

Web comment

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**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.

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Wednesday, July 07, 2004

National Park Service  
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**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 Mr. 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*.

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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 be 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,

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Donn Bree, Ph.D.

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

Understanding the *Real* Mineral King Controversy

by

Aubrey Cairns

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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

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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

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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

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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 our 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 supposed 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

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as protector, steward, and administrator. These duties are a reflection of sovereignty through Congress. Congress is *not* sovereign under the United 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.



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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

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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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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

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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,

  
Carl 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,



Thomas Clohessy  
P.O. Box 845  
Sonoma CA. 95476

66

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 former 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 former permittees understand the idiosyncracies 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 Cochran

#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 H. Cosart

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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  
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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.

NPS GMP Team Leader  
October 6, 2004  
Page 2

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

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*L. Laile Di Silvestro*  
130 Big Bear Place NW, Issaquah WA 98027

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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](http://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 5<sup>th</sup> generation member of the Mineral King community. My children (9 and 17) belong to the 6<sup>th</sup> generation of Crowleys to live in Mineral King (as summer residents), and are descendants 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](mailto: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  
PO Box 7587, Incline Village NV 89452

13



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 improve the road not discussed in the GMP?

2. Water supply to Silver City. As you are no doubt aware, there 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 facilities 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

**DON E. DUNHAM**

**P. O. BOX 127**

**WAUCONDA, WA 98859**

319.

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

David Gaber, GMP Coordinator

SEKI

47050 Generals Hwy  
Three Rivers CA 93271

294-1

I, Perry Eaton, as ~~an~~<sup>an</sup> active back packer, fly fisher, and wilderness lover would like to comment on the RGP 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 Mtn has also been observed by myself. My 45 years experience in the mountains has taught me that the present philosophy of stock usage is absolutely the most serious threat, on ground, to the wilderness of SEKI.

The draft GMP for SEKI is clearly anti-environment and pro-commercial 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 within Park boundaries. They can travel to trail heads just like back packers do. Also inholdings such as the Mineral King cabins should be removed when the permits die as the law provides.

Backpackers 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 Targe 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.



270

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 permittees 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.

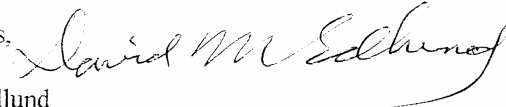
The NPS should use the wording of the present Sequoia and Kings National Parks Master Plan (1971) which stated that "...Livestock may be used in the lower elevations **and around** developed areas where it can be stabled and fed without open grazing on park lands."...in the new plan. (Underlines are 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  
1922 Tioga Blvd  
New Brighton MN 55112-7273

341

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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. Out-houses 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.

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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-

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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

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Page Four

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



October 6, 2004

Re: SEKJ 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.

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P.O. BOX 806 • THREE RIVERS, CA 93271 • 559/260-2909

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October 6, 2004  
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Page Two

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 does undermine 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.

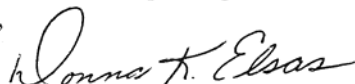
<The history of the settlement can still be seen because the cabins are maintained by families who have had the permits for generations and have a vested interest in keeping them just as they were in the days of John Muir and John C. Fremont, among others.

<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,







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 trail 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 09  
SEP 23

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

170-

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.

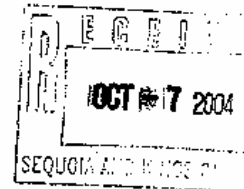
The High Sierra Camp at Bearpaw Meadow should be eliminated. The negative impacts on the environment are too great- sewage disposal, helicopter use, food storage, stock use and pervasive noise impair the scenery.

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



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.

Superintendent Martin  
October 5, 2004  
Page Two

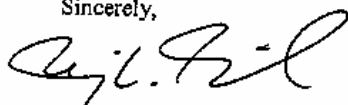
The 1971 Master Plan for SEKI promised a phase-out of nonessential pack stock use in fragile high altitude areas. More than 30 years later, we are still seeing these packs of hoofed invaders and their inconsiderate riders/owners and their impacts over the vast area of the parks that are over 9,000 feet. 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 overnights 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 researchers 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

October 4 '04 (1)

315-1

To: United States Department of the Interior  
 Nat'l Park Service  
 Sequoia and Kings Cyn Nat'l 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 <sup>then</sup> 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 <sup>are</sup> possibly of real value as the seed of the new.

For me, one main component of our living Mineral King Family ... there is what I experience as

the romance of Mineral King. <sup>(2)</sup> 315  
It is indeed a bonafide historical and still living romance, much of which is within the memory of us and our forebears 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 association.

We cabin owners come to Mineral King every summer to live out a purity and simplicity found only rarely in modern life. Campers who

have been coming here for 20, <sup>315-3</sup> 30, and 40 years <sup>3</sup> come for the same experience. Park employees are part of our <sup>mk. families</sup> cultural mix as well. Anyone who arrives in our community experiences the harmonious blending of our modest cabins and the natural world.

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

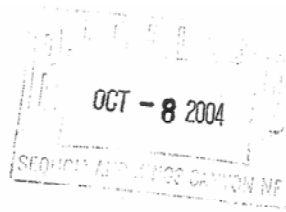


of our romance with the ④  
Mineral King that we all  
love. I would like to foster  
an art experience at my  
cabin site. There may be  
others who will offer the same.  
Amongst us are teachers of  
other subjects - experts in their  
own fields. Let us have  
learning in the beautiful  
out of doors!

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



293-

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.

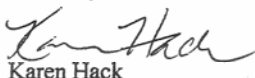
The cabins are an integral part of a nationally recognized cultural landscape, The Mineral King Road Cultural Landscape District, which derives its value as a whole and thus must be kept as a whole. Together it forms a context within which to understand the history of human adaptation to Mineral King. 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.

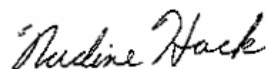
The loss of revenue from Mineral King cabin special use permits, which is greater than that received from camping fees, would be of major adverse impact on the parks. The cabins do not deprive the public of access to the natural wonders of the Mineral King valley but rather provide the park visitor with 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



207

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 permittee 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