



**PRELIMINARY DRAFT ALTERNATIVES PUBLIC
COMMENT SUMMARY REPORT**

SEQUOIA AND KINGS CANYON NATIONAL PARKS

**WILDERNESS STEWARDSHIP PLAN AND
ENVIRONMENTAL IMPACT STATEMENT**

March 2013



Preliminary Draft Alternatives Public Meeting, Oakland, California, October 29, 2012

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INTRODUCTION AND GUIDE

Introduction

The National Park Service (NPS), Sequoia and Kings Canyon National Parks (SEKI) is preparing a Wilderness Stewardship Plan and Environmental Impact Statement (WSP/EIS) for the Sequoia-Kings Canyon and John Krebs Wildernesses, both located entirely within the parks. The WSP/EIS will establish a framework for the management of wilderness within SEKI in order to preserve wilderness character and provide opportunities for access and use in accordance with the Wilderness Act and other laws and policies. The WSP/EIS will focus on providing visitors with opportunities for solitude or primitive and unconfined recreation, managing the wilderness character impacts directly related to visitor use, and determining the administrative actions necessary to protect the parks' wilderness character.

As an implementation level plan, the WSP/EIS will provide detailed guidance on a variety of issues including, but not limited to: wilderness permitting; maintenance of trails, bridges, or other necessary infrastructure; use of campfires; wildlife and proper food storage; human waste management; party size for people and stock groups; camping and campsites; night limits for all campers; stock use – access and travel, and grazing; administrative support facilities; and other facilities such as frontcountry facilities to support wilderness use. Also to be analyzed and determined is the extent to which commercial services are necessary to fulfill the recreational and other purposes of SEKI's congressionally designated wilderness areas. This "extent necessary" determination for commercial services will be performed to ensure compliance with §4(d)(5) of the Wilderness Act.

This comment analysis report provides a summary of the public comments received during the public review for the preliminary draft alternatives, and assigns codes to those comments based on the subject. Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public, and may not accurately reflect existing conditions, directions, or situations. Furthermore, this was not a vote-counting process, and the emphasis was on content of the comment rather than the number of times a comment was received. This report is intended to be a summary of the comments received, rather than a statistical analysis.

Preliminary Draft Alternatives Public Comment Process Summary

In October 2012, SEKI released the Preliminary Draft Alternatives Newsletter for the WSP/EIS. The newsletter provided a description of the purpose and need for the WSP, an overview of wilderness character, actions that were common to all the alternatives, and a brief summary of the key topics addressed in the preliminary draft alternatives. The newsletter also provided a table outlining details of the preliminary draft alternatives, and a more detailed full matrix of alternatives was available online at the park's planning website. This newsletter and the preliminary draft alternatives were released to the public for review and comment. The public was invited to submit comments on the scope of the planning process through November 19, 2012.

During the comment period, public meetings were held in various locations throughout California from October 25 to November 5, 2012. Meetings were held in Bishop (October 25); Los Angeles (October 26);

Oakland (October 29); Visalia (October 30); and Three Rivers (November 5). These meetings presented information on the purpose and need for the WSP/EIS, background of SEKI's wilderness and planning process, wilderness legislation, concepts and elements of the alternatives, topics common to all alternatives, and the planning timeline in a formal presentation. After this presentation, NPS staff was on hand to discuss commenters' questions and concerns.

A total of 93 individuals attended the public meetings in California.

- Bishop – 15 attendees
- Los Angeles – 4 attendees
- Oakland – 18 attendees
- Visalia – 36 attendees
- Three Rivers - approximately 20 attendees

The public were able to submit their comments on the project using any of the following methods:

- Electronically through the NPS Planning, Environment, and Public Comment (PEPC) website
- In person at the public meetings
- By mailing comments to the NPS
- By emailing comments to the NPS

Nature of Comments Received

During the scoping period, 201 pieces of correspondence from over 16 states and 2 countries (Canada and the United States) were received during the public scoping period. Approximately 77% of the 201 letters (representing 201 signatures) were submitted by individuals living in California. The topics that received the majority of comments were regarding stock use, commercial services, and zoning. All correspondences were entered into the PEPC system. Several letters were received after the posted deadline for comment submission. These letters were read and were considered and processed separately from the letters received before the comment period, but are not included in this analysis.

Many comments were of a subject matter that did not pertain to the WSP for the Sequoia-Kings Canyon and Johns Krebs Wildernesses. These comments were reviewed and have been coded as outside of the scope of analysis of the WSP.

All comments that were within the scope of the WSP, regardless of their topic, were carefully read and analyzed and are presented in this report. Commenters will continue to be notified of the project's progress, and are encouraged to visit the NPS PEPC website at www.parkplanning.nps.gov/seki/wild to view information pertaining to this project.

The Comment Analysis Process

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by decision-makers including the SEKI WSP/EIS Team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to National Environmental Policy Act (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- Developing a coding structure
- Employing a comment database for comment management
- Reading and coding of public comments
- Interpreting and analyzing the comments to identify issues and themes
- Preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS alternatives scoping and the public scoping process, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

Analysis of the public comments involved the assignment of codes to statements made by the public electronically on the PEPC website, in their letters, and email messages. All comments were read and those that arrived before the comment period ended were analyzed.

Definition of Terms

Primary terms used in this document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition. Each piece of correspondence is assigned a unique identification number in the PEPC system.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It should include information such as an expression of support or opposition to the use of a potential management tool, additional data regarding an existing condition, or an opinion debating the adequacy of the analysis.

Code: A grouping centered on a common subject. The codes were developed during the scoping process and are used to track major subjects throughout the WSP/EIS process.

