



## Rehabilitate 15.29 Miles of the Mineral King Road in Sequoia National Park Response to Public Comments

In Spring 2021, the National Park Service (NPS) solicited feedback on a proposed action to rehabilitate the Mineral King Road in Sequoia National Park during a 30-day public comment period extending from April 20 to May 19, 2021.

The NPS posted the proposed action and associated scoping materials for public review and comment on the NPS Planning, Environment, and Public Comment (PEPC) website: <https://parkplanning.nps.gov/MineralKingRoadRehab>. The availability of the documents, the comment period dates, and associated public meeting were announced through a press release and emailed to approximately 720 individuals and/or organizations including the Mineral King Preservation Society, the Mineral King District Association, Silver City Resort, and Tulare County. Public comments were accepted via email, letter, and the PEPC website.

The NPS held a virtual public meeting on the proposed action on April 27, 2021 where staff presented on the purpose and need for action, the full scope of the proposed action, resources of concern, and the overall project timeline. Questions from the public were also welcomed during this meeting. Approximately 18 members of the public joined this approximately 45-minute-long meeting.

This public scoping effort resulted in the receipt of 30 pieces of correspondence. These correspondences have been reviewed by park staff, coded into comments tied to specific aspects of the decision-making process, and considered in the decision-making process. Those comments deemed substantive or otherwise requiring a reply were summarized in the following concern statements, for which the NPS has provided a response.

In addition to formal public scoping, the NPS has met with specific stakeholders in the Mineral King area, including the Mineral King Preservation Society, the Mineral King District Association, and Tulare County on several occasions over the course of 2020 and 2021 to share information and hear feedback on the proposed action.

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## Comments that Question Purpose and Need for Action

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### **CONCERN STATEMENT:**

Several commenters suggested that the road or portions of the project (such as parking lots or aprons) did not need to be rehabilitated or paved; one commenter suggested that sections of the project are not conducive to paving.

**Representative Quotes:**

*“The road is serviceable as is, the area receives light visitation, which is one of the attributes that draws the people who use it.”*

*“There are sections of the road that seem (given roots, angle, water flow, etc.) to NOT be conducive to paving & even if the sections were paved, they would need yearly maintenance vs. a less frequent 'facelift.'”*

**RESPONSE:**

The Mineral King Road largely remains as it was constructed in the 1870's and lacks the typical subsurface material and treatment characteristic of our more modern transportation system. For this reason, the road is susceptible to damage from root systems, freeze thaw events, and other environmental factors that lead to a poor and difficult-to-maintain surface. Similarly, failing and otherwise undersized culverts have resulted in poor drainage along the entire length of the road, such that during high precipitation events, water flows in sheets across the roadway and sheds to the outside edge—eroding and undermining the slope below the road. These issues have resulted in poor pavement conditions along the entire roadway as well as several thousand feet of pavement cracking on the outside edge of the roadway where the supporting road structure is failing. For all these reasons, the NPS believes rehabilitation of the Mineral King Road—not just repaving the existing surface—is necessary to prevent road failure in key locations and ultimately enable more efficient maintenance along the entire road surface.

The challenges listed above are particularly true in unpaved sections of the road. Routine grading, snow plowing, vehicle use, and poor drainage has resulted in erosion and downcutting of the unpaved sections of the Mineral King Road. In unpaved sections, dust produced by vehicles traveling along the roadway also negatively impacts local air quality and reduces driver visibility. In both unpaved sections and paved sections where pavement is poor, exposed tree roots, including those of sequoia trees, are continually damaged by road maintenance and passing vehicles.

The unpaved sections of the road also require more cyclic maintenance actions. Grading is currently required 1-2 times per year along unpaved road sections; paving these sections would eliminate the need for roadbed grading. In addition to reducing maintenance needs, project engineers anticipate that improvements to both pavement and drainage would result in a more sustainable roadbed, thereby reducing erosion and downcutting, reducing dust production, and protecting tree roots and vegetation from further damage.

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## **Range of Alternatives**

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**CONCERN STATEMENT:**

Several commenters opposed the proposal to pave and/or stripe parking areas in the Mineral King Valley. These commenters generally either questioned the need for or value of this aspect of the proposed action or voiced concern that such pavement and/or striping would degrade the valley's undeveloped, rustic character or other resources.

