US Department of the Interior
National Park Service
FINAL GENERAL MANAGEMENT PLAN AND COMPREHENSIVE RIVER MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT
Sequoia & Kings Canyon National Parks
Tulare and Fresno Counties California

RECORD OF DECISION

INTRODUCTION - The Department of the Interior, National Park Service (NPS), has prepared this Record of Decision (ROD) regarding the *Final General Management Plan / Environmental Impact Statement* for Sequoia & Kings Canyon National Parks, California. This ROD includes a statement of the decision made, synopses of other alternatives considered, the basis for the decision, a description of the environmentally preferable alternative, a discussion of impairment of park resources or values, an overview of required measures to minimize environmental harm, a summary of public involvement in the decision-making process, and errata documentation of corrections and clarifications made to the Final EIS. Attached as an appendix are responses to letters sent to the parks following release of the Final EIS.

DECISION (SELECTED ACTION) - The NPS will implement the preferred alternative as described in the *Final General Management Plan (GMP) and Comprehensive River Management Plan (CRMP) / Environmental Impact Statement (FEIS)* issued in November 2006; there are no substantive changes or modifications. The Comprehensive River Management Plan and approved individual plans are common to every alternative. Key elements of the approved plan include the following:

- The integrity of park resources is paramount. The parks' *Natural and Cultural Resources Management Plan (1999) is affirmed by the GMP/FEIS.* It perpetuates naturally functioning ecosystems; preserves natural biodiversity; restores damaged ecosystems by removing alien species and reintroducing native ones; and protects cultural resources. River protection measures in the CRMP protect the parks' existing, and eligible and suitable wild and scenic rivers. Cultural resources that portray diverse cultural themes are preserved and required consultations continue.
- The parks' appeal is broadened to be more relevant to diverse user groups while the parks remain strikingly distinct from surrounding areas. The basic character of park activities and the rustic architecture of facilities are retained. Park facilities accommodate sustainable growth.
- Increased day use is accommodated without unacceptable effects, and overnight visitation is retained. Increasing traffic, visitation and congestion are addressed by alternative transportation systems, entrance station improvements and redesign of some roads and parking. Visitors are provided diverse opportunities to experience the parks.

- Use of stock continues, both as a means of access to wilderness by visitors, and for the administration of wilderness and protection of wilderness values. A formal system of resource monitoring is used to adaptively adjust stock use through regulation and local closures.
- The parks' designated wilderness and other areas managed as wilderness are zoned to reflect the varying intensities of use of different areas. In heavily traveled zones, there exist engineered trails and bridges, food lockers, designated campsites, and toilets to protect park resources, while in less-used areas, amenities are minimal or non-existent. A new subsection, below in italics, entitled *"Decision-making Process for Facilities within Backcountry and Wilderness Zones,"* is added to the GMP/FEIS (Vol.1, Page 67) to clarify the action.

  This General Management Plan is a programmatic plan. The GMP provides conceptual guidance for park managers about the kinds of resource conditions, visitor services, and visitor experiences that best fulfill the mission of these parks. The listing of categories of "appropriate facilities" within the individual zone prescriptions serves only to exemplify the types of facilities that may now exist or that the parks may wish to consider at some point in the future. For a new facility to be considered, or for an existing facility to be repaired or replaced within the Major Trails, Secondary Trails, or Cross-Country Areas zones, the parks would conduct the appropriate level of compliance under the National Environmental Policy Act (i.e., Categorical Exclusion, EA or EIS). Incorporated into any such compliance would be appropriate consideration of the Wilderness Act (Minimum requirement analysis), the Endangered Species Act and the National Historic Preservation Act. Further, installation of or repairs to facilities would have to comply with any prescriptions contained in the action alternatives considered in this plan. Only facilities that undergo additional site-specific compliance and that comply with all applicable legal and planning requirements would be constructed or repaired.

- A *Wilderness Stewardship and Stock Use Plan* will be developed—with formal opportunities for review and comment as well as informal public meetings—to regulate use and protect wilderness values. The plan will consider natural ecosystem functions and the native species that depend upon them. No installation of new structures nor any new commercial activities will be undertaken until after approval of this plan. Structures or equipment that require replacement in wilderness will have NEPA compliance (including Minimum Requirements Analysis) completed.
- The parks will refine the visitor carrying capacity framework and use it to ensure the preservation of park resources and the quality of the visitor experience.
- Stronger educational and outreach programs will provide enjoyment and introduce NPS conservation values.

- Over time, facilities, including utilities, will be made more resource-efficient. Water conservation measures continue to be implemented as needed. Work camps for staff, partners and volunteers may be developed to support ranger activities, maintenance, resource protection, interpretation and interagency projects. Park administrative facilities are redesigned and may be relocated outside the parks if beneficial.
- A small amount of private land would be a priority for acquisition, should it become available, to improve user access.
- Clarifying text (below in italics) is added to the FEIS (Vol.1) at pages 65, 66, and 67, to indicate that the designation of the Major Trails, Secondary Trails, Cross-Country Areas zones on the ground will be analyzed and considered in the public planning process accompanying the Wilderness Stewardship and Stock Use Plan.

  This Plan does not designate specific trail segments or the geographic area around each trail segment that is included within this zone. Trails and the areas around each trail that fall within this zoning prescription will be considered as an element of the Wilderness Stewardship and Stock Use Plan. The Wilderness Stewardship and Stock Use Plan will be accompanied by an EA or EIS and will involve many opportunities for advance public scoping and subsequent public review of the compliance document tiered to the GMP.

