

#34

I would like to make the following comments on the proposed SEKI management plan.

I definitely support the removal of the private cabins at Mineral King.

I support NONE of the proposals designed to restrict or eliminate the use of horses in the back country. Those who advocate this are members of a small elitist group who believe that the use of horses impacts their back country experience, and that foot travel is somehow "sacred", and is the only way the backcountry should be visited.

Our family is in a situation where we are no longer able to carry packs into the backcountry, so eliminating horse travel would eliminate our chance to have any back country experience in the parks. The advocates of these proposals are, in my opinion, very selfish. Perhaps they never think they'll be too old to not carry a 50-pound pack. Well, they should think again.

The only anti-horse proposal which seems to be half-way reasonable is the "no grazing" alternative, because I have seen small meadows wrecked by one night of horse grazing, and realize that irresponsible stock users can cause such problems.

It should be kept in mind that this same high-minded group of elitists is in full support of removing 18 small rock dams in the Emigrant Wilderness. Therefore they have to take at least partial responsibility for the occasional "work party" which has visited these dams and attempted to illegally demolish some of them. Again, all I can say is they are a very selfish group of individuals who care little about the people who, for one reason or another, like to use horses in the backcountry or who make their living from pack stations.

Thank you for taking our input.

John F. Helms
Julie R. Helms
Moraga, CA

Hells to
Dr. David Graber,

10/4/04

297-1



We have enclosed some letters our kids wrote about our family cabin at Mineral King.

We do know it's a complicated issue, but we are humbly asking that we would be allowed to keep our spartan cabin that my husband's great-grandfather built. We always work to maintain the area around the cabin and we don't feel we are depriving anyone in the public from enjoying the gorgeous Mineral King area.

Truly, it can be a "win-win" situation in that we will maintain our cabin & enjoy the history of our family there, and at the same time not hamper anyone else wanting to visit the area. I certainly wouldn't presume any ownership of a cabin in someone else's family. Please understand

the importance of this to our family: 297
We certainly thank you for your
work and time invested in this
situation.

Humbly submitted,
David & Courtney
Hengst
Woodlake, CA 93286

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

52

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

Dear Superintendent Martin:

Thank you for this opportunity to comment on the draft General Management Plan for Sequoia and Kings Canyon National Parks. We have the following comments:

The draft GMP needs to be re-written to include and fully consider a "no grazing" alternative. A "no grazing" alternative is both feasible and reasonable, and was requested by numerous respondents. If recreational stock use is to be continued in the fragile, high elevation areas of Sequoia-Kings Canyon, then stock users should be required to carry feed for their animals, as is done in many other national parks, to avoid the extensive and considerable impacts caused by stock animals foraging for food (i.e., overgrazing, trampling of sensitive wetlands and lakeshores, etc.). High, rocky trails pose safety issues with regard to pack trains passing hikers. The hikers must get off the trail onto steep talus slopes because those pack trains just keep coming and the packers often demand that hikers get off on the steep downhill side so they won't frighten their animals.

The authors of the draft GMP have improperly concluded that the "preferred alternative" is environmentally superior to the "no stock" alternative. Eliminating recreational stock use from Sequoia-Kings Canyon would avoid the many major impacts caused by stock animals. They have already done grave damage to the areas where they have been allowed. When we began hiking in the Sierra 40 years ago, all the water was safe to drink without treatment. It is hard to believe that pack stock, whose droppings are everywhere on trails where they are allowed, have not been the primary cause of the spread of giardia in the Sierra. Their erosion damage is great, particularly in meadows, where there are often 3 or 4 parallel trails carved deep. The packers are either unable or unwilling to keep their animals on the trails, as evidenced by their droppings in the campsite we occupied along the John Muir Trail in the Bear Creek Drainage on the nights of 8/17 and 8/18 of this year. We also noticed that there were droppings right next to the creek!

In our hike up Bear Creek from Bear Diversion Dam 8/16-8/20, we found the lower portion of the trail, which is not used by stock, much more pleasant than the John Muir Trail, which is. We had to get off the JMT to allow passage of a typical pack train - 5 tourists plus packers using a total of 13 stock - and then we had to walk amidst the manure. This seems a disproportionate impact on the fragile wilderness. Their impact on the Wilderness per visitor is many times that of hikers who carry their own packs and do not try to bring all the trappings of civilization with them.

We believe your duty is to the people of this country who are the principal users of the Wilderness, and not to the packers. We also resent the expenditure of taxpayer funds to benefit commercial outfits while degrading the wilderness experience of the general public. A "no stock" alternative would without any doubt be environmentally superior to current stock management practices, which would be continued by the "preferred

alternative."

The GMP should retain the key language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At the absolute minimum, the GMP should allow no grazing or off-trail travel by stock animals above 10,000 feet elevation throughout Sequoia-Kings Canyon NPs. These are park-wide issues that must be addressed now, not put off to some future planning process.

The commercial camp at Bearpaw Meadow should be removed, the site restored, and the area designated as wilderness, as envisioned by the House Committee Report for the California Wilderness Act.

All of the commercial pack stations should be removed from park lands. They could be relocated outside the parks, if the operators so desire.

The cabins at Mineral King should be removed when the permittees-of-record dies, and the sites restored to their natural condition, as envisioned by Congress when it added Mineral King to Sequoia National Park.

Thank you for considering our views.

Sincerely,

Nancy and Bill Homeyer
2025 Avila Court
La Jolla, CA 92037-6912

302

Richard Judd
51 Parkside Drive
Berkeley, CA 94705

October 5, 2004

David Graber
GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Dear Mr. Graber:

Please consider these comments on the draft General Management Plan for Kings Canyon and Sequoia National Parks.

My concerns are that the Plan will allow stock to continue to damage the backcountry, and also that damage caused by stock use will inevitably lead to otherwise unnecessary limits on hiking access. The net effect will be to keep many people out of the wilderness in order to make up for the disproportionate damage caused by packtrain access for a few.

In August 2000 my family backpacked over Piute Pass, down Piute Creek, up Evolution Creek and, one rainy afternoon, hurried into Colby Meadow looking for a place to put up tents before the rain got worse. When the rain partly cleared off after dinner, we had spectacular views of the surrounding slopes and mountains through the shifting mist and clouds.

The next day, in the morning light we discovered that in the large clearing where we had camped, there was not a patch more than 3 or 4 feet square that was free of mule or horse excrement, of varying ages and consistencies. Much of the area had been swept in an effort to clean things up, but the overall effect was of a farmyard—a depressing contrast to the spectacular preceding evening. Where both tents were pitched, all around the large fire ring left in the center of the clearing, and in the area where we had cooked and eaten, grass and pine needles had been replaced by droppings and their fragments.

The Plan needs to consider realistic alternatives to give places like Colby Meadow a chance to recover, and to keep other spots from suffering the same consequences. Permit quotas regularly turn hikers away from most points of entry into this part of the backcountry. Trailhead quotas might be doubled if pack trips' effects on the backcountry did not have to be taken into account. The damage Colby Meadow has suffered from pack stock is out of all proportion to the number of backcountry visitors who rode in, magnified something like ten times by the stock necessary to carry not only the visitors themselves but their dunnage, packers and the packers' food and equipment.

Colby Meadow is certainly not the only environment degraded by pack stock. For instance, the Piute Pass trail itself toward the end of that summer was chewed up, full of exposed, trip-hazard rocks and dust churned up by stock traffic, turning into a slog what should largely be a pleasant climb up an attractive drainage.

The common justification for allowing packers in the backcountry is to make possible a wilderness experience for those who cannot hike in, because they are too old, too young or have a disability. In more than 30 years of visiting the High Sierra, I have yet to see a party using stock which lived up to this justification. My younger son, age 11 during the summer of 2000, carried his pack with us, including hiking out over Lamarck Col. My wife and I are now both over 50. Most pack train visitors I have ever seen are between those ages, neither old enough nor young enough to justify a need for assistance based on age. Likewise, I have never seen an overnight stock party in the wilderness which included individuals with apparent disabilities. The vast majority of stock travelers choose to ride as a matter of preference.

Backpacking aches, pains and fatigue are real enough, and I would not outlaw alternatives to hiking on some high moral ground. All other things being equal, getting more people a chance to experience the backcountry is a good thing. However, allowing access by pack train inevitably has the opposite effect when wilderness management requires limiting entry overall, reducing the overall number of people who can spend time in the mountains, as well as routinely causing damage beyond the capacity of hikers at their worst, to meadows, trails, and streams.

One alternative that should be considered, if pack trains are to be permitted as a means to allow access to those unable to hike, is limiting stock access to trips with young children, those over 60 and people with disabilities. In mixed groups, able individuals could hike. This would intrude into visitors' privacy and freedom of choice, but that seems preferable to having to deny wilderness permits to many others so that a few have the freedom to choose to use mules or horses.

Another alternative that should be considered is to require packers either to bury or to collect and carry out their animals' defecations. Humans, who leave behind a fraction of what mules or horses do, are now strictly admonished to deposit waste at least 100 feet from water, buried at least 6 inches deep, or to carry it out. Mules and horses, in contrast, foul trails, stream crossings, camps and meadows indiscriminately, burying nothing. Their leavings are then inevitably spread by those who must walk through after them.

Another alternative worthy of consideration would be to regulate what stock carry. This past summer I spent a night at Fifth Lake on the North Fork of Big Pine Creek.* Three men who had been packed in to a campsite a few hundred feet away were enjoying the comforts of a full-sized two-burner Coleman stove, a folding aluminum camp table and cold beers, among other things. I don't know how many extra animals are used over the course of a season to transport creature comforts, but even one animal weighs many times what a human does, and does corresponding damage. Over the years my consistent impression has been that pack trips

* Big Pine Creek and the Piute Pass trail aren't in the national parks, but they are park entry points. The same issues that affect next-door Forest Service wilderness exist in Kings Canyon and Sequoia.

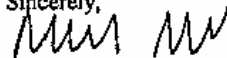
enable their passengers to achieve a standard of living which requires more weight, and more animals, than needed to enjoy the backcountry.

One thing stock could usefully be required to carry is their own feed. This would protect grass and meadows.

Finally, most important, the Park Service should consider phasing out pack stations. In reality, pack trains persist largely because horse and mule packers are a Sierra tradition, and provide a livelihood for a handful of owners and work for their employees. However, times have changed, and will keep changing. Demands on the backcountry have grown, and a steady tide of new or newly recognized impacts has curtailed once seemingly essential features of High Sierra trips, like campfires and drinking from streams. The environmental damage caused by pack trips, and the otherwise avoidable limits they cause on the number of people who can get into the wilderness, will only worsen and lead to greater conflicts in the future. The Plan should provide now for phasing out or at least scaling back permits as they expire, allowing owners and employees a transition.

Steve Roper foresaw in 1976 (in the Climber's Guide to the High Sierra, p. 26) much of what packtrains have caused since. It has become obvious that his concerns were more than the "rantings of an anti-packtrain fanatic" which he called them. I hope that it will not take another 30 years to bring this problem under better control.

Sincerely,

A handwritten signature in black ink, consisting of several stylized, overlapping loops and strokes, representing the name Richard Judd.

Richard Judd

16

I did not have time to review the entire document, so I focused on reading sections which are most important to me. I also focused on the preferred alternative, because, as I understand it, this is the alternative which will be implemented or modified to make the final GMP.

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

It was unclear to me the reasoning behind wanting to buy out Wilsonia, or what the park plans to do with historic structures if they buy them. Can these properties be used to supplement the inadequate employee housing situation in Grant Grove? Could they be used for more office space? It is my understanding that the park has allowed the historic structures which they own in Wilsonia to slide into disrepair. What do we plan to do with them?

Why does the plan say that the park will have no pack station at Wolverton? This is not good for the High Sierra Camp at Bearpaw, who need weekly resupplies to operate. It also has impacts on the backcountry resource. When Cedar grove pack station does the resupply they have to stay overnight in the backcountry rather than being able get in and out in one day. Impacts to the backcountry from this extra overnight stock use was not considered.

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

Catie Karplus
49580 Whitaker Forest Dr #9
Badger, CA. 93603

93

Topic 1: Misc. comments and ideas

Having just returned from a week of backpacking in SEKI out of Lodgepole, I felt compelled to respond to the Draft GMP. I have been hiking in SEKI for 52 years, going back to when it was safe to drink the water. Obviously, I am very prejudiced against stock use; this last hike was the worst - trails and campsites (within 30 ft of Ranger Lake were littered with manure, the trail from Orwell Meadows to Ranger churned to dust, and the Bear Box totally filled by one party. The only idea I have, if you must continue it, is to require manure catchers on the stock and at least limit the number of stock to 3 or 4. This is done as a matter of practice in Charleston, N. C. where they have a multitude of commercial horse and buggy tour companies. Lastly, can you limit what comes in from the national Forest?

Topic 2: Comments on alternatives related to Nat. Res. and Back Country/Wilderness

It was stated that Wilderness Studies & Recommendations were not part of the GMT - Ridiculous!

Support previous public comments re. Additional Wilderness

Alternative A is by far the best

Am appalled at Alt. D serving as the base for pfd

" " " " D and the Pfd claimed to be supporting

changing user groups and "enhanced by more diverse backcountry use." Like what: motor bike, nudity, rock bands, etc.?

Am appalled that Alt. D and Pfd are claimed to not impair Resources or Values

Am appalled that Alt. A is claimed to only partially meet NEPA Goal 101 (b)

"responsibility of each generation as trustee of the environment," and safe, healthful, productive environment because it bans stock use," thus hampering resource protection efforts." Outrageous! A is the only one that does. What about impact of horse manure on health and safety?

Pfd is all right on "Backcountry Use and Trail System," so-so on "Commercial Stock Operations," terrible on "Stock Operations."

Good idea to provide campsite for backpackers.

Can't believe that D was rated so highly in the CBA process. As an engineer I've done a lot of systems evaluation and comparisons and do not feel that your evaluators were accurate and unbiased.

To me, backpacking in the wilderness is all about solitude with nature.

When I hike, I live in dread of large groups - should be limited to no more than 6.

Topic 6 Special Use Permits

Support keeping the Scout camp at Wolverton

Walt Keller, Ph.D.

Page 1 of 10

46

Subj: Draft General Management Plan-----Environmental Impact Statement
 Date: 10/4/04 11:19:58 AM Pacific Daylight Time
 From: Otrkennedy
 To: david_graber@nps.gov
 CC: susan_@nps.gov, Otrkennedy

Respondent:
 Ronald D. Kennedy
 4741 Sleeping Indian RD.
 Fallbrook CA. 92029
 760-723-4357
 otrkennedy@aol.com

(West Mineral King # 17)

MY DRAFT COMMENTS 10-4-04

Regarding: Sequoia And Kings County National Parks and Middle And South
 Forks of The Kings River And North Fork Of The Kern River, Tulare and Fresno
 Counties. California.

General Management Plan And Comprehensive River Management Plan /
 Environmental Impact Statement. EIS

TO:
 Dr. David Graber, Senior Scientist
 Sequoia and Kings Canyon National Parks
 47050 Generals Highway
 Three Rivers, California 93271-9651

Forward: After reviewing EIRs on the "Environmental Quality Action Committee"
 for the City of Newport Beach CA. I find this draft reads like a puzzle, trying to
 figure what the true options are is confused: in it's design and approach for the
 reader. On the Comity I would have made a Motion to reject a EIR of this quality
 against the Applicant, for the above findings.

A. CABIN RIGHTS

V.2, P.299, "At one time the U.S. Forest Service had a program that permitted
 privately owned cabins on public land through 99-year leases.---there are
 examples of privately owned recreational cabin communities at -- Mineral King --
 Recreation cabin communities are not unique to Sequoia and Kings Canyon
 National Parks, their surroundings, or the Sierra Nevada."

Monday, October 04, 2004 America Online: Otrkennedy

V.2, P.293 " NPS 2000a). In this case a special use permit is defined as a "privilege," not a "right"* Director's Order #53: Special Use Permits has procedures to be followed for special park uses (NPS 2000a). Discontinuing special use permits beyond the current permit period would be consistent with NPS policy and would result in the achievement of the core mission for Sequoia National Park."

V.2, P.355 "Permit cabins at Mineral King would be removed in accordance with PL 95-625, section 314. About two-thirds of the 60+ cabins contribute to the Mineral King Road Cultural Landscape District. Removal would result in the irreversible and irretrievable loss of cultural recourse in terms of the cultural landscape district"

V.1, P. 39 "The 1978 Law that add Mineral King to Sequoia National Park provided the National Park Service with limited authority--- In accordance with Public Law 95_625, the permits are non-transferable and can be revoked by the National Park Service at any time if the service determines that continued use of the cabins by private parties is incompatible with park purposes or if the land is needed for park purposes."

Comment: Regarding the "99-year leases" This original binding "Lease" Contract with the Federal Government has not been signed away by cabin owners of record, Nor was it signed away in the transfer of the area from the Forest Service to the Park service in 1978 in the "§ 45f. Mineral King Valley addition authorized." And therefor it is still in force. How does Director's Order # 53 (NPS 2000a) Cancel the original terms of the original Federal Lease, And Congressional Legislation of 45f ?

§ 45f. Mineral King Valley addition authorized (as shown below)
As drafted by Congress, Giving Rights to the Secretary, And giving protective rights to the holders of Land and Leases. Also giving guidelines for compatible uses in the Mineral King Valley after the ("(b) (2) The Sequoia National Game Refuge is hereby abolished and the Secretary of Agriculture shall transfer,") transfer to the Park Service, Department of the Interior.

The above legislation does not Recognize or call out "Directors Order # 53" as sited in the EIS. page V.2, P. 293. But in fact this legislation gives rights to holders of Leases,

(2) "Such rights of use and occupancy shall be for not more than twenty-five years or a term ending at the death of the owner or his or her spouse, which eve is later."

(7) (d) Leases" (A) "any leases or permit on Federal Land within the area added to the park under this section which is in effect immediately before November 10, 1978, shall continue in effect pursuant to its terms and conditions

Monday, October 04, 2004 America Online: Otrkennedy

416

following the expansion of the park under this section."

My recommendations are for Alternative C.

:V.1, P. 70-1. "Alternative C: Preserve Traditional Character and Retain the Feel of Yesteryear; Guide Growth," p.71 Mineral King---"Special use permit cabins are preserved to exemplify a recreation community in Sequoia National Park,"

B. DISNEY OWNED PROPERTIES

V.2, P.69 "Mineral King Valley Private Properties (Sequoia National Park)"

Comments: these 29 Acres of land should be identified as Disney, and listed in the reference index as Disney.

V.2, P.247 "The parking capacity at trailhead lots has not been measured, but park staff report parking demand has exceeded supply"

V.2, P.301. "Mineral King" This Trail Head Parking also should be called out as Disney, and listed in the reference index as Disney

V.2, P.339 and 345 have this call out, Regarding Disney Property "The purchase of land (on a willing-buyer / willing-seller basis) by the Federal Government"

V.2, P 301 "Since this action would involve a Willing Seller" (of trail Head Parking).

Comment: On looking at "§ 45f. Mineral King Valley addition authorized." There are no call outs of a "WILLING SELLER"

or any restrictions on acquiring in holdings. This Willing Seller addition is not called out by Congress and should be totally deleted from this Environmental Impact Statement.

In fact § 45f. states:

(1) "Within the boundaries of the area added to the park pursuant to this section, the Secretary may acquire lands and interests in lands by donation, purchase with donated or appropriated funds, exchange, or transfer from other Federal departments or agencies."

(4) "Nothing in this section, or in any other provision of law, shall prevent the Secretary from exercising his authority to acquire property"

C. COMMERCIAL USE IN MINERAL KING

V.1, P.200 "Private Land and special Use Permits on Park Land" "the preferred alternative would result in major, beneficial,---acquiring and adaptively using special use permit cabins for public use,"

"Park Management Operations, and Facilities" "The preferred alternative would generally have moderate, beneficial impacts on park operations---commercial or incidental business permit holders, and partners-would be minor to major and beneficial"

V.1, P.201 "Park Management Operations, and Facilities" "Alternative A" ---

Monday, October 04, 2004 America Online: Otrkennedy

commercial or incidental business permit holders, and partners-would be minor to major and beneficial"

V.2, P. 202 "Historic structures, districts, and landscapes would be preserved, restored, rehabilitated, and adaptively used in accordance with the Secretaries Standards"-----"Numerous adverse historic facilities would be preserved and adaptively reused"

V.2, P 204, 213, 218 "Mineral King"---"The National Park Service would acquire special use permit cabins for public use."-----"(1) appropriate sustainable public uses for acquired cabins; (2) cabins to be retained for public uses; (3) a strategy to ensure that cabins and related utilities meet appropriate codes; (4) a viable management / maintenance strategy,

V.2, P.339 Under the preferred alternative some cabins would be made available for public use or park administrative purposes. Permit holders would be given the opportunity to donate structures in lieu of required removal, providing a major, beneficial, short-term impact for these individuals because they would be relieved of the legal requirement to remove their structures and rehabilitate the sites, and they would not have to pay for the cost of removal or rehabilitation."

V.2, P.303 A cultural resource management plan for the Mineral King Road Cultural District would be developed in consultation with the California historic preservation officer to make decisions related to contributing and non-contributing cabins, appropriate public uses and adaptive reuses, and the management of acquired cabins. This would result in major, beneficial long-term impacts on public use of park land"----"The operator would have to ensure that utilities met applicable health, safety, and environmental standards in order to accommodate long-term public use."---"Eventually over 60 permit holders and their families would no longer own private cabins on public land."----"and historic resources would be adaptively reused. Making cabins available for public use would have a moderate, beneficial, long-term impact on public recreational use in the Mineral King area"

V.2,P.321 "With the acquisition of Mineral King permit cabins for public use, individual utility systems would be assessed and sustainable utility systems developed for the level and location of self-supporting public use. The system would be managed by a partnership group, resulting in moderate, beneficial, long-term impacts to park operations."

