ERRATA
Environmental Assessment
Construct Wireless Telecommunication Facility
Atop Park Ridge in Kings Canyon National Park

Sequoia and Kings Canyon National Parks, California
August 2009

The announcement of the availability of the Environmental Assessment and Assessment of Effect (EA/AoE) for the proposed wireless telecommunications facility on Park Ridge was sent to a mailing/email list of approximately 330 individuals, agencies, tribes, businesses, interest groups on May 20, 2009. This mailing list is used when EAs are made available for public review; the list is modified as needed based on public requests. Approximately 120 printed or CD copies of the document were mailed to interested parties. An electronic copy of the EA/AoE was placed on the parks' Planning, Environment, and Public Comment (PEPC) Web site (http://parkplanning.nps.gov/seki) to which all reviewers and interested parties were directed. There was also a link to this site from the Sequoia and Kings Canyon National Park Service Web site at http://www.nps.gov/seki/parkmgmt/planning.htm. Printed copies of the EA/AoE were also made available at the parks and at 12 area libraries, including: the Tulare County Library (Exeter and Lindsay branches), the Tulare County Law Library, and the Fresno County Library (Central, Sunnyside, Fowler, Kingsburg, Orange Cove, Parlier, Reedley, Sanger, and Selma branches).

Information on the public review of the EA/AoE was published in the Mammoth Times newspaper on May 30. In addition, availability of the EA/AoE was announced at the June 8 Three Rivers Town Hall meeting. The National Park Service conducted public review of the EA for 30 days, with the comment period ending on June 22, 2009. The park received 51 comment letters on the EA/AoE.

The Errata are compiled as an attachment to the EA/AoE for the purpose of clarification or corrections. There are no substantive edits made to document contents, revisions to the proposal, or substantive changes to document content. The corrections and clarifications do not constitute a substantive change in the purpose of the project, the alternatives evaluated, the alternative selected for action, or the consequences of the alternatives, including the selected alternative.

To ease comparison between the original EA/AoE and the Errata, the Errata are presented as complete paragraphs from the EA/AoE with the added or deleted information either underlined or deleted through strikethrough. The original page numbers in the EA/AoE are referenced along with the chapter and section.

Changes to the Environmental Assessment

Chapter 1, Issues and Impact Topics, Wilderness, EA/AoE pages 12-13

Wilderness
In accordance with *NPS Management Policies 2006*, in evaluating environmental impacts, the National Park Service will take into account (1) wilderness characteristics and values, including the primeval character and influence of the wilderness; (2) the preservation of natural conditions (including the lack of man-made noise); and (3) assurances that there will be outstanding opportunities for solitude, that the public will be provided with a primitive and unconfined type of recreational experience, and that wilderness will be preserved and used in an unimpaired condition. Interagency cooperation and coordination will facilitate efforts for establishing agency and interagency consistency in wilderness management techniques. On September 28, 1984, the Sequoia – Kings Canyon Wilderness was established as federally designated wilderness, encompassing approximately 723, 000 acres, or about

83.5% of the parks. Through Congressional action, additional lands within the parks have been designated as wilderness, for a total of 807,962 acres currently designated as wilderness, or about 93.3% of the parks. Other lands within the parks are also managed as wilderness, although they are not officially designated as such. In total, 837,962 acres, or 96.8% of the lands within the parks are managed as wilderness.

The wilderness acreage within the parks, when combined with the adjacent wildernesses in the neighboring Inyo, Sequoia, and Sierra National Forests are the second largest continuous wilderness in the lower 48 states totaling nearly 2,240,000 acres. The parks and national forests have continued to manage these areas to preserve wilderness characteristics per regulation and policy.

The proposed project area is not within a wilderness area. Visitors in some wilderness areas in the parks would be able to see Park Ridge, but it would be difficult to discern an 80-foot-tall tower there. U.S. Forest Service managers in the adjacent national forests have advised that an 80-foot-tall tower on Park Ridge would not be visible from most of their wilderness areas. Although it would be visible from Giant Sequoia National Monument, it would not be readily visible from areas that are frequently visited.

In accordance with the Wilderness Act and NPS policies, cell phones are not considered a mechanical device and they are not prohibited in wilderness. It is true that some people may find that use of cell phones detracts from their wilderness experience (e.g. sense of solitude), but other people may find use of cell phones entirely acceptable. The degree potential adverse affects to wilderness values will ultimately depend upon individual values and expectations, making it extremely difficult to quantify within an EA.

Since the act of using a cell phone in wilderness is not a prohibited action under the Wilderness Act and NPS policies, and the impacts to wilderness from wilderness visitors speaking on their cell phones would be highly localized and small, and overall the impact would be minor, because any change in the wilderness character and associated values would be small and highly localized~~; therefore,~~ wilderness was dismissed from further analysis in this EA/AoE.