- Numerous measures to address user capacity are adopted. A new subsection (below in italics) consolidating previously disclosed measures in one location has been added to the GMP/FEIS (Vol.1, Page79) to follow the subsection entitled *"Backcountry Monitoring, Indicators, and Management Actions":*

  Carrying Capacity Measures for Wild and Scenic Rivers.

  A variety of specific, measurable user capacity limits for the parks' designated Wild and Scenic River Corridors are used. These measures include overnight backcountry quotas, restrictions on group sizes, meadow opening dates for stock use, area closures, and location restrictions on stock use and camping. Each is described below:

  ▪ *Overnight trailhead quotas are numeric limits on the number of overnight hikers in wilderness. Trailhead quotas have been established for each backcountry trailhead. Wilderness permits are required; if a trailhead quota has been filled, visitors cannot get an overnight permit for that trailhead.*

  ▪ *The parks have established maximum group size limits for hiker and stock parties. Current party size limits are 15 people per party and 20 stock animals per party, unless otherwise specified.*

  ▪ *Opening dates of meadow grazing are based on soil moisture conditions and thus vulnerability to trampling. A scientifically-based protocol based on*

information spanning more than two decades and using snow survey data is used to assess whether a given year will be dry, normal or wet. This in turn is used to establish meadow opening dates. These dates are typically announced in the late spring. Private or commercial stock may not use meadows prior to the designated opening dates.

▪ *Area closures to stock, are based on specific, measurable variables, and are used to protect meadow ecosystems. Meadow conditions are measured through the Stock Use and Meadow Management Program. Pursuant to this program, residual biomass (RBM) and proportion of bare ground in meadows that receive regular stock use is measured. The Meadow Management Program has led to the closure of several meadows to grazing, and to area restrictions. Examples of area-specific regulations in place for the 2007 season include the closure of Granite Lake Meadow and Vidette Meadow to grazing; the closure of Lake Reflection Meadow and Darwin Bench and Meadow to all stock use; a limit of fifteen stock animals per party limits in four meadows; length-of-stay restrictions in several meadows; and the prohibition of overnight stock use in two meadows.*

▪ *Stock use is generally restricted to maintained trails; stock may travel ½ mile from each trail to reach a campsite. Off-trail stock use is prohibited except in specific areas designated for such use in the parks' annual Stock Use and Grazing Regulations publication.*

▪ *In the future, RBM data (which measures the amount of above-ground plant material in a meadow) will be used to further refine stock use levels for park meadows by establishing a limit on the number of "stock nights" for each meadow. The residual biomass monitoring program will provide the parks with additional information regarding the amount of grazing that is appropriate for park meadows.*

▪ *Backcountry and wilderness camping regulations require that campsites be no closer than 25 feet from water sources and recommend they be 100 feet from water sources. Campsites too close to water are frequently removed and rehabilitated by wilderness staff.*

▪ *The GMP/FEIS commits the parks to incorporating adaptive management principles into the parks' carrying capacity program. Indicators will be adopted relevant to the desired conditions for each zoning category. For backcountry and wilderness areas, site-specific indicators and standards will be identified in the Wilderness Stewardship and Stock Use Plan. These indicators will be monitored, and use levels adjusted, to ensure that desired resource conditions are being maintained.*

A suitable location for a commercial pack station to replace the Wolverton Pack Station will be identified, provided that it does not result in unacceptable environmental effects or lead to impairment of park values.

OTHER ALTERNATIVES CONSIDERED - Four other alternatives (three "action" and the comparative baseline "no action" alternative) for managing Sequoia & Kings Canyon National Parks were evaluated in the draft and final EISs.

The *No-Action Alternative* (Continue Current Management): The parks are managed as they are now in accordance with approved plans (such as development concept plans, and the 1996 Giant Forest Interim Management Plan); negative resource impacts and visitor demands are responded to by relocating development, reducing some uses, or confining new developed areas. Visitor uses are reassessed and revised as new information about natural and cultural resource impacts and visitor needs emerges. Current facilities are inadequate for park needs and visitor use levels, and crowding is common in some areas.

Alternative A: Emphasize Natural Ecosystems and Biodiversity; Reduce Use and Development: The parks are natural resource preserves; they are primarily valued because they contain publicly owned resources that will be conserved for the future. Levels of use are lower than at present, and visitor experiences are more directly connected to natural resources and provide more solitude. The parks strongly contrast with surrounding lands that are under increasing pressure for use and development. Park managers aggressively cooperate with the managers of surrounding lands to enhance range-wide biodiversity.

Alternative C: Preserve Traditional Character and Retain the Feel of Yesteryear; Guide Growth: The parks present a traditional park character and a feeling of yesteryear, where experiences are more reminiscent of how visitors used the parks in the past. This is conveyed through rustic architecture and lower impact recreational activities (such as sightseeing and hiking) that were popular from the 1920s to the 1960s, and providing an experience that is strikingly different from that in an urban setting. Redesigned developed areas accommodate limited growth; overnight stays are encouraged. Negative impacts on natural resources are controlled, so as to maintain or improve resource conditions.

Alternative D: Preserve Basic Character and Adapt to Changing User Groups; Guide Growth: The parks preserve some of their traditional character and rustic architecture, but diverse new user groups and uses are encouraged. Day use is more common. Facilities are expanded to meet users' needs, while frequent interpretive programs are offered to educate, entertain, and instill a sense of park conservation values. Negative impacts on natural resources are controlled or mitigated, so as to maintain or improve resource conditions.

