supported).

The types of commercial services provided would remain the same as the Selected Alternative. The standards and measures developed to address the visitor capacity in wilderness (e.g., trail encounter frequency standards and campsite condition standards), and the management strategies developed to

protect wilderness character would remain the same as defined by the WSP/FEIS. Grazing standards would remain the same. Overall use levels and visitor use days of 111,000 average and 134,000 maximum, including trailhead quotas established by the Selected Action, would not change. All CUA holders would continue to operate within the established quotas, and comply with NPS regulations, wilderness-use restrictions, and permit terms and conditions.

**Table 4. Selected Action and Revised CSD Totals with Total Visitor Use Days**

	<b>Selected Action per WSP/FEIS</b>	<b>Revised CSDs</b>
Wilderness-wide	Annual <i>Allocation Cap</i> CSDs: 8,400 Non-stock: 5,040 Stock: 3,360  <b>Percent of total visitor use commercially supported: 7.6%</b>	Annual <i>Allocation Cap</i> CSDs: 8,625 Non-stock: 5,175 Stock: 3,450  <b>Percent of total visitor use commercially supported: 7.8%</b>
Mount Whitney Management Area	Annual <i>Allocation Cap</i> CSDs: 1,430 Non-stock: 930 Stock: 500	Annual <i>Allocation Cap</i> CSDs: 1,621 Non-stock: 973, rounded to 975 Stock: 648, rounded to 650
Total Visitor Use Days	111,000 average - 134,000 maximum	111,000 average - 134,000 maximum

**A. Analysis of Whether Impacts would change as a result of Revised CSDs**

Soils: The revised CSDs would not result in a change in overall visitor use levels (i.e. total visitor use days allowed per year), management controls, and restrictions from those specified in the WSP/FEIS, thus there would be no difference to the impacts on soils between the Selected Action and the proposed action with the revised commercial service day allocations.

Vegetation: The revised CSDs would not result in a change in overall visitor use levels, management controls, and restrictions from those specified in the WSP/FEIS, thus there would be no difference to the impacts on vegetation between the Selected Action and the proposed action with the revised commercial service day allocations.

Wildlife: The revised CSDs would not result in a change in overall visitor use levels, management controls, and restrictions from those specified in the WSP/FEIS, thus there would be no difference to the impacts on wildlife between the Selected Action and the proposed action with the revised commercial service day allocations.

Special-Status Species: The revised CSDs would not result in a change in overall visitor use levels, management controls, and restrictions from those specified in the WSP/FEIS, thus there would be no difference to the impacts on special-status species between the Selected Action and the proposed action with the revised commercial service day allocations.

Cultural Resources: The revised CSDs would not result in a change in overall visitor use levels, management controls, and restrictions from those specified in the WSP/FEIS, thus there would be no change to the impacts on cultural resources as previously analyzed in alternative 2 of the WSP/FEIS.

Socioeconomics: The revised CSDs may provide individual commercial service providers additional and limited opportunities to generate revenue, but would leave the basic foundation of the area's economic and demographic outlook unchanged. SEKI would continue to benefit the regional economy, but the revised allocations are not expected to dramatically alter the influence of the parks' wilderness on



gateway communities. While the allocations within the MWMA would be slightly higher under the revised CSDs, there is still a cap that limits the potential for future growth, resulting in the same impacts as discussed under the Selected Action to the area's economic and demographic outlook. Thus there is no important difference between the Selected Action and the proposed action with the revised CSD allocations.

Visitor Use and Experience: Under the revised CSDs, commercial services would continue to be allowed, and commercial support for visitors would continue to be a benefit to those visitors who wish to use these services. While there would be additional commercial service days allowed under the revised numbers, there would still be ample opportunities for private (non-commercial) users to access wilderness and obtain permits for overnight use. Of the 134,000 maximum total visitor use days, an additional 225 would be allotted to commercial services (7.8% versus the 7.6% in the WSP). Overall, this slight increase would be inconsequential. Thus, there is no important difference between the Selected Action and the proposed action with the revised CSD allocations

Park Operations: The revised CSD would not change the impacts on park operations. The management and tracking of commercial services in wilderness will continue to affect the parks' concession management program, wilderness office, and data management program. This will not change with the revised CSD allocations.

Summary: In conclusion, visitors utilizing commercial services have similar adverse effects on soils, water quality, vegetation, wildlife, special-status species, and cultural resources to those of the independent wilderness visitor. Commercial service providers adhere to the wilderness quotas, group size limitations, grazing standards, and other wilderness-related regulations and restrictions. Because the amount of overall visitor use and stock use would remain consistent with that evaluated under the Selected Action, there is no change to the impacts on soils, water quality, vegetation, wildlife, special-status species, cultural resources, socioeconomics, visitor use and experience, and park operations between the Selected Action and the proposed action with the revised CSDs allocations.

## **B. Analysis of Whether Impacts to Wilderness Character would change as a result of Revised CSDs**

### Wilderness Character:

*Untrammelled Quality* – The revised CSDs would not result in additional trammeling in wilderness beyond what was analyzed in the WSP/FEIS. There would continue to be limited and short-term trammeling actions associated with trail and campsite restoration, and the removal of hazard trees from selected areas; these actions would not change due to the revised CSDs. Wilderness would continue to be dominated by the natural processes.