**Representative Quote:**

*"I strongly object to any of the parking lots being paved, and especially painted or striped. The appearance would be more like a city shopping center lot and less like the wilderness area that it is."*

**RESPONSE:**

The NPS shares the public's concerns over changes to the aesthetic of the Mineral King Valley and has extensively discussed the trade-offs between different surface treatments, including maintaining existing dirt and gravel surfaces or leaving paved lots unstriped. A number of concerns were considered in discussions on whether or not to pave and stripe lots, including, but not limited to: existing impacts of dust on local air quality and visibility, potential impacts to vegetation and cultural resources from ongoing vehicle encroachment, high levels of parking demand along with haphazard vehicle parking in the parking lots, recurring maintenance needs associated with both surfaces, potential for stream sedimentation from parking area runoff during storm events, and the character of the Mineral King Valley (i.e., the character of the Mineral King Historic District).

In weighing the positive effects and potential adverse impacts, the NPS has determined that paving and striping of existing parking lots would represent a more sustainable solution for the Mineral King Valley over current conditions. Paving and striping would effectively address ongoing natural and cultural resource and maintenance concerns, reduce traffic bottlenecks, and improve space utilization. Potential negative impacts to the character of the Mineral King Valley will be minimized by limiting the scope of the action such as: restricting the amount of paving to existing footprints in most situations, utilizing logs for vehicle stops instead of curbs, and restricting striping only to areas where it could increase the efficiency of parking.

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**CONCERN STATEMENT:**

A few commenters were opposed to paving additional road sections, pull outs, and/or aprons due to potential impacts to natural resources.

**Representative Quote:**

*"I would like NPS to be as conservative as possible with paving unpaved sections of road. Covering over soil is destructive to absorption of rain and destroys more plants and animal habitats."*

**RESPONSE:**

This project proposes to rehabilitate the road and parking areas largely within their existing developed footprints and would not modify wildlife habitat beyond these boundaries. The only exception is the expansion of the parking area for the Eagle and Mosquito Lakes Trailhead, which would expand a maximum of 35 feet to the southwest through mostly previously disturbed soils. Currently unpaved road pullouts would remain unpaved. Paving of aprons would be limited to the extent necessary to protect the integrity of the roadbed.

With regards to stormwater runoff/absorption, most parking lots in the Mineral King Valley have bedrock immediately beneath them or otherwise function as bedrock given compaction onsite over time. In addition, the unpaved road sections and parking surfaces where rehabilitation is proposed were compacted during initial construction and have been continually compacted through maintenance and use. Because infiltration is already limited by

previous compaction and existing sub-surface barriers, paving is not expected to result in a significant change in overall infiltration in these areas.

As described previously, it is anticipated that paving parking lots would reduce vehicular encroachment on vegetation, minimizing ongoing impacts to vegetation surrounding the existing lots. Paving unpaved sections and improving pavement in paved sections would also benefit roadside trees and vegetation by decreasing erosion, downcutting, and root damage. In addition, replacement of culverts with those larger in size and improved design would better address runoff and erosion impacts to the adjacent vegetation and increase safe crossing opportunity for endangered fisher and other wildlife.

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**CONCERN STATEMENT:**

One commenter suggested rerouting the road around Atwell Mill Grove.

**Representative Quote:**

*"Go around the Atwell mill grove if possible."*

**RESPONSE:**

Rerouting the Mineral King Road around the entire Atwell Grove has been determined infeasible due to the size of the Grove, the steepness of the terrain, and the prohibition against the construction of permanent roads in the surrounding designated Wilderness. New construction would also invariably come with adverse effects to other natural resources. Instead, the purpose and need of this project has been tied to rehabilitating the road as the only vehicular means of access to Mineral King Valley and within the existing corridor in order to preserve the historic alignment of the Mineral King Road and the integrity of the Mineral King Historic District. That said, the NPS is concerned about impacts to sequoias from existing use along the road and from road construction; see page 8 of this document for additional details on the site specific mitigations to protect individual sequoia trees.

Despite the infeasibility of rerouting around the entire Grove, the NPS evaluated a potentially feasible reroute near Atwell Mill Campground where two sequoias are located on the current road's edge and create a pinch point in the road corridor. After careful consideration, the NPS believes the proposed action will minimize the damage these sequoias are currently incurring to their roots and bark by slightly elevating and thereby widening the road and reducing the exposure of the trees' root structure. That said, should the viability of these sequoia trees be threatened by road encroachment in the future, the NPS may consider implementing a short reroute in this location after thoroughly evaluating impacts to natural and cultural resources as well as visitor use and experience.