An alternative that was considered but rejected was a collective public suggestion to remove all development from the parks, including roads, and to ask people to hike into the parks. Cultural resources would be removed, including those highly valued facilities related to early NPS rustic architecture and the CCC (the Generals Highway and related facilities), as would all park and concession facilities. And only visitors physically capable of a strenuous hiking experience could enjoy the parks. While the intent of these

suggestions may have been to protect resources, this alternative would not meet the NPS mandate to provide for public enjoyment, and the ability to fulfill the mandate to preserve cultural and natural resources would be hampered. This alternative would not meet NPS *Management Policies* or any of the six goals of the National Environmental Policy Act. Consequently, it was rejected.

BASIS FOR DECISION - The Organic Act established the NPS in order to "promote and regulate the use of … national parks…." The Organic Act defined the purpose of the national parks as "to conserve the scenery and natural and historic objects and 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." The Organic Act provides overall guidance for the management of Sequoia & Kings Canyon National Parks.

In reaching its decision to select the preferred alternative, the NPS considered the purposes for which Sequoia & Kings Canyon National Parks were established, and other laws and policies that apply to lands in Sequoia & Kings Canyon National Parks, including the Organic Act, the Wilderness Act of 1964, the National Environmental Policy Act, the National Historic Preservation Act, and *NPS Management Policies*. The National Park Service also carefully considered the full spectrum of public comments received throughout the planning process, and used these comments in formulating the final plan. Consequently, this final plan in some instances includes elements not present in any of the draft alternatives. Changes in the laws regarding the permitting of cabins in Mineral King Valley, and the permitting of the hydroelectric systems operation by Southern California Edison are reflected in the selected plan. In particular, comments received during the period following release of the Draft General Management Plan /EIS, as well as consultation with government agencies and tribes, have resulted in adjustments. Those comments, and the responses to them, are provided in Volume 3 of the GMP/CRMP/FEIS

Each of the four alternatives in the *Draft General Management Plan* presented a different approach for managing Sequoia & Kings Canyon National Parks. As a result, each alternative would have different impacts on park resources and visitors. The preferred alternative presented in the *Final General Management Plan* represents a synthesis of what the NPS considers to be the best elements of each of the original alternatives.

Compared to the other alternatives considered, it is the determination of the National Park Service that the preferred alternative (selected action) best protects park resources while meeting the needs of diverse user groups, accommodating increased day use and a wide variety of wilderness users, and improving access to the parks; while maintaining essential elements of park character, expanding education and outreach programs and improving facilities, services and transportation. The selected alternative will have both positive and negative impacts on the park's natural resources, but most of the negative impacts will be minor and localized. Increased emphasis on incorporating research findings, partnering, and visitor education will enhance the quality and quantity of resource information. The information gained will allow for more efficient and

sophisticated resource programs. Cultural resources will benefit from continued surveys, inventories, and evaluations of these resources for their eligibility for listing in the National Register of Historic Places, as well as from such actions as rehabilitation and adaptive use of some historic structures. Additionally, visitor experience will be enhanced by increased visitor opportunities for recreation and educational programs, and access to park facilities and services. Overall, the selected alternative provides for optimal visitor experience while protecting park resources.

Unlike the no-action alternative, the selected alternative addresses issues that have arisen since the 1971 Master Plan. Visitor use patterns and demographics have changed; there are demands for new recreational experiences and activities, and 22,400 acres have been added to the park. The no-action alternative would provide for continued management and protection of resources, although visitor opportunities would not be enhanced and issues such as crowding and congestion would continue. Compared to the no-action alternative, the new plan will provide a greater diversity of opportunities for visitor experience, and the protection and management of park resources will benefit from new and expanded information and better informed visitors.

Alternative A This alternative would have resulted in a somewhat greater protection of the natural scene than the preferred alternative; it would also result in a moderate adverse impact on the visitor experience due to the decrease in diversity of opportunities, accessibility, and number of interpretive programs.

Alternative C would have sought to guide visitation toward traditional activities and longer visits. However, visitation has been consistently trending toward shorter visits, especially day use, with fewer traditional activities, so this alternative would have conflicted with visitor preferences.

Alternative D would have accommodated the greatest diversity of visitor experiences and the greatest increase in visitation, but at the price of increased development and local crowding.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE - Pursuant to guidance provided by the Council on Environmental Quality, the environmentally preferable alternative is defined as "the alternative that will promote the national environmental policy as expressed in §101 of the National Environmental Policy Act. Section 101 states that "...it is the continuing responsibility of the Federal Government to...

(1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;

(2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;

(3) attain the widest range of beneficial uses of the environment without degradation, risk to heath or safety, or other undesirable and unintended consequences;

(4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;

(5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and

(6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources."

As identified and analyzed the *Draft and Final Sequoia & Kings Canyon National Parks General Management Plan / Environmental Impact Statement,* the environmentally preferable alternative was deemed to be the NPS preferred alternative. Taken as a whole, the preferred alternative best satisfies the six goals. This alternative enhances the park's ability to carry out its mission through developmental and programmatic activities while limiting the amount of new environmental impacts from development and use. Current visitor experiences will still be available but with a greater depth and range, and there will be increased opportunities for both recreational diversity and learning about park resources. Buildings will be adaptively used for new functions, thus maximizing visitor opportunities without expanding the developed areas. Consequently the preferred alternative satisfies national goals 2, 3, 4, and 5 to a high degree, ensuring for the long-term that visitors coming to the park see an esthetically and culturally pleasing area, providing a wide range of opportunities for visitors to learn and enjoy the area with minimal adverse impacts, while preserving and enhancing the understanding and preservation of the park's important natural and cultural resources and fulfilling the NPS' responsibilities as trustee of the environment (goals 1 and 4).