V.2,P.323 "Partners. Partnerships would be pursued to provide education and other operations, including the management and operation of the Mineral King permit cabin area, Which would be acquired for public use."

V.2, P.333* Partners. Partnerships would be pursued to provide educational and other operations, including management of the Mineral King area, resulting in a moderate, beneficial, long-term impact on park operations."

Comments: In the past the Mineral King cabin owners have opposed any type of Commercializing of the Mineral King Game Refuge. Now that the game refugee has been 'abolished' and placed in Sequoia National Park, Our

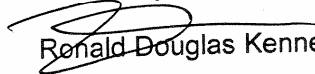
Monday, October 04, 2004 America Online: Otrkennedy

stewardship of keeping this Alpine Valley free of: Commercializing. Partners, Partnerships groups, and Operators, will not be Abandoned. Do you really believe current Cabin Lease Permittees will sign there Leases & Cabins over to the Park to allow the "start" of Commercializing rental units on a seasonal or year around basis in Mineral King? "No, we will not help Commercialize Mineral King." This Development plan should be Denied.

On looking at "§ 45f. Mineral King Valley addition authorized." "(3) The commercial use of such property subsequent to November 10, 1978, shall be treated as incompatible with the purposes of this section. In the case of any property which was used for commercial purposes at any time during the ten calendar years immediately preceding November 10, 1978, any substantial change or expansion of such commercial use subsequent to November 10, 1978, without the express approval of the Secretary shall be treated as incompatible with such purposes."

Note: The Disney land at (the old Dump site) needs to be Mitigated for there is loose Asbestos on the ground and affixed to old: stoves and water heaters. And it is not a safe place for children to play, or adults to look for souvenirs. OSHA has many directives which all state "there is no safe exposer level for breathing Asbestos."

Sincerely,


Ronald Douglas Kennedy

ENCLOSURE:

EDITOR'S NOTE: The enclosure (16 USC 45f) has not been reprinted. The original letter is on file at park headquarters.

72

David,

I feel that preservation of the Mineral King District is a beautiful thing. The people who live there are part of the WHOLE and add that certain character to the area. They have the background and feel for the area whereas the Park people do not. As long as the homes stay maintained, no new building to take place while loving people with the "right energy" own these cabins, i am good with it. Heck, i would love to have one of the cabins up there!!!! it would make a great retreat with gorgeous scenery.

Thanks for your time

Barry "Sequoia" Klein

273

2125 Ames St.
Los Angeles, CA 90027
October 4, 2004

Dr. David Graber
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Dear Dr. Garber:

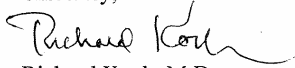
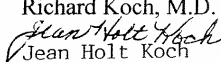
We are writing in response to the Draft General Management Plan for Sequoia and Kings Canyon National Parks. Our particular concern is Topic # 6 and the cabins at Mineral King. We favor Alternative C of this plan. Since Mineral King is now part of a National Historic District, it is incumbent upon the Park Service to make sure the cabins remain as the historic structures that they are. And since the cabins have been maintained by the heirs and successors of the pioneer families who built them and since no two of them are alike and each has its own idiosyncrasies and quirks, no one is better able to preserve them than the family members who have the ability and the incentive to do so. No commercial operator could afford to bring the cabins up to code and rent them out and maintain the historic integrity of the buildings. And we would hope the Park Service would not destroy the cabins and erect plaques to indicate the locations of historic structures.

We strongly recommend that the Park Service and the cabin owners continue to work together to maintain Mineral King as a family-friendly historic district. Since the cabin owners have begun working with the Park Service in the VIP program (helping in the ranger station, leading campfire programs, leading nature walks, painting park tables and benches and acting as docents for some of the historic cabins) the relationship between them and the Park Service personnel has strengthened. We anticipate that this program will grow in ensuing summers. The cabin owners have also been asked by park rangers to be alert to the operations of marijuana farms with armed guards adjacent to the Mineral King road and to report any suspicious activities. Since cabin owners drive the road often, they can notice any irregularities more easily than the average person and report them.

The cabin owners are good for the Park and for Tulare County. They not only pay nearly \$900 per year apiece for permit fees, they also pay taxes to Tulare County.

These are just a few of the reason we support Alternative C to Topic 6 of the proposed Management Plan. Thank you for giving us the opportunity to respond.

Sincerely,


Richard Koch, M.D.

Jean Holt Koch

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

1991

6 June 2004

General Management Plan, Sequoia and Kings Canyon Parks

We have reviewed, from our standpoint, what we believe are salient parts of the extensive CD file information on the Draft General Management Plan you mailed to us.

In our opinion, alternative C is clearly the best of the options currently listed in the Draft plan. Obviously, as you will note, additional work or a new alternative will be needed.

The "Preferred" alternative fails to consider the interests of the average citizen because they have not been identified. The "No action" alternative is a misnomer because it does not represent all conditions as they exist today. It assumes that certain things will happen which might not, such as the removal of special use cabins in the Mineral King Historic area.

Alternative C preserves the history, continuity, and security of the Mineral King Valley by retaining the special use permit cabins. Many of us senior citizens have had the opportunity to share the Valley experience over many years, due to the many gracious permittees who have allowed us and our families and our guests to use their cabins year after year. In my case, this started in 1935, when I was but 4 years old! In our opinion, the cabin permit holders and all of their repeat guests lend the real continuity and security to the Valley and should be recognized as a very powerful asset by the National Park Service. These people are the true stewards of the Valley and the Valley will be adversely impacted, should they no longer be a part of it. They are among the most respectful groups of visitors this wonderful mountain area will ever see.

The cover letter, dated May 7, mentions "adapt to changing user groups." What has changed? The implication is that the old user groups may now be obsolete.

Topic 1: It appears that no listed alternative has been prepared strictly from the standpoint of the average citizen as an interest group. Average people rarely organize as a group to speak out strongly as to their interests or concerns. It appears to us that all of the alternatives presented in the Draft General Management Plan reflect the significant input of special

interest groups. Special interest groups are generally outspoken and politically forceful. These groups include the environmentalists such as the Sierra Club, and other organizations such as those of private owners and permittees. The Draft plan should be expanded to include an alternative that would represent the interests of the "average citizen" as a group. This would allow a direct comparison with each of the currently listed alternatives. The ultimately adopted plan should address the interests of all interest groups.

Topic 2: What interest does the "average citizen" have in wild and scenic rivers, or the backcountry and wilderness? We do not know.

The historic hydroelectric facilities should be preserved. The old masonry dams, constructed as parts of the original power projects, must be maintained. Has the California Division of Safety of Dams indicated what would be required to improve resistance to seismic activity? Has an hydrologist performed competent computer analyses on possible flood damage if any of these dams were to fail?

Topic 3: The Mineral King long-time cabin permittees and their guests are an important cultural resource, some with ancestors dating clear back to the mining days in the 1800s. They give needed continuity to the Mineral King Valley. This is in marked contrast to the practice of the Forest Service and, more recently, the National Park Service, where employees, dedicated as they always are, are necessarily rotated in and out of the valley at frequent intervals to broaden their work experiences.

These private cabin owners (permittees) were instrumental in the defeat of the Forest Service's Mineral King plan involving Disney and the subsequent transfer of the area into Sequoia National Park. It is obvious to us that these people are the true stewards of the Mineral King Valley and its rich history.

What does the "average citizen" have to say about the permittee cabins?

Topic 4: Because of the 23 +/- miles of difficult road leading to Mineral King, round-trip day visits will be limited for most drivers. They will want to be able to spend at least a night or two in the area before returning. This is especially true for seniors, many of whom visit Mineral King almost annually. This, coupled with the general knowledge that camping sites are often limited, will discourage many drivers from trying to make the drive on a chance that a camp

site might be available. Our experience is that many non-cabin owners do, in fact, use the private permittee cabins at the invitation the cabin owners, allowing them to enjoy the rustic atmosphere of the Valley for multi-day visits. All the alternatives, except C, would effectively remove those cabins from private ownership, and therefore would further restrict access to the Mineral King Valley. Because the group impacted would probably consist of many seniors, the removal of the cabins would severely discourage seniors from using the Valley, thus these alternatives would actually discriminate against older people.

Topic 5: Most of the private land inside the Park is part of the wonderful heritage of the park going way back to the 1800s and the huge mining operations that have forever left their print on the area. The store at Silver City is a good example of a neat rustic feature remaining nearby and below the Mineral King Valley. We feel these lands should be retained as private lands in the adopted plan.

Topic 6: Special use permits on the private Mineral King cabins. Several of the alternatives view some public use of the former private cabins. In our opinion this is pie-in-the-sky thinking. The National Park Service will never have funds nor be able to find competent informed help to maintain the idiosyncrasies of each individual cabin. Certainly no former owner is going to want to visit his old cabin in a run-down condition. Our experience suggests that each old cabin has many peculiarities that only a permanent resident could possibly be aware of, or understand. No standard electrical power is available. Propane feeds gas lighting fixtures, manual water heaters, and old Carnot cycle refrigerators. The alternatives that propose to utilize these old cabins as public facilities appear to us to be misrepresenting the true picture, apparently in an effort to add credence to the plan to remove them from private ownership.

Thank you,


Charles D. Leighton


Marianne A. Leighton

462 Santa Alicia
Solana Beach, CA 92075

Tel (858) 755-8111

298

Oct. 1, 2004
58 Coyote Rd.
Chalfant Valley, CA 93514

To Whom It May Concern:
Below are my comments on the Draft General Management Plan.

Concerns

Action # 372: Mineral King Cabins:

While I understand the NPS' desire to placate and appease the Mineral King cabin owners, I strongly disagree with the proposed actions described in the draft GMP. The intent of the original legislation assigning management of the Mineral King area to the NPS was to return this area to a natural state. There is no reason to depart from the legislation. While I understand that it will be hard for the families of the cabin owners to lose the privileges they've enjoyed, there is *no* reason for anyone to enjoy privileges in a national park that aren't shared by all. Furthermore, there is *no true* historic value to the cabins. There are countless locations throughout California and the west where anyone wishing to view similar cabins in similar settings may do so. People who don't wish to camp or backpack can be accommodated at Silver City. There should be *no* development of commercial facilities in the Mineral King area, including in "historic" cabins.

Mineral King is a special and unique frontcountry area in Sequoia: not crowded by RVs, not dominated by a commercial flavor, quiet and rustic. Having worked in the area, I know that many, if not most, people who use the area come specifically because of these values. There are many other areas of the park that offer a more developed setting for those who seek that experience. There is absolutely *no* reason that every park area has to offer every possible visitor experience. It is incumbent on the NPS to preserve and enhance the undeveloped uniqueness of Mineral King rather than catering to the desires of an extremely small group. As current cabin owners die, the cabins should be removed and the area naturalized, as intended by the original legislation.

Action # 162: High Sierra Camps

The stated reason for the NPS continuing to allow a commercial operation in the backcountry has been to provide a backcountry experience for those who otherwise would not be able to enjoy the backcountry. This is a fallacious argument. During the time I worked at Bearpaw ranger station, I did an informal survey of users of the facility. The majority were well-heeled, middle-aged, and perfectly capable of backpacking. Though I haven't been in the area recently, I frequently day-hike in Yosemite, and observe the same phenomenon with the YOSE camps.

Backcountry camps are a luxury for the elite who can afford them: an undemocratic holdover from days of yore when parks were far less heavily used. In the case of the Bearpaw camp, backpackers are relegated to a dark, ugly campground, while those who pay the price get to "camp" on a promontory with an exceptional view. Heavy and unacceptable impacts are associated with this kind of operation (stock and helicopters for supplies and maintenance, diversion of spring flows, septic systems that frequently

malfunction releasing sewage into the surrounding areas, etc.). The Bearpaw area has been excluded from wilderness designation because of the camp; it is, however, absolutely worthy in all respects – other than the camp – of that designation.

As far as the idea of establishing another camp on the Hockett Plateau, I am absolutely opposed to that for the reasons outlined above.

I would like to see the preferred alternative be the one outlined in Alternative A, the removal of the Bearpaw camp *and* no feasibility study for any other such camps. Given that I have always heard that the concessioner *loses* money on the Bearpaw camp, I can see no good reasons whatsoever for continuing to support this high-impact activity.

Action # 161: (and other related actions): Pack Stations

The commercial pack operations at Wolverton and Mineral King (at least) should be removed and not replaced. A national park is not an amusement park and doesn't need to provide day rides. There are ample opportunities on the outskirts of our parks for this kind of activity. With a pack station at every major eastside trailhead, people who want a backcountry pack trip also have ample choices. Given that the Wolverton pack station will have to be relocated (more development and impacts), that the Mineral King pack station is currently vacant, and that typically it's hard to find people to run these concessions and even harder to find people to run them *well*, I see no valid and defensible reasons to keep the operations running.

Action #160: Backcountry Stock Use

In the previous Master Plan and in subsequent years there was a commitment to evaluating stock use in the higher, most fragile areas of the backcountry with a goal of removing stock and their impacts from these areas. None of the alternatives even considers this possibility, which I believe to be a gross oversight.

Commendations

Action #12: Transit Systems

I believe that the provision of a transit system for the Giant Forest area will enhance visitors' experience in the area, relieving congestion and encouraging people to get out of their cars and walk.

Action #18: Educational Outreach

Increasing outreach efforts is a mandatory step toward protecting park resources. Since the Parks are increasingly used by "local" visitors, it makes good sense to teach these users how to care for the parks in their "backyard".

Action #30, 335, 367: Hydroelectric Facilities

I strongly support the removal of all hydroelectric facilities from the Parks.

Thanks— I don't need a response!
yours— Lo Jyness

69

September 27, 2004

David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Susan Spain, Landscape Architect
12795 W. Alameda Pkwy.
Denver, CO 80225-0287

Subject: Draft GMP Comments for Sequoia and Kings Canyon National Parks

Dear Dave Graber and Susan Spain:

I am writing to comment on the Draft General Management Plan and the Comprehensive River Management Plan for Sequoia and Kings Canyon National Parks. What follows are my concerns about the plan, and what I feel should be added to the plan.

NPS Development Issues

I have four comments that relate to NPS development issues. First and foremost, I believe that as we move into the 21st century, the National Park Service should, and must, act as a role model for the public by reducing the impact of our daily activities on the environment. If we focus on conserving land, but don't reduce our contribution to the local ozone problem, we are being short-sighted. If we provide educational programs with the hope of encouraging visitors to reduce their environmental impact while continuing our heavy use of fossil fuels, we are being blatantly hypocritical. It is therefore critical that the GMP take a strong stance on "greening up". By this, I mean using double (or even triple) paned windows in all facilities, installing solar panels, and encouraging the GSA to provide more appropriate and fuel efficient (hybrid) vehicles. There should be bike paths in all sub-districts. While the shuttle system is a good start, it is just one element of what needs to happen. Light pollution may also be mentioned here. With our desire to reduce bright lights, why did the NPS put lights into the foothills campgrounds that are so bright that one can see one's own shadow at camp?

Second, there should be a greater emphasis on planning new developments and recreating old developments in such a way that protects natural resources. For example, if developments are to be created in phases, so should the logging and paving that precedes them. Wuksachi doesn't seem to be expanding to anywhere near the size of its designated footprint and in the meantime, many mature trees have already been cut. On that note, it turns out Wuksachi might not even be able to expand due to recently discovered water limitations. This would be less of a problem if we had considered greener alternatives to begin with, such as a youth hostel. Another example of improved planning is in the decision process of when to keep developments in operation. If Cedar Grove is kept open longer, what will be gained? It isn't cost effective and it doesn't serve many visitors. At the same time, Cedar Grove will lose buffer time before and after winter when it normally heals from impacts. This is also the time that wildlife moves down from higher elevations into the Cedar Grove area, where they are free from intrusions from humans. Then there is also the issue of planning where to put new developments. The new Sherman Tree lot is surrounded by sugar pines, an important fall food for bears. One can easily predict the human-black bear interactions that will occur at the new lot – it will likely be much like the Pinewood Picnic area.

A third concern with development issues is that only one alternative discusses the idea of making facilities more rustic-looking. The other alternatives hardly mention aesthetics. We need to face it, the Mission 66 style of buildings, the enormous parking lot at Lodgepole campground, and the Grant Grove developed area are just plain ugly. There is nothing about them that says wilderness, beauty, or respect for nature. Let's move toward improving the situation.

Finally, I believe that the employee housing issues were not adequately addressed. There are certainly many appropriate reasons for locating employee housing outside of the parks. It encourages mixing with the local community and reduces impacts on natural resources. What is important to remember that there are also many reasons we do need housing in the parks. Housing in the local community is expensive and therefore many employees are moving up to an hour away. What problems does this create? Air pollution, enormous safety issues with driving – especially for those employees working far from towns at Lodgepole and Grant Grove, employees who have little connection with the resource, and perhaps most importantly, employees who live too far away to respond to emergencies after hours. When seasonal employees live in the park without permanent employees, the culture can become out-of-control with drinking, etc. Also, the lack of permanent employees in communities effectively eliminates the "park service family" that is supposed to make us a cohesive unit. If we do not expand housing, but retain what we have, it also must be stated that the housing that does exist in Lodgepole and Grant Grove is, in many cases, both limited and unacceptable. Employees sleep in trucks in the parking lots, and supervisors' homes, and in the campgrounds. Some facilities are not bear-proof. Some facilities are just awful.

Concessions Development Issues

I have a few comments relating to concessions development issues. First, the employee housing areas at both Wornwood and Wuksachi are shameful. They are so bad that employees commute daily from Three Rivers – through winter storms – to get to work without living there. Historic or not, these facilities need to be enlarged, updated, made bear-proof, and given communal areas. The terrible housing may also be a factor in why it is nearly impossible for them to attract and retain a cadre of good employees. As it is, concessions employees are often just at the parks to party and cause numerous problems for bear management and law enforcement throughout the summer.

Second, it seems that the park is at one time encouraging visitors to come in the winter, while increasingly limiting services that visitors need. For example, if a group rents a room in Wuksachi during the winter and it rains the whole time, what can they do? The hotel rooms are far from the restaurant so it is difficult for elderly people to get back and forth and the main lobby has the only communal area. There should be communal rooms with puzzles and games and a fireplace like the lodge at Grant Grove. Also, if one is staying for a week, there is only one eating option – Wuksachi. This is boring and expensive. I imagine the situation could be fairly easily improved.

Land Classification, Use, and Aquisitions

I have some concerns on the classification of various land types. For example, Rock Creek-Miter Basin is classified as cross-country, meaning remote and largely untouched. This is far from a description I would use for that area. Ever since quotas were placed on Mt. Whitney, there has been a huge increase in the use of the Rock-Creek-Miter Basin area. My suggestions therefore are to put quotas on wilderness cross-country use and note that even remote areas may quickly become crowded. Also, there seems to be a lack of regional planning. It makes more sense to make plans for wilderness on the scale of the southern Sierra with other agencies than to work alone with limited partnerships.

The proposal to use the Hockett area for another high sierra camp is going to impact the use of the area (mainly stock users) and the meadows. I recommend against it.

The plan for land acquisitions needs to be expanded. Areas that are being managed by other agencies bordering the park are not being preserved for the values in the GMP. For example, Case Mountain is constantly grazed and full of exotic plants. Also, why not try to acquire more foothill land? It is a unique and valuable resource.

Wild and Scenic Rivers

Please add into this section the danger of heavy human use along the river corridors as relates to erosion, trash, and trails. These impacts are already noticeable in the foothills area where we also now have many bear problems that start at the river.

Mineral King Historic District

If the Mineral King cabin issue was a new one regarding eminent domain, I would side with the cabin owners. That, however, is not the case, and the cabins need to be removed. They are a fire hazard, and a safety hazard, they impact wildlife, and they add more unnatural light and noise to the valley.

Devil's Postpile

SEKI should turn management of DEPO over to YOSE. The six-hour drive to DEPO necessitates a large investment of time and money to send experts over to manage the area. It would be more convenient for YOSE managers to take on the management.

The Purpose of SEKI

Shouldn't one of SEKI's purposes be to "Protect and preserve natural resources – especially native flora and fauna"?

Wildlife Effects

The GMP notes impacts to wildlife from the parks such as roadkill and habituation and then classifies them as negligible. In 2003, two fishers were hit and killed on the highway – how can that be considered negligible? In recent years, dozens of bears have been hit by cars, a handful killed by management, and thousands of hours of employee and volunteer time have gone into reducing incidents – is that negligible? Air pollution is potentially a factor in the rapid spread of the fungus that is killing the mountain yellow-legged frog – how about that?

Superlatives

Isn't the General Grant tree now the second largest tree?

Thank you for the opportunity to comment on this important plan.

Sincerely,

/Rachel Mazur/

Rachel Mazur

*Susan B. Merrill, CPA (ret.)
Arthur Q. Merrill
30007 Road 158,
Visalia, CA 93292*

*559-625-1314
Sbaqmerril@aol.com
cell 559-679-7186
FAX 559-625-1303*

October 5, 2004

Richard Martin, Superintendent
C/o Dr. David Graber, Senior Scientist
C/o Susan Spain, Landscape Architect
Sequoia & Kings Canyon National Parks
47050 Generals highway
Three Rivers, CA 93271-9651
david_graber@nps.gov

**Re: General Management Plan (GMP), Sequoia and Kings Canyon
National Parks**

Dear Sirs and Madams,

These are my comments on the GMP and they are arranged according to your requested format. Please be patient if they are not quite in the order you requested.