Concern: Concerns are a written summary of all comments received under a particular code. Some codes were further separated into several concern statements to provide a better focus on the content of the comments.

Guide to this Document

This report is organized as follows:

Content Analysis Report: This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

Public Scoping Comment Summary: This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements. Below each concern statement are representative quotes, which have been taken directly from the text of the public's comments and have not been edited; therefore spelling and grammar errors are not corrected. In addition, letters that had to be scanned for PEPC may contain spelling errors due to the scanning software. Representative quotes further clarify the concern statements. Comments that pertained to subject matter that was irrelevant to the scoping for the WSP/EIS have not been included within the analysis of this report, but will be documented in the administrative record for this project.

Correspondence Index of Organizations: This provides a listing of all groups that submitted comments, arranged and grouped by the following organization types as defined by PEPC: business; churches and religious groups; civic groups; conservation/preservation groups; federal government; NPS employees; non-governmental groups; recreational groups; state government; town or city government; tribal government; unaffiliated individuals; university/professional society. In many instances, the organization type was not defined by the commenter; therefore, organizations were listed as "Unaffiliated Individuals". Each piece of correspondence was assigned a unique identification number upon entry into PEPC. This number can be used to assist the public in identifying the way NPS addressed their comments. This list is organized alphabetically, and can be found in Appendix A: Correspondence Index of Organizations.

Correspondence Index of Individual Commenters: This provides a listing of all of the individuals who submitted comments during the public scoping period. Like the previous index, each correspondence was assigned a unique identification number which can be used to assist individuals in identifying the way in which NPS addressed their comments. This list is organized alphabetically. Those correspondences identified as N/A represent individuals who did not submit their first or last name. This list can be found in Appendix B: Correspondence Index of Individual Commenters.

CONTENT ANALYSIS REPORT

Correspondence Distribution by Code

Code	Description	Number of Correspondences	Number of Signatures
AD1000	Comments on alternative(s) development and suggestions for changes to alternatives	35	35
AF1100	Supports specific alternative(s) for Administrative facilities: Ranger Stations and Crew Support Facilities	11	11
AF1300	Suggests new or change in alternative(s) for Administrative facilities: Ranger Stations and Crew Support Facilities	4	4
AL1000	General comments to in support or opposition of alternatives	32	32
CF1000	General Comments on Campfires	14	14
CF1100	Supports specific alternative(s) for Campfires	13	13
CF1200	Opposes specific alternative(s) for Campfires	10	10
CF1300	Suggests new or change in alternative(s) for Campfires	12	12
CP1000	General Comments on Camping: Campsites, Stock Camps, and Camping Night Limits	10	10
CP1100	Supports specific alternative(s) for Camping: Campsites, Stock Camps, and Camping Night Limits	11	11
CP1200	Opposes specific alternative(s) for Camping: Campsites, Stock Camps, and Camping Night Limits	5	5
CP1300	Suggests new or change in alternative(s) for Camping: Campsites, Stock Camps, and Camping Night Limits	13	13
CS1000	General Comments on Commercial Services	74	74
DC1000	Duplicate comment	9	9
EN1000	General Comments on Extent Necessary Determination (END)	12	12
EN1100	Comments on Types of Commercial Services	4	4
EN1200	Comments on the Extent Necessary Determination (END) Process	4	4
FS1000	General Comments on Food Storage	7	7
FS1100	Supports specific alternative(s) for Food Storage	13	13
FS1200	Opposes specific alternative(s) for Food Storage	1	1
FS1300	Suggests new or change in alternative(s) for Food Storage	7	7
HW1000	General Comments on Human Waste	9	9
HW1100	Supports specific alternative(s) Human Waste	10	10
HW1200	Opposes specific alternative(s) for Human Waste	2	2
HW1300	Suggests new or change in alternative(s) for Human Waste	5	5
KT1100	Suggests New Key Topic to Address	3	3
LP1000	Laws and Policies Relating to Wilderness and Wilderness Management	6	6

Code	Description	Number of Correspondences	Number of Signatures
MT1000	Miscellaneous Comments: General Comments	46	46
NA1000	General Comments on No Action - Current Management Practices	11	11
NA1100	Supports specific alternative(s) for No Action - Current Management Practices	23	23
NA1300	Suggests new or change to alternative(s) for No Action - Current Management Practices	1	1
NS1100	Non-substantive correspondence	3	3
OF1100	Supports specific alternative(s) for Other Facilities: Redwood Canyon, Pear Lake, Bearpaw Meadow High Sierra Camp and Frontcountry	13	13
OF1200	Opposes specific alternative(s) for Other Facilities: Redwood Canyon, Pear Lake, Bearpaw Meadow High Sierra Camp and Frontcountry	2	2
OF1300	Suggests new or change in alternative(s) for Other Facilities: Redwood Canyon, Pear Lake, Bearpaw Meadow High Sierra Camp and Frontcountry	8	8
PN1000	General Comments on Purpose and Need	3	3
PP1000	General Comments on Party Size	11	11
PP1100	Supports specific alternative(s) for Party Size	11	11
PP1200	Opposes specific alternative(s) for Party Size	6	6
PP1300	Suggests new or change in alternative(s) for Party Size	13	13
PQ1000	General Comments on Permits and Quotas	21	21
PQ1100	Supports specific alternative(s) for Zones and Permits/Quotas	17	17
PQ1200	Opposes specific alternative(s) for Zones and Permits/Quotas	10	10
PQ1300	Suggests new or change in alternative(s) for Permits and Quotas	9	9
PS1000	General Comments on Party Size: with Stock	24	24
PS1100	Supports specific alternative(s) for Party Size: with Stock	12	12
PS1200	Opposes specific alternative(s) for Party Size: with Stock	6	6
PS1300	Suggests new or change in alternative(s) for Party Size: with Stock	15	15
SA1000	General Comments on Stock Use: Access and Travel	76	76
SA1100	Supports specific alternative(s) for Stock Use: Access and Travel	20	20
SA1200	Opposes specific alternative(s) for Stock Use: Access and Travel	10	10
SA1300	Suggests new or change in alternative(s) for Stock Use: Access and Travel	50	50
SC1000	General Comments on Stock Use: Camps and Party Size	13	13
SC1100	Supports specific alternative(s) for Stock Use: Camps and Party Size	7	7
SC1200	Opposes specific alternative(s) for Stock Use: Camps and Party Size	4	4