The no-action alternative, would continue to preserve important cultural and natural resources (goals 1 and 4), although it would not enhance the NPS's ability to achieve these goals to the same degree as under the preferred alternative. Educational, informational, and research opportunities would remain limited by lack of facilities and programs and would thus not fulfill goals 2, 3, 4, and 5 as well as the preferred alternative.

Alternative A would provide the highest degree of protection from visitor and infrastructure impact for the parks' natural resources, primarily by removing facilities and restoring areas to more natural conditions. However, some cultural resources would be recorded and removed. Although some visitor opportunities would be enhanced, particularly non-motorized opportunities, overall there would be a narrower range and fewer opportunities for all visitors to fully enjoy the park as compared to the other alternatives. Thus goals 1 and 6 would be well served by this alternative, but goals 2, 3, 4, and 5 would not be adequately addressed.

Alternative C would provide for modest growth in visitation while preserving the traditional means of enjoying the parks. While this would meet all goals to a significant extent, it would not achieve goals 1 and 2 to the extent of the preferred alternative.

Alternative D would provide the greatest range and flexibility in visitor recreational opportunities, thus meeting goals 2, 3, 4, and 5. However, this alternative would not have the emphasis on both research-based educational opportunities and recreational diversity that the preferred alternative would offer. Providing these opportunities and associated

new facilities would also result in more extensive and dispersed resource impacts and a greater likelihood that resource management would become more reactive rather than proactive in addressing issues. Thus this alternative would not provide as great a degree of protection for resources (goals 1 and 4) compared to the preferred alternative.

FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES - The NPS may not allow impairment of park resources and values unless directly and specifically provided for by legislation or proclamation establishing the park. Impairment that is prohibited by the NPS Organic Act and the General Authorities Act is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including opportunities that otherwise would be present for the enjoyment of those resources or values. In determining whether impairment would occur, park managers examine the duration, severity and magnitude of the impact; the resources and values affected; and direct, indirect, and cumulative effects of the action.

According to NPS policy, "An impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is: a) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; b) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or c) identified as a goal in the park's general management plan or other relevant NPS planning documents."

This policy does not prohibit all impacts to park resources and values. The NPS has the discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impacts do not constitute an impairment. Moreover, an impact is less likely to constitute an impairment if it is an unavoidable result, which cannot be further mitigated, of an action necessary to preserve or restore the integrity of park resources or value.

After analyzing the environmental impacts described in the *Draft* and the *Final General Management Plan / Environmental Impact Statement* and considering the public comments received, the NPS has determined that implementation of the preferred alternative would not constitute impairment to Sequoia & Kings Canyon National Parks' resources and values. The actions in the preferred alternative are intended to protect and enhance the management and preservation of the park's natural and cultural resources, and provide for high-quality visitor experiences. The alternative will have beneficial effects on such resources as biotic communities, special status species, historic structures, and museum collections. The alternative will have a positive effect on most visitors' experiences by increasing educational opportunities and recreational diversity.

From a park-wide perspective, no major adverse impacts to the parks' resources or the range of visitor experiences are expected. While the alternative will have some adverse effects on park resources and visitor experiences, most of these impacts will be site-specific, minor impacts. None of the impacts of this alternative will adversely affect resources or values to a degree that will prevent the NPS from fulfilling the purposes of

the park, threaten the natural integrity of the park, or eliminate opportunities for people to enjoy the park.

MEASURES TO MINIMIZE ENVIRONMENTAL HARM - The NPS has investigated all practical measures to avoid or minimize environmental impacts that could result from the preferred alternative. All such measures to avoid or minimize environmental harm have been identified and incorporated into the selected alternative and are described in the *Final General Management Plan / Environmental Impact Statement*. These measures are described in the alternatives chapter, and in the analysis of environmental impacts. Measures to minimize environmental harm include, but are not limited to: locating projects and facilities in previously disturbed or developed locations; restoration of disturbed areas with native plants; data gathering and monitoring to evaluate visitor use and associated impacts; conducting surveys of special status species and their habitats; monitoring changes in the condition of natural and cultural resources; monitoring construction activities; and consulting with the California State Historical Preservation Officer, U.S. Fish and Wildlife Service, and park-associated American Indian tribes when appropriate.

PUBLIC INVOLVEMENT - In the development of the draft plan, nine scoping meetings were held, seven planning newsletters issued; alternatives planning workshops were held in seven cities; and a mailing list developed consisting of over 3700 entries. The parks maintained regular communications with the cooperating association and concessioners authorized to operate in the parks. Meetings and contacts occurred with special use permittees (Southern California Edison, Mineral King District Association, and the Boy Scouts of America); private landowners (Wilsonia, Silver City, Oriole Lake); and other stakeholders (Backcountry Horsemen of California, High Sierra Hiking Association, Friends of the River, National Parks Conservation Association, Sierra Club, National Park Foundation, Three Rivers community, Clean Air groups, Mineral King Advocates, Mineral King Preservation Society, Tulare County Historical Society, California Department of Transportation, Tulare County, Fresno County, Save-the-Redwoods League, local and regional business groups, educational institutions and the Sierra Federal Managers Group).