Topic 2: Natural Resources, Wild and Scenic Backcountry, Wilderness

**1. Wild and Scenic River Consideration of the East Fork of the
Kaweah River (Mineral King)**

Response: The East Fork of the Kaweah River should not be designated as a "Wild and Scenic River" due to the multiple uses from its headwaters down past Atwell Bridge. The hydroelectric facilities and stock use are two examples that preclude this designation. Both of these uses should remain and there should be no change in the river's designation

2. Wilderness Designation of Mineral King and surrounding areas.

Response: Wilderness Status should not be considered for the Mineral King or Oriole Lake areas. These areas are not suitable as

they have had habitation for over 100 years and the whole area presently has multiple uses. These areas should not be restricted. Oriole Lake in-holders should be allowed to remain and not be condemned. Bearpaw Meadows High Sierra Camp is a wonderful resource and should be allowed to remain.

3. Air Quality

Response: We support the continued control burn program of the National Parks with the cooperation of the Air Pollution Control Board to reduce air pollution. As indicated on Page xiv, air quality should improve over time, as it desperately needs to be better than it is presently. This past year has been better but it is probably due to a milder summer. The Air Pollution Board needs to be more responsive to the long time frame of the Parks once a burn has been established.

Topic 4: Transportation, Visitor Experience

1. Visitor Experience, Stock

Response: Pack stock should be allowed throughout the Park and not eliminated. They should be allowed in the backcountry on established trails as is presently done. Major trails out of the Mineral King Lake basins should be maintained as one of the three backcountry prescriptives. Secondary trails should also be enhanced and maintained. The 1971 Master Plan calling for the phasing out of stock should be shelved and eliminated and Pack Stock use should be continued in the backcountry.

2. Visitor Experience, Hockett High Sierra Camp

Response: A new High Sierra Camp at the Hockett Plateau would be a positive impact on the educational level of the High Southern Sierra ecosystem and therefore Hockett Meadows should NOT be included in any wilderness designation and a High Sierra Camp should be considered.

3. Transportation

Response: Mineral King road should not be improved to become a high scenic driving experience. The only suggestion would be to provide some type of pavement or chip seal on the road to keep the dust down on the dirt part of the road to help in the air quality.

There needs to be an internal shuttle within the Parks to the Big Trees to reduce dependence on individual transportation. The City of Visalia is in the process of trying to coordinate a Gateway Shuttle from Visalia to the Parks to facilitate the out of State and Foreign visitors, but it would not be feasible without the internal shuttle. Fee increases to accommodate this internal shuttle should be of the utmost importance.

Topic 5: Private Lands

1. Silver City Status Quo

Response: Private use of private lands such as Silver City should be allowed to continue as stated in the Preferred Alternative. Only a willing seller of property through donation would be allowed to occur. Removal of private property from the property tax rolls of Tulare County would be detrimental.

2. Enhanced Facilities at Silver City

Response: There is a suggestion of Enhanced Facilities at the Silver City Resort (Page 152), to expand services. This suggestion should be researched carefully and thoroughly. The existing utilities (water) are being used to the maximum presently in this drought year to provide the necessary flow of potable water to the owners. This is also after upgrading the system. The Silver City Mutual Water Corporation is owned by 61 members and at this time provides water to its members. New regulations governing water delivery and training is expanding and more demanding and it could require extensive new infrastructure and management to develop any additional services for the Park. It seems the system can only provide existing flow without extensive new infrastructure and more intense daily management.

3. Oriole lake

Response: Oriole Lake access should be improved to provide public access to the foothill lake environment. The in-holdings should remain.

Topic 6: Special Use Permits

1. Mineral King Special Use Permits

Response: Mineral King and Cabin Cove cabins permits should be allowed to be renewed. As special use permits expire, permit cabins should be allowed to renew their permits and transfer them to future generations. Special use permit cabins should not be removed as suggested. They exemplify a recreation community in Sequoia National Park that is unique as their Historical Designation implies. Present proposed bills by our representatives in Congress could help solve the problem with Congress approving legislation that allowed the special use permits to continue. This is the best alternative. These cabins were originally under the US Forest Service and their legacy should remain. It is unfair and not in the best interests to change the policy and laws midstream in 1978 after over 60 years.

2. Hydroelectric Facilities

Response: Hydroelectric Facility permits should be renewed after September 8, 2006 and should be renewed indefinitely. The Parks purpose should be superceded for clean electrical generation. The water diversions on the mountain lakes are minimal and are negligible to the river system and have been in operation for over 100 years and cause no negative impact. This action of not renewing the permits would increase costs of electricity to the Park due to existing discounts and permit fees.

Sincerely,

Susan and Arthur Merrill, Owners
Homer Cabin #97, Silver City
Financial Consultant, City of Visalia

216

October 4, 2004

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

Re: Continued use of Mineral King cabins by lease holders

Dear Dr. Graber,

I am 23 years old and have grown up going to Mineral King every summer of my life. My family has had our cabin for over 50 years. All my brothers, cousins, aunts, uncles, parents and grandparents have spent their summer time in Mineral King, because we have a cabin there. All I know about life, I learned at our cabin in Mineral King. I learned how to fish, catch and release fly fishing; I learned how to respect the forest flora and fauna, even the marmots; I learned to hike and back pack, and eat jerky and dried oatmeal on the trail. I also learned that Mineral King is a very special place in the United States, a place that is worth fighting to keep. I look forward to raising my children in Mineral King at the cabin, where Grandma Meyer cooked pancakes on the wood stove, and Dad showed us how to clean the fish we kept.

The cabin owners and their families are people who care about the environment and take seriously the warning to stay on trails, don't pick the flowers, but do pick up trash (I earned my Blue Jay award when I was a little boy).

I am for the continued use of the cabins by the lease holders in Mineral King.

Sincerely, 

Jacob Meyer
405 West Camino Fairhaven
Tucson, AZ 85704

215

October 4, 2004

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

Re: Continued use of Mineral King cabins by lease holders

Dear Dr. Graber,

The cabin owners of Mineral King are pioneers whose families had vision and gumption back in the day when the road was mostly an unpaved trail to paradise. The road keeps many people from coming to the top of Mineral King, and it's paved these days!

My family has been coming to Mineral King since my dad was a little boy. Grandpa and Grandma Meyer and my dad came up to camp at Sunnyside for years before there was ever a cabin to buy. God was gracious to make a way for them to buy our cabin in 1953.

I want to raise my family the way Dad and Mom raised us boys, coming to Mineral King every summer. We know how to fish, hike, camp in the back country, cook on a wood stove, roast marshmallows, and to chop wood with an axe, because we have a cabin at Mineral King.

I pray we will have the continued use of our Mineral King cabin in the future, as lease holders will be granted permits.

Thank you,

Sincerely,



D. Christian Meyer
405 W. Camino Fairhaven
Tucson, AZ 85704

274

October 3, 2004

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

Re: In support of continuing to issue permits to Cabin Owners

Dear Dr. Graber,

My family has had a cabin in Mineral King since 1953 and my grandchildren represent the 4th generation of those who have enjoyed the Mineral King Valley in Sequoia National Park. We have seen a lot of things change since we became involved with NPS, mostly political, and your study (the General Management Plan) has really only pointed out that Mineral King is pretty much the same. We support the continued use of the cabins and the permit holders to maintain the use of the cabins. The permit holders and their families are a big part of what makes Mineral King so unique and their efforts have upgraded the Mineral King experience. The National Park Service has missed a real opportunity to use and apply the talent the cabin owners represent. They have been there and experienced many adventures that are interesting and represent a great portion of "The Real History" of Mineral King. The people and the cabins are one wonderful opportunity to enhance the story of Mineral King and the surrounding country. Your rangers and support staff are brought in from far away places and are supposed to share their knowledge of Mineral King. How foolish when your Ranger Station is surrounded by individuals who have been raised over the summer years in Mineral King and have many rich stories and experiences yet untold.

Once again we support the preservation of the cabins by the lease holder families and by continuing to issue permits to cabin owners.

Sincerely,


Earl D. Meyer
405 West Camino Fairhaven
Tucson, AZ 85704

92

David,

Hard copy with enclosures on the way.
John Modin

Subject: Public Comment Draft General Management Plan
Sequoia Kings Canyon National Parks

August 2, 2004

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

Dear Dr. Graber:

Among the many issues presented in the Sequoia and Kings Canyon General Management Plan none is more important than resolving some long standing problems at Mineral King.

On November 10th 1978 President Carter signed into law the National Parks and Recreation Act containing a provision to transfer Mineral King from Sequoia National Forest into Sequoia National Park. The legislation marked the end of a 13-year battle to prevent the development of a hideous winter and summer recreational complex in the tiny scenic valley and environmentalist were ecstatic with the outcome.

Unfortunately, this legislation did not resolve serious impacts the existing pack station and trailhead parking lots were having on the visual quality in the Mineral King Valley. In October of 1976 I wrote in Bonanza, a Sierra Club Newsletter, article enclosed, "In its present location the lot and accompanying assemblage of vehicles result in an incredible insult to the visual qualities of Mineral King." After 28 years and a new management plan forthcoming its time to relocate the lots and pack station to a more suitable site in the Faculty Flat area. The new GMP should emphasize this as an essential goal for Mineral King directing efforts to accomplish this task as special use permits for private cabins expire and additional siting for trailhead parking and pack station become available according to provisions under the 1978 legislation.

As the use permits expire, architecturally suitable and structurally sound historic cabins could be used adaptively for public purposes as described in the preferred alternative so long as their use would not interfere with the higher priority of relocating the environmentally damaging and visually intrusive pack station and trailhead parking lots out of the valley,

and so long as their continued presence does not impact scenic or wildlife values or public access to public lands. We cannot wait another 15 or 20 years and another General Management Plan to resolve this problem. We must begin these important relocations now.

Other issues are important as well; wilderness management, transportation, fuels management, fees for backcountry use etc., should be considered with maximum concern for resource protection and restoration. Determining user capacity and resource limits should be given the highest priority in the decision making process, to ensure that excessive visitation and use does not degrade the resource we are trying to preserve. With a rapidly increasing population encroaching on these Parks this may prove to be a difficult challenge.

Other Points of Issue:

1. Maintain only the lowest level of use in the Dillonwood area. A small campground without recreational vehicle access might be suitable.
2. To prevent further erosion and widening of the Mineral King road pave remaining unpaved sections.
3. Do not consider new High Sierra camps in existing or proposed wilderness areas. The High Sierra camp proposal at Hockett Meadow is an excellent example of the inexorable, incremental degradation of the natural world that we are trying to preserve in our National Parks. This proposal should not be considered in the GMP.
4. Any fees imposed for backcountry use should be used only for maintenance and restoration purposes and not for new "improvements". There are enough trails already and restrooms and other amenities only attract more use. There is too much use already.

Thanks for listening,

John and Chris Modin
El Dorado Hills California

Cc: Assistant Superintendent Russ Wilson
Chief of Interpretation Bill Tweed

242

11512 Chapman Ave.
Garden Grove, CA 92840
September 18, 2004

Dr. David Graber, Senior Scientist
Sequoia and Kings Canyon National Parks
4705 Generals Highway
Three River, CA 93271-9651

Dear Dr. Graber:

I am writing you in response to the Draft General Management Plan for Sequoia and Kings Canyon National Parks. Thank you for the opportunity to have an input on this important plan.

I want to respond specifically to Topic # 6 regarding the cabins at Mineral King. I have enjoyed vacationing at Mineral King my whole life. My parents first took me camping there when I was 18 months old. I favor Alternative C of this plan. Since Mineral King is now part of The National Historic Registry and since many of the cabins are historic structures, these cabins should be preserved. The logical people to care for them with all their idiosyncrasies are the families who have done so throughout the years for many generations. Economically, this is a win-win plan for the Park. The owners of the cabins, not only pay nearly \$900 a year to the Park Service in "user fees", they also pay taxes to Tulare County. They have also become part of the VIP (Volunteers in the Park) program in Sequoia National Park, in which they help in the Ranger Station, relieving the rangers for other duties, they lead nature hikes, act as docents for some of the historic cabins, help with the campfire programs and help with maintenance, such as painting camp tables and benches, etc.

In addition to maintaining the Mineral King district, the cabin owners can be helpful to the Park personnel in vigilance against the armed marijuana farms, which still exist in hidden areas of the Park. The cabin owners probably go up and down the road more often than others. They are aware of the problem and have been asked by the rangers at Mineral King to report any suspicious activity.

I do not believe additional camping space is needed at Mineral King. The total number of visitors has declined 4 % annually from 1995 to 2000 and the rental cabins at Silver City operate at only 50 % capacity. It obvious the cabin owners are not enjoying special privileges.

The cabins owners and their friends love Mineral King and want to work with the Park Service to see it preserved for future generations to enjoy.

Sincerely,

Helen L. Mueller
Helen L. Mueller

176

James Murphy
1462 Paseo Manzana
San Dimas, CA 91773

September 7, 2004

David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

This letter is commenting on the Draft General Management Plan ("GMP") for Sequoia and Kings Canyon National Parks.

I view your service as the spokes person for the forest, after all, if you don't, who will? Your job is to speak on behalf of the forest in response to political and economic pressures. The forest can only lose its wilderness characteristic once, and then it is gone forever; so speaking on its behalf is a voice of preservation.

The Preferred Alternative appears to allow stock, commercial or personal, use on a business as usual basis. Commercial pack companies should not be allowed to have permanent facilities within Park boundaries. These facilities should be located outside of the Parks where they can come into the park, only when permitted, just like any other user. The permits available for packers, including commercial operators, should be as restrictive or more than those that apply to human use. This discrimination is quite justified since pack stock results in wider and degraded trails, enlarged campsites, dust, trampling, compaction, erosion, and to urinate or defecate in or near waterways.

Additionally, these animals have so far been allowed to eat the flora, which is quite valuable for a whole host of nature's insects and mammals. I also believe that you should impose a no grazing, and have a required stabling rule should be applied to all pack animals. This practice is in effect in other National Parks and should be in effect in your National Parks. Stables and a carry your own feed rule would allow the permitted stock to operate at high elevation.

Although I'd prefer to have no stock animals in the wilderness, I recognize this is impractical, but giving it equal weight to other recreational users makes sense.

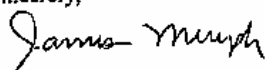
Since I like to visit wilderness to look at butterflies, I am particularly shocked to see stock eat plants and walk on meadows and other flora areas. Walking (stomping) on meadow and other flora is viewed as disturbing the soil, which is considered quite bad to the health of native plants, which for the most part, have a limited growing season each year.

I believe that the Park Service should use horses for supervision and safety purposes and that its use of horses be covered in a separate section of the GMP. I've seen such use in Toulumne Meadows and found it to be quite effective. I hope the attractive horses they use are fed high energy grain, and not just let out to the local meadow when not in service.

My other observations about the GMP are not as wordy, but certainly strongly felt. The commercial camp at Bearpaw should be removed and not replaced. Environmental attitudes and outdoor use technology have changed over the past decades and which means this kind of facility is no longer needed. The private cabins in Mineral King should be removed when the permittee-of-record as of 1978 dies, as was intended by Congress when Congress added Mineral King to the National Park.

Please protect these National Parks.

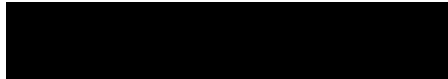
Sincerely,

A handwritten signature in cursive script, appearing to read "James Murphy".

296

To Dr. David Graber, Park GMP Coordinator
and
Susan Spain, NPS GMP Team Leader

From



Re Personal Responses to GMP Draft :
Mineral King environment and
future use of cabins

This is to
Request
that my name
and
address
be with-held
from
public scrutiny

I hope that the GMP is finalized soon and will reflect these hopes:

ABOUT PERMITTED USE OF CABINS
IN THE MINERAL KING HISTORIC DISTRICT

EACH present permittee and his/her family, (the "Class of '78,") under terms of present occupancy, excepting date of eviction, will be allowed:

To stay another 100 years, at least...mebbe 200 !

In the scree of continuing controversies about permits and Park goals, NPS has 26 years of experience managing the Area and dealing with permittees, and has done very well with those tasks. Mineral King is not yet within a designated Wilderness Area, however, and summer occupancy of forty or so cabins, by people who understand and respect the need to protect the valley's environment has had minimal impact on it. And plans and decisions about Mineral King's future are tangled with the contentious, broad-scope, highly politicized discussions at the national level about wilderness designation, access, and level of use outside of Mineral King.

Obviously, the NPS Mineral King planners feel that heat, but disappoint me, because they appear to have stayed within a small box as they managed the planning process, interpreting private use of cabins as violation of the policy which speaks to public use of public lands, so: evict the Class of '78.

Private AND public use of the area and overnight lodging there does not seem to have been considered, (although NPS manages several places with that combination in other parts of the country.) Overnight summer accommodations which are available for public AND private use becomes a legal option, does it not? and gives some satisfaction to each group....even if the arrangement were also put on an eventual phase-out schedule? *Such a position would be attractive to the several different constituencies at this time?* (See "C", below.)

Although "occupancy forever," is an unlikely option at this time, then I suggest three others, also left out of the plan:

THREE OTHER ALTERNATIVES in regard to PERMITS

are attractive to me but are not listed as NPS Draft Plan:

A) Allow present permittees to stay until 2030, with permits renewed until then, even if NPS needs congressional authorization, or directive, to do that.(And perhaps to combine with "C", below?)

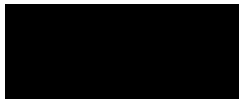
B) Allow present permittees to stay until the time that sellers/owners of the MK Trailhead Parking Area are willing, and do sell it to NPS, and NPS is able to, and does buy it. (In this Option "B," I presume that planning might take another turn.) (Remember to remove the gas tanks under the parking spaces!)

OR

C) Perhaps a reasonable alternative , which might interest many of the different constituencies at this time, would be a motel , to echo the historic buildings and preserve the "village concept," and *satisfy the perceived need for public use?* And, perhaps, through voluntary agreements, such a plan could capture some of present cabins for public use (if volunteered by present owners) to be managed by the vendors who would manage new motel

) ABOUT PUBLIC USE OF CABINS

I am pleased that the area now has historic designation but find the suggestions of public use of all, or most of the present cabins are impractical and absurd. In particular, the plan is disrespectful of the families who have been the best of stewards of the cabins, as well as the area, for nearly 100 years. It is unlikely that a succession of "strangers," (the new cabin occupants,) will understand that kind of stewardship, ("touching the ground lightly".) Unless the terrain and environment of Mineral King is greatly controlled by the NPS with asphalt paths, fences, etc. (which would automatically destroy the "historic village" dimension,) environmental damage to the valley will surely occur if present tenants are all evicted. Protection of natural features of the area is as important a priority to some of us as it was in the '70's.



To: Susan_Spain@nps.gov, David_Graber@nps.gov
cc:
Subject: Comments on SEKI Draft GMP

08/05/2004 10:16 PM
MST

I attended one of the July 20th presentations on the draft GMP for Sequoia and Kings Canyon National Parks. I have a few comments on the draft General Management Plan. I have organized my comments around the alternatives matrix which starts on page 79 and am using the reference numbers in that matrix.

1. Park Education / Interpretative Programs, reference number 17: There should be some specifics about responding to the increase in Hispanic population surrounding the parks. For example, should rangers be bilingual? Should there be more Spanish language materials, such as maps and ranger-led interpretative programs? Do the nearby residents of the area want a different set of services than the visitors from other states and countries? During my visit I saw much more evidence of visitors from Germany than I did of Hispanic visitors, which is surprising given the growth in local Hispanic population and makes me wonder why the parks isn't attracting the local community.

2. Adjoining Lands, reference number 31: With the intent of moving to a 50/50 day use for the parks, I think the GMP should be much more specific about working with the Forest Service in areas where NPS and Forest Service missions overlap, particularly in the coordination of plans for trails and campgrounds. Those who want to hike and camp in the area should be able to get consolidated information on what the campground options are throughout all areas managed federally. Trails should be able to cross park, monument, and forest boundaries without regard to the different organizations responsible for their maintenance. As day use increases in the parks, NPS should work with the Forest Service to publicize their existing campgrounds as options and even encourage the development of more forest service and national monument campgrounds.

3. Outstanding Remarkable Values, reference number 46: This section mentions the existence of remarkable stands of sugar pine. When I stumbled on such stands, I too found them remarkable, and don't understand why the park doesn't highlight them as an attraction, both in and of themselves as well as with respect to their role and relationships to sequoias. I would hope that the GMP could study how to help visitors better appreciate the sugar pine.

4. Trails, reference number 223: Lost Grove is a beautiful part of the park, and I would hope it could be developed and protected as an example of a more natural form of a sequoia grove. The trails there are ill-defined, which means hikers don't know which way to go as they explore the area.

Thank you for the presentation and for the opportunity to comment on the draft GMP. Please include me on any mailing list about the parks and the progress of the GMP.