Code	Description	Number of Correspondences	Number of Signatures
SC1300	Suggests new or change in alternative(s) for Stock Use: Camps and Party Size	6	6
SG1000	General Comments on Stock Use: Grazing	23	23
SG1100	Supports specific alternative(s) for Stock Use: Grazing	11	11
SG1200	Opposes specific alternative(s) for Stock Use: Grazing	18	18
SG1300	Suggests new or change in alternative(s) for Stock Use: Grazing	43	43
TC1000	General Comments on Topics/Elements Common to All Alternatives	15	15
TC1200	Suggests new Topic for Common to All	1	1
TC1300	Suggests a Topic that would warrant the development of alternatives	2	2
TO1000	Topics Related to Future Planning Efforts	7	7
TO1100	Topics Outside the Scope of the WSP	8	8
TR1000	General Comments on Trail, bridges, signs	23	23
TR1100	Supports specific alternative(s) for Trail, bridges, signs	8	8
TR1200	Opposes specific alternative(s) for Trail, bridges, signs	5	5
TR1300	Suggests new or change in alternative(s) for Trail, bridges, signs	28	28
WC1000	General Comments on Wilderness Character	8	8
ZO1000	Comments on Zoning	48	48

(Note: Each correspondence may have multiple comments, and each comment may have multiple codes. As a result, the total number of comments may be different than the actual comment totals)

Correspondence Signature Count by Correspondence Type

Organization Type	Number of Correspondences	Number of Signatures
Federal Government	1	1
University/Professional Society	1	1
Business	4	4
Conservation/Preservation	2	2
Recreational Groups	11	11
Non-Governmental	2	2
Unaffiliated Individual	180	180
Total	201	201

Correspondence Signature Count by Correspondence Type

Type	Number of Correspondences
Web Form	124
Park Form	2
Letter	60
E-mail	15
Total	201

Correspondence Distribution by State

State	Percentage	Number of Correspondences
Arizona	1.5%	2
California	77.1%	155
Colorado	4.0%	8
Hawaii	0.5%	1
Minnesota	0.5%	1
Montana	0.5%	1
New Jersey	0.5%	1
New Mexico	1.5%	3
Nevada	1.5%	3
Oregon	2.5%	5
Tennessee	1.0%	2
Texas	0.5%	1
Vermont	0.5%	1
Virginia	1.0%	2
Washington	1.5%	2
Unknown	5.5%	11
Total		201

Correspondence Distribution by Country

Country	Percentage	Number of Correspondences
Canada	0.5%	1
United States of America	99.5%	200
Total		201

PUBLIC SCOPING COMMENT SUMMARY

AD1000 - Comments on alternative(s) development and suggestions for changes to alternatives

Concern ID: 43041

CONCERN STATEMENT: The park should conduct a needs assessment for commercial stock services before continuing the WSP process, and should revise the alternatives.

Representative Quote(s):

Corr. ID: 112 **Organization:** *Not Specified*

Comment ID: 303550 **Organization Type:** Unaffiliated Individual
Representative Quote: Perhaps before you developed these "preliminary" alternatives the Park Service should have answered that same question about appropriate/inappropriate alternatives. If you had done that honestly, especially through preparing a proper "needs assessment" of the extent to which any commercial services should be permitted in the SEKI wilderness, you would have developed far better alternatives. Why did you put the cart before the horse?

Corr. ID: 119 **Organization:** *Not Specified*

Comment ID: 303336 **Organization Type:** Unaffiliated Individual
Representative Quote: From an administrative point of view, the Park Service should undertake a needs assessment to determine if commercial stock use is necessary in the Sequoia-Kings backcountry. That should have taken place before issuing these Preliminary Alternatives.

Corr. ID: 135 **Organization:** *Not Specified*

Comment ID: 304258 **Organization Type:** Unaffiliated Individual
Representative Quote: First, I understand that Preliminary Alternatives for SEKI are under consideration, yet a needs assessment has not been conducted. Moving forward with a preliminary alternative is, therefore, premature. The Park Service should first conduct and publish a needs assessment to determine whether commercial stock use may be necessary in SEKI's wilderness.

Corr. ID: 155 **Organization:** Wilderness Watch

Comment ID: 304512 **Organization Type:** Conservation/Preservation
Representative Quote: The National Park Service's (NPS) effort of sending out "Preliminary Alternatives" is premature. The NPS should first conduct a "needs assessment" to determine whether and the extent to which commercial stock use may be necessary in SEKI's Wilderness, and only then craft alternatives for its WSP.

Corr. ID: 185 **Organization:** *Not Specified*

Comment ID: 304434 **Organization Type:** Unaffiliated Individual
Representative Quote: It is my opinion that The National Park Service has acted prematurely by sending out Preliminary Alternatives for SEKI's Wilderness Stewardship Plan. The National Park Service should first conduct a needs assessment to determine whether commercial stock use is even necessary in SEKI's wilderness, and then to what extent to which commercial stock use may be necessary, and only then should the National Park Service craft alternatives for its Wilderness Stewardship Plan.