Accompanying the project introduction in **Newsletter 1**- Summer 1997/reprinted Winter 1998, public meetings were held in six locations in the parks during the summer of 1997; and in Three Rivers, Visalia and Fresno/Clovis in the winter of 1998. Comments and ideas were recorded from all meetings. **Newsletter 2** - June 1998 summarized public scoping, desired visions for the park, issues, type of decisions to be made, and provided background information about the Mineral King area. **Newsletter 3** - March 1999, described a transportation study conducted in 1997-98 and a 1998 visitor satisfaction survey. It also summarized the finding of a 1998 study to determine the eligibility of Mineral King Road corridor for the National Register of Historic Places as a cultural landscape. **Newsletter 4** - Spring 1999, a 24-page workbook with maps to prepare for alternatives workshops, consisted of issue discussion and asked tradeoff questions; a total of 745 responses were received. Alternatives workshops held to ensure that public ideas were incorporated into the range of alternatives to be assessed were attended by about

five hundred people. These April 1999 workshops were held in San Francisco, Sacramento, Bishop, Los Angeles, Three Rivers, Visalia and Fresno/Clovis. During July 1999, Native American consultations were held on both sides of the Sierra Nevada. Government-to-government communication continued throughout the plan's progress, and detailed records have been kept of all consultations with Native American groups.

Ideas from scoping, public workshops and consultations guided the development of the range of alternatives, and suggested wording was used for alternative titles and descriptions. **Newsletter 5** - Winter 2000, described a range of four alternatives that would be assessed in the Draft EIS; included a pullout of alternatives maps; and presented draft park-wide zoning prescriptions. **Newsletter 6** - December 2000, an update, described establishment of Giant Sequoia National Monument; announced the eligibility of the Mineral King Road Cultural Landscape District; announced inclusion of the Wild and Scenic Rivers Plan in the GMP process; announced that the plan would be delayed until a new superintendent was in place; and answered public questions about wilderness designation, and stated that a summary would be sent to people on the mailing list. **Newsletter 7** - Spring 2002 was a brief update announcing the new superintendent and the addition of the 1540 acre Dillonwood Grove of giant sequoias to the park; discussed document distribution formats; and described the process known as "choosing by advantages" that was to be used to develop a preferred alternative. The process combined elements of all the alternatives to maximize benefits to the parks and cost-effectiveness. Newsletter 7, by asking what document format (CDs or printed copy) was desired, revised the Newsletter 6 approach that would send a printed summary to everyone. The newsletter stated that if NPS was not notified, a CD would be sent; approximately one hundred people specifically requested CDs and fewer than fifty requested printed copies. Altogether roughly 1100 oral and written comments were derived from the extensive scoping effort.

The comment period on the Draft Sequoia & Kings Canyon National Parks General Management Plan and Comprehensive River Management Plan / Environmental Impact Statement was initiated with the EPA notice of filing published in the Federal Register on May 7, 2004 (the NPS notice of availability of the draft document was published in the May 18, 2004, Federal Register). On August 25, 2004, the comment period was extended through October 6, 2004 (for a public comment period totaling 150 days). The NPS received approximately 400 comments on the draft plan by mail, e-mail, and fax, as well as posted on the Internet planning website. A number of individuals and groups submitted duplicate comments by different means, and several people commented up to six times. No substantive comments were received from American Indian tribes. Of the comments, approximately 10 were received from agencies and an elected official, and 23 from organizations. The remaining comments were from individuals and included form letters, a petition, and variations of form letters. The EPA noticed its "lack of objections" rating in the Federal Register on July 9, 2004. The new standard for PM2.5 particle emissions was added per EPA suggestion, as was further discussion of shuttle bus transportation within Sequoia National Park and connecting it to external points. Based on careful consideration of all responses received, in preparing the Final EIS the NPS made editorial changes and additional explanatory text on topics of interest were incorporated. There were no substantive changes as a result of public commentary.

DEVELOPMENTS AFTER RELEASE OF FINAL EIS - The EPA notice of filing for the final EIS was published November 17, 2006 in the Federal Register - the 30 day "no action" waiting period ended on December 18, 2006. The NPS notice of availability for the final environmental impact statement was published in the November 20, 2006 *Federal Register.* Approximately 3,500 copies of the final document were distributed. Two letters were received following release of the Final EIS, from: (1) Wilderness Watch and (2) High Sierra Hikers Association. The appendix to this Record of Decision addresses issues raised by these letters; however no substantive new information or concerns were imparted which had not already been fully considering in preparing the Draft and Final EIS.

CONCLUSION - Among the alternatives considered, selection of the preferred alternative provides a GMP that best protects park resources while also providing a range of quality visitor experiences, meets NPS goals for managing Sequoia & Kings Canyon National Parks, and meets national environmental policy goals. The approved GMP will not result in the impairment of park resources and values. The officials responsible for implementing the selected plan are the Regional Director, Pacific West Region, and the Superintendent, Sequoia & Kings Canyon National Parks.