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**CONCERN STATEMENT:**

One commenter suggested reducing the scope of the project to not include replacement of culverts.

**Representative Quote:**

*"I would encourage a priority structure (in the face of reduced funding or schedule constraints) that favors upgrading the roadbed and surface over improving 200 culverts."*

**RESPONSE:**

The project would be adequately funded to accomplish all improvements. Although surface treatments do not theoretically require modifying the subsurface material or drainage, the subsurface materials and drainage along the Mineral King Road are in such poor condition that they are causing, at least in part, poor surface conditions which threaten the integrity of the road.

In addition to improving drainage, culverts provide a safe and effective passageway for a host of wildlife species including the endangered fisher. Increasing culvert size as planned in many locations to adequately support proper drainage, can further facilitate movement and decrease vehicle collisions with wildlife. Plans for culvert replacement or upsizing have been made on a case-by-case basis, with site specific considerations and mitigations to protect any potentially affected resources.

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**CONCERN STATEMENT:**

One commenter suggested that the upper portion of the Tar Gap parking lot remain a viable option for parking; the proposed action includes restoring that area to natural conditions.

**Representative Quote:**

*"I am concerned on the reduction of parking at the Tar Gap parking lot. During peak weekend parking for back packers appears to be a problem. The Tar Gap parking lot is a good relief valve. I would encourage you to not restore the upper part, neaten up the lot so it is a viable parking area in upper and lower."*

**RESPONSE:**

The NPS shares the public's concern over limited parking availability in the Mineral King Valley. Parking lot paving and striping layouts were designed by project engineers to maximize parking spaces within the limits of existing lot footprints, including Tar Gap parking lot. By maximizing parking efficiency, parking availability is expected to increase at both the Tar Gap and Sawtooth parking lots when compared to current informal and inefficient parking conditions. The Eagle Lakes Trailhead parking lot has also been designed to increase parking availability; this aspect of the proposal is contingent upon obtaining some property rights (e.g., easement) to that land which is under private ownership.

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**CONCERN STATEMENT:**

One commenter suggested relocating the Sawtooth Parking Lot.

**Representative Quote:**

*"The Sawtooth parking lot needs to be relocated near the old dump site. This way the cars and hikers do not disturb the cabin owners nearby. There is more room and the vehicles would be hidden by the thick willows there to the east of the old dump site."*

**RESPONSE:**

Relocation of parking lots lies outside the scope of this project, the goal of which is to rehabilitate surfaces within existing footprints to prevent development expansion, and to avoid

impacts to cultural and natural resources of the Mineral King Road and Mineral King Historic District.

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**CONCERN STATEMENT:**

Two commenters requested that the NPS consider either keeping the lower Mineral King gate open in winter or removing it all together; one noted that due to a reduction in illegal marijuana cultivation in the parks, the gate was unnecessary.

**Representative Quotes:**

*"I wish the road would open earlier in the year and that the gate below Lookout Point would not close in winter."*

*"Now that marijuana is legal in California, we aren't hearing as much about the pot groves below the MK road. Would you consider eliminating the troublesome lower gate?"*

**RESPONSE:**

The NPS continues to see evidence of illegal marijuana cultivation along the Mineral King Road. The gate is therefore considered necessary for law enforcement purposes. This project will remove and replace the existing gates with gates that are more user friendly.

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**Question Adequacy of Information**

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**CONCERN STATEMENT:**

A few commenters were concerned that the NPS did not have sufficient survey or background information to fully ensure protection of cultural resources. These commenters offered background information and additional methodologies for the NPS to consider.