358

Web comment

This Comment was Created on 09/16/2004

Name: john nelson

Address: p.o. box 37

City: kaweah

State: ca

Zip: 93237

Telephone: 559-561-3696

Email: johnnelson1@charter.net

Comments: Topics 1 and 2 are where my comments will be concerned. Colony Mill Road/Trail. Should be opened up Bikes as an alternative for access of non motorized vehicles to enter the park. The trail is hardly used by anyone at all right now and bikers are very unsafe trying to negotiate the Generals Highway. Many people bring bikes to the park and are very disappointed when they find no where they can feel safe to ride. The stock users have almost unlimited access to park trails and do significantly more damage to trails than do bikes. Mineral King-Winter Access. Opening the Mineral King area in the winter to visitors would be taking advantage of a valuable resource with no adverse impact. No plowing needed but use the existing sno cat to ferry skiers from roads end up through Silver City and out to the Valley floor. A schedule of ride times with a shuttle charge could offset the expense. Cabin leasers would also take advantage of this service. Coincides with the development of the shuttle service that is being implemented within the Giant Forest to Lodgepole. The Pear Lake Ski Hut is a very popular program and many people are being turned away now because of its limited capacity, opening up the Mineral King area for winter recreation could lead to some sort of lodging to begin in that area. I do realize that my comments affect only a tiny percentage of the visitors who utilize the park each year. But they are visitors who are exceptionally passionate about remote places and love to experience them. They are also repeat visitors who will return to the park for these spectacular opportunities again. Thank you for accepting my comments. John Nelson

61



"Brian or Judy
Newton"
<xchiker@lightspeed.net>

To: <susan_spain@nps.gov>, <david_graber@nps.gov>
cc:

Subject: Possibly Spam: GMP comments

10/01/2004 11:51 PM
MST

Dear Susan and Dave,

Regarding the SEKI NP GMP:

I think the Mineral King cabin owners should not have their lease permit extended. They agreed to the initial arrangement of having the cabins for the life of the owner and now that those owners are aging, they want to renege on the deal so they can pass their cabins on to their heirs.

I do not think all the cabins in the MK valley should be razed but I also think the NPS does not have the resources (money, time, or manpower) to properly manage these cabins with the required upkeep.

Therefore I believe an acceptable compromise would be to allow the present owners to be the caretakers and occasional users of the cabins with ownership turned over to the NPS. Since a major concern is that an exclusive minority has access to part of a magnificent national park valley that the public does not, I suggest the cabins be opened to public use. The particular details and arrangements would be negotiated. The risks would not be very different from how the public is now using the cabins in Yosemite, Grant Grove, or the former cabins in Giant Forest.

If my experiences in MK are a factor in what is decided I will tell you that I have taken dozens of day hikes, 5-10 backpack trips, and camped at Cold Springs and Atwell Mill repeatedly. I have climbed Sawtooth Pk 6x, Hengst 4x and all of the other 10 peaks that form the MK rim 1-3x each. I have also skied there twice, once from the gate at mile 18 to the top of Timber Gap and back in one day.

I would like to give one other comment about the plan. Since the park should be open to the public, I think it is wrong that the road be locked 7 miles before the valley floor in the winter, yet cabin owners are given the key (or combination) to pass freely.

Thank you and best wishes.

Sincerely, Brian Newton

312

September 30, 2004

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

Dear Dr. Graber:

Regarding the "Preferred Plan" for the future of Mineral King, I would like to offer a reasonable and inexpensive alternative to taking the privately owned cabins in the valley.

It has been stated that the cabins are needed for rental to other park visitors who would like to have a "cabin experience". In many of the parks in Oregon and Washington states, the parks have added, in addition to their camping facilities, "Yurts". Yurts are pre-manufactured housekeeping facilities with wooden floors and doors, beds, cooking and heating equipment that are similar in nature, but far superior to the wooden platform tent cabins that are found in many of our National parks. One of the nearest examples that I am aware of is located in Bullard's Beach State Park on Highway 101 in Bandon Oregon. The Yurts are very popular with non tent camping visitors there are several that are set up for individual family use and others for large or median groups use and activities. I feel that these types of structures or the traditional tent platform that I have seen in many of our National parks would be safer and better for use by people who are not familiar with the differences between a "cabin" and a home.

Silver City has rental cabins very nearly and I understand that they often are utilized to full occupancy. Mineral King has basically a short occupancy season with the road conditions and altitudes and long winter and early spring cold making it not suitable for use for more than 6 months of each year.

The privately owned cabins are each unique with delicate fixtures, such as; gas lights, and refrigerator that are easily damaged. They are old and require frequent and expensive maintenance and repairs to keep them useable. It should be much more for the park to continue to collect rent from the cabin owners and allow Tulare County to collect taxes. Let the owners remain responsible for the expense of maintenance as well as continue to contribute to the visitor experience, as in the past. Cabin owners could continue to lead nature walks and historical programs, man the ranger station, issue permits, and continue as strong volunteers in the park program. We are anxious to help with making visitors experience pleasant.

Our cabins and most of us have been here for much longer than the park has and we offer a wealth of knowledge and experience that we are more than willing to share. For years before the park took over, we were involved in search and rescue missions, fire control, Natural History interpretation, and a myriad of other activities.

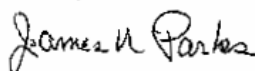
-2-

When the park took over ownership of Mineral King, I spent the better part of a day with William Tweed and led him to the area that was ideal for the Park Developed Cold Springs Walk in campsites. I also showed him another site that could be very easily developed into the suggested tent platform or Yurt rental site for additional visit or housing. There is already an access road that leads to the repeater station.

Just to the east of this repeater is an area that could easily be developed. Gentle slopes, deep granite soil, a white fir forested area, and very close to an easily available water source. Due to the location, it would have no visual impact and minimal biological impact.

It is within easy hiking distance to the entire Mineral King area. I will be very happy to lead any individual or team to this area and as a cabin owner, and would also be happy to help with development there.

Sincerely,



James N. Parks

2060 Short Drive
Stanford CA 93230

cc: Superintendent Dick Martin
Senator Diane Feinstein
Congressman Calvin Dooley
Congressman George Radanovich
Congressman Devin Nunes
Congressman Richard Pombo
Congressman Dennis Cardoza

71

As an aerospace engineer during the race to the moon, the many many rejuvenating weekends and vacations I spent at Mineral King with family and friends back packing around MK/ Sequoia National Park always fulfilled needs for Shangri-La like recoveries to return to projects completely refreshed.

Just watching Sputnik passing over MK showed the challenges we overcame. In the years packed to the hilt with time spent becoming friends with the historic old cabins at MK and Silver City, it seemed we captured and blended in with our heritages along with the local summer inhabitants plus hordes of campers/hikers/backpackers like my family and me.

We triggered the "Save Mineral King" from the attempted assaults of corporate planners to place the area into over built, over managed, over crowded, over polluted atmosphere, over artificial arenas as with far too many of our national parks. Just imagine a Knotts' Berry Farm or Disneyland like developments with needs for paid docents demonstrating our heritages when MK already has a century and more already there without turning the place into something like Yosemite. The old cabin holders ever remain as most delightful co-lovers for MK.

The delightful twenty-seven mile road zig zagging up to MK fortunately restricts traffic and despoilers. G. Peters , PE(IE) retired back to my Chicagoland roots with a heartfelt of MK ever present.

63

I am Edward F. Peterson and I am a partner in Cabin 16 of East Mineral King. I feel that the Park would not be able to maintain the cabins due to the financial requirements of maintaining an old historic cabin as most of these cabins are. Also, the cabins are fragile and would not take the use of persons who did not know or really care about them. Therefore rental to visitors would be out of the question. We have a good working arrangement with the NPS and would be able to work with the Park to maintain and show these cabins to the public as a partnership. Mineral King is an historic place and deserves to be preserved and maintained. The presence of the cabins has assured visitors of care in emergencies that the Park would not have been able to provide. I took a young boy off the trail one time with a collapsed lung and was able to care for him till his parents came to get him. With oxygen in the cabin at all times I have been able to help heart victims, and I have lost count of the stitches I have placed in small wounds. We Have been able to care for hikers who were wet, tired, and hungry, and have even cared for and fed some visitors over night. I have not mentioned the fractures that have been treated by myself or guests in our cabin. My brother-in-law, a Medical Doctor, who has been a frequent visitor has been of valuable assistance in several occasions.

In conclusion I would like to see a working arrangement with the National Park Service whereby the cabin owners would remain and would care for the cabins in accordance with the requirements of the Park in the maintenance of these historic treasures.

87

Dear Mr. Graber, I am writing to you to voice my opposition to the pro-commercial, anti-environment Draft GMP. I believe the NPS must include a 'no grazing' alternative. Many other national parks require stock users to carry feed for their animals which would minimize the impact on meadows, wetlands, and lakeshores. All alternatives of the GMP should retain the language from the 1971 Master Plan to phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. The commercial horse/mule pack stations based within SEKI should be removed as well as the commercial camp at Bearpaw. No new backcountry camps should be built. The private cabins at Mineral King should be removed when the permittee-of-record dies, as was intended by congress when it added Mineral King to the national park. Please protect our environment so that generations to come may enjoy the beauty. Sincerely, Barbara Sholle 4166 Clark Ave Long Beach, CA 90808

79.

09/10/04

TO: NPS GMP Team, SEKI

FR: Greg and Laurie Schwaller, Three Rivers

RE: Comments on the SEKI Draft GMP

Parkwide

While we strongly favor many aspects of Alternative C (Preserve Traditional Character and Retain the Feel of Yesteryear; Guide Growth), we understand that broad-based public support of the National Parks is important to their survival and funding, and it appears that actively promoting and increasing such support through stronger educational and outreach programs underlies the actions and advantages of the Preferred Alternative; thus, we support the Preferred Alternative (especially because it is the environmentally preferred alternative), with the provisos that, truly, resource integrity must be paramount, as without the resource there is no point to the park, and that sustainable growth and development to meet the needs of diverse user groups must be carried out only while bearing always in mind that the parks cannot and should not be all things to all people. Indeed, perhaps the greatest value and greatest good of the parks is that they are so increasingly and irreplaceably different from what we have made of most of the rest of the planet, to the great detriment of the future of most life forms upon it.

Therefore, efforts to meet the needs of diverse user groups should be made on the parks' terms, directed at enabling users to be aware of and to wish to enjoy the limitless opportunities which the parks offer them to experience physical, mental, emotional, and spiritual engagement, uplift, and growth. In this profound sense, parks do have a great deal to offer every visitor, and the offer is repeated with every visit, as long as we don't think we can do a better job of this than the parks themselves can. Our efforts should lead the visitor, by a path inviting to that visitor, to the resource itself; and the resource should speak for itself, if we have prepared that visitor to listen, hear, and grow in understanding and appreciation.

Also, the outreach and educational activities and messages must convey the critical importance of the parks as irreplaceable, literally invaluable sources of the good life; even if you never physically visit the parks, much of the quality of your life depends on them: as watersheds, airsheds, viewsheds, soil banks, wildlife habitat, open space, as wellsprings, benchmarks, beacons, retreats, preserves, symbols, sources, sanctuaries, safety valves, laboratories, museums, teachers, measures, roots, reminders, and as all we have left of our true, original home, before we started with the home "improvements."

When we talk about appealing to diverse user groups, are we talking about categories such as age, sex, education, cultural background, physical ability, and language preference? Certainly we can present the parks so that anyone in any of these categories who is interested in beauty, science, animals, exercise, adventure, scenery, discovery, family fun, their own self-interest (learn how these trees clean your air, how these mountains provide your water, etc.), history, archeology, etc. can see their attraction; but it is important not to over-package, or trivialize the introduction to the point that the visitor or potential visitor loses the joy of his/her own unique contact with and connection to the giant sequoias and the other marvelous features and inhabitants of these parks.


We strongly agree that basic, natural, and rustic are key criteria in the parks' built environment, which should be as harmonious as possible with its setting, while at the same time showing visitors that sustainable structures can be beautiful, functional, and appropriate in any setting. Displays should explain the

energy-efficient, "green" features of the buildings (solar power, natural heating and cooling, native plants only for landscaping, etc.), giving visitors ideas they can use at home.


Many park visitors want to see the world's biggest tree, grab a snack and a souvenir, and get back to the freeway. Others want to be properly introduced to these noble trees and to make their acquaintance in peace and solitude. Some visitors are here for the physical challenge – hard and fast hikers and climbers. Some are here to travel the backroads. And some are here to escape from the valley or the city, to be in a cool, green place where water flows free, trees grow, the sky still looks blue, and a deer could walk right past your picnic table.

If only these people could leave their cars in a hidden parking structure and take an educational shuttle ride to the area in the parks best suited to their desires and abilities.

Most visitors have less than a day to spend in these parks. Therefore, regardless of their interests and abilities, time alone will restrict them to a main road and just a few stops. However, many of these visitors are Californians, and a positive experience in the parks will incline them to return and sample more. California's constantly growing population provides an ever-expanding pool of potential visitors. How do we help this population to become aware of, enjoy, care about, and protect their parks without loving the parks to death, through ignorance, carelessness, or sheer numbers?

To enable enjoyment and understanding on a brief visit, we need to focus on who our visitors are, what they're looking for, what infrastructure (human and otherwise) needs to be provided to help them find it, and how we can quickly enhance their understanding and appreciation of the resource. For most people, this means human contact. But we don't want an endless line of polluting vehicles inching their way toward an entrance kiosk where one or two harried attendants are trying to answer all these questions. So we need an  take structure, potentially an automated one: you pull up, pay your entrance fee, and receive with your pass written directions and an automated voice message telling you where to go to get parking, detailed information, and a free (or low-cost) ride into the parks.

If you don't require information, and you want to drive yourself, you drive on. If you need information, or you would like someone to do the driving for you or you're driving a vehicle too big to go up the switchbacks after Hospital Rock, you come quickly to a visitor center with a LOT of parking, where you can get orientation, direction, information, food, a movie, and public transportation to your in-park destination. You can walk some foothill trails and access the river directly from here, and you can picnic here also. Zion National Park is a good model of this. Ash Mountain might be converted to such a center. Or it might better be even closer to Three Rivers (maybe where the Edison plant is, by the park entrance?) to reduce vehicle traffic into the parks and to make it easy for those staying in Three Rivers to hop a shuttle that circulates through the town and takes employees and visitors to the orientation/administration area (this also happens at Zion and its gateway town). Another shuttle would loop to Visalia. The shuttles are quiet, fuel-efficient, all-weather vehicles. They are only about the size of airport shuttles, so they can easily navigate the worst of Generals Highway and Moro Rock and Crystal Cave roads. Relatively small, they fill up and unload quickly, so their turnaround times are quick and they can be flexibly scheduled.

At this main center, information is available in many languages, and there is sufficient staff (Rangers, SNHA, volunteers) to guide and inform a highly diverse visitor population. Those focused on General Sherman are directed to the express shuttle that stops only at the Giant Forest Museum and at General Sherman. Those touring Crystal Cave board the Cave Shuttle. Those staying at Wuksachi take the Lodge  shuttle. On all shuttles, the driver or a recorded speech provides the passengers with an introduction to park resources, activities, and values. Shuttle drivers are knowledgeable and can answer many of the passengers'

questions. All shuttles have easy-access storage compartments so that passengers can stow picnic gear, luggage, and backpacks. Most shuttles have a bike rack at the rear.

to meet the needs of diverse user groups, short, easy, paved, educational loop trails accommodate the very young, the old, the infirm, and anyone who appreciates an easy, convenient way to see and enjoy the various park environments. The Round Meadow Trail is an excellent example of this approach. Most park shuttles stop at all of these trailheads, enabling visitors to come back on many different days to experience each time a new doorway or window into the parks. Interpreters staff each of these environments, to answer questions, assure safety of the resource and the visitors, and provide educational experiences.

Moving park administrative facilities outside the parks may not be desirable because it would separate administrators from regular in-person contact with the majority of park employees and would put administrators "off-site," away from the parks they serve and protect. Too often decision-makers seem too distant, in every way, from the resources, human and otherwise, they're supposed to be serving. Also, a large area in the park has already been "developed" for this administrative purpose; buying and developing land outside the park would be expensive. Wouldn't it be better to modify the existing structures to enhance sustainability energy efficiency (which would also serve as a good example for visitors), and shuttle the employees to work (using public transportation being another good example)?

Backcountry

Keep the wilderness as big as possible and as wild as possible. Any additional facilities in the non-wilderness backcountry should be carefully designed to blend into their surroundings so that the backcountry doesn't start looking like the front country. Such facilities should be accessible only by non-motorized means (except maybe emergency helicopters), should be self-sufficient in terms of power and water, and should use the best composting technology to avoid concentration and build-up of human waste. Such a facility could be a great demonstration project and learning station.

Wuksachi

It would be nice to have a picnic area at Wuksachi, near the trailhead. This would be a quiet area, secluded from Generals Highway.

Cedar Grove and Floor of Kings Canyon

How can you include more spring and fall time in Kings Canyon without having to plow that road? Can you afford to plow that road? We'd love to see the Canyon in the winter, but we also love the thought that it gets to rest from human activity for a period of each year. Most of the rest of the easily-accessible park is protected in winter by snow, but not the Canyon floor. We are strongly opposed to Kings Canyon becoming as developed as Grant Grove and Giant Forest. Fortunately, there are many easy trails that can lead one quickly away from crowds and into wonderful groves of Big Trees, but the floor of Kings Canyon is so restricted and the walls are so steep that it's easy to feel crowded. We need a "quiet Yosemite." Please minimize any additional development in Kings Canyon.

Wolverton

Wolverton is the best spot near Giant Forest to locate winter recreation because its slopes are good for snow, miniature downhill skiing, and sledding, and it already has a good building to serve as a warming hut and snack bar. The meadow is a fine place for cross-country skiing and snowshoeing, and it's not visible

from Generals Highway. There should be a winter Snow Shuttle from Visalia and Three Rivers to Wolverton, stopping at Giant Forest Museum also. This would reduce pollution and road blockages. Too many visitors have trouble putting on chains and driving on snow.

Giant Forest

We definitely agree with the plan for peak time road closures and shuttle access. The remodeled Round Meadow Trail is excellent. We are expecting equally good results at Hazelwood, but hope it can continue to be a less-traveled path.

Please keep a few parking areas in winter at Hazelwood and also by the Giant Forest Museum so that cross-country skiers can access those areas without having to cross the highway carrying their gear.

Crystal Cave

It would be good to have shuttle service to Crystal Cave. This would reduce pollution, might deter vandalism, and would allow the visitors who come in motorhomes to get to the cave.

Ash Mountain/Foothills

It would be good to have more foothills trails for fall-spring use. A great one would run along the river (on the non-highway side) from Ash Mountain to the Potwisha area; access to Potwisha would be via the suspension bridge (another suspension bridge would have to be built below Ash Mountain). This trail would be small and not open to stock. The trail would continue up to the Buckeye area, crossing the river on the existing bridge above Buckeye. The road to Buckeye (or to just above the campground) should be kept open year-round to facilitate hiker access to the Middle Fork trail also. A little bridge crossing the creek at the beginning would be very helpful in good rain years.

Mineral King

We agree that the permit cabins should be used for public purposes (and NOT for private purposes). They could house a small historical and natural history museum, trail and environmental displays, and marmot information; they could provide a contact point for interpretive staff, a weather shelter for hikers, a shuttle stop shelter, or rustic lodging. They could also become models of how to remodel/rehabilitate existing structures using green materials for sustainable use. One could remain as an open, working exhibit, with displays and literature available. Probably not all the cabins would be needed at Mineral King; perhaps only the farthest up ones should be preserved there, as they are the least conspicuous and are not in the fragile meadow area. The rest might be moved to be used at other areas in the park, as shelters for hikers and shuttle riders, information areas, and contact points for interpretive personnel (along the lines of the little ranger station at Roads End in Kings Canyon). We are definitely opposed to leaving the permit cabins in private hands on public land; anyone interested in seeing a private historical recreation community in a national park can do so at Cabin Cove, Silver City, Faculty Flat, and Wilsonia. A daily shuttle to Mineral King (up in the morning, down in the evening, or two round-trips per day) could reduce pollution and wear and tear on that road (especially if there's going to be a High Sierra camp at Hockett). But where would shuttle-users park their cars?

Dillonwood

Could Dillonwood have a campground? It's a long drive for day-use only. Perhaps a Mineral King cabin

could be moved to Dillonwood to house interpretive/campground host personnel.

Mitigation for Increased Water Withdrawals

Wastewater should be cleaned (filtered) and recycled for irrigation use if possible. Could solar-powered composting toilets be used? Water should not be served at dining facilities unless requested. In lodgings, bed linens and towels should not be washed daily during a visitor's stay, but only at the end of the stay. Water table levels must be carefully and regularly monitored.

Impacts on Backcountry and Wilderness

Keep as much of it as wild as possible. Let it alone as much as possible. Let nature manage the resource. If a High Sierra camp is added at Hockett, where would the access points be? Where would the trailhead parking be? Would the Mineral King road be improved to accommodate more traffic? Would there be a shuttle to the trailhead(s)? What about having the High Sierra camp up the Pear Lake Trail? There's lots of parking area at Wolverton already.

What are the "adverse permanent impacts" of removing the hydro facilities in the park? Loss of electricity?

Thanks for listening.

371

August 2004

Response to D18 (DSC-P) SEKI 286

*Draft General Management Plan and Comprehensive River Management Plan
/Environmental Impact Statement for Sequoia and Kings Canyon National Parks and Middle and
South Forks of the Kings River and North Fork of the Kern River.*

NOTE on these comments: statements in italics are direct quotations from the Draft General Management Plan, all other comments are my personal opinions. If no objection is stated to the Draft quotation it indicates support for that alternative.

Topic 4. Comment on Alternatives or analysis related to Transportation, Visitor Experience.