Approved: Jonathan B. Jarvis **Date:** 9/14/07

Jonathan B. Jarvis
Regional Director, Pacific West Region

APPENDIX

Following release of the Final Environmental Impact Statement for the GMP, the parks received two letters expressing concerns with a number of issues. The letter from *High Sierra Hikers Association* reiterated issues raised in their comment letters on the Draft GMP/Draft Environmental Impact Statement. *Wilderness Watch* did not comment on the Draft GMP/DEIS, and expressed their concerns for the first time in response the Final GMP/FEIS. As a supplement to the GMP/FEIS, which includes a detailed response to all comments received in response to the DEIS, the NPS has prepared the following additional responses to the issues raised by these two letters. As these are not substantively new concerns, the description of the selected plan in the ROD includes elements responsive to these concerns.

I. RESPONSES TO WILDERNESS WATCH LETTER

Issue 1: Wilderness Watch claims that the GMP/FEIS allows new facilities to be built, and existing facilities to be rehabilitated or reconstructed, within the Backcountry and Wilderness Prescription zones.

Response:

As explained in the Record of Decision (ROD), the GMP does not authorize the installation of new facilities such as food storage lockers and ranger stations in areas zoned as Major Trails, nor does the GMP authorize the construction of new bridges and ranger stations in areas zoned as Secondary Trails. (These zoning prescriptions are found at GMP/FEIS pages 64-66)

The Preferred Alternative in the FEIS indicates that "additional facilities are considered only in the non-wilderness backcountry." (FEIS Matrix Reference No. 144) This provision prohibits the installation of new facilities in areas designated as wilderness and in areas managed as wilderness, with extremely limited exceptions. The only types of new facilities that would be considered for designated wilderness and areas managed as wilderness are directional signs and research or monitoring devices. The installation of small monitoring devices (such as air quality monitoring devices) would be considered only if the installation of the device would substantially increase the parks' understanding of resource conditions in the affected area of the parks. Further, monitoring devices and directional signs would only be installed if all applicable legal requirements were met, including the requirements of the Wilderness Act.

The GMP is a programmatic plan that does not authorize the construction of any specific facility. To clarify the role of the GMP and its relationship to future, tiered plans, a subsection, entitled *"Decision-making Process for Facilities within Backcountry and Wilderness Zones,"* is included in the Record of Decision.

Issue 2: Wilderness Watch claims that the GMP/FEIS fails to specifically identify which segments of trail and surrounding land would be designated as Major Trails or Secondary Trails.

Response:

In response to this concern, clarifying text is included in the ROD that indicates that the designation of zones on the ground will be analyzed and considered in the public planning process accompanying the Wilderness Stewardship and Stock Use Plan.

Issue 3: The Wilderness Watch letter claims that the GMP/FEIS authorizes the installation of toilets and food lockers in wilderness areas.

Response:

The ROD clarifies that the GMP does not authorize the installation of specific new facilities. Moreover, the GMP Preferred Alternative, which is the action selected in the Record of Decision, does not allow the installation of new food lockers or toilets in designated wilderness or in areas managed as wilderness. Maintenance may occur on a case-by-case basis, following identification of the "minimum tool" necessary for such work, and would be addressed in tiered compliance documents.

Issue 4: Wilderness Watch asserts that the GMP/FEIS should direct the removal of existing food storage lockers in wilderness and that the GMP/FEIS should require the use of portable food storage containers.

Response:

As a programmatic plan, the GMP cannot and does not provide detailed guidance on all the activities occurring in these parks. With regard to the issue of food storage lockers, the GMP does not require the parks to retain any of the approximately 90 food storage lockers that now exist in several popular backcountry areas. Decisions to retain or remove existing food storage lockers are more appropriately addressed in tiered compliance documents. Likewise, the issue of portable food storage container requirements is too detailed for a programmatic plan and thus was not addressed in the GMP. The use of portable food storage containers is addressed in park rules regarding food storage, and these rules are available on the parks' website. Backcountry visitors must use approved portable, food storage containers in designated areas. Outside these designated areas, backcountry users must use an available food storage locker or properly secure their food to make it inaccessible to bears.

Issue 5: The GMP does not include adequate zone prescriptions for designated Wild and Scenic Rivers.

With the exception of a portion of the South Fork of the Kings River, all Wild River segments are in wilderness, and GMP wilderness prescriptions are adequate in addressing Outstandingly Remarkable Values (ORVs) protection (FEIS Vol. 1, P.100). ORV protection is inherent in wilderness protection. Likewise, there are prescriptions specific to the Recreational River corridor of the South Fork Kings Rivers (FEIS Vol. 1, p. 104).

Issue 6: The Wilderness Watch asserts that the parks' existing stock use restrictions (such as the permit requirements, party size limits, overnight quotas and area closures) are inadequate to protect "wild" river values.

***Response*:**

Based on the management prescriptions and environmental analysis included in the FEIS, existing stock use restrictions adequately protect ORVs. The Comprehensive Management Plan component of the GMP/FEIS adopted a number of existing stock use restrictions including overnight wilderness quotas, wilderness permit requirements, restrictions on stock party size, use restrictions for stock parties, and area closures. These river management prescriptions are described in the FEIS in Volume 1 at page 53 and in Matrix Reference Number 47.

Based on these prescriptions, the FEIS evaluated impacts to Wild and Scenic River values for each of the river segments administered by the parks. All of the Wild and Scenic River sections managed by the parks have scenic, recreational and geologic ORVs. Geologic ORVs (e.g., granite peaks, glaciated canyons, U-shaped valleys) are not affected by stock or hiker use. As to scenic and recreational ORVs, the analysis in the FEIS concludes that the use of the river management prescriptions would result in minor beneficial impacts to these ORVs, although in some localized areas there could be minor adverse effects on these ORVs from stock use and hikers. The other ORVs identified: Wildlife, Prehistory/History, Vegetation (for the Middle Fork Kings), and Fish (for the North Fork Kern), pertain generally to small geographic areas and are also analyzed in the FEIS. These are either unaffected by stock use or could receive minor adverse effects in specific cases (FEIS Vol. 2, p. 172) The FEIS concluded that these minor adverse impacts would not lead to degradation of these ORVs.