Chapter 2, Alternatives, Environmentally Preferred Alternative, EA/AoE page 17

ENVIRONMENTALLY PREFERRED ALTERNATIVE
In accordance with DO-12, the NPS is required to identify the "environmentally preferred alternative" in all environmental documents, including EAs. The environmentally preferred alternative is determined by applying the criteria suggested in NEPA, which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that "[t]he environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in Section 101 of NEPA, which considers:

1. fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations
2. assuring for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings
3. attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences
4. preserving important historic, cultural, and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice
5. achieving a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities
6. enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources" (NEPA, section 101)"

The no action alternative is not the environmentally preferred alternative, because it would not provide visitors, employees, travelers and residents in surrounding areas with cellular telephone and wireless internet accessibility, thereby increasing their safety and sense of personal security.~~, and improving their recreational experience~~ This may or may not improve their recreational experience, depending on their expectations and personal beliefs about the use of cell phones in national parks (criteria 2, 3, and 5 are not met as well as under the preferred alternative)

The environmentally preferred alternative in this EA/AoE is the preferred alternative, because it protects public and employee health, safety, and welfare by providing reliable wireless communications services for park visitors and employees, public health and safety officers, emergency response teams, and residents and travelers in the surrounding area (criteria 2, 3, and 5).

Chapter 2, Alternatives, Mitigation Measures, General Measures, EA/AoE page 26:

Add the following mitigation measure:

Noise from generators will be at the lowest decibels technically possible.

Chapter 4, Environmental Consequences, Visitor Experience, Alternative 2: Preferred Alternative, EA/AoE pages 44-45:

Alternative 2: Preferred Alternative
Park Ridge Trail users within sight of the Verizon Wireless tower would see it alongside three other communications towers, a fire lookout tower, and associated service buildings. The impact on those visitors' experience created by a new 80-foot-tall tower would be long-term, minor, and adverse. The number of visitors hiking the Park Ridge Trail to the vicinity of the lookout tower and other towers is not known.

Visitors in some more distant parts of the parks would be able to see Park Ridge, but it would be difficult to discern an 80-foot-tall tower there. Managers of the adjacent national forests have advised that the tower would not be visible from wilderness areas, and although it would be visible from the Giant Sequoia National Monument, it would only be readily visible from locations that are infrequently visited. The impact on the visitor experience would be long-term, negligible, and adverse. Photographs depicting representative views of Park Ridge from areas outside of the Grant Grove area are included in this EA as part of the discussion of scenic resources. Those photographs are presented as figure 9 and figure 10.

There would also be short term, negligible, adverse impacts to visitor experience if a communications tower were built on Park Ridge. Vehicles required for constructing the necessary facilities and erecting the tower would pass through a part of the Sequoia National Forest, and would travel park roads enroute to and from the construction site. Their passage would impede traffic and detract from the natural woodland experience most visitors anticipate in the parks and the national forests. Construction equipment would also travel through Grant Grove Village during construction, disrupting the quiet relaxed atmosphere usually found there. Such intrusions would occur infrequently and only during the anticipated two-month construction period. Aside from the vehicles transporting the workers, the only construction-related vehicles anticipated would be a backhoe, a crane, concrete trucks, and a concrete pump.

Relatively few park visitors would be affected by construction-related impacts in the Grant Grove area during the anticipated two-month summer construction period. Figures from the National Park Service Public Use Statistics Office indicate that in 2008, approximately 2.8% of visitors to Sequoia and Kings

Canyon National Parks stayed overnight at Grant Grove during July and August, the two busiest months of the year.

Construction impacts in the proposed project area on Park Ridge, such as noise, dust, and vehicle exhaust, would have very little impact on visitors. Park Ridge is 900 feet to 1,000 feet higher in elevation and at least one mile away from Grant Grove Village and the nearby campgrounds and sequoia groves. Dense forest covers the slopes between the ridge and those attractions.

Visitors on the Park Ridge Trail while construction was underway would be more directly and forcefully impacted, depending upon their proximity to the construction activities. However, the great majority of visitors in the Grant Grove area do not hike the Park Ridge Trail, and overall, the impact level would be negligible.

A one or two-member maintenance crew would regularly service the communications tower equipment after construction was complete. Their passage to and from the site would likely go unnoticed by visitors in the parks and national forest.

The basic character of the parks and national forests, which includes rustic settings and traditional activities, would be unaffected by the Verizon Wireless tower, but the cellular telephone services and wireless internet access provided by the tower would create an increased sense of security and convenience for visitors who would use those services. That would have a long-term beneficial impact on visitor experience.

Under this alternative, there would be improved cell phone coverage in select areas of Kings Canyon National Park and adjacent U.S. Forest Service lands. This will likely increase the use of cell phones in these areas, particularly in the developed areas where visitors congregate, and in residential areas in the park. The impacts from the use of cell phone are quite varied and difficult to quantify. Some people may find that use of cell phones detracts from their park experience but other people may find use of cell phones entirely acceptable. The degree to which the proposal potentially affects visitors will ultimately depend upon individual values and expectations and cannot be quantified. Generally, depending on visitor expectations, the impacts would be both beneficial and adverse, long- and short-term, and minor to moderate and are not expected to change experiences fundamental to the parks' mandates.