Concern ID:
CONCERN
STATEMENT:

43042

The current alternatives do not provide limitations on stock use at SEKI. Preliminary alternatives are biased by allowing stock at current levels, and new alternatives are needed to address this issue.

Representative
Quote(s):

Corr. ID: 71 **Organization:** *Not Specified*

Comment ID: 302878 **Organization Type:** Unaffiliated Individual

Representative Quote: From my review of the documents I see no alternatives that limit the overall number of stock animals that are allowed in the wilderness. This is a key flaw that must be addressed in the revised document. The current situation allowing unlimited use of stock animals is related to all of the problems they cause, and a needs assessment should be conducted to determine a cap on the number of animals to be allowed in the wilderness.

Corr. ID: 130 **Organization:** *Not Specified*

Comment ID: 304163 **Organization Type:** Unaffiliated Individual

Representative Quote: Please withdraw these alternatives and offer new ones that include sensible, measurable and enforceable limits on stock use, so that people can enjoy the wilderness without the manure, dust and flies that now pollute the trails, campsites and water sources.

Corr. ID: 143 **Organization:** High Sierra Hikers Association

Comment ID: 304340 **Organization Type:** Recreational Groups

Representative Quote: The GMP for SEKI established that stock use, both recreational and administrative, is proper in the wilderness of these parks. The GMP provides for continued administrative, commercial, and private stock use under current NPS policies." (Enclosure 1)

As explained in our letter of October 26, your staff's reliance on the GMP to rationalize commercial stock services clearly violates the Court's Remedy Order in *High Sierra Hikers Ass'n v. Dep't of Interior, et. al.* (Case No. 09-cv-04621).(1)

In short, your staff crafted biased alternatives'essentially all of which would allow continued unlimited stock use at SEKI'based on the unlawful assumption that all stock uses would continue "under current NPS policies," To be clear, there is no upper ceiling on commercial, administrative, or private stock use at SEKI today, nor is there any upper ceiling proposed in any of the alternatives. The "preliminary draft alternatives" therefore pave the way for business as usual, founded on the assumption that all stock use will be continued "under current NPS policies

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43043

The alternatives are lacking upper limits on stock use and commercial services.

Corr. ID: 143 **Organization:** High Sierra Hikers Association

Comment ID: 304354 **Organization Type:** Recreational Groups

Representative Quote: Finally, it is absolutely crucial to point out the most fundamental, glaring, and fatal problem with the "preliminary draft alternatives." None of them contains (or purports to consider, going forward) any upper limits on the total amount of stock use. There are no limits on the total numbers of stock animals allowed per year (whether

administrative, commercial, or private). There are no limits on the numbers of overnight stock trips, or day trips (whether administrative, commercial, or private). There are no limits on the numbers of commercial outfits, or numbers of commercial clients. There is no definition (as we have requested over-and-over again) of what SEKI means by the statements in its GME/ROD (and now its WSP documents) that stock use will be continued at current levels and under current policies. It is therefore impossible for anyone to discern what the alternatives actually mean, what (if anything) they would accomplish, or whether the range of alternatives is adequate.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43044

The proposed alternatives are confusing and unclear. Clear alternatives and regulations must be developed, and must be easy to follow.
Corr. ID: 104 **Organization:** *Not Specified*

Comment ID: 303787 **Organization Type:** Unaffiliated Individual
Representative Quote: We care deeply about these magnificent places, and the silence & solitude that we seek there, and we want you to address the issues in straight-forward, understandable, easy-to-implement, and enforceable ways. The garbage you put out is as clear as mud, and would create more problems than it resolves. You can (and should) do better. Start by dumping the bogus "zoning" scheme, treat the grand Sequoia-Kings wilderness as one wilderness, and take on the issues with solutions that will actually work in reality.

Corr. ID: 107 **Organization:** *Not Specified*

Comment ID: 303709 **Organization Type:** Unaffiliated Individual
Representative Quote: In summary, many of the new alternatives proposed for the Wilderness Plan are too complicated and are essentially unnecessary. It is far better to have stricter entry quotas on the number of people entering the Park and not try to manage them once they are in the Park. The new layers of regulations will remove all sense of the wilderness experience. Most of the new alternatives with added regulations will not improve resource protection.

Corr. ID: 148 **Organization:** *Not Specified*

Comment ID: 304441 **Organization Type:** Unaffiliated Individual
Representative Quote: In spite of several readings of the Draft Alternative Tables for the Sequoia Kings Wilderness Stewardship Plan, I'm not sure I fully understand many of the proposed alternatives. I'm hopeful the final Alternatives are more clearly presented. Overall, they seem to concentrate on perceived problems not justified by current or projected use patterns.

Corr. ID: 159 **Organization:** *Not Specified*

Comment ID: 304530 **Organization Type:** Unaffiliated Individual
Representative Quote: The documents convey absolutely no sense of the magnificence, beauty, and uniqueness of these parks, or the awesome responsibility that has been entrusted to the Park Service to preserve their wilderness character. Instead, the materials are permeated with lame attempts to rationalize continued destructive practices by labeling them as "historically significant" or "traditional." Further, the overarching framework is so unnecessarily complex that it borders on incomprehensible, making it nearly impossible for public to evaluate which alternative might truly provide for an enduring and pristine wilderness. I spent numerous hours this past weekend trying to decipher

the dizzying matrix of management zones and alternatives presented on your website and find it impossible to digest (despite my two advanced degrees in science!) and, in critical ways, fundamentally flawed.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43045

Baseline data and public involvement is critical to making informed management decisions.