*Natural Quality* – The revised CSDs would not result in an increase in overall visitor-use levels, thus there would be no discernable change to the effects analyzed to the natural quality of wilderness in the WSP/FEIS. The revised CSDs would not affect the implementation of campfire restrictions, reductions in the number of food-storage boxes and privies, and the improvements to campfire conditions as stated in the WSP/FEIS. Changes to stock management, including trail closures, grazing levels and restrictions would occur as stated in the WSP/FEIS. The current visitor use levels and patterns would remain as stated and analyzed in the WSP/FEIS.

*Undeveloped Quality* – The revised CSDs would not change the undeveloped quality of wilderness and not alter the analysis in the WSP/FEIS. There would still be a reduction in most types of development in wilderness and an overall improvement on the undeveloped quality in many areas of the wilderness.

*Opportunities for Solitude or Primitive and Unconfined Recreation* – The revised CSDs would not change opportunities for solitude and primitive and unconfined recreation because the revisions would not result in a change in overall use levels or trailhead quotas. The management controls and restrictions would remain as described and analyzed in the WSP/FEIS. The visitor encounter standards would be implemented as described in the WSP/FEIS in order to increase opportunities for solitude in the five areas that are near or exceed the trail encounter standard. Tools to meet encounter standards, such as reducing night limits, reducing maximum party size, and reducing commercial services in the MWMA would be implemented per the WSP/FEIS, thus improving opportunities for solitude in areas that are currently out of standard. There would continue to be outstanding opportunities for solitude or primitive and unconfined recreation in the parks' wilderness.

*Other Features of Value* – The revised CSDs would not result in a change to other features of value in wilderness. There would be no change in overall visitor use levels, trailhead quotas, or management controls or restrictions from the Selected Action in the WSP/FEIS. Cultural resources would be protected as specified in the WSP/FEIS. No changes would occur to other features of scientific, educational, scenic, or historical value.

Summary: The effects on the natural quality will remain the same as disclosed in the WSP/FEIS for the Selected Action (alternative 2). Trail and meadow closures to stock use and grazing restrictions will be implemented in specific areas, which results in a beneficial effect on the natural quality of wilderness character. There will be no change to the undeveloped nature of the wilderness with the revised allocation numbers. Commercial services may afford additional opportunities for visitors to experience the primitive quality of wilderness, but at the same time would degrade the unconfined and self-reliant character for those visitors who chose to use a commercial service provider. There will be no discernable differences to wilderness character between the Selected Action and the proposed action with the revised commercial service day allocations. Thus no additional analysis for wilderness character is needed due to the revised commercial service day allocations.

#### **IV. Summary of Findings and Recommendation**

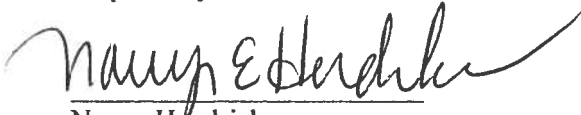
The extent to which commercial services in the parks' wilderness were deemed necessary is just one outcome of the overall wilderness stewardship planning process. Along with the analysis that determined the overall amount of use appropriate in wilderness, and the proportion of this use that may be supported by commercial services, the WSP also identified key elements of wilderness character, defined desired conditions and management objectives, and analyzed the effects of the management direction proposed in the plan.

The revised analysis of CSDs will not change the trailhead quotas (the number of entry permits allocated for each trailhead) that have been established by the Selected Action. All commercial service providers will still operate within these quotas. All CSDs must still comply with wilderness regulations and restrictions, including night limits, group size limits, and stock use and grazing restrictions. The Selected Action does not change substantially, and there would be no to little change to the environmental impacts resulting from the adjustments in CSDs, and the little changes that could result are fully evaluated in the WSP/EIS. The proposed changes, therefore, are not substantial and thus do not trigger the need for a supplemental EIS pursuant to 40 CFR 1502.9(c). Additional analysis of effects on wilderness character is also not needed.

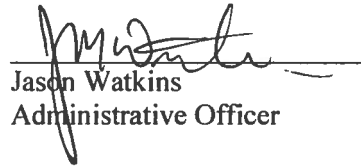
*Final Supplemental Information Report to the  
Sequoia and Kings Canyon National Parks  
Wilderness Stewardship Plan/Final Environmental Impact Statement*

Based on the above information, a categorical exclusion is the appropriate NEPA pathway to support the recommended corrections to the Extent Necessary Determination. This Supplemental Information Report and the accompanying categorical exclusion will be posted at: [https://parkplanning.nps.gov/SEKI\\_WSP\\_SIR](https://parkplanning.nps.gov/SEKI_WSP_SIR) for 30 days, and a notice will be sent to parties on the parks' mailing list. After the 30 day period, on or after July 10, 2017, the compliance documentation will be submitted to the Superintendent for approval.

Prepared by:



Nancy Hendricks  
Environmental Protection Specialist



Jason Watkins  
Administrative Officer