**Representative Quote:**

*"I posit that that the standard cursory pedestrian survey is, though necessary, not sufficient to meet NHPA Section 106 requirements given that a Section 110 inventory is not yet complete. Recent weather events impacting portions of the road and parking lots have resulted in the exposure a high density of artifacts and demonstrated that the road and its turnouts and parking lots maintain substantial potential to provide insight into important research topics. . . Due to duff and road maintenance debris, however, these features and artifacts are not readily visible to pedestrian surveyors, especially those without knowledge of the historic use of specific sections of road. Therefore, to protect the cultural resources for interpretive and research purposes I advocate the following:*

*1] Determine where the previous iterations of the road are located. Identify where they abut and intersect the current road, and where the current road follows the path of the historic roads. In those specific locations plan for the probability of artifacts dating from 1873 to 1915 that could provide meaningful insight into the evolution of road construction techniques and equipment and the societal roles and life ways of the families and Chinese and Euro-American laborers who built the roads, as well as the miners, loggers, teamsters, livestock herders, military personnel, and resort visitors who used the road during this time period.*

*2] Identify the road work camps, especially those occupied by the extended families building the Meadows trail in 1873-4, the Chinese road construction crew in 1877, and the Euro-American road construction crew in 1879. All camps along the current road corridor identified thus far were located at creeks. In these locations, plan for the possibility that the road work will disturb and expose features and artifacts pertaining to the societal roles and life ways of the families and the Chinese and Euro-American laborers who built the roads. Artifacts and features of the Chinese camp sites would be particularly valuable because little is known about the Chinese in Tulare County during this period.*

*3] Expand the period of significance for protected archaeological sites adjacent to the road that have features and artifacts pre-dating the official period of significance and record the older features. Such sites include, for example, the wayside that was given a terminus post quem of 1921 but was actually an important hospitality wayside since 1873 and has the potential to yield insight into the lifestyle of families with children providing hospitality services during the mining period.*

*4] Identify, locate, and characterize the historic mine and mill site claims dating from 1873 that will be impacted by portions of the project. The known claims in this category include the S. Barton, Harmon, Thayer, E. D. Barton / Cone, Meadows, Lovelace, Pogue, Ford, Kellogg, Stranger's Lot, Kuisman, J. F. Crabtree, Allen / Tullis / Truman, Shipley / Peterson / Anderson, O'Farrell & Co., Anderson, Green, Hedges / Harrison, and Whiskey Smith / Crowley mill site claims, as well as the Black Diamond, Rose, Salt Grass 1N, Iron Cap, Pinnacle 3S, Red Warrior 1S, and Cedar Point mine claims. Several have interpretive value, and several are highly significant from a research perspective, including one that was owned by women in the 1870s. Mineral King is believed to be unique in having female miners in the 1870s and 1880s, and any data the female-associated sites possess can add to our understanding of the early women's enfranchisement movement in the United States and the role of women in Mineral King within the context of this movement. Most of the historic mine and mill sites are already known to include both features and artifacts within the area of potential adverse impact. Plan for the probability that the project work will disturb and expose features and artifacts with significant research value in these locations.”*

## **RESPONSE:**

Thank you for sharing your knowledge and research ideas; the NPS appreciates your interest in preserving the cultural resources of this area. The period of significance is one point of reference for the Mineral King Road Historic District and does not limit the evaluation of archeological sites. In this process, the NPS conducted a comprehensive analysis beginning with the prehistoric period and through the historical mining period. Pedestrian surveys were completed following contemporary methodology, and documentation of sites adjacent to the road were evaluated against the criteria defined in 36 CFR 60.4.

The scope of this project would not disturb abutments, roadside features, or other features outside the currently maintained and previously disturbed development prisms – which extend beyond the driven corridor. The NPS has consulted with the California State Historic Preservation Officer (SHPO) in accordance with Sec 106 of the National Historic Preservation Act. This consultation process included determining the area of potential effect (APE) for this undertaking, the identification of historic properties within the APE, and the assessment of

effect to those properties. Through this consultation process, the NPS determined that this project will have no adverse effect to historic properties.

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## Potential Impacts and Suggested Mitigations

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### CONCERN STATEMENT:

Several commenters noted concern over the potential for the project to impact giant sequoias, in particular those very close to the road.

### Representative Quote:

*"I have specific concerns about the preservation of the Sequoias that are close to the roadway and area of the proposed projects. I worry that those performing mitigation measures will prioritize completing tasks over protecting these historical resources."*

### RESPONSE:

The NPS has had many opportunities to study and learn about how trampling and soil compaction affects sequoia trees. Early investigations (Meinecke 1926) expressed strong concern that sequoias would be harmed by foot traffic and by the placement of road fill and pavement over their rooting zones. However, detailed field studies in both Yosemite and Sequoia and Kings Canyon National Parks have found that most mature sequoias actually showed a distinct increase in growth rate after these disturbances (Hartesveldt 1962, 1965).