Corr. ID: 23 **Organization:** Access Fund

Comment ID: 302379 **Organization Type:** Unaffiliated Individual

Representative Quote: The use of baseline data and public involvement (with due regard to the protection of confidential tribal information) is critical to making informed management decisions that protect these resources and allow public access.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43046

The alternatives should be more specific, and should address the impacts of various user groups.

Corr. ID: 64 **Organization:** Not Specified

Comment ID: 302858 **Organization Type:** Unaffiliated Individual

Representative Quote: The general characterizations of the alternatives is vague as to what each seeks to accomplish. Also, some of the specifics in the alternatives, especially regarding the zones, also remains vague. Both the public and individual SEKI employees may interpret the intent and meaning in a variety of ways and come to different conclusions. This will cause both public anger and distrust, and result in an administrative nightmare. It is important that when the next round of alternatives are presented for public comment, each alternative's intent, actions, and outcomes are clearly defined as well as the issues each alternative addresses.

Corr. ID: 121 **Organization:** Not Specified

Comment ID: 303317 **Organization Type:** Unaffiliated Individual

Representative Quote: One thing I see missing is a discussion of the many different types of users within wilderness and a more thorough discussion of impacts from these different user groups. Please include a discussion of how the plan and alternatives will affect different user groups. At this point, I only see a discussion of hikers/backpackers and horse users. I would think that a clear understanding and discussion of how the wilderness is being used by various user groups is critical to create a workable Wilderness Stewardship Plan.

Concern ID:
CONCERN
STATEMENT:

Representative
Quote(s):

43047

Alternatives should be largely based on the issues that they seek to alleviate; these issues should be clearly defined, and the primary stressors such as climate change, invasive species, and air pollution should be incorporated in to the alternatives.

Corr. ID: 49 **Organization:** Not Specified

Comment ID: 302286 **Organization Type:** Unaffiliated Individual

Representative Quote: As a former SEKI backcountry ranger I am dismayed at the quality of the proposed preliminary Alternatives. As you should know Alternatives are supposed to be issue driven. The only issues clearly stated in the supplementary information are those global issues that

are beyond the scope of a parks management responsibilities and a brief mention of the use of electronic devices. The purpose and need properly cite the relevant congressional legislation. However the problems (issues) that need to be addressed are not.

Corr. ID: 64 **Organization:** *Not Specified*

Comment ID: 302863 **Organization Type:** Unaffiliated Individual

Representative Quote: It is of paramount importance that when the next round of alternatives is presented, each alternative should be based on how it will address specific issues of wilderness management in SEKI. The issues each alternative addresses must be clearly defined. There should be clearly defined alternatives, each with clearly defined outcomes for how they will deal with specific issues.

The current choice of alternatives seems to be based on the initial public comments, for which, as I stated in my earlier comments, you should be commended. What is missing in the current alternatives is interpreting those comments so that they relate to specific issues of how to manage the SEKI wilderness.

Corr. ID: 101 **Organization:** *Not Specified*

Comment ID: 303244 **Organization Type:** Unaffiliated Individual

Representative Quote: However, wilderness is all about personal freedom. That's the essence of the whole experience and is what makes it so thrilling and soul cleansing. Any Wilderness Plan must not adopt new unnecessary restrictions. Many of the Alternatives listed are "solutions" to problems that may not exist, or are unnecessary in place of current regulations and continued visitor education. Of course a "balanced" approach is favorable in the spirit of compromise, but perhaps a better way to address what needs to change is to identify SPECIFIC PROBLEMS, then offer alternative solutions to those.

Corr. ID: 120 **Organization:** *Not Specified*

Comment ID: 303326 **Organization Type:** Unaffiliated Individual

Representative Quote: The limitations on use and visitation imposed in the various alternatives, particularly Alternatives 4, 5 and 6, do not seem to correlate to the list of stressors provided in the Supplemental and Background information.

Corr. ID: 120 **Organization:** *Not Specified*

Comment ID: 303330 **Organization Type:** Unaffiliated Individual

Representative Quote: My third concern is that I cannot find a link between the proposed limitations and the 'primary stressors' listed in the Supplemental Information (climate change, fire regime, invasive species, habitat fragmentation, and air pollution). These stressors are, as the document suggests, driving the biggest threats to the Parks' Wilderness but the proposed Alternatives do not address them at all -- and they should. The Alternatives should be addressing specific threats to the Wilderness but I don't see that called out.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43048

The rationale on the various limitations of the alts is not clearly provided.

Corr. ID: 120 **Organization:** *Not Specified*

Comment ID: 310945 **Organization Type:** Unaffiliated Individual

Representative Quote: My concerns with the plans as presented are as follows:

1. The rationale for the various options and the timing of the Plan is unclear;
2. The rationale for the various options, in particular why various limitations would be imposed in different alternatives, are not clearly provided;

Concern ID:

43052

**CONCERN
STATEMENT:**

Current management practice problems should be identified and clearly stated and commenters questioned if current impacts warranted the development of alternatives.

**Representative
Quote(s):**

Corr. ID: 49 **Organization:** *Not Specified*

Comment ID: 302287 **Organization Type:** Unaffiliated Individual

Representative Quote: A couple (but not necessarily all) questions that should be asked are:

Are current regulations resulting in degrading habitat within wilderness areas within the park? If so what is being degraded, where is such degradation occurring, and which regulations are resulting in such degradation?