Visitor Experience: Impacts of the Preferred Alternative

BACKCOUNTRY ACCESS: (Vol. 2, pg. 56) *While the backcountry still comprises about 97 % of the land in the parks, backcountry use accounts for only 2%-3% of the visitation.*

My father before us and our extended family have had the privilege of spending considerable time in the backcountry of the parks. My son and nephews have worked as pack trip guides out of Mineral King and my son was a east side back country seasonal ranger. We all treasure our experiences in the back country which have been a significant influence on our lives and we would hope these experiences might be available to more people. On hearing of these trips, many people have expressed their desire to participate but have been reluctant to do so because they lack the expertise and experience to undertake them on their own.

We have observed, and the NPS knows better than anyone else, that many of the people going into the back country are ill prepared for the experience and we would like to make a suggestion that might 1) allow more people to safely access the back country and 2) to enjoy and appreciate the experience they have there. We would like to see the NPS facilitate and promote GUIDED backcountry back packing trips. Perhaps some services of this kind are presently available but should be encouraged and expanded. These guides would be private concessionaires operating under NPS supervision and direction. Experienced guides would lead a small group of back packers who would have been previously informed as to appropriate equipment, the route, terrain and altitude and would spend a day of education, orientation and acclimatization at the trail head before heading out into the backcountry.

This kind of trip would help to implement the emphasis placed on the backcountry usage in the Preferred Alternative and enhance the *Impact of the Preferred Alternative* (Analysis, Vol 2, Pgs. 190 and 191) *Under the proposed alternative visitor education would focus on resource protection, stewardship, and leave-no-trace backcountry skills, potentially making more visitors aware of wilderness designation and wilderness values. These wilderness recreational opportunities and values are highly valued by park visitors. Opportunities for recreation in protected wilderness, along with opportunities to experience areas of solitude by participating in primitive or unconfined recreation, would expand, resulting in minor, beneficial, long term impacts because more visitors would be aware of wilderness characteristics, values, and recreational opportunities.* Guided backcountry back packing trips would contribute to these goals, would result in additional protection for the natural resource, would result in enhances visitor experiences, would safely provide access to Secondary trails and cross country areas which are presently underused, would relieve the NPS of distress and rescue calls and allow many people who would otherwise be discouraged from entering the backcountry to safely enjoy it. The NPS would have a role in the training and education of the guides. With appropriate marketing these trips would be financially viable and attract qualified persons to the program. They have been successful in Europe and elsewhere.

Page 2

AIRTOURS(Vol.2, Pgs. 260, 265, 273, 280) Fixed wing airtours should be encouraged and managed in accordance with the National Parks Airtour Management Act of 2000 These tours would provide a non invasive means for people who would not otherwise be able to at least SEE the 96% of the Park which is wilderness. Fixed wing aircraft would be minimally disturbing to recreationist on the ground in the backcountry since they would be flying at some elevation above the terrain and most people are accustomed to fixed wing aircraft flying over head. Recreational helicopter flights should be discouraged since they are extremely invasive, noisy and disturbing. NPS helicopter flights should be kept to a minimum.

STOCK USE_(Vol.2, Pgs. 273, 274 etc.) *Opportunities for Stock use. Under the preferred alternative, horses and other stock use would continue with reasonable regulation and enhanced monitoring.* Stock use provides traditional opportunities to enjoy the Park and should be encouraged and expanded. As the population ages, stock use provides the only means of access to the back country for a large portion of the population including those with disabilities.

STABLES, CORRALS, PACKSTATIONS *would continue providing day and overnight trips* Since pack stations are usually financially marginal the NPS should provide some support for these facilities by providing infrastructures, i.e. access roads, corrals, buildings, to ensure the continuing existence of these important and desired facilities to serve the public. The Wolverton pack station should be relocated and operative as soon as possible. The NPS restrictions on stock use have contributed to the financial instability of these concessionaires and to reduced stock usage in the back country and should be relaxed in areas where stock use has been found to be not detrimental.

Topic 5. *Comment on alternatives or analysis related to Private Lands inside the parks (primarily Wilsonia, Oriole Lake, Silver City)*

. Oriole Lake: Acquire the Oriole Lake inholdings from willing sellers and provide public access to *this uncommon, foothill lake environment.* (Vol.1, pg. 38) The terrain lends itself to some campground facilities and parking. If drive in access is not feasible then hiking in would be available. This would provide additional accessible frontcountry experiences for visitors who are unable to handle the more rugged backcountry, would help to relieve over crowding in other frontcountry areas, would be easy for the NPS to maintain and could be managed to have minimal environmental impact on the area and is not visible from the Mineral King road. It is not wilderness and should not be included in the wilderness area.

Silver City: *"Private inholdings continue thereby perpetuating recreation communities."* (Vol.1 pgs. 38, 60, 86, 152, etc.) Individual properties within the subdivision at Silver City should not be acquired by donation or purchase by the NPS since this would result in a mixed matrix of public and private holdings deemed undesirable by the NPS and the community. Individual properties in Silver City should be freely exchanged in the private sector.

Develop a partnership with the Silver City resort to provide expanded services within the scenic easement constraints; inholdings and services remain. Such a partnership should enhance and not limit the financial viability of the resort and thus insure its' continuing presence to serve the public.

Page 3

Kaweah Han: (Vol. 1, pgs. 38, 108, 152) Continue private ownership for personal use. Develop a scenic easement if agreeable to private owner.

Wilsonia: (Vol. 1 pgs. 38, 86, 120,) *Private inholdings continue at Wilsonia...thereby perpetuating recreation communities. Preserve or adaptively reuse NPS buildings contributing to the historic status.* Water supply and sewage disposal concerns should be addressed by both the private sector and the NPS.

Topic 6: Special Use Permits on Park Service Lands (Hydroelectric facilities, Boy Scout Camp, and Mineral King Special Use Permit Cabins)

Hydroelectric facilities: (Vol. 2, pgs. 179, 301, 302). In addition to the loss of power generated, the reduction of pertinent water supplies and the loss of historic structures, the proposed removal of the dams at Lady Franklin, Monarch, Crystal and Eagle Lakes above Mineral King could have a devastating effect on the fisheries in these lakes and the East fork of the Kaweah river all the way to its' confluence with the main fork above Three Rivers. Wildlife of all kinds would be adversely affected throughout the area. Without the control of the dams, in dry years the water levels in the lakes could be reduced to pools unable to sustain fish life and the streams might dry up completely. This would destroy a valuable and heavily used recreational asset not only for fishermen but for hikers and campers as well. Perhaps a free flowing river is not always as desirable as a controlled one? Under present controlled conditions, the fishery in Mineral King is the best it has ever been. The loss of these recreational features would severely limit access to readily accessible day and overnight high country experiences by those who are unable to handle the more rugged backcountry multi day trips and would put additional pressure on other frontcountry areas.

If the dams are to be removed, mitigation provisions must be implemented during the destruction of the dams and there after to insure an adequate year round flow in the East Fork and its' tributaries as well as maintaining minimum pools in the lakes to sustain a healthy and viable fishery. The loss of this valuable asset would be an environmental disaster with far reaching and unintended consequences.

The introduction of House of Representatives bill #3932 which would provide for the issuance of two more 10 year permits for continued use of the hydroelectric facilities in the park under certain conditions and the unanimous do pass recommendation of the Resources Committee to the full House provides needed protection for these facilities. Since the testimony of Donald W. Murphy, Deputy Director of the NPS before the Subcommittee on National Parks, etc, House Committee on Resources on April 29, 2004 stated that "The Department has no objection to enactment of H.R. 3932 if amended in accordance with this testimony" which was done, the passage of the bill before the full House is virtually assured, the dams will remain and the fisheries will be preserved for the time being. A wise and sensible development for which the NPS is to be commended.

Mineral King Special Use Permit Cabins: (Alternative C: (Vol.1, pgs. 71, 155, etc) *"Preserve Traditional Character and Retain the Feel of Yesteryear: Guide Growth"* is the preferred option in regard to the Mineral King cabins with some modifications.

Congress enacts legislation to continue to reissue current use permits to families/heirs of the present permittees. The NPS should withdraw its' objections to the adoption of "House of Representatives 4508 to amend the National Parks and Recreation Act of 1978 to require the

Page 4

Secretary to permit continued use and occupancy of certain privately owned cabins in the Mineral King Valley in Sequoia National Park" for reasons given below.

Continue to use the Memorandum of Understanding between the NPS and the Mineral King Preservation Society to protect and manage the contributing elements of the Historic District including implementation of informational and educational programs, guided tours, resource management, information sharing, research efforts and volunteer activities. A joint committee consisting of representatives of the Preservation Society, the NPS and the State Historic Preservation Office would be established to provide liaison between all responsible parties, provide resource information to permittees and assure compliance with historical standards.

All cabins would be brought up to and maintained to standards for historical compliance as defined in the "Guide to Repair and Maintenance of Historic Summer Homes within the Mineral King Historic District". by the permittees. Non contributing cabins would be given the opportunity to become contributing if desired and physically possible

Emphasize the theme of an historical recreation community in Sequoia National Park

ADVANTAGES OF THIS ALTERNATIVE: This is the most viable plan to meet the NPS obligation for the preservation of the contributing elements of the Historic District and for interpreting its' significance to the public. The NPS does not have the funds, the personnel nor the historical knowledge to preserve these elements for future generations. The cabin owners are the only ones who have the means, the knowledge, the incentive and the demonstrated ability to maintain the cabins and assist with the preservation of other contributing elements. They have never been a detriment to public use of the area and have not required supervision or assistance; on the contrary, they have been the continuing caretakers and preservers of this historical area. The NPS is well aware of the many other advantages of this alternative which have been demonstrated over the years. The NPS should take advantage of this unique opportunity for assistance in the maintenance of this Historic District and for enhancing its' significance to the public by permitting continued occupancy of the cabins by the present permittees and their families.

RESPONSE TO NPS PREFERRED ALTERNATIVE: *"Accommodate Sustainable Growth and Visitor Enjoyment, Protect Ecosystem Diversity, and Preserve Basic Character While Adapting to Changing User Groups."* (Vol. 1, Pgs. iii, ix, 68, 148, 154, 156, 200 etc.) as it relates to Mineral King special use permit cabins.

Vol. 1, pg. ix: *As special use permits expire, permit cabins are acquired and adaptively reused for public purposes. (The NPS would partner with a nonprofit or commercial service organization to provide public lodging or other public use. A plan would be developed for public use, including limited use by former permittees. The plan would address treatment methods to preserve the Mineral King Historic District, sustainable use, code compliance, needed utilities, self-sustaining funding, maintenance and potential hazardous materials mitigation. etc.*

While providing for reissuing of current special use permits in five year increments, the Preferred Alternative does not provide for continuing issuance of permits to heirs/families beyond death of present permittee. See above.

Gives permittees the option of donating cabins in sound condition to the NPS if ownership is no longer desired.

"Develop a cultural resource preservation plan for the Mineral King Historical District in consultation with the state historic preservation officer." The cabin owners should be an equal partner in the formation and implementation of such a plan.

Page 5

Preferred Alternative: (Reference # 372, Vol.1, pg. 154 (bottom of column) and pg.156.)
*Analyze **IE** operating acquired permit cabins as public lodging would be economically feasible. If feasible, examine various operational approaches (e.g. operation by a partnership, a non profit entity or a commercial service provider)."* Subject to NPS review and approval the operator would be responsible for "ensuring that required infrastructure improvements were made to meet applicable health, safety and environmental standards to accommodate long term public use"

This is a very big **IE**.

The proposed plan to acquire permit cabins (assuming at the end of the present permits) and adopt them for public use, including lodging, and to have them managed by an external operator of any kind who would have sole responsibility for making infrastructure improvements and long term maintenance of the cabins poses many problems.

A. **Financial concerns:** It would be extremely difficult to obtain an operator who would take the responsibility for bringing the structures up to "applicable health, safety and environmental standards" at its' own expense. The cost of updating these aging structures and their infrastructures would be immense and no operator would perceive a way to earn a return on the capital investment. The NPS is well aware of the difficulty of obtaining qualified permittees/lessees/concessionaires and Mineral King would be a particularly challenging area. No financial feasibility or marketing studies have been done and the return on such an investment is limited by the following factors:

The very short operating season of 90 days. Winter operation would be virtually impossible.

The NPS requirement that the project be financially self sustaining.

The cabins would become available incrementally over a long period of time. The few cabins initially available would require an onsite staff to provide services and maintenance the cost of which would exceed the income generated. Some cabins will be found unfit for public occupancy particularly lodging. It could be many years before enough cabins are available to provide a profit on the annual operation.

While cabins would be acquired in "sound condition", the permittee's families would no doubt want to remove treasured furnishings and accessories and so an operator would have to furnish the cabins for public use at considerable expense.

The annual cost of maintenance of the individual cabins to historic and public safety standards would be very large. All of these cabins are old and, due in part to the extreme winter conditions, require considerable annual maintenance. Each of these cabins has it's own idiosyncratic problems which would require considerable research and experience on the part of a new operator. These cabins will continue to deteriorate over time requiring increasing levels of maintenance. (Vol.2, pg. 202:) *Historic structures could suffer wear and tear from increased visitation, but the carrying capacity of historic structures would be monitored, and visitation levels or constraints could be imposed that would contribute to the integrity of the resources without unduly hindering interpretation for visitors. Unstaffed or minimally staffed structures could be more susceptible to vandalism.* Limiting the occupancy of the cabins to maintain their historic integrity would reduce their availability for rental revenue.

Required mitigation of hazardous materials could prove to be expensive.

The Mineral King road itself is a limiting factor because of its' length and configuration. It is discouraging and dangerous for many Park visitors. In order for this project to be economically feasible, the occupancy of the cabins by the public would have to be markedly increased over the present light usage by the permittees which would result in increased inexperienced traffic on the road.

Page 6

The cost of liability insurance, if obtainable, would be extremely high but no operator would take the personal responsibility of opening the cabins for public use without it. Fire and structural damage insurance if required and available would be very expensive..

It is unknown how many potential visitors are actually interested in staying in an old cabin with no electricity or other conveniences. Most of the public is used to and expects the usual lodging amenities and while there are some interested in a "rustic" experience their number is limited and will be decreasing as the older generation passes on. The problem of handicapped access would have to be addressed; any solution would add to the expense.

Initially some of the available cabins would have to be committed to personnel housing, storage and maintenance facilities, etc. which would limit the number of cabins available for rental to the public thus reducing income. (Vol. 2. pg. 77 *Mineral King is not considered within a reasonable commute distance due to the terrain and road conditions.*)

In order to make the project financially feasible, rental charges for the use of the cabins would have to be extraordinarily high compared to comparable facilities thus limiting the potential market and denying access to lower income citizens.

B. Management concerns:

The cabins are scattered over a large area making daily services difficult. A central service and supply area would have to be established and transportation provided for workers to service the cabins. Potential guests would have to be personally escorted to their rented cabin since the access roads are unnamed, poorly maintained and unlit. Access after dark would be hazardous.

Each of the cabins has its' own particular idiosyncrasies. None have electricity and each new public occupant would have to be instructed in the use of the fireplace, the wood or propane stove, candles, the propane lights or lanterns, the hot water heater, the propane refrigerator, the water and sewage systems, the fire extinguishers, etc. all of which are potential hazards to inexperienced guests. A maintenance person would have to be available 24/7 to ensure the on going operation and safety of these facilities and the guests. Careful instruction should be given to appropriate responses to contact with wild animals. With no telephones, a contact arrangement with management would have to be provided for guests.

Even though the cabins might be brought up to "health, safety and environmental" standards, many of them have dark interiors, rough and uneven floors, steep stairs and unusual interior configurations. These potential hazards must be revealed to each new tenant and are a continuing concern for any operator.

Education of guests and continuing surveillance would be necessary to insure that all nuisances are abated, noise and light constraints and pet regulations are adhered to so that some guests do not interfere with enjoyment of other guests and the public

Information should be provided about the history and significance of the Historic District to enhance the guests enjoyment of the area.

All of the above concerns are time consuming for the operator, require an unusual amount of staff time and therefore add to the cost of operation of the facilities.

C. Environmental concerns. As has been stated, in order to make the public use of acquired permit cabins economically feasible, occupancy would have to be a substantially increased over the present permittee usage. This would cause increased demands on the water supply, (Vol.1, pgs. 73, 88) adversely impact sewage disposal systems, increase traffic on the road, contribute to

Page 7

overcrowding of the parking facilities, increase use of trails, riverside and meadow off trail tramping, increase demand for public and emergency services, including trash disposal and fire protection and adversely affect the peaceful alpine atmosphere people come to Mineral King to enjoy.

The acquisition of permit cabins over time would result in the mixing of public and private uses which has been termed undesirable by the NPS, poses management problems for the operator and is unacceptable to the private sector. Permittees who still occupy their cabins are not going to be motivated to be of much assistance to the management and operation of the Historic District if they feel their efforts are going to profits of a private operator instead of contributing to the public enjoyment and historical preservation of the area.

CONCLUSION AND QUESTIONS: In my view, the Preferred Alternative is economically and managerially unfeasible for the reasons given above and many other considerations I do not believe the NPS will be able to attract an operator/partner of any kind given the conditions stated. If no operator can be obtained or if an operator fails, how will the NPS discharge it's responsibility for the preservation of the Historic District and its' contributing elements? The care taker permittees will disappear over time and the NPS will have the sole responsibility for the management and maintenance of the Historic District.. **HOW WILL IT BE ABLE TO DISCHARGE THIS RESPONSIBILITY? IS IT EQUIPPED TO DO SO?** These are challenging questions.

MY RECOMMENDATIONS, AND THOSE OF MY FAMILY, ARE FOR THE NPS TO SUPPORT THE PROPOSED CHANGES IN THE 1978 LAW TO PERMIT THE PERMITTEES AND THEIR FAMILIES TO CONTINUE TO OCCUPY THEIR CABINS AND PARTNER WITH THE NPS IN THE RESPONSIBILITY FOR THEIR CONTINUING MAINTENANCE AND THE MAINTENANCE OF OTHER CONTRIBUTING ELEMENTS TO THE MINERAL KING HISTORIC DISTRICT THUS RELIEVING THE NPS OF THE SOLE RESPONSIBILITY OF DOING SO. SINCE THE CREATION OF THE HISTORIC DISTRICT IS A RECENT DEVELOPMENT WITH WHICH THE NPS HAS HAD NO EXPERIENCE, THE NPS SHOULD DEPEND ON THE PEOPLE WHO HAVE THE EXPERIENCE, EXPERTISE AND MOTIVATION TO CARRY OUT THE RESPONSIBILITIES FOR THE MAINTENANCE AND MANAGEMENT OF THE DISTRICT==THE CABIN OWNERS.

UNDER THE CIRCUMSTANCES THERE SEEMS TO BE NO OTHER VIABLE ALTERNATIVE.

I have generally commented only on the Preferred Alternative and on those areas in which I have some personal knowledge and experience. As the former long time owner and operator of the Silver City Resort and adjacent property I am keenly aware of the difficulties involved in operating a public facility in this remote area. I was a fifty year resident of Three Rivers and until recently spent some time each summer of my 86 years in Mineral King and am the permittee of record for East Mineral King #10 where the fourth generation of our family is enjoying the cabin. I hope my comments will be helpful in the present planning process and we wish you well in your continuing efforts to meet the challenges you face.

Sincerely,

Margaret A. Seaborn

Margaret A. Seaborn 55519 Big River Drive, Bend, OR 97707

email: pegsea@starband.net. Telephone: 541 593 5823. FAX: 541 593 5297

54

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

Dear Superintendent Martin:

I have been hiking and backpacking in King's Canyon and Sequoia National Parks for over 30 years. I have become disturbed at the severe trail damage as well as damage to trees and other plants in the park by pack animals. The trails in many areas are becoming dangerous, with rocks kicked into the ever-deepening trail by horses. Horse manure is everywhere, and horses are inevitably ruining camping areas with concentrations of manure and urine. Streams also are impacted by these animals.

Please don't cave into the pack animal business pressure and what is right--preserve our little remaining wilderness for the plants and animals living there, and for our future generations to explore and appreciate using minimum impact.

I agree with the more detailed suggestions of the High Sierra Hikers Association, detailed below.

• The draft GMP needs to be re-written to include and fully consider a "no grazing" alternative. A "no grazing" alternative is both feasible and reasonable, and was requested by numerous respondents. If recreational stock use is to be continued in the fragile, high elevation areas of Sequoia-Kings Canyon, then stock users should be required to carry feed for their animals, as is done in many other national parks, to avoid the extensive and considerable impacts caused by stock animals foraging for food (i.e., overgrazing, trampling of sensitive wetlands and lakeshores, etc.).

• The authors of the draft GMP have improperly concluded that the "preferred alternative" is environmentally superior to the "no stock" alternative. Such a conclusion does not make any sense at all, and does not even pass the straight face test. Eliminating recreational stock use from Sequoia-Kings Canyon would avoid the many significant impacts caused by stock animals. A "no stock" alternative would without any doubt be environmentally superior to current stock management practices, which would be continued by the preferred alternative.

• The GMP should retain the key language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At the absolute minimum, the GMP should allow no grazing or off-trail travel by stock animals above 10,000 feet elevation throughout Sequoia-Kings Canyon NPs. These are park-wide issues that must be addressed now, not put off to some future planning process.

• The commercial camp at Bearpaw Meadow should be removed, the site

restored, and the area designated as wilderness, as envisioned by the House Committee Report for the California Wilderness Act.