The Middle Fork of the Kings River and the North Fork of the Kern River have natural resource-related ORVs. The FEIS concluded that these ORVs would not be affected on a segment-wide basis by ongoing stock use because stock use would be regulated by the river management prescriptions adopted in the plan. (FEIS Vol. 2, p. 172)

The GMP/FEIS also envisions the possibility of future adjustments to the parks' existing stock use restrictions. The Preferred Alternative provides that management of stock use in the parks, including areas containing wild river segments, would be improved through expanded use of controls on stock party size, regulation of dates and locations,

designation of areas, and appropriate closures as needed. The Parks will conduct stock use, visitor capacity, and grazing studies to establish standards and indicators for managing stock and visitor use in areas containing Wild and Scenic River corridors. Any refinements or additions to the system for managing stock and visitor use in the backcountry would be analyzed in the forthcoming Wilderness Stewardship and Stock Use Plan (WSSUP). (See FEIS Vol. 1, Matrix Reference Numbers 22, 42, 47, 57, 62, 157, 160, and 161)

Issue 7: Wilderness Watch claims the existing stock party size limit of 20 animals per party is insufficient to protect wilderness character or Wild & Scenic River values, therefore the GMP/FEIS should have considered and adopted a smaller party size limit for stock animals.

Response:

As a programmatic level plan, the GMP does not make decisions about what party size limits will apply in future. The Environmental Consequences section of the FEIS concludes that the management prescriptions included in the Preferred Alternative are adequate to prevent degradation of wilderness character (FEIS Vol. II, p. 182-183), and river values, (FEIS Vol. II, p. 172). The forthcoming WSSUP, which will be tiered to this GMP, will evaluate detailed options for regulating stock use. Changes to existing party size limits could be addressed in that plan.

Issue 8: Wilderness Watch claims the GMP/FEIS does not adequately discuss past and future riverbank restoration efforts.

Response:

The parks have not conducted any riverbank restoration, *per se*, in the past. As to future effort, the GMP is a programmatic document. The GMP thus presents information at a less-detailed level than project-level NEPA compliance. As a programmatic plan, the GMP provides a general description of the Affected Environment in the parks and then analyzes how that environment would change based on the management prescriptions contained in each alternative. Because the GMP/FEIS does not direct any specific restoration project, it cannot include detailed analysis of the environmental consequences of such a project. If the NPS determines in future that riverbank restoration projects may be desirable, appropriate tiered environmental compliance and public involvement will precede any such actions.

Issue 9: Wilderness Watch asserts that the GMP/FEIS fails to establish meaningful user capacities for designated Wild and Scenic Rivers.

Response:

See Decision (Selected Action) section in Record of Decision.

II. LETTER FROM HIGH SIERRA HIKERS ASSOCIATION (HSHA)

Issue 1: The HSHA letter expressed the concern that the GMP authorized a number of specific actions that would result in significant adverse impacts to park resources and that would substantially increase stock use. HSHA believes such actions include the construction of a new stock campground on the North Fork of the Kaweah River, a new stock trailhead in the Dillonwood area, various stock use improvements in the Ash Mountain/Foothills area, and new locations for two pack stations.

Response: Although the GMP provides programmatic direction for these actions, the GMP does not address site-specific design and location attributes for such facilities. (For example, the GMP does not specify the size or precise location of a new stock campground along the North Fork of the Kaweah River) With the exception of the Wolverton Pack Station, all of the actions identified by HSHA will be further analyzed in the EIS that will accompany the WSSUP. The WSSUP will analyze alternatives for the design, location and size of these facilities. As an EIS, the WSSUP will be subject to public review and comment. Because project-level design aspects of these actions are not formulated, the NPS disputes HSHA's claim that these actions will result in an increase of stock use in the parks.

Replacement of the Wolverton Pack Station currently is the subject of an Environmental Assessment under NEPA. The GMP/FEIS establishes criteria for the possible re-establishment of a pack station in the general area. We have noted HSHA's concern about the text in the FEIS that provides that the action may occur provided that it does not result in "major adverse effects." To better clarify the criteria governing the possible re-establishment of this pack station, the Record of Decision states that a pack station may be established provided that it does not result in "unacceptable adverse effects."

Based on the criteria included in the GMP/FEIS, the EA for this project will analyze multiple alternatives, including an option of having no pack station in the area, removing the remaining structures, and restoring the site to natural conditions. The EA will be subject to public review and comment and all site specific impacts related to the pack station will be evaluated before a final decision is made.

Finally, all decisions made by the parks (including decisions to construct or replace stock use facilities) are subject to the non-impairment standard of the National Park Service Organic Act (see NPS Management Policies 2006). The NPS may only implement actions that do not impair park resources.

Issue 2: HSHA asserts that language from the parks' 1971 Master Plan regarding the phasing out of stock use should still provide management direction for the parks with regard to stock use.