Are current regulations resulting in degrading the wilderness experience of visitors? If so how, where, when, and again which regulations are contributing to degrading the wilderness experience of visitors?

Alternatives should be developed only after asking and answering these and other relevant questions.

Corr. ID: 49 **Organization:** *Not Specified*

Comment ID: 310946 **Organization Type:** Unaffiliated Individual

Representative Quote: While the alternatives address controlling use numbers of backpackers, stock, and stock users there is no clear statement of problems associated with current management practices--unless there is a problem or a perceived problem there is no need for changes in management. Please state the issues clearly and then develop alternative to resolve them. From my experience much of alternatives 4-6 imply problems that, except in extremely limited areas, do not exist and consequently without documented problems seem to create an unreasonable range in the alternatives.

Corr. ID: 120 **Organization:** *Not Specified*

Comment ID: 303329 **Organization Type:** Unaffiliated Individual

Representative Quote: the various Alternatives, in particular 4, 5 and 6, promote limitations on wilderness use without offering a compelling reason why. For example, requiring waste to be packed out could be justified if there were studies indicating that regions of the Parks are currently being negatively impacted. Similarly, reducing stock use (which, as a hiker, I admit I'd like to support) should include some sort of evidence that stock are actually causing negative impacts to the Parks' ecosystems and/or user experiences No such references were provided. The same applies for issues with high-use areas, with destination quotas, stock use, etc. In general I have found that, from my user's perspective, the current regime tries to provide a balance between resource protection and allowing usage -- and it generally does a good job; as I mentioned above, my experiences in the Parks' Wilderness Areas have generally been positive. If changes to that regime are to be made, the problems should be

clearly identified and the way these changes will solve (or at least ameliorate) those problems should be called out. This is important not just to clearly identify what problems you're attempting to solve but also to help identify potential second-order effects - for example, reducing trailhead quotas in the Parks could impact surrounding areas much more heavily (e.g. the already heavily-used Jennie Lakes Wilderness would get even more usage); or requiring human waste packout in a greatly expanded area could reduce compliance in ALL areas of the Parks, consequently harming the high-use areas even more.

Concern ID:

43053

**CONCERN
STATEMENT:**

The plan should be based on the practices and numbers that were used in the past.

**Representative
Quote(s):**

Corr. ID: 129

Organization: Balch Park Pack Station

Comment ID: 304158 **Organization Type:** Unaffiliated Individual

Representative Quote: Some of these Alternatives seem a reaction to the recent attempt at a small hiking group to tell you how to manage a Park you have been trained to run. Most seem bent on keeping out stock hence limiting use to an exclusively healthy hiking few. There is no reason you can not write your plan using the very practices and numbers you have used in the past.

Concern ID:

43054

**CONCERN
STATEMENT:**

The alternatives and scope of the WSP should be broadened, and a full range of feasible alternatives should be developed. Alternatives in the WSP should be more practical for issues such as managing day use and stock in low-elevation meadows.

**Representative
Quote(s):**

Corr. ID: 40

Organization: Not Specified

Comment ID: 304244 **Organization Type:** Unaffiliated Individual

Representative Quote: I commend the park staff for their great start at developing alternatives for the Wilderness Stewardship Plan (WSP). I am pleased with all that I have seen, but I believe that the park would benefit from broadening the scope of the document.

Corr. ID: 86

Organization: Not Specified

Comment ID: 304019 **Organization Type:** Unaffiliated Individual

Representative Quote: So out of the five action alternatives, only two of them (#3 and 4) seem to be worth being fully assessed. That doesn't provide a very broad range of alternatives. Maybe I'm missing something because I can't view the Purpose and Need statement. But it seems like there could be a more practical range of alternatives for approaching issues such as managing dayuse of wilderness, stock use of low-elevation meadows, etc.

Concern ID:

43055

**CONCERN
STATEMENT:**

The header titles of the alternatives should be changed.

**Representative
Quote(s):**

Corr. ID: 148

Organization: Not Specified

Comment ID: 304442 **Organization Type:** Unaffiliated Individual

Representative Quote: The headers seem too provocative for Alternatives 4, 5 and 6. The phrase "decreasing visitor access and increasing restrictions" and the increasingly draconian sounding

alternatives from there is dependent on actual numbers for future implementation - numbers that are not presented yet.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43056

There are too many alternatives. Alternatives should be eliminated, reduced or combined to simplify the restrictions.

Corr. ID: 40

Organization: *Not Specified*

Comment ID: 304251 **Organization Type:** Unaffiliated Individual

Representative Quote: What is important is that the alternatives contain elements of a full range of feasible possibilities/opportunities for which there is significant public interest, and that each alternative adequately addresses real and significant wilderness management needs. Alternatives 3 through 5 represent a gradient in declining use capacity that might be folded into one alternative. Alternative 6 was the most unique, and I liked that it was somewhat unique, but is it a realistic alternative? I was a little bothered by the alternatives being constructed around a gradient of controlled use.

Corr. ID: 49

Organization: *Not Specified*

Comment ID: 302288 **Organization Type:** Unaffiliated Individual

Representative Quote: You may also consider and eliminate alternative from detailed consideration. I would say that would be the proper way to deal with much of Alternative 6 that would reduce quotas so much that use levels would drop to a level that no further regulation was needed. It seems that both the Wilderness Act and the Organic act would rule out such a regulation because to few people could experience the wilderness.