• All of the commercial pack stations should be removed from park lands. They could be relocated outside the parks, if the operators so desire.

Sincerely,
Donald M. Selcer
928 Alma Place
Oakland, CA 94610

109

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

Re: Draft General Management Plan

Dear Dr. Graber:

Please enter the following comments regarding the draft General Management Plan for Sequoia and Kings Canyon National Parks into the formal record. As someone who has backpacked in Sequoia/Kings Canyon (SEKI) for more than 30 years, I have a keen interest in how the backcountry of SEKI is managed, and my comments are directed primarily toward sections of the draft GMP that directly affect my use and enjoyment of these spectacular wilderness areas.

I confess to being extremely disappointed in the GMP for its failure to substantively address the most critical backcountry management issue facing these parks: that of damage to wilderness resources and aesthetic values caused by recreational livestock and, particularly, commercial stock pack outfits. It is unclear to me whether the Park Service's failure to address this critical issue is a function of a simple lack of understanding on the part of park planners or a deliberate attempt to favor these commercial operations over the wishes of the vast majority of wilderness users, but the result will predictably be the same if the preferred alternative is selected: continued damage to meadows, trails, and surface waters, and continued degradation of the experience of backpackers, who constitute 90 to 95% of all wilderness users in SEKI.

Particularly telling of the inherent bias on the part of park planners is the comment on Page 274 of Volume 2, where it is concluded that under the preferred alternative

"...Impacts of horse use (feces, eroded trails, dust) would continue to cause minor, adverse, long-term impacts on a small number of backcountry hikers..."

At best, this statement demonstrates a complete lack of understanding of the degree to which stock use negatively affects the experience of wilderness visitors—a fact that is inexcusable given that published studies conducted within these parks (and others) document these social effects (see, for example, Watson et al. 1993). In the 30+ years I have been hiking in these parks, I have talked to countless other hikers and without question, the single most frequently mentioned impact to the backcountry is the stock-generated dust, manure, urine, and flies that are pervasive on so many trails (particularly those departing from commercial pack stations), as well as the trampling and grazing of meadows caused by livestock when they are allowed to graze in park meadows. (Indeed, it is hard for backpackers to take seriously park admonitions to "leave no trace" or to not "pick wildflowers" when twenty horses/mules at a time are allowed to run amok in park meadows, trampling and eating this "fragile" vegetation that, they have been told, cannot

withstand an occasional flower picker.) In the face of this evidence, for the Park Service to conclude that these are “minor” impacts that affect only a “small number” of backpackers is, at best, unsupported by any factual information. At worst, this language is a blatant attempt by park planners to downplay the significance of recreational stock impacts, portraying them as “minor” impacts that are somehow offset by the “positive” impacts of continuing to allow this “traditional” use. (I shouldn’t need to remind you that feeding bears at garbage heaps within national parks was once a “tradition” too.)

Further evidence of the Park Service’s favoritism toward recreational stock users is the curious conclusion that the “preferred alternative,” which by and large allows stock use to continue at current levels, would be “environmentally preferred” over the “no stock” alternative. Again, this absurd conclusion shows that park planners are either oblivious to the many documented ecological and aesthetic impacts of recreational livestock use or are deliberately attempting to downplay these impacts to allow continued excessive use by recreational livestock.

What the draft GMP lacks are two critical elements: 1) an open and honest discussion and disclosure of the many ecological and aesthetic impacts of recreational stock use in the backcountry of these parks (including full citation of the available literature addressing these issues), and 2) evaluation of a range of *reasonable measures* that could be used to reduce or eliminate these impacts. Instead of evaluating a reasonable range of alternatives for managing recreational livestock (including a host of measures that are currently employed at other national parks in the western United States), the Park Service has chosen two extremes with respect to backcountry stock management: the status quo and a no-stock alternative that has no realistic chance of ever being seriously considered.

Specifically, the draft GMP should consider alternatives that contain the following elements:

1. **Prohibition of grazing within the parks.** This is far from a radical concept. In fact, many national parks in the mountainous west—Mt. Rainier, Lassen Volcanic, Rocky Mountain, Glacier, and Crater Lake—currently prohibit grazing by recreational livestock, and other parks (Olympic, North Cascades, Yellowstone) either prohibit grazing in certain areas (including high-elevation meadows), actively discourage grazing, or allow grazing only around designated stock camping sites. In all of these parks, stock users carry pelleted feed to eliminate the need for grazing. The necessity of such regulations to protect wilderness ecosystems is thoroughly documented in the planning documents for these parks. Why has SEKI not considered a “no grazing” alternative when such an alternative is both practicable (as demonstrated by these other parks) and necessary to reduce grazing and trampling impacts?
2. **Prohibition of all cross-country travel by stock.** Again, there is ample scientific evidence that cross-country travel by stock results in rapid damage to vegetation, particularly in sensitive high-elevation areas. Many other parks in the West (Mt. Rainier, Olympic, Lassen Volcanic, Rocky Mountain) prohibit all

cross-country travel by stock, and others limit cross-country travel to a small number of designated areas (North Cascades) or prohibit pack strings off trail (Yellowstone). Although I understand that cross-country travel is currently prohibited in many areas of these parks, a full environmental analysis of a park-wide ban on cross-country travel should be evaluated and is fully appropriate for a programmatic document such as the GMP.

3. **Establishment of a network of foot-travel only trails.** Again, many other national parks (Mt. Rainier, Olympic, North Cascades, Crater Lake, Glacier, Yellowstone) have modest networks of foot-travel only trails to allow hikers to enjoy a stock free experience or to protect sensitive areas. Although designation of specific trails as "foot-travel only" is probably best left for analysis in the SEKI Wilderness Management Plan, programmatic direction toward establishing such a network within the parks is both appropriate and supported by a large number of wilderness users.
4. **Revision (lowering) of maximum groups size limits for stock parties.** The current limit of 20 head of stock results in unacceptably high impacts to the vast majority of wilderness users (including most stock users), as evidenced by work conducted in and around these parks (see Cole 1989, Cole 1990, and Watson et al. 1993). Furthermore, these limits exceed maximum group size limits in place in most other parks in the west. Several parks have maximum group-size limits that range from 6 to 16 head of stock (Mt. Rainier, Olympic, North Cascades, Crater Lake, Lassen Volcanic, Rocky Mountain), and those that allow large numbers (20-25 head) do so only on a limited number of trails constructed to high standards. Although the scientifically defensible approach would be to establish area-specific group-size limits that reflect differences in environmental sensitivities and capacities, the Park Service has in the past argued (as part of the effort to establish uniform group-size limits throughout the central and southern Sierra) that uniform group-size limits are desirable from a management standpoint. If that remains the case, then the GMP is the appropriate place to evaluate or at least provide programmatic direction for lowering group-size limits.
5. **Establishment of designated stock camps.** The Park Service should consider and alternative that would provide programmatic direction for the establishment of designated stock camps, as is currently done in many national parks in the mountainous west (e.g., Mt. Rainier, Olympic, North Cascades, Rocky Mountain, Yellowstone). Designation of such sites would help localize stock impacts to certain "hardened" sites, and would allow hikers to avoid areas used by recreational stock, thereby greatly alleviating user conflicts. Again, designation of specific sites, and the associated environmental analysis, is best left to the Wilderness Management Plan for these parks, but programmatic direction for establishing such a network of designated stock sites is clearly appropriate for this document.

The five elements above constitute entirely reasonable and feasible measures to help minimize stock impacts and thereby substantially increase the enjoyment of thousands of wilderness visitors each year. These measures are completely consistent with regulations in place at other national parks—measures that have been demonstrated to be both practical and effective. Such measures would also eliminate the need for costly (and impractical, given current budget constraints) attempts to monitor stock impacts using methods that are of questionable utility (such as the residual biomass method the parks now use) and that fail to address key impacts such as trampling. And final, the Park Service has the legal obligation under NEPA to evaluate such reasonable alternatives in formulating this important plan that will guide management of these parks for perhaps decades to come. Any plan that does not, at a minimum, incorporate these key elements and analysis of their environmental consequences is clearly deficient.

It has been my past experience in commenting on stock use in national parks and forest of the Sierra that wilderness planners have portrayed comments from hikers regarding inadequate stock regulation as being indicative of a desire to see all stock eliminated from the wilderness. The reality is that most hikers are tolerant of a modest level of stock use in the backcountry of these parks. What hikers find objectionable are 1) the clearly inadequate measure in place to manage recreational livestock, which results in clear (and well documented) damage to the wilderness and to the aesthetic experience; 2) the tendency of commercial outfitters to bring in vast amounts of unneeded luxury items into the wilderness to cater to their clientele, when each additional mule needed to carry such items compounds the damage to trails, meadows, and campsites; and 3) which the clear double-standard that exists in management of hikers versus stock users. The measures outlined above would go a long way toward reducing the conflicts between hikers and stock users that have been the source of tension between the two user groups since I started hiking in the 1970s.

In addition to these recommendations regarding backcountry management, I also have the following recommendations.

1. The commercial stock camp at Bearpaw Meadow should be removed, the site restored to its pre-disturbance condition, and the area designated as wilderness.
2. All commercial pack stations should be removed from park boundaries and relocated outside of the parks to eliminate impacts associated with stable, including the attraction of nonnative brown-headed cowbirds, which have adverse impacts on native songbirds in the parks.
3. The private cabins at Mineral King should be removed upon the death of the current permittee. The Park Service's attempt to justify these structures as "historically significant" shows a blatant disregard of Congressional intent when Mineral King was added to Sequoia National Park. What is "historically significant" is not the cabins, but the fact that Congress had the wisdom to recognize Mineral King as a unique and spectacular area worthy of the greatest protections that our land use laws allow.

Thank you for considering my comments, and I look forward to a revised GMP that does a far better job of addressing the serious impacts that these parks face, and that fully discloses the environmental costs and benefits of the elements proposed in this letter.

Sincerely,

Brian C. Spence, Ph.D.
687 36th Ave
Santa Cruz, CA 95062

Dr. Graber:

The following references were inadvertently omitted from my previously transmitted letter. Please add them to the letter.

Watson, A.E., M.J. Niccolucci, and D.R. Williams. 1993. Hikers and recreational stock users: predicting and managing conflicts in three wildernesses. U.S. Forest Service Intermountain Research Station, Research Paper INT-468

Cole, D.N. 1989. Low-impact recreational practices for wilderness and backcountry. U.S. Forest Service Intermountain Research Station. General Technical Report INT-265.

Cole, D.N. 1990. Ecological impacts of wilderness recreation and their management. Pages 425-466. In Hendee et al. (eds.) Wilderness Management. North American Press, Golden, Colorado.

Thank you.

Brian Spence

Peter Stekel ♦ (206) 933-1178 ♦ 3048 62nd Avenue SW ♦ Seattle, WA 98116-2706

July 6, 2004

Susan Spain, Landscape Architect
National Park Service - DSC
12795 W. Alameda Parkway
Denver CO 80225-0287

Dear Susan Spain,

I am writing to comment on the SEKI GMP and topic 6: the Mineral King special use permits.

The whole idea of private in-holdings in a national park is anathema to the entire reason we have parks. Granted, the Mineral King cabins pre-date their inclusion in Sequoia National Park and were granted special use by the USFS. Originally, these permits were to expire with the death of the permittee. This policy must be continued. No extensions. No exceptions. The cabin owners may own their cabins but we, the public, own the land.

There are many problems with continuing to allow the cabins to stand in Sequoia National Park. As a 30+ year visitor to the Park I have seen, first hand, what some of these problems are. Water quality is a big issue. There is no sewage system for the cabins and effluent is not regulated. The east fork of the Kaweah suffers from this lack of oversight.

Cabin water systems are scattered throughout the area with pipes both above and below surface. And I suspect the water systems are not up to any kind of building or health code.

The age of the Mineral King cabins and their general level of benign neglect when it comes to maintenance creates an eyesore. Many of the buildings present safety hazards. More importantly, the buildings are fire hazards as the owners don't seem to do much to create defensible space in this urban-rural interface area.

Please keep me informed on this subject.

Sincerely,



Peter Stekel
email: author@peterstekel.com
<http://www.peterstekel.com>

328-

Fri, Apr 8, 1904 4:42 PM

From: s/l stocking <snlsox@earthlink.net>
To: <susan_spain@nps.gov>, <david-graber@nps.gov>, <snlsox@earthlink.net>
Date: Thursday, April 7, 1904 11:09 PM
Subject: SEKI GMP

NPS GMP Team:

I have commented on management plans for various areas of Sequoia-Kings Canyon in the past. This Plan has been more difficult to read and understand due to the way in which it is structured. It appears that each "Alternative" must be discussed completely in relationship to each issue. This led to so much duplication that it was difficult for me to detect how the "Alternatives" differed. This has made it difficult for me to make a well organized response. I will attempt to separate comments by topic and hope that I am successful in the effort although the topics, of necessity, overlap quite a bit.

Topic 1: Miscellaneous Comments:

Vol II

Pg. 9 "Currently several HUNDRED (?) people per year visit park caves."

Pg. 10 Has Park surface water been checked for Giardia, Campylobacter and Cryptosporidium? Have base levels been established? Are there references? Are any studies related to stock use? There was a recent study in Yosemite.

Pg 10-11 Has increase in global warming been correlated with the timing of snowmelt, runoff and extent of 100 year floodplain? This has been done in some Sierran drainage basins. (Mokelumne)

Pg 13. (Stressors) "Park developments at Grant Grove....were constructed in and among the sequoia trees...."Comment: This was true in Giant Forest but how was it true in Grant Grove?

Pg.15. trespass cattle have been reported in both Redwood Canyon and Big Stump areas this summer (and other summers).

Pg. 14 "Spice bush along stream banks". comment: various Salix spp are much MORE typical at most all elevations and locations discussed.

Pg. 17 Pallid bat: "This and following bat species etc" (NONE follow)

Pg.38. No mention of Cedar Grove Ranger Station or "Cache Cabin" at Kanawyers as "Historic". They would seem as "historic" as Knappe Cabin. Have they been proposed for designation?

Pg. 39. There are other Shorty's Cabins. Have they been proposed for inclusion in the historic district? If not, why not?

Pg 46-51 (Possibly better under Transportation) What has been the change in the "Average Daily Traffic" of various areas? (In 6 years a 30% change in some California areas) Has there been a change in the number of busses? This relates to parking and size and number of turnouts.

Pg 63, Table 10 No mention of trail from Wukaschi parking area or Lodgepole to Twin Lakes etc.

Pg. 65 Grant Grove" Crystal Springs Campground has around 6,700 overnight stays and 1,900 R.V. stays. This is certainly good justification to keep this campground open, not to close it as is proposed. (Also C-4)

Pg. 74 "Over 1,400 volunteers serve in the parks in a variety of capacities." This would seem to justify further discussion. Who are they, what do they do, and are they NPS, SNHA or other volunteers? How many hours does this represent?

Pg 113. Stock use (Alt. D and elsewhere) Has the ~~input~~ ^{impact} of stock use on surface water been studied? (see 2nd comment above)

Fri, Apr 8, 1904 4:42 PM

Pg 119-120"sequoia groves south of the Grant Grove." To which groves does this refer? Are they in the Grant Grove hydrologic area?

pg. 126-131. Relocating and redesigning bridges in Cedar Grove area. Would the location of some or all of the 3 bridges be changed? Would the new bridge (or bridges) continue to impact riparian and bank areas? Would the location(s) be changed? Could there be mitigation to banks and wetlands if the locations were not changed?

pg. 128-132 Is background information available for the meadow areas which would be impacted by "increased water demand" caused by concession development at Grant Grove? For example is there now "moisture stress" within and adjacent to the meadows in the Sequoia Groves during drought? Natural Resources: Wildlife and Wildlife Habitat (The whole section)

I find it very difficult to evaluate statements such as; "Habitat restoration, particularly in riparian areas, would be a minor (or incremental and localized, beneficial and adverse) benefit." How are these impacts determined? Have there been baseline studies made and reported for sensitive areas and populations?

pg. 143-151 etc (Also vol 1, pg 26)
What types of increased management will be carried out to protect special status species?

Will there be increased management actions taken to remove exotic species which impact (or not) native species?

Are these addressed in the Resource Management Plan?

pg. 162-163. The southern San Joaquin Valley has "some of the worst air quality in the United States", Breathing smoke is not healthy. What attention is being paid to strategies for reduction of air pollutants through different management strategies of "prescribed fires"? (Is this addressed in the Fire & Fuel Management Plan?)

a. there were management fires early this summer on Redwood Mt and Buena Vista Peak at a time when air quality in the valley appeared poor. It was impossible to see the adjacent hills.

b. What is being produced by these fires? Are the amounts of PM10 measured? Measured in the foothills? What part of valley pollutants come from park management fires?

c. Legislative changes may impact actions of SJVARCD. (SB 999 Machado) Has this been considered?

d. Are these points considered in the "Resource Management Plan or the Fuel and Fire Management Plan or both?

pg. 175 Impacts of various uses on riverbanks and riparian areas. How have these been determined?

Has the carrying capacity of these areas been determined for Cedar Grove areas? The lack of such determination was challenged in Yosemite.

pg. 182. Which bridge (of the 3) is to be relocated?

TOPIC 4:

Vol.1, pg 55. "The parks CONTINUE TO LIMIT low-flying aircraft to avoid disturbing the natural setting". I was awakened by a series of back and forth night overflights of the Grant Grove area during the last week of June this year. During the same week there was a low level mid day jet flight down the length of the Kings Canyon at Cedar Grove.

How are flights limited? Has the base commander at Lemoore been asked to control overflights?

pg. 88. "Provide work camp development for staff, partners and volunteers to support ranger activities, interpretation etc." This appears to be a good plan but is it consistent with the following? "A limited amount of housing is provided in park development for some permanent and seasonal employees." I understand that the N.P.S. policy is to cut back on housing within the parks when possible.

Vol 1, pg 116, Vol 2 pg 269. Provide a Visitor Center at Cedar Grove. Excellent suggestion. Location is critical. Present Ranger Station and Road's End have proven to be less than ideal. How about between Camp 2 & 3, Canyon View or Knappe Cabin areas? Is this the meaning of "adaptively using

Fri, Apr 8, 1904 4:42 PM

Knapps Cabin? (pg 219 Vol. 2)

pg. 120. "Gas station for a potential visitor facility." Access and visibility of this site is limited and could add to area congestion. Could be used to increase needed parking for the store, postoffice etc. which is not now adequate. The old comfort station here may be a neglected historic structure which could be updated to alleviate crowding at the visitor center restrooms.

pg ? There is mention of connecting trails in Grant Grove area to those in Sequoia National Monument. Good idea, but WHAT trails exist to connect to in Sequoia National Monument?

pg 122. (etc) Crystal Springs is not viable for conversion to day use. It is not easily seen from the highway or from the village area. It is not close enough to the village area to be useful for parking. It is well used as a camping area (is comment pg 65 above.)

Picnic areas are quite adequate at this time in Grant Grove. Both Big Stump and Columbine are easily seen and have recently been upgraded. Panoramic Point Picnic Area is well used but is not mentioned in this GMP. It has a restroom, garbage and recycling containers and several picnic tables as well as adequate parking.

pg. 132-134 and also pg 271 in Vol. 2

What is the proposed use for the old gas station at Lodgepole? Why not remove it and restore the area? Why not relocate the Nature Center to this location? And, or it could be used as the Lodgepole shuttle stop. It could also be used as a selfservice service station with restrooms.

pg 132. Wuksuchi. Possible location for commercial pack station. But where do you want to direct day use horseback rides?

pg 132. "Provide a small picnic area across the Generals Highway." Entrance on a curve near the campground and Visitor Center entrance? Congestion and safety could be a problem here. Location might also increase river bank access and erosion. Possibly better to further develop the picnic area at Wolverton.

pg. 140 Provide transit from parking lot at Lodgepole and from ticket center to Crystal Cave. Has this been investigated?

Shuttle: Has a Giant Forest Shuttle been operating? I saw no evidence of this on a visit this summer. Have I misunderstood what is said here? We have recently used the shuttle in Yosemite National Park, Tuolumne Meadow, and in the Valley... great!

Vol 2 Page 248 Have I missed discussion of such possibilities as having two entry and 2 exit lanes at Big Stump? I know that there are two lanes now but everyone usually stays in one lane. Those with passes and who have no questions could be directed to one lane and those buying passes or with questions to the other. (Similar to a "carpool" designated lane.)

pg. 280. The Wolverton Picnic Area is referenced here. Where is it? I know where the restrooms and parking lots are located. Are there obvious signs? How many tables? Generally the Parks have much better picnic areas than does Yosemite.

pg.304. The way this paragraph is constructed it appears that all areas mentioned may be of the same type. Some U.S.Forest service permitted use areas are mentioned as are private properties and others.

Pg 318-322. Are "stock user groups" the ONLY volunteer groups? Are any volunteer groups or individuals involved in other projects such as the removal of "Weeds"? With so many volunteers (pg 74 vol 2) could not some be involved in such projects?

Socioeconomic:

It is good to see that an increase in park staffing is recommended
This is needed to better serve the public.
Would not increasing the housing of park staff outside the parks

Page 3 of 4

Fri, Apr 8, 1904 4:42 PM

lead to increases in both air pollution and congestion?
A reduced number of campsites at Grant Grove and Cedar Grove could
unequally impact those economic and social groups which use these
facilities but could not afford to use the expanded lodging
facilities. Has it been found that there is increased demand for
lodge facilities and decreased demand for campsites?

Thank you for the opportunity to comment on this General Management Plan.