Response:

The GMP/FEIS explains the relationship of the 1971 Master Plan to the new GMP. (See Volume 1, page 6 and 36) The GMP, which has been adopted pursuant to the public review requirements of NEPA, now establishes the parks' programmatic approach to stock use. The programmatic approach adopted by the GMP is that stock use is an appropriate activity in these parks and that stock use will be subject to NPS control and regulation to ensure that it occurs in a manner that protects park resources and wilderness character. While the NPS recognizes that HSHA has a policy disagreement with the NPS over stock use in particular areas of these parks, the 1971 Master Plan no longer sets programmatic direction on the issue of stock use.

Issue 3: HSHA asserts that the GMP contains an insufficient range of alternatives with regard to stock use.

Response:

HSHA's letter presents a number of detailed alternatives that it believes should have been considered in the GMP. The alternatives that HSHA suggests are of the scale of detailed options on one issue (i.e., stock use) that are appropriate for an implementation level NEPA document. The WSSUP will include implementation level planning for stock use that will replace the Stock Use and Meadow Management Plan and the Backcountry Management Plan. The WSSUP will consider a range of alternatives regarding specific conditions for stock use such as the timing and location of stock use and grazing, the conditions under which grazing would occur, and whether stock use should be limited or restricted in specific areas. The range of alternatives to be included in the WSSUP will be informed by the results of the NEPA public scoping process. During the scoping process, HSHA and other members of the public will have the opportunity to identify in advance issues and concerns or pertinent environmental information that they believe should be addressed in the WSSUP.

Issue 4: HSHA asserts that the GMP contains an insufficient range of alternatives with regard to commercial pack stations and that the retention of certain stock related facilities, particularly the Mineral King and Wolverton pack stations, will impair park resources. The HSHA also asserts that a *needs assessment* regarding commercial services in wilderness should be conducted.

Response:

As explained above, the NPS believes that the range of alternatives included in the GMP is sufficient with regard to stock use. The NPS also disputes the contention that retention of commercial stock use facilities necessarily results in violations of the NPS Organic

Act, the Wilderness Act and other laws. The parks' existing stock use controls ensure that impacts from stock use do not impair park resources; the environmental consequences analysis in the GMP/EIS demonstrates that impacts remain within acceptable limits. In addition, the NPS will consider additional methods of monitoring and regulating stock use in the forthcoming WSSUP.

HSHA's letter also raises concerns related to commercial pack stations at Wolverton and Mineral King. The status of the Wolverton pack station is addressed above. The GMP/FEIS indicates that the NPS should relocate the Mineral King Pack Station to improve resource conditions. Options for the relocation of this pack station will be addressed at a site-specific level in the WSSUP. A needs assessment will be conducted as part of the WSSUP process.

Issue 5: HSHA says that the GMP fails to adequately consider the "substantial adverse impacts of stock animal use."

Response:

The environmental consequences analysis in Volume 2 of the GMP/FEIS analyzes the impacts of GMP actions, including stock use, on water quality, wetlands, bighorn sheep, and other park resources. The level of detail in the environmental consequences section is more than adequate for a programmatic document. With regard to potential stock use impacts on bighorn sheep, there are existing stock use restrictions that limit stock use in bighorn sheep habitat. The recovery plan for Sierra Nevada Bighorn Sheep does not identify recreational stock use as a threat.

Issue 6: According to HSHA, the GMP does not contain adequate measures to mitigate the impacts of stock use.

Response:

As explained above in our responses to the letter from Wilderness Watch, the parks have a number of existing controls on stock use. The Decision (Selected Action) section in this Record of Decision consolidates in one location the numerous mechanisms the parks currently use to regulate and mitigate the impacts of stock use on park resources.
The GMP also specifies that the parks will adopt additional monitoring protocols in the future. These monitoring protocols will be designed to maintain desired resource and visitor experience conditions established by the GMP for the parks' different zones. (A description of the desired conditions for backcountry and wilderness zones can be found at FEIS, Vol. 1, pages 64-67) Selection of specific indicators and standards for monitoring and maintaining conditions in wilderness and backcountry areas will be made during the public planning process accompanying the WSSUP. (FEIS, Vol. 1, page 79)

Issue 7: HSHA asserts that the GMP establishes inappropriate criteria for the possible relocation of the Wolverton Pack Station.

Response:

As outlined above, the parks will prepare an environmental analysis considering the possible relocation of the former Wolverton Pack Station. The EA for this project will analyze multiple alternatives, including an option of having no pack station in the area, removing the remaining structures, and restoring the site to natural conditions. The EA will analyze the impacts of a new pack station location on park resources and visitor experience, including the experience of wilderness visitors. The EA will be subject to public review and comment and all site specific impacts related to the pack station will be evaluated before a final decision is made.

In accordance with NPS policy, each alternative in the EA will be analyzed to determine whether it complies with the non-impairment standard of the NPS Organic Act. The NPS may only select an alternative that satisfies the non-impairment standard in the NPS Organic Act. The NPS does not agree that the GMP/FEIS creates a new standard for the NPS Organic Act.

Issue 8: HSHA's letter alleges a number of flaws with the GMP NEPA process, including mischaracterization of the public comments, inadequately responding to public comments, and failure to evaluate relevant information. Lastly, HSHA states "the EIS and SEKI staff characterize the public comment process in glowing terms, yet it was far from ideal."

Response:

The National Park Service has received no other communications from any other individual, organization, or agency supporting these alleged shortcomings. To the contrary, EPA noted its "lack of objections" in the Federal Register on July 9, 2004, as stated in the Record of Decision.