Corr. ID: 105

Organization: Sierra Mountain Guides

Comment ID: 303724 **Organization Type:** Unaffiliated Individual

Representative Quote: We believe there are too many alternatives presented in this plan. While both Alternatives 5 and 6 may reflect some public comment, they are not consistent with the spirit and historic interpretation of the Wilderness Act as they are overly restrictive to public access to and appreciation of the wilderness. How can we build and maintain such elaborate public mountain road systems to trailheads that allow such little public access and foot travel? How can we possibly consider so many restrictions to going to the mountains in America, the "land of the free?" Agencies should not defer to access restrictions until all efforts to maximize stewardship have failed.

Concern ID:
CONCERN
STATEMENT:

43057

Alternatives should be based not on limiting numbers of visitors but on the nature of the wilderness experience, and alternatives should be restructured on different ways to achieve acceptable use without limiting use.

Representative
Quote(s):

Corr. ID: 40

Organization: *Not Specified*

Comment ID: 304252 **Organization Type:** Unaffiliated Individual

Representative Quote: Rather than building the alternatives around "different levels of use", perhaps some of the alternatives might be constructed around "different ways to achieve acceptable use without limiting use" - to achieve success with a carrot rather than a stick (quotas).

I am not necessarily advocating that the park consider this as an alternative, but I am suggesting that the WSP team give some thought to

replacing one or more of the draft alternatives with alternatives that could effectively accommodate use without imposing quotas.

Corr. ID: 47

Organization: *Not Specified*

Comment ID: 302201 **Organization Type:** Unaffiliated Individual

Representative Quote: A basic assumption seems to drive these alternatives, and it is expressed in their summary descriptions, i.e., that the fundamental question here is the number of people in the wilderness. Your summary descriptions talk about "accommodating increased visitor use," or "reducing visitor use." I believe that this assumption has a negative and distorting effect on your planning process.

Several decades of data suggests that there is no measurable demand for increased wilderness use in SEKI. Use has been relatively flat for a quarter century, and there is no demographic data suggesting that a huge wave of new wilderness users is about to arrive. In this situation, it is not clear why you structure your preliminary alternatives largely around increasing or decreasing use.

The real issue here is not so much the level of over-all wilderness use but rather its nature and character. The Wilderness Act is designed to ensure that designated wilderness areas provide appropriate wilderness experiences to area users. Your list of "wilderness character" points emphasizes similar concerns. My point here is that the organizing principles sustaining your alternatives ought to be more about the nature of wilderness experiences rather than simple use numbers. This approach is suggested by your preliminary alternatives, but it comes across as secondary and subordinate to the issue of overall use.

Concern ID:

43058

**CONCERN
STATEMENT:**
**Representative
Quote(s):**

New alternatives should be created to prevent high usage impacts to ensure a pristine wilderness.

Corr. ID: 106

Organization: *Not Specified*

Comment ID: 303719 **Organization Type:** Unaffiliated Individual

Representative Quote: New alternatives need to be developed and circulated that do not permit high usage and impacts in the SEKI wilderness; the current alternatives do not go nearly far enough towards insuring pristine wilderness in SEKI going forward.

Concern ID:

43059

**CONCERN
STATEMENT:**

Alternatives 5 and 6 could be replaced by an alternative with only minimal infrastructure support. Other alternatives could provide more visitor services and accept the resulting impacts to wilderness areas. The remaining alternatives would provide a compromise by offering different wilderness experiences in different areas.

**Representative
Quote(s):**

Corr. ID: 47

Organization: *Not Specified*

Comment ID: 302202 **Organization Type:** Unaffiliated Individual

Representative Quote: Following the approach that I am suggesting, the question before you is what kind of wilderness experiences should the parks present and where? For example, your alternatives 5 and 6 (framed as being about heavily regulation and reduced use) could be replaced by an alternative that sees the parks as moving toward "Alaskan-style" wilderness with only minimal infrastructure support (trails, food storage

containers, defined campsites, ranger stations, etc.). Such an alternative would have many of the same results as your existing alternatives, but it would flow from a different and more appropriate philosophical base. (This particular approach may not be very practical in California, but it offers a perfectly reasonable alternative for purposes of comparison, which is one of the purposes of alternatives.)

On the other end of the spectrum, your alternatives ought to consider facilitating experiences that see SEKI as a "California-style recreational wilderness," which is pretty much what SEKI (and the other surrounding Sierra Nevada wildernesses) now offer. This type of wilderness provides lots of visitor services and accepts the resulting impacts to wilderness character. The middle alternatives that would result from such an approach would allow for either compromise management between these two poles or desired-experience zoning, which would provide different wilderness experiences in different areas.

Concern ID: 43060

**CONCERN
STATEMENT:**
**Representative
Quote(s):**

The alternatives do not describe the scope of the wilderness experience the park intends to offer.

Corr. ID: 47 **Organization:** Not Specified

Comment ID: 302226 **Organization Type:** Unaffiliated Individual

Representative Quote: most of the details of what I am suggesting are embedded at secondary levels within your preliminary alternatives, but you do not offer in these alternatives any clear, overarching view of the type of wilderness experiences you intend to offer. Such an approach would be, I believe, much more useful to your WSP reviewers and wilderness users than the approach offered to date.

AF1300 - Suggests new or change in alternative(s) for Administrative facilities: Ranger Stations and Crew Support Facilities

Concern ID: 42744

**CONCERN
STATEMENT:**

Ranger stations and crew facilities should be maintained as part of a ranger system, and historic buildings such as cabins should be evaluated for eligibility for the NRHP. Any reconstruction on historic buildings should be done in kind.

Representative Quote(s): **Corr. ID:** 102 **Organization:** Not Specified

Comment ID: 303373 **Organization Type:** Unaffiliated Individual

Representative Quote: RANGER STATIONS AND CREW SUPPORT FACILITIES - These facilities should be kept in proper condition and historical buildings should be evaluated for consideration to be placed on the National Register. Reconstruction should be done in kind.