Soils covered by pavement and compacted by foot traffic were warmer and retained more soil moisture than uncompacted soil, resulting in accelerated growth and longer growing seasons for the affected sequoias. In these studies, compaction to a level that would restrict sequoia root penetration generally did not extend much below 6 inches in depth. Both Hartesveldt (1962, 1965) and subsequent investigators (Hartesveldt et al. 1975, Stephenson 1996) also pointed out that roads and foot traffic tend to be localized, and their negative effects on most mature sequoias seem to be small to insignificant.

While adding fill and surface compaction does not appear to negatively impact mature sequoia trees, root damage can expose sequoias and other trees to pathogens. In unpaved or poorly maintained areas along the road, annual grading required to maintain the road in passable condition, as well as daily road traffic, continually subject exposed tree roots to damage. Every time grading occurs, more road surface is scraped away – resulting in downcutting of the road, steep cut banks, and increased potential for erosion. As downcutting continues, roots are further exposed, resulting in further damage and increased potential for pathogen exposure.

Paving unpaved sections and improving pavement in others is expected to prevent further erosion and downcutting of the roadbed thereby protecting roots from being further exposed and damaged by vehicles and equipment.

Furthermore, the parks' Plant Ecologist and Forester coordinated with the U.S. Geological Survey's leading sequoia expert to develop plans to mitigate potential impacts of road rehabilitation on sequoia trees both during and after construction. These plans include specialized road surface treatments at each mature sequoia, forgoing culvert replacement in at



least one location where the ecologists determined monarch sequoia roots were likely to be damaged, and exploratory hand-digging in several locations to determine whether the potential for root damage exists. Decisions for replacement or retention of culverts where exploratory digging is planned would be made based on findings.

All mitigations developed for this project have been documented and a qualified biological monitor would oversee implementation of all mitigation plans during construction to further protect these iconic species.

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**CONCERN STATEMENT:**

One commenter was opposed to the proposed removal of a juniper tree in one of the parking lots, noting that the tree should not be removed to pave the lot.

**Representative Quote:**

*“The old MK store parking lot has an old juniper that is marked to cut down. This tree has been there for 100 years and is the iconic symbol of the area. It would be like cutting down the General Sherman tree in the Park. Do not do that. Do not cut this tree down to pave the lot.”*

**RESPONSE:**

The property owner’s decision to remove the Juniper tree in question is independent of proposed parking area improvements. During the planning phases for this project, an onsite evaluation by the Park Forester determined that less than 30% sound wood remains, indicating a lack of structural integrity within the tree. While the NPS does not own the land where the tree is located, NPS staff notified the landowner of the tree’s condition and the potential threat that it poses to any people or vehicles within the vicinity. The NPS understands that the property owner wishes to mitigate the tree hazard due to its condition, but it remains in place as of this writing (June 2022).

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**CONCERN STATEMENT:**

One commenter expressed concerns that the project would pave over archeological resources.

**Representative Quote:**

*“As a Registered Professional Archaeologist, I would not support a plan to pave over known historic sites such as the CCC camp, Thayer and Barton's mill sites, Salt Grass Extension 1N, Iron Cap, J.F. Crabtree's mill site, and the Whiskey Smith / Crowley mill site without excavation. Given the NHPA Criterion D research value of these sites, paving over the features and artifacts would constitute a substantial loss not only to local researchers, but to researchers around the globe.”*

**RESPONSE:**

The sites listed here have been identified and are included in the Area of Potential Affect and were therefore considered in the Section 106 consultation process with the State Historic Preservation Office (SHPO); the project does not propose paving these areas and is unlikely to affect them. Project related artifact disturbance would be limited to artifacts that had been inadvertently or purposely moved from their original location into the road corridor or parking area footprint. Because these artifacts lack their historical context, they no longer contribute to eligible sites though may contribute to the larger historical context of the district. Actions

proposed in this project would encapsulate these displaced resources and protect them from further disturbance.

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**CONCERN STATEMENT:**

One commenter asked for mitigation measures to protect culturally important features.