S.K. Stocking P.O. Box 1259, San Andreas Ca. 95249

89



Edward.Sweet@kp.org

To: susan_spain@nps.gov, david_graber@nps.gov

09/01/2004 11:55 AM
MST

cc:

Subject: Draft GMP for Sequoia and Kings Canyon National Parks

I have been an avid user and supporter of Sequoia and Kings Canyon National Parks for more than 30 years and am very disturbed by the Draft GMP which would seem to disregard the 1916 Organic Act and the 1964 Wilderness Act, the mandates which should govern management of the parks. I am particularly concerned about commercial and noncommercial stock use, the private cabins at Mineral King, military overflights, and air pollution. As recently as last month, while backpacking in the lower Kern River Canyon, I witnessed the unacceptable impacts that stock use causes to the wilderness which, according to the 1916 Organic Act, should be left "unimpaired for the enjoyment of future generations." I witnessed trampled meadows and streambeds and spent much of my time avoiding stepping in manure and running away from swarms of flies which thrive on the horse excrement. Needless to say, this hike hardly represented a natural wilderness experience. I find that once again I need to eliminate future visits to a supposed wilderness area which has been ruined by stock use. While I agree with Alternative A (no stock use), I don't believe the NPS would seriously consider this option. But why hasn't a "no grazing" policy, a reasonable compromise alternative, been given consideration? Requiring stock users to carry feed, as occurs in many other national parks, would minimize very damaging grazing impacts. And why not phase out nonessential stock use in the most sensitive high-elevation areas of the parks as suggested in the 1971 Master Plan? What happened to that agreed upon decision anyway? Has an Environmental Impact Statement evaluated and disclosed the impacts of discarding that existing language? If not, why not? Lastly, commercial pack stations based within the parks should be removed. The 1964 Wilderness Act specifies that there shall be no commercial enterprises within wilderness areas "except as necessary to meet the minimum requirements for the administration of the area for the purpose of this Act." Why not site any pack stations outside the parks and limit commercial stock use only to persons who are truly disabled and persons carrying out true administrative needs that can't be accomplished by other, less destructive means? Recreational commercial stock use is not "necessary" under the law. The biases in favor of on-going, and even expanded, stock use under the Preferred Alternative of the Draft GMP conflicts with the desires of the vast majority of the public and the will of Congress as expressed in the 1916 Organic and the 1964 Wilderness Acts. Please rectify this disturbing deficiency.

As concerns the private cabins at Mineral King, they should be removed when the permittee-of-record dies. This was the intention of Congress when Mineral King was added to the national park. The cabin sites should be restored to their natural state as soon as possible. The "culture resource preservation or public lodging plan," part of the Preferred Alternative, is simply a ruse to give private interests on-going control of public lands. The idea of a priority lodging reservation system for former special use permittees is obviously discriminatory. Mineral King is suppose to be part of the national park, not a private holding. Please get rid of the cabins as soon as possible as they represent an affront to the very idea of wilderness.

Anyone who has backpacked in Sequoia Park is well aware of the very frequent and very loud military overflights that severely detract from the wilderness experience. While I understand that the NPS may have limited control over the airspace, it bewilders me why the military must use airspace over national parks. Isn't there enough airspace elsewhere? Are flights over national parks really unavoidable? I encourage the NPS to address this issue with our military

services.

While air pollution is an extremely complicated and difficult problem, a vision for the future of Sequoia and Kings Canyon National Parks that doesn't address the atrocious air quality that plagues the parks isn't much of a vision. I encourage the NPS to further publicize this issue and to work with other government agencies to begin to grapple with the air pollution problem which not only effects the enjoyment and health of visitors but seriously threatens the very existence of the parks by adversely impacting water resources, the flora, and the fauna.

I appreciate your consideration of my comments and concerns and hope that Sequoia and Kings Canyon National Parks will be preserved unimpaired for future generations.

Sincerely, Ed Sweet 160 Stonewall RD
Berkeley, CA 94705

266

David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Dear Dr. Graber:

I am writing to comment on the draft General Management Plan (DGMP) for Sequoia and Kings Canyon National Parks (SEKI).

My primary concern is that the DGMP fails to consider a "no grazing" alternative. The NPS should back up and fully evaluate a no grazing alternative. Such an alternative is highly feasible and entirely reasonable. It was requested by many commenters during the scoping period for this GMP. It would allow recreational stock use to continue, to serve those who cannot visit the backcountry under their own power. It would require stock users to carry feed for their animals, as is required in many other national parks. It would eliminate nearly all of the ongoing and substantial impacts of stock grazing and trampling of meadows, wetlands, and lakeshores.

The DGMP instead includes a "no stock" alternative, which is a radical notion that will not even receive serious consideration by the NPS decision-makers. It would not even allow stock use for essential administrative functions, such as trail crew support and ranger patrols. It is both unconscionable and illegal for the NPS to include such a radical alternative while ignoring the numerous comments that have asked that you fully evaluate and consider a "no grazing" alternative. It is unconscionable because the public deserves a GMP that addresses the many substantial impacts of ongoing commercial and private recreational stock use. It is illegal because the National Environmental Policy Act (NEPA) requires that you evaluate a range of reasonable alternatives, and that you assess every significant aspect of the environmental impact of a proposed action.

The DGMP should retain the important language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At minimum, the GMP should include replacement language that fully protects the parks from the many substantial impacts of stock use (i.e., overgrazing, trampling of sensitive areas, stock manure & urine in campsites, introduction of non-native plants, proliferation of brown-headed cowbirds, reduction of invertebrate populations in meadows, etc.). The DGMP is fatally flawed because it essentially proposes to continue "business-as-usual" stock management, which has resulted in myriad substantial impacts throughout SEKI.

In addition, I support the removal of all commercial pack stations from SEKI, the removal of the commercial camp at Bearpaw, and the removal of the cabins at Mineral King. These areas should be restored to their natural condition insofar as possible.

Sincerely,



Rob Talbert
481 Osgood Court
Laguna Beach, CA 92651

#9-1

Re: comments on the SEKI GMP

Dear Ms Spain and Mr Graber:

Please accept these comments on the draft General Management Plan (GMP) for the Sequoia and Kings Canyon (SEKI) National Parks. While I support most aspects of the Preferred Alternative, this must be revised to incorporate more aspects of Alternative A. Specifically, Mineral King Permit Cabins should be removed, pack stock should not be allowed in the parks, there should be no gas stations in the parks, there should not be a tent hotel on Hockett Plateau, and all dams, impoundments and diversions within the parks should be removed.

The Preferred Alternative should require the removal of Mineral King Permit Cabins when the original permittee dies, as was stipulated in the original (1978) agreement. Removing the cabins (rather than reuse as public facilities) will have several desirable environmental benefits to the Mineral King area. First, there is already too much development in the Mineral King Area (e.g., Silver City, Kaweah Han); removing the permit cabins will help to alleviate this. Furthermore, removal will eliminate problems from waste disposal including septic systems and it may help reduce habitat fragmentation. These considerations far outweigh the cultural loss resulting from the cabins removal, which could be largely mitigated by carefully photographically recording the cabins prior to removal. Last, discontinuing special use is consistent with NPS policy (part 2, page 299). I regard a "priority reservations" (as described in the Preferred Alternative) as a form of "special use" and hence inconsistent with NPS policy.

As called for in the Preferred Alternative, efforts should be made to acquire the inholdings at Oriole Lake, and after facilities are removed, to turn this area into a wilderness.

The Preferred Alternative should not allow for a new High Sierra tent hotel on the Hockett Plateau. Such a hotel would only negatively impact the environment around the plateau (helicopter noise, increased stock use, crowding, trampling of soils and vegetation loss). The hotel would also prevent the adjacent area from becoming a wilderness, which violates NPS Management Policies 2001 that states the NPS will take no action to diminish the suitability of an area possessing wilderness characteristics (page 187 of Vol. 2 of the DGMP). From a land area perspective, the area near the hotel that would not be included in any wilderness represents a small fraction of the Hockett Plateau region that may be considered as a wilderness (0.07%). However, the sheer numbers are deceptive, because they ignore the qualitative negative impact the hotel would have on a wilderness. I don't want to see a hotel as I hike up through a wilderness area, and indeed, even knowledge that such a hotel exists detracts for my wilderness experience.

As originally called for in the 1971 Master Plan, the Preferred Alternative should eliminate all pack stock use in SEKI National Parks. There are many desirable reasons for this. Pack stock use only benefits a few - approximately 4% of backcountry users (using data from part 1, page 63-64; see also part 2, pg 265-266). However, stock use has

a hugely disproportionate negative environmental impact (part 2, pg 110, 125, 129). One of the most important of these concerns introduced species. As noted on several occasions in the DGMP, one of the most important systemic stressors of the park ecosystems is introduced species. The elimination of stock use in SEKI would eliminate one significant source of introduced species - invasive plants originating from feed and pack stock. This issue is not adequately addressed in the DGMP, and given the importance of invasive plants as a systemic stressor, the conclusion that the impact of eliminating stock use would be 'minor' (part 2, pg 110) is incorrect. This shortcoming is indicated by the long list (which seems to me only partial) of areas favorably impacted by the elimination of stock.

There are other ways that pack stock negatively impact the environment, include fouling of the backcountry and trampling of meadows and riparian areas. These significantly degrade the environment of the parks highly disproportionate to pack stock use. Indeed, as noted in the DGMP (part 2, pg 129), pack stock cause "potentially irreversible impacts to heavily grazed meadows". Given this and that one of the purposes of SEKI is to "protect forever the greater Sierran ecosystem", the only way to achieve this purpose is to eliminate pack stock use and hence prevent the potentially irreversible impacts to meadows.

On a personal note, I have had several bad experiences with pack stock. A campsite I used in Junction Meadow in 2002 was severely polluted with manure and the smell was barely tolerable; not only that but a nearby party of pack stock users was using a chain saw to cut firewood! This would, of course, been impossible without pack stock to carry the chain. In 2000, a stock party I encountered in Dusy Basin proceeded to camp immediately adjacent to a high alpine lake, completely ignoring requirement of camping 100 ft from water; none of the many backpackers here were camped next to the lake.

If the Preferred Alternative does not eliminate the use of pack stock, then it must include several provisions to insure that the environmental impact of pack stock is limited. There should be no grazing of pack stock in the parks; there should be no new pack stations; pack stock should not be allowed on cross-country routes; and pack stock manure should either be buried (as humans must bury their waste) or packed out. These measures will help mitigate some of the environmental impacts caused by pack stock (described in previous few paragraphs), although these will not be as effective of eliminating stock from the parks.

The Preferred Alternative should not allow for any gas stations in the parks, since gas is readily available outside the parks. Any gas station inside the parks will only create unnecessary environmental problems such as increased air pollution due to fumes from filling and to the inevitable gas spills. Gas stations will also lead to even more traffic congestion, because the large gas tankers necessary for filling the stations would have to travel the already crowded park roads.

The Preferred Alternative should ban all snowmobiles from SEKI. Snowmobiles, being motorized equipment, have no place in National Parks and, given the limited winter staffing levels, the NPS will not be able to enforce any rules limiting snowmobile access.

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

As noted in the DGMP, one of the largest systematic stressor to the park ecosystem is anthropogenic climate change: the climate will continue to warm in the future. This warming, and the impact that this will have on reducing water supplies, must be factored into all water use plans. This likely reduction in water supplies will be particularly important when assessing water withdraws near giant Sequoia groves. The likely reduction in water supplies due to climate change should be noted in the Preferred Alternative.

The Preferred Alternative should call for the removal of all dams, impoundments and diversions of free-flowing rivers within the parks. While the presence of some of these constructions does not preclude the inclusion of adjacent river segments in the wild and scenic river system, these constructions do not belong in National Parks: they adversely impact the purpose of protecting forever the greater Sierran ecosystem and its natural evolution. The removal of these would have important environmental impact on soils and vegetation as well as improve visitor experiences: who wants to see a dam in the middle of an otherwise free-flowing river? Any historic sites could be preserved by photographic recording. The loss of recreational activity directly associated with any dams removal is small. The arguments given on part 2, page 298, that the removal of Mineral King dams would result in moderate-major adverse impacts is misleading, because it does not consider that many of the stated recreational activities (e.g., camping, hiking and fishing) could continue even if the dams were removed.

Sincerely,
Dr Michael F Toney
6747 Heathfield Drive
San Jose, CA 95120
mftoney@yahoo.com

338.

October 6, 2004

Susan Spain
NPS GMP Team Leader
12795 W. Alameda Pkwy
Denver, CO 80225-0287
Susan_spain@nps.gov

Ms Spain:

Thank you for giving the public the opportunity to comment on the General Management Plan for Sequoia/Kings Canyon National Parks.

I would like to comment on the area of air quality and the policy of prescribed burning. With the marginal air quality in and around the Park, every attempt should be made to minimize additional factors that contribute to this bad air. While the majority of the bad air is from vehicles, ag burning and metro area incursion into the San Joaquin Valley, there is one source that the Park itself produces, and that is the aggressive policy of Prescribed Burns.

At one time, the Park announced a goal of 20,000 acres of intentional burning each year. With the burning period constrained by weather and other factors, the summer and fall seasons see an intense effort to 'get the job done,' and unfortunately, air quality suffers during these prolonged periods. In communities like Three Rivers, the results are days and weeks of eye stinging events that are unhealthful for residents, particularly the elderly and infants. Many people moved from metro areas to Three Rivers to escape air pollution, only to find an equal problem right in our backyard.

The Park discusses 'Memorandums of Understanding' with Valley ARB's, but burning on no burn days continues, and fuel is added (allowed to burn) during periods that others outside the Park would receive violations for. I believe in fact, that the Park feels it is above local and state air pollution guidelines, and can frankly, do what it wishes. Burns are allowed to grow to a size that control, when air quality is an issue, is impossible.

Loss of control is another issue. In 1997, the residents of Three Rivers were told (by then Superintendent Mike Toffefson) that there would be no more prescribed burns in the center fork drainage in that year (due to previous bad air fire incidents,) and yet, they started the Amphitheater Prescribed burn in September, and promptly lost control of it. The suppression costs were in excess of one million dollars. Another loss-of-control burn happened in the Mineral King area several years ago. Helicopter costs alone to control that one were approximately \$345,000. Amazingly, no one was fined, no one lost their job over these incidents. Loss of control of a prescribed fire has residents of Three Rivers concerned. The history lesson of Los Alamos has not been forgotten.

Susan Spain - 2

When residents complain of bad air during prolonged days and weeks of stale air due to the burning of damp and green fuels, the Park tells residents to 'stay inside' and 'keep your windows closed.' Hardly what one would call good public relations efforts.

The Park must balance the aggressive goals of Prescribed Burns with the effects on human health (I think this comes before the health of the forest), the effects on visitor enjoyment of the Park, the reduction on quality of life in neighboring communities, the risk of a catastrophic loss of control event, and the effects of smoke on the trees and other living things in the Park. I bet the deer and bears aren't real happy when these burns occur. I wonder if anyone has done a study on their happiness factor when this happens!

Anyway, to get serious, I think that the policy of 'damn the torpedoes, full speed ahead' has to be reigned in, the burning done in small time envelopes (like maybe 4-5 days out of every month, not to exceed 4 months a year. Mechanical thinning should also be increased, not limited as discussed in the Plan. I think Grand Canyon NP has developed an aggressive thinning plan as to not degrade the already deteriorating visual capabilities at that Park. Sequoia/KC should work on plans to do the same, as the view of Moro Rock and Alta Peak should be as important to us as the canyons are to visitors to that beautiful Park.

Sincerely,

Pete van Gilluwe
43275 Kaweah River Drive
Three Rivers, CA 93271
pvg1@hotmail.com

Susan et. al,

I want to take this moment to thank you all for what was obviously a lot of hard work on the draft GMP. Your presentation was smooth and relaxed and your demeanor was friendly in spite of the possible inflammatory nature of a couple of the issues. By the way, thanks for the water.

The Natl. Park Service GMP is certainly comprehensive. Though, if you will allow me, in regards to Mineral King, your final analysis is based upon some unsound assumptions. To retrofit those cabins up to code for the public would be a daunting task, if not expensive and could possibly alter the historic significance of the cabins. And, you assume that we would want to rent back our own cabins for a number of days with an annual reunion of cabin owners/stewards. I'm afraid that would be emotionally difficult. No offense, but that won't work.

As you probably noticed, the vast majority of people in attendance were responding to the Mineral King situation, and they were in favor of letting the cabins remain in the hands of the present owners/stewards. You did not include that option in your list of alternatives. And if I remember correctly, that alternative (mentioned above) was the suggestion emphasized by the majority of the participants at the public scoping meetings prior to the draft GMP. Wasn't the purpose of those scoping meetings your attempt at public input for your GMP? I was under the assumption that was the purpose. I surely hope it was an oversight on your part and not purposeful. We want to continue to work in partnership with you.

I have to assume, based on the turnout at the Fresno draft GMP Response session, that the public thinks the Park should direct its resources elsewhere other than to the upkeep of the Mineral King historic district, especially in light of the cabin stewards/owners volunteering to keep them up at their expense. What a deal for the NPS. A proverbial feather in their cap. The NPS gets the cabin stewards/owners to keep them up at their expense and labor, the NPS continues to receive the lease money for the land and the NPS gets to show the cabins off as a victory for historic and cultural preservation and frugal handling of monetary resources. Win-win.

It seems to me that the upkeep of these historic cabins would be best left in the hands of the present owners/stewards who know their many eccentricities, some of which are quite dangerous. No cost to you, really, unless, of course, you would like us to bill you. At the least maybe you could volunteer to work on them periodically as we do for The NPS in the area. I think that that would be a fair trade. I'll be looking for your name(s) on the sign-up sheet for work on the cabins. Be sure to wear old cloths.

Thank you again for all your hard work.

Respectfully,

Dan Voelz
1961 Richert
Clovis, CA. 93611

203

September 29, 2004

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

Topic: Mineral King Special Use Permits

Dear Dr. Graber,

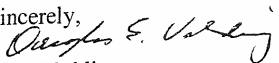
I have read your General Management Plan (GMP) cover to cover. You have certainly taken many hours to compile this document and I applaud the Park Service for their efforts. I would like to take this opportunity to comment on the Mineral King issue specifically.

I was disappointed to see that there were very few references to the fact that this community is now a National Historic District. This designation certainly carries a whole new meaning for the treatment of the cabins and their care. The first thing that comes to mind is the National Preservation Act of 1966. As you know this act requires that Federal agencies pay attention to historic preservation. There are even passages that suggest partnerships with appropriate groups to help achieve this goal. So my first question is why was that not addressed in the GMP? Alternative C suggests that the cabins can stay but alludes to the fact that legislation is needed to make this happen. Are you supporting the current legislation to make this happen?

Second, President Bush has his Preserve America Executive Order #13287 as part of the goals he holds for Federal agencies. As you know this states that agencies such as yourself cooperate with state and local governments and **citizen groups** to promote tourism of historic sites. I did not see any passages of significance addressing this mandate either.

The solution is obvious but not simple. The cabin owners are ready, willing and able to cooperate in a partnership agreement. They have a long and successful history of taking care of their cabins, preserving and maintaining them in a fashion that is appropriate with historic standards. This past summer they had volunteers working at the Mineral King Ranger Station every day and also involved in interpretive hikes, campfires and a variety of park maintenance projects. The cabin owners are doing all the right things in accordance with Preserve America and the National Preservation Act. At this point all they need is for the Park service to formally get on board and make the changes that need to happen so they can remain in their cabins doing what they do best.

Alternative C is the best option you have to offer at this time. Please consider a way to make this partnership between the National Park Service and the Mineral King cabin owners a reality. It is a solution that will be good for the public, the Park Service and the cabin owners.

Sincerely,

Doug Volding
28122 Somerset Mission Viejo, CA 92692

102

James S. Voorhees
13460 Fieldcreek Ln.
Reno, Nevada 89448
(775) 852-8267
jvoorheesnv@charter.net

June 14, 2004

Dr. David Graber
Senior Scientist
Sequoia & Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651
VIA EMAIL: david_graber@nps.gov

Re: Draft General Management Plan

Dear Dr. Graber:

I am writing regarding the Draft General Management Plan, and specifically the various alternatives for the cabins in the Mineral King Community. I believe that regardless of the language of the 1978 law, one recent development has made a new alternative feasible – one not considered in the Draft Plan. Now that the cabins have been placed on the National Register of Historic Places, there is an obligation for them to be preserved for their historic value.

The alternative that deserves to be included and considered is for the current owners to continue use of the cabins providing that they are maintained according to appropriate guidelines. Such an agreement would benefit the cabin owners and the public at large by providing a way to preserve the cabins. Additionally, the park would continue to benefit by the stewardship of the historic community in the Mineral King Valley.

It is unlikely that the Park Service will receive funds for preservation of the cabins. This coupled with the fact that the current cabin owners are the only ones familiar with the idiosyncrasies of their cabins further supports this approach.

I ask that this alternative receive all due consideration. Thank you.

Sincerely,

James S. Voorhees
Whitney Cabin #20
West Mineral King

JOHN I. WEAVER

July 22, 2004

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

Dear Ms Spain:

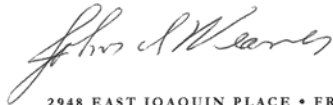
Thank you for providing a copy of the ***Draft general management plan and comprehensive river management plan / environmental impact statement for Sequoia and Kings Canyon National Parks and Middle and South Forks of the Kings River and North Fork of the Kern River*** for review and comment. The following are recommended for inclusion into the final document.

Topic 1: Miscellaneous comments and ideas.

