

US EPA ARCHIVE DOCUMENT



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

June 25, 2004

David Graber  
GMP Coordinator  
Sequoia and Kings Canyon National Parks  
47050 Generals Highway  
Three Rivers, CA 93271-9651

Subject: Sequoia and Kings Canyon National Parks/Middle and South Forks of the Kings River and North Fork of the Kern River General Management Plan and Comprehensive River Management Plan Draft Environmental Impact Statement (DEIS) [CEQ# 040207].

Dear Mr. Graber:

The U.S. Environmental Protection Agency (EPA) has reviewed the document referenced above. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

We have rated this DEIS as LO – Lack of Objections (see enclosed “Summary of Rating Definitions”). However, we request some additional information be included in the Final Environmental Impact Statement (FEIS) for clarification.

The DEIS mentions in several sections the possibility of expanding the shuttle system, which would reduce vehicle miles traveled within the parks and relieve traffic and parking congestion in some high-use areas. The DEIS (Vol. 2, p. 243) states that a new transit system is planned to begin at Giant Forest/Lodgepole in 2005. The FEIS should discuss options for expanding the shuttle system, identify criteria that would be used to analyze these options, and indicate whether the analysis would be the subject of a future tiered NEPA document. The FEIS should also include a map depicting the current and planned shuttle/transit routes.

On July 18, 1997, EPA promulgated an annual PM<sub>2.5</sub> standard of 15  $\mu\text{g}/\text{m}^3$ , a 24-hour PM<sub>2.5</sub> standard of 65  $\mu\text{g}/\text{m}^3$ , and an 8-hour ozone standard of 0.08 parts per million (62 FR 38652 and 38856). The San Joaquin Valley is non-attainment for the new PM<sub>2.5</sub> and ozone standards. Volume 2, Table 2 of the DEIS should be revised to include the annual and 24-hour PM<sub>2.5</sub> (particulate matter smaller than 2.5 microns) standards and the eight-hour ozone standard, which are currently in effect. Tables 32 through 36 should also include the projected PM<sub>2.5</sub> emissions for each alternative.

The Park Service conducts monitoring and research on the stock carrying capacity of park areas, including meadows and riparian areas, and some mitigation measures are identified in the DEIS. According to the DEIS (Vol.2, p. 62), some front country stock use trails are heavily eroded. Riparian areas are also being damaged by trespass cattle (DEIS, Vol. 2, p. 15). However, it is unclear what measures are being taken or will be taken to prevent further damage, repair trails, and monitor and enforce against trespass cattle in order to protect surface water quality. The FEIS should provide this information.

We appreciate the opportunity to review this DEIS. Please send a copy of the FEIS to this office when it is officially filed with our Washington, D.C., office. In the meantime, if you have any questions, please contact Jeanne Geselbracht, the lead reviewer for this project. Jeanne can be reached at (415) 972-3853 or [geselbracht.jeanne@epa.gov](mailto:geselbracht.jeanne@epa.gov).

Sincerely,

/S/Shanna Draheim for  
Lisa B. Hanf, Manager  
Federal Activities Office

Enclosure