**Representative Quote:**

*“Articulate the plans to mitigate impact to culturally significant features. These include the rock where for several decades it has been a whimsically humorous tradition to place sticks; the sweet peas at Trauger's Last Chance Ranch; the developed spring west of Atwell Mill (just east of the steam donkey remains); and the juniper at end of road which retains square nails and, per local tradition, still retains the marks used by Mary Trauger to record the snow level in the 1880s. If mitigation isn't possible, work with the community to commemorate and record the features and document their significance so that at least the cultural narrative, if not the features themselves, can be preserved for current and future generations. . . Due to the importance of the road corridor and sites along it to archaeological research, it is important that archaeologists be informed of the historical data collected as part of this project, and that the data be made available for both future and ongoing research. For reference see the Register of Professional Archaeologists Codes and Standards.”*

**RESPONSE:**

Thank you for your thoughtful concerns regarding culturally important resources in the Mineral King Valley. This project would not affect the rock, the Atwell Mill spring, or the sweet peas at the Last Chance Ranch. While some sweet peas may now occur on the roadside, they are escapees lacking historical context and are therefore not contributing features of the historic site in question. Please see the NPS' response on page 9 to a similar concern about the juniper tree.

The NPS maintains extensive historical and archeological records. Though sensitive records are protected from public disclosure, some data is available to researchers operating under an NPS issued research permit.

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**CONCERN STATEMENT:**

Several commenters were concerned that road construction activities and road improvements would negatively affect the endangered fisher (*Pekania pennanti*) and other wildlife through noise disturbance and road mortality.

**Representative quote:**

*“I have concerns about fisher displacement and worry that fishers will lose vital areas for many years. I worry this area is vital for them. Road improvement will result in increased traffic and increased prolonged threat to the fisher population in this area. According to Salzman and Thompson (2019, 293), habitat deconstruction and modification are the major threats to endangered species in the United States.”*

**RESPONSE:**

The NPS shares the public's concerns over threats to endangered species and works closely with the United States Fish and Wildlife Service (FWS) to ensure our actions do not reduce the likelihood of endangered species survival or preclude their recovery. Construction related

disturbance, which could displace fisher during the sensitive time when they are rearing kits, is of primary concern, and the NPS has consulted with the FWS to develop conservation measures to minimize the potential effects of disturbance on fisher.

Though documented incidents of fisher road mortality along the park's roads remains low, road mortality remains a significant concern; especially where vehicle speeds are high. However, this project would not modify the road layout and the speed limit would remain the same (15-25 mph). The NPS therefore does not anticipate the project would result in an increased risk of road related mortality for fisher or other wildlife. Rather, we anticipate that, by incorporating culverts specifically designed and placed to increase safe crossing opportunities, the project would benefit fisher over current conditions.

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**CONCERN STATEMENT:**

One commenter expressed concern about impacts to the biophysical environment from the use of equipment and introduction of materials.

**Representative Quote:**

*"The project will take from two to five years, and the amount of equipment potentially will cause compaction and disturbance in the land."*

**RESPONSE:**

This project would treat road and parking surfaces previously altered and compacted through construction and use. The project does not propose to modify the developed footprint of these previously altered and compacted surfaces. All staging of equipment and materials would occur on previously compacted and disturbed areas. Materials utilized for this project would come from NPS approved sources and would be inspected to ensure they are free of noxious weeds and non-approved chemicals.

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**CONCERN STATEMENT:**

Many commenters expressed concern that road improvements would lead to further increases in visitation to the Mineral King Valley which some commenters noted would negatively impact natural resources, such as wildlife, vegetation, natural soundscape, erosion, and air quality. Some of these commenters wondered whether the NPS had a plan to manage high visitation in the area; one commenter suggested developing a carrying capacity in the park or otherwise limiting the number of vehicles into the park during high season.

**Representative Quote:**

*"Let's find a way to prevent cars from parking illegally by the side of the road for days at a time."*

*"I understand that the visitors are important in bringing in some of the revenue for the park and providing upkeep- I strongly believe that capacity numbers should be kept low. Tourism is a huge industry and while national parks offer environmental peace and beauty, it's also environmentally degrading the parks. Vegetation trampling, parking in undesignated spots, going off trail, littering, excessive noise, erosion to trails and cliffs and CO2 emissions from cars or RVs bring in a lot of problems."*

**RESPONSE:**

While this project is not intended to evaluate or manage visitor use, Sequoia and Kings Canyon National Parks are committed to NPS' mission of preserving unimpaired the natural and cultural resources and values of the National Park Service System for the enjoyment, education, and inspiration of this and future generations. To meet this mission, the NPS welcomes visitors from across the nation and around the world who seek a range of experiences. As we greet a new generation of visitors and park supporters, increased demand for recreational opportunity is driving record visitation in all areas of these parks.