- a. The cover on the Manuals and the CD, should not show a park ranger in uniform, with others, walking on the roots of a Giant Sequoia. It appears this may be a Sequoia tree inside a rail fence, which the Park Service constructed to keep people off the roots. It is my understanding that pedestrian traffic is detrimental to Sequoia root systems.

Topic 4: Comments on alternatives or analysis related to Transportation, Visitor Experience.

- a. The traditional range of park activities should be expanded to add mountain biking on some trails in the Sequoia and Kings Canyon National Parks. The trails on which stock animals are presently permitted should be open to bicycles as well. The effect on the landscape and the environment is less with a bicycle than a horse or pack animal.
- b. Snowmobiles should be permitted on some trails in the Sequoia and Kings Canyon National Parks. In the late 1960's and early 1970's one such trail was from the intersection of Hazel and Fern lanes in Wilsonia, to the Manzanita Trail in Grant Grove, along the trail to Park Ridge road (which is paved), to the Sequoia National Forest, and on up to the Park Ridge Fire Lookout Station. The route was flagged. Travel was restricted within the National Park to the established, and marked, snowmobile route. This snowmobile route should be re-opened, and extended to the Grant Grove Visitor Center Parking Lot. The route afforded an appropriate Winter Visitor Experience within SEKI parks, and facilitated use of snowmobiles within Sequoia National Forest. It also made this Winter snow experience possible for physically impaired people when they were pulled in a sled behind the snowmobile. The view from the base of the Park Ridge Fire Lookout station, looking at the stars at night, with the area covered with snow is magnificent. It is a very strenuous hike in the snow from the Grant Grove Parking Lot, but in a sled behind a snowmobile can be an inspiring, spiritual experience for a physically impaired person.



2948 EAST JOAQUIN PLACE • FRESNO, CALIFORNIA • 93726-4230
PHONE: (559) 229-3368 • FAX: (559) 222-9768 • E-MAIL: LJWeav@Peoplepc.com



"John I. Weaver"
<LJWeav@peoplepc.com>

10/06/2004 08:26 PM
MST

To: <Susan_Spain@nps.gov>, <david_graber@nps.gov>
cc: "John & Lee Weaver" <LJWeav@peoplepc.com>, "Alan I Weaver" <alanw@ci.clovis.ca.us>, "Sally Tripp" <sltripp@sbcglobal.net>, "Gus & Barbara Collins" <Gus3@psnw.com>, "Dennis Patzkowski" <bluejayent@hotmail.com>
Subject: SEKI GMP Oct 6, 2004

84

October 6, 2004<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />
NPS GMP Team Leader
Susan Spain, Landscape Architect
National Park Service – DSC
12795 W. Alameda Parkway
Denver, Colorado 80225-0287

Dear Ms Spain:

In addition to my previous e-mails concerning the ***Draft general management plan and comprehensive river management plan / environmental impact statement for Sequoia and Kings Canyon National Parks and Middle and South Forks of the Kings River and North Fork of the Kern River***, please consider the following comments for the final document.

It is difficult to determine which of the alternates these items concern; therefore my references will be to certain pages in the Draft GMP.

Volume 1, Page 33, "Major Decisions to be made":

The GMP should decide that more visitor use is desirable. The appropriate amounts of visitation to the parks should be increased without causing irreparable resource damage, however ***altering the desired experience*** will change as the population and use increases, and therefore should not be a determining item.

Volume 1, Page 35.

The range of activities should be expanded even if the new activities could alter the experiences of other visitors or increase demands on park staff.

Volume 1, page 35.

Bicycling Opportunities should be increased. The NPS policy should be re-considered to permit off-road biking in the parks. A road shared with motor vehicles with bicycles is very dangerous for the bicycle rider.

Sincerely yours,

John I Weaver

John I Weaver

39



"Harold Werner"
<wernerhw@lnreach.com>
10/04/2004 06:17 PM
MST

To: "Susan Spain" <susan_spain@nps.gov>, "David Graber"
<david_graber@nps.gov>
cc:
Subject: SEKI GMP Comments

While the GMP staff is to be commended for the tremendous amount of hard work, there are some components about it that I find disturbing.

<?xml:namespace prefix = o ns = "urn:schemas-microsoft-com:office:office" />

1) **Unlike all of the other alternatives, the title of the preferred alternative does not present a clear vision of what it represents.** It reads like a grab bag of this and that. I recommend something shorter like: "Sustainable growth to achieve changing visitor and future resource needs".

2) **Changes in the ratio of front country and backcountry under the different alternatives are really artifacts of the way the maps are drawn, not actual differences in visitor use.** Did anyone bother to look up the meaning of backcountry before delineating these boundaries? From a quick search of the web, I came up with: "a generic term that refers to areas that are relatively unmodified and usually accessible only by foot, horse, watercraft, or Off Highway Vehicle (OHV); a term used to describe extremely remote areas; out in the bush; nothing but you, your backpack, and nature; any terrain that isn't in bounds at a resort, very dangerous turf." Unlike wilderness which is a legal status that can come to the edges of development, backcountry requires traveling some significant distance (in our case, by foot or horse) to achieve. The maps for the alternatives show backcountry coming right up to the edges of development, an area that is clearly front country. I recommend that the maps be redrawn (and the areas recalculated) to show the backcountry as "the area beyond the reach of normal day use" or use some distance like "five (or more) miles from the nearest road". With those choices, the term backcountry would mean something. It means nothing as used in this document.

3) **There is no green alternative.** With the park being in one of the dirtiest airsheds in the country and the parks responsibility for protecting natural resources and the emphasis on safety, there should be a green alternative. From the title, I expected Alternative A to be "green", but it fell far short. The document acknowledges a serious air quality problem and the expectation of visitation increasing in the future, but the draft does not do much to address eliminating generation of air pollution within the park. There is the tiny shuttle service in the Giant Forest area and some language to explore a more extensive transportation system under some alternatives, but there is nothing that presents a really significant change. The park should have explored one alternative that seriously considered elimination of pollution using known technologies. An example of some components within a "green" alternative might read something like this.

- All public (and maybe some administrative) access would be restricted to a mass transit system utilizing non-polluting technologies. The system would pick up visitors from parking garages in gateway communities (or just inside our park entrances or include major urban areas and airports) and move them within the park. Alternatively, visitors may enter on bicycle or on foot and be excluded from an entrance fee, rewarding them for practicing the cleanest form of transit. DOE expects hydrogen vehicles and refueling infrastructure to have mass-market availability in fifteen years (thus within the scope of this document) and electric and hybrid

busses exist now. Getting further outside the box, consider an electric monorail system. They are noisy (and expensive), but I understand that they are developing some new technology to improve quietness. A monorail would free up the existing road for bicycles, a form of transportation that we should be encouraging.

- The existing draft GMP does virtually nothing for bicycles, the greenest form of transportation (other than hiking). The current draft provides for some local bicycle use in Cedar Grove and considers bicycle use on the Colony Mill Trail in one alternative. That is sad support for a clean, non-polluting form of transportation. We need to give bicyclists the ability to safely travel to all road accessible points within the park, even if it means excluding cars from some areas or building special bicycle paths that parallel some roads.

- Perhaps a green alternative should encourage continued operation of the flume system (However, the Mineral King dams need to go.) to generate electricity. It is clean power; the flume system has some historical value; the system exists; the impacts of building the system have already occurred and are now history; and the environmental impacts from the flume's operation are minimal. This could be carried a step further and the plan could ask Congress for authorization to acquire (rather than dispose) the power plant to support the electric transit system and sell excess power back to the grid to help support the park. Probably not feasible, but has anyone even considered it?

- Sewage would be provided tertiary treatment (or whatever it takes to restore pristine water quality) or be piped (or hauled) out of the park for treatment.

A green alternative would not be looking to reduce visitation, only at virtually eliminating the pollution associated with visitation (and continuing to emphasize recycling). However, this alternative should also consider social and biological carrying capacity.

4) **The alternatives do not give serious consideration to boundary adjustments.** The draft GMP dismisses the need for further consideration because many of the proposed resources are already managed by federal agencies or already were added through the Dillionwood addition. While the adjacent federal agencies are in many cases managing the proposed additions well, I believe the authors of the draft GMP miss the point of the public's comment. The proposed additions would make for a more complete park. The fact that most of it is already federal is what makes boundary adjustment feasible. The existing draft does not ask if existing protected NPS lands are adequate, and it should. Furthermore, I suspect that the list of potential additions is not complete based on casual comments I heard from one or more of the GMP team during the public scoping. For instance, someone told me that a surprising number of people at the workshops drew a boundary adjustment from Grant Grove to the Tehipite area, rounding out the shape of Kings Canyon NP. Of that proposal, only about half (the area south of highway 180) is described in the draft. I know that at least one person proposed addition of BLM land in the Dry Creek drainage and the Volcano Creek area of the Inyo National Forest and those proposals are not listed. Combined, the proposed additions represent a more complete cross-section of the southern Sierra Nevada extending from the San Joaquin Valley to Owens Valley. This seems like an admirable objective to place on one or more of the alternatives, especially within Alternative A.

5) **Wildlife, vegetation, and T&E/sensitive species should have been placed in impact topics dismissed from further analysis.** While those are topics that many readers will want to see, the information is virtually meaningless at the scale of the GMP for alternatives that have such slight differences in the development footprint. The real differences in fauna are related to

how much commitment exists in implementing various laws and policy. For example, the alternative involving the greatest amount of development and visitor use (D) would probably have far less impact on wildlife than the alternative with least development (A) if Alternative D also included a commitment to much more use of natural and prescribed fire than Alternative A (not a likely combination but presented to clarify my point). It is possible that an alternative that encourages increased visitation would result in more funding for staff which in turn results in more successful effort at managing problems like food storage. The point is that wildlife effects are not necessarily a linear function of how much habitat was altered, and the most significant variable (how much real effort is available for managing the stressors) is not addressed by the existing alternatives. I do not consider any of the evaluations of impact to biotic resources meaningful without identifying commitment to managing resources and the public. Within the socio-political world in which we function, less development likely translates into less funding for resource management. It is likely that less funding would be available to implementing natural resources management under an alternative like A than under an alternative like D even though A is intended to enhance natural systems. The real differences in biotic resources under the different alternatives would be affected most by the social and political response to funding resource management under each of those alternatives, not the minor changes in acreage designated for various management prescriptions. Also, the presumption (in Alternative A) that increased emphasis on natural ecosystems and biodiversity comes with reduced use and development is not necessarily true. Sites can be hardened to increase capacity by design (physical barriers), education (increasing respect and voluntary compliance with the 'don't do' activities), and more enforcement. Even solitude can conceivably be improved with some increased use by improving dispersal.

6) The draft does not address strategies or feasibility for implementation. A year ago I would not have considered this important, but I don't see much funding in the near future regardless of who runs the administration. Our planning needs to consider the feasibility of implementing every alternative, and allow the public to comment on those plans. While parks are already partnering and raising funds through donations, Congress could give us the authority to raise entrance fees and keep more of the proceeds. Perhaps the alternatives should explore new funding opportunities.

7) The plan does not give a clear reason for the North Fork Kaweah River not being eligible for "Wild and Scenic River" status. This river is not just extraordinary, but unique within the park. It is the only park river with its headwaters originating at mid-elevations resulting in it being the warmest river in the park. This coupled with the river's extraordinarily low gradient and deep pools result in some unique aquatic habitat. The result is extensive riparian development, the best population of western pond turtle within the park, the only (to my knowledge) park river containing the large mussels (*Margaritifera*), and pools that sometimes show thermal stratification similar to lakes. Not all of the river is low-gradient. Slightly above the confluence with Redwood Creek exists one of the more spectacular waterfalls in the park. While the edges of the river do show evidence of both archeological and historical artifacts, there is no permanent contemporary use, no bridges or trails or equipment. The North Fork is one of the few places to see a wood duck in the park. When you are on the North Fork, you feel like you are in a wild place. The old road that parallels the river is far above it. The North Fork Kaweah is still a wild place where bear and other wildlife dominate the landscape, not people. While it is true that some of the major headwater tributaries flow from private land outside the

park, I don't believe that they have much influence on the river within the park. Yes there are introduced fish in the lowest reaches of the river and it receives contaminants from the sky, but that is true for the other rivers rated as eligible, and some of them are crossed by bridges. It is true that the NPS does not own the west bank, but most of it (maybe all?) is public land. Either the document should provide some clear reason (Perhaps it does, but I could not find it.) for one of the most unique rivers in the Sierra Nevada to not be eligible, or it should be added to the list of eligible wild rivers.

8) Clarify plans for visitor use in the Ash Mountain area. The preferred alternative says "Provide concentrated use areas from Buckeye Flat to Ash Mountain, . . ." What does that mean? Though not acknowledged in the "no Action" alternative, we have concentrated use there now and inadequate facilities or staff to manage the situation. In the summer, day use there is overwhelming. At popular swimming areas, pullouts are often at capacity. The public has created there own trails when the Park failed to provide engineered trails. Some could become erosion nightmares, not to mention safety issues. Litter from picnicking along the river without proper facilities is awful. If we are going to permit the use (and I think we should), then we need to harden the sites with proper parking, trails, restrooms, food-storage, garbage facilities, and staff for public education and enforcement.

Harold Werner
44946 Sierra King Drive
Three Rivers, CA 93271

#3

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

Dear Superintendent Martin:

I have these thoughts on the draft General Management Plan for Sequoia and Kings Canyon National Parks.

- A fee structure of AT LEAST \$20 PER DAY PER ANIMAL (maybe \$30 per day?) needs to be implemented to cover the cost of trail maintenance made necessary by the devastating impact of livestock use on back country trails. The wilderness users really wonder at the wink and nod attitude by the govt at horse and mule interests while sticking it to walkers and hikers with ever increasing and proliferating fees for use of this public resource. Make those who impact it the most pay their fair share.
- The GMP needs to include and fully consider a "no grazing" alternative. A "no grazing" alternative was requested by numerous respondents. If recreational stock use is to be continued in the fragile, high elevation areas of Sequoia-Kings Canyon, then stock users should be required to carry feed for their animals, as is done in many other national parks, to avoid the extensive and considerable impacts caused by stock animals foraging for food (i.e., overgrazing, trampling of sensitive wetlands and lakeshores, etc.).
- The authors of the draft GMP have improperly concluded that the "preferred alternative" is environmentally superior to the "no stock" alternative. Such a conclusion does not make any sense at all, and does not even pass the straight face test. Eliminating recreational stock use from Sequoia-Kings Canyon would avoid the many significant impacts caused by stock animals. A "no stock" alternative would without any doubt be environmentally superior to current stock management practices, which would be continued by the preferred alternative.
- The GMP should retain the key language from the 1971 Master Plan that would phase out non-essential stock use in the most sensitive high-elevation areas of SEKI. At the absolute minimum, the GMP should allow no grazing or off-trail travel by stock animals above 10,000 feet elevation throughout Sequoia-Kings Canyon NPs. These are park-wide issues that must be addressed now, not put off to some future planning process.
- The commercial camp at Bearpaw Meadow should be removed, the site restored, and the area designated as wilderness, as envisioned by the House Committee Report for the California Wilderness Act.
- All of the commercial pack stations should be removed from park lands. They could be relocated outside the parks, if the operators so desire.
- The cabins at Mineral King should be removed when the permittee-of-record dies, and the sites restored to their natural condition, as envisioned by Congress when it added Mineral King to Sequoia National Park.

Thank you for considering my views.

Sincerely,

Bill West

#37

Date: October 5th, 2004
RE: Topic #6 - Mineral King Special Use Permits

Dear Dr. Graber & NPS,

My name is Wanda Wollenman, and my late husband Joe and I purchased Cabin # 1 in West Mineral King in 1958. Our children were very young then, and we spent many quality days from winter trips in on snowmobiles, through summer months of hiking, fishing, relaxing, and exploring. The many MK families developed life-long friendships as a second neighborhood. My husband and his sons for many years assisted the Forest Service with Snow Surveys, First Aid needs, and Search and Rescue.

My husband was a leader in the installation and upgrades of the West MK water system, and was instrumental in including the Park to partner with our water district in providing quality spring water for the Park and the public campground.

I am asking you to include in the GMP provisions for the continued renewal of private property leases and allow for future transfers of these leases.

Mineral King cabins are more than just buildings. This is a multigenerational community. The cabin owners make up a unique characteristic of Mineral King. Preserving this community and the historic buildings can only be done through continued private ownership of the buildings and Park leases.

- (1) Cabin owner will use their own fundings for maintenance of the buildings.
- (2) Leasees have been advocates to the public in giving information, working on trails and projects, trash cleanup, helping with car troubles and first aid, and being positive good usage of the area. Cabin owners are an asset to the Park for help and relations.
- (3) Having the Park take over the Cabins would not be cost feasible, as operations of the cabins (cleaning, heating, kitchens, bathrooms) and repairs and upkeep would be expenses for an inholder and/or Park.
- (4) To leave the cabins empty and make MK a ghost town of historic buildings removes the unique character of the buildings and community of people, as well as reducing the overall usage of the area, which cabin owners usage counts as one of the highest groups within this area.

Please consider changing your plans to include continued Cabin leases.

Sincerely, LaWanda Wollenman
1876 W. Waddell; Lindsay, Ca 93247

236

GORDON E. WOOD

5310 Pali Point Lane, La Cañada, CA 91011

September 20, 2004

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

Dear Dr. Graber:

I am writing to express my concern that the Sequoia-Kings Canyon General Management Plan may under evaluate the historic and cultural value of the Mineral King community.

Over the years, particularly since 1978 when Mineral King became the responsibility of the National Park Service, I have seen several attempts to minimize its historic heritage and transform Mineral King into a very different locale than has existed in the MK valley for more than 100 years. This has resulted in attempts to evict the permit-holders and their cabins, limit the ability of cabin owners to transfer the equity in their property improvements to third parties, and much greater restrictions on use of the area.

At times the NPS has argued that eviction of the cabin owners is necessary to make room for more campground space for the transient public. But I must remind the NPS that after they assumed responsibility for Mineral King it was the NPS that closed the Sunny Point campground that could accommodate far more campers than Cold Springs. I believe the argument that the need for more campground space is without merit, particularly since Cold Springs campground has vacancies for most of the summer even though it is often erroneously posted as being "full."

There is also a background issue of government credibility since the area was promoted in the 1930's by the Forest Service. At that time it was encouraged that people obtain use permits, build cabins, and make general improvements in the area. So that's what people did. They invested their money and work into making Mineral King the community it has become while preserving the historic sites and legacy of the area. To have the government now reverse that position and advocate the elimination of cabins is a disservice not only to the cabin owners but also threatens the historic heritage of the entire region.

I urge you to take these issues into consideration and document them in the deliberations that will soon occur relative to the General Management Plan.

Thank you for your time and attention.

Sincerely,



Gordon E. Wood

306

Bradley L. Young
Victoria L. Young

Post Office Box 416
Twain Harte, CA 95383
Phone: (209) 586-0776

September 30, 2004

David Graber, GMP Coordinator
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, CA 93271

Re: Draft General Management Plan

Dear Mr. Graber:

I am writing to express my dismay in regard to certain elements of the proposed Draft General Management Plan ("GMP") for the Sequoia and Kings Canyon National Parks. The GMP, as it currently stands, is obviously anti-environmental and strongly pro-commercial. If this plan is implemented, we are clearly headed in the wrong direction, quite opposite the basic foundational premises of the National Park Service ("NPS"). The 1916 Organic Act, that created the NPS, has as part of its mission statement:

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

To wit, blights on these areas include, but are not limited to, the Mineral King Cabins, various high sierra camps, particularly the High Sierra Camp at Bearpaw Meadow, and the virtually unregulated use of stock animals.

The private cabins at Mineral King should be removed when the permittee-of-record dies, as intended by Congress when it added Mineral King to the national park. The cabin sites should then be restored to their natural state.

The commercial horse/mule pack stations based within SEKI should be removed, as should the commercial camp at Bearpaw, with no provision of the GMP to consider, build, or rebuild such backcountry camps. These are exquisite examples of commercial exploitation of public land for private profit, and in no way resembles a "wilderness experience." In particular regard to Bearpaw, the House of Representatives' Committee Report prepared for the California Wilderness Act, specifically directed the NPS to monitor conditions at the Bearpaw camp, to report regularly to Congress on the findings of its monitoring, and to remove the Bearpaw camp if significant problems were ever found. However, the NPS has conveniently never conducted the monitoring requested

Barry's Resoles
September 28, 2004
Page 2

by Congress because the concessionaire, the NPS, wants to retain this camp, and any true monitoring would reveal the devastating and ongoing environmental impact of improper sewage disposal, food storage, helicopter use, stock use, noise pollution, and general impairment of the scenery.

It is common knowledge that stock animals severely and negatively impact sensitive meadows, creek beds, wetlands and lakeshores. Grazing and trampling effect root shearing, compaction and soil erosion, as well as the introduction of non-native invasive plants from animal feed. Stock animals can also pollute water sources with the dreadful giardia organism that affects the intestinal tract of both humans and animals. Please keep in mind that the 1964 Wilderness Act forbids commercial activity in wilderness areas – while SEKI is actively promoting and encouraging commercial stock activity. There is no reason why pack stations could not be located outside the parks' boundaries. Commercial stock use should be limited to only those persons who are truly disabled and cannot walk or carry their equipment into the wilderness.

The focus here should be true preservation of our wilderness areas, before there is no wilderness to preserve, not exploitation and profit for a few select, privileged individuals.

Very truly yours,


Bradley L. Young



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