Though preferences for visitation levels vary across individuals and user groups, the NPS recognizes that high visitation levels can degrade the experience of some visitors. Currently, the NPS utilizes a variety of mechanisms to manage visitor use and provide high quality visitor experiences. These include enforcing regulations, maintaining restrooms and trash services, and providing park conditions and resource information via our website and signage. In addition, Sequoia and Kings Canyon National Parks are taking the initial steps of developing a Visitor Access and Transit Plan (working title), which will, among others, identify visitor capacities for certain areas of the parks and explore site specific strategies to address visitor use issues, such as parking and congestion. Civic engagement will be a key part of this planning effort.

We also note that while visitation can affect natural resources – primarily resulting in vegetation and soil trampling and either displacement or attraction of wildlife – these affects tend to be concentrated immediately adjacent to park facilities in developed park areas representing less than 3% of the parks' total land area. The remaining 97% of these parks are protected as wilderness and are surrounded by similarly protected federal lands where direct human influences on vegetation, wildlife, water, air, and soundscapes are limited and where natural processes predominate.

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**CONCERN STATEMENT:**

Several commenters provided recommendations on the construction schedule, particularly related to public closures. Examples of these recommendations include the following: 1) ideally, closures should occur during the shoulder seasons, in particular when the gate is closed; 2) closures over holiday weekends should be avoided, 3) avoid closures during weekday hours, 4) have periodic closures allowing regulated public access, 5) allow hard closures only during nighttime hours (10:00 pm - 6:00 a.m.); and 6) allow hard closures during daylight hours on weekdays to speed up the repairs.

**Representative Quotes:**

*"I would encourage the NPS to afford maximum access capabilities for weekends during the summer season (Fridays through Mondays)."*

*"Please consider only letting traffic through every 2 hours so that the work can be done more quickly/efficiently. Closing it after 8 pm, as long as you ALERT the PUBLIC in ADEQUATE WAYS (signs posted) would seem to help get the work done & allowing 1 midnight pass is usually feasible. Even a weekend closure would be feasible as long as you ALERTED the public & esp. businesses so they could plan accordingly if it would help get the project finished UNDER BUDGET & in LESS TIME."*

*“Possibly arrange for up and down access in work areas once or twice a day, specifically timed.”*

*“I would like to see the NPS consider peak travel time when deciding on road closures. off-season and evening closures would be beneficial to those traveling in the park.”*

*“It will take more than several years to do the work you are planning if you try to keep the road open. I would recommend closing it during daylight hours during the week completely to speed up the repairs...better to get it done quick than drag it out to allow constant access.”*

**RESPONSE:**

We understand the public’s interest in maintaining reasonable access to the Mineral King Valley and the vital importance of communicating road closure information in a timely manner. The NPS, in cooperation with the Federal Highway Administration (FHWA), continue to identify strategies to reduce the effects of project related closures on residents and visitors while also balancing the limited seasonal window of time each year when temperatures and conditions are suitable to complete the work. At this time, periodic daytime closures, as well as full nighttime closures, are anticipated. The NPS will consider all public feedback as we continue to refine closure schedules and will communicate all closure information.

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**CONCERN STATEMENT:**

Many commenters requested that the NPS develop a robust communication plan to ensure the public is adequately informed of road closure schedules.

**Representative Quotes:**

*“I’m most concerned about road closures, and how notifications will be distributed. As you know, most of the cabins are without telephones, all are without Internet, and cellular service is non-existent. How will visitors be notified of hard closures, especially at the last minute? If someone drives up and leaves on a multi-day backpack trip, and returns to discover he is trapped at the upper end of the valley, what recourse would he have? He can’t call, text, or email anyone from the valley unless he walks down to Silver City. What might help is to have someone stay at the Ranger Station 24/7 to help with trapped visitors. Also, put a large sign at the bottom of the hill (corner of Hwy. 198 and Mineral King Road) advising of road closures, and perhaps one or two along the road as reminders. Frequent and timely communication will be the key.”*

*“I would also encourage accurate and timely announcement of the closure schedules at least a week in advance (recognizing that minor deviations would have to be made for weather or project implementation contingencies).”*

*“Could there be some communication posted around Three Rivers that indicates what the plan/agenda is, given that not everyone is on the internet 24/7?”*

*“Please share updates via the Mineral King District Association (cabin owners).”*

**RESPONSE:**

Thank you for the suggestions and recommendations concerning efficient and effective forms of communication concerning construction schedules. The NPS is committed to providing

advance notification of all closure schedules via news releases, email correspondence to cabin owners, signage, social media posts, and the parks' website. Overnight wilderness users will be notified of any potential closures when they pick up wilderness permits. Any updated schedules or unanticipated closures will be shared via these same methods as they become available.

The project does not propose to modify locations or quantity of existing pay phones which will continue to be available to the public for emergency communications.

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**CONCERN STATEMENT:**

One commenter expressed concern that the boundaries of the project will encroach upon private land within the Mineral King area.

**Representative Quote:**

*"Members of our family have witnessed construction grade stakes and other markers that indicate that the proposed project might severely impact our property by encroaching upon the existing lot lines."*

**RESPONSE:**

The road rehabilitation work will not encroach on private property without proper easement or other rights or approvals. During the design phase of this project, the NPS and FHWA placed some temporary markers to help identify utility lines that project engineers wanted to note in order to avoid impacts to existing infrastructure; these do not annotate construction boundaries. The NPS is also aware of other project work by private property owners in Mineral King Valley that could account for some of the stakes or markers the commenters observed onsite.

Related to this overarching project, the NPS is also pursuing an easement on a 5-acre property at the end of Mineral King Road where a parking area currently exists (the trailhead for Eagle and Mosquito Lakes). Should the NPS obtain rights from the property owner(s), this parking area could be expanded, striped, paved, and maintained by the NPS. Again, no action would be taken on non-federal land without the NPS first obtaining property rights (i.e., an easement).

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**General Comments**

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**CONCERN STATEMENT:**

Several commenters were interested in knowing how the NPS is coordinating with the County to rehabilitate the lower portions of the Mineral King Road, including replacement of the County Bridge.

**Representative Quote:**

*"What coordination efforts is the NPS taking with Tulare County to assure that the County will obtain funding to rehabilitate the 10 miles of road outside of the NPS boundary?"*

**RESPONSE:**

The NPS does not have jurisdiction over the Tulare County portion of the Mineral King Road; however, NPS staff assisted Tulare County with a grant application to match federal dollars with

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Rehabilitate 15.29 Miles of the Mineral King Road in Sequoia National Park

Response to Public Comments

County funding to rehabilitate the road outside Sequoia National Park. Thus far, these attempts have been unsuccessful. NPS Staff also continue to communicate with the Tulare County Supervisor regarding potential construction schedules for a bridge along the County portion of this road and this rehabilitation effort. We anticipate this coordination will continue in a joint effort to minimize construction impacts to residents and visitors to the area.

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**CONCERN STATEMENT:**

One commentor provided NPS information on underground AT&T utility lines that may be affected by the project so that the infrastructure could be protected. This commenter asked what coordination had been completed with AT&T relative to ensuring the integrity of the infrastructure.

**RESPONSE:**

The NPS will coordinate with all utility companies to ensure services provided by non-NPS infrastructure are not affected by the project. Should non-NPS infrastructure be incidentally damaged during project implementation, the NPS has committed to replacing that infrastructure (such as a water pipe) in situ in the same, if not better, condition as prior to the work.

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**Questions**

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**QUESTION:**

*What is your plan for the 4 water troughs along the road?*

**RESPONSE:**

The water troughs will not be affected by this project. Mitigation measures have been identified to protect these features during construction/project implementation.

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**QUESTION:**

*While the construction itself is to bring about positive changes to your park, what about the negative impacts it will bring over the course of those two to five years? Will there be an environmentalist or natural resource professional on hand to make sure air pollution levels or noise levels are not disturbing nearby wildlife? How will these issues be addressed?*

**RESPONSE:**

Disturbance to all listed species has been evaluated through the Endangered Species Act Section 7 consultation process with FWS, and appropriate conservation and mitigation measures have been developed to reduce impacts to wildlife and other natural and cultural resources. An NPS project manager and park resources monitor would also oversee implementation and ensure all project mitigations are being followed.

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