Corr. ID: 124 **Organization:** Not Specified

Comment ID: 303306 **Organization Type:** Unaffiliated Individual

Representative Quote: In order to adequately protect the natural resources that the wilderness designation is meant to protect, it is important to maintain the backcountry ranger system. All structures should be evaluated for their historical and cultural significance and if found to be historic, be maintained as such. Historic and/or cultural resources should not be destroyed.

Concern ID: 42746
CONCERN STATEMENT: Ranger stations should be restored for the use of visitors.
Representative Quote(s): **Corr. ID:** 8 **Organization:** *Not Specified*
Comment ID: 302183 **Organization Type:** Unaffiliated Individual
Representative Quote: There doesn't appear to be a "buildings" category in this Plan, but I'd very much like to see restoration of backcountry structures for visitor enjoyment, such as the wilderness Ranger Stations in Redwood Meadow (Cliff Creek) and at Lewis Camp on the lower Kern River.

Concern ID: 42748
CONCERN STATEMENT: Ranger stations, patrol cabins, and administrative pastures should be retained as they currently exist, but do not build any new hard-sided cabins.
Representative Quote(s): **Corr. ID:** 124 **Organization:** *Not Specified*
Comment ID: 310590 **Organization Type:** Unaffiliated Individual
Representative Quote: I support retaining all ranger stations and patrol cabins as they currently exist, but not building any hardsided cabins. Administrative pastures should be retained if they are needed by supply or trail crew pack animals.

Concern ID: 42749
CONCERN STATEMENT: More lottery options should be available for the Ranger Station at Hockett Meadows.
Representative Quote(s): **Corr. ID:** 32 **Organization:** *Not Specified*
Comment ID: 304028 **Organization Type:** Unaffiliated Individual
Representative Quote: Offer more lottery options for the Ranger station at Hockett Meadows as you do for Pear Lake. Charge more since it is a lottery and the demand is there (it's not that expensive-people can save up vs. drinking beer).

CF1000 - General Comments on Campfires

Concern ID: 42750
CONCERN STATEMENT: Campfires should be allowed in higher elevations, and the current rules on campfires are too strict.
Representative Quote(s): **Corr. ID:** 8 **Organization:** *Not Specified*
Comment ID: 302184 **Organization Type:** Unaffiliated Individual
Representative Quote: I think the existing rules on campfires are too restrictive. Where there is adequate downed wood, campfires should be allowed, as should be traditional fire rings.
Corr. ID: 87 **Organization:** Sierra Club
Comment ID: 303211 **Organization Type:** Unaffiliated Individual
Representative Quote: The rules and restrictions regarding campfires and grazing at higher elevations are already very strict, and making them even more strict would only serve to keep more people out of the backcountry, and to put out of business these hard-working and responsible people who love the mountains and add so much to the lore of the area.
Corr. ID: 152 **Organization:** National Forest Recreation Association

Comment ID: 304474 **Organization Type:** Non-Governmental
Representative Quote: Campfires are an integral part of the wilderness experience. There should be no additional campfire closures or exclusions. There are some areas of the Sequoia and Kings Canyon Wilderness areas that are choked with dead standing and downed trees. In some areas, campfires should be encouraged.

Concern ID: 42751
CONCERN STATEMENT: Campfires should not be allowed in higher elevations or in certain areas.
Representative Quote(s): **Corr. ID:** 157 **Organization:** *Not Specified*

Comment ID: 304528 **Organization Type:** Unaffiliated Individual
Representative Quote: In any plan, it makes sense to limit fires in higher altitude or high use areas--preventing the removal of dead wood where there isn't a lot of it, preserves the wilderness, sustaining the whole ecosystem.

Concern ID: 42752
CONCERN STATEMENT: No firewood should be packed in to higher elevations to accommodate fires.
Representative Quote(s): **Corr. ID:** 145 **Organization:** Sierra Club Sierra Nevada Resilient Habitats Campaign

Comment ID: 304402 **Organization Type:** Conservation/Preservation
Representative Quote: We oppose allowing packers to pack in firewood to campsites at elevations above the campfire limit so that their customers can have a "campfire experience."

Concern ID: 42753
CONCERN STATEMENT: Campfires are important for creating camaraderie and allowing for environmental education of park visitors. Some visitors recounted the importance of campfires for their wilderness experience and for staying warm.

Representative Quote(s): **Corr. ID:** 12 **Organization:** *Not Specified*

Comment ID: 302214 **Organization Type:** Unaffiliated Individual
Representative Quote: The evening and morning campfire not only provide heat in the cold, but is a tool that provides a forum for sharing information, camp lore, and education. Without the ability to sit around a warm campfire, hikers would not be able to learn the environmental wisdom and knowledge shared by the pack staff.

Corr. ID: 66 **Organization:** *Not Specified*

Comment ID: 303844 **Organization Type:** Unaffiliated Individual
Representative Quote: Are some of the fire restrictions that are in place right now really necessary?
Part of the wilderness experience is at the end of the day you sit around the fire, reliving the great adventure of the day and commenting on the beauty of the land around you. When that fire is not there and it is dark, people are getting cold, and camaraderie gets cut short- something is missing.

Corr. ID: 81 **Organization:** *Not Specified*

Comment ID: 303997 **Organization Type:** Unaffiliated Individual
Representative Quote: I was quite surprised when I returned to work at the pack station in 2011 and observed there could not be any fires above

10,000 feet. This severely impacted peoples' enjoyment of the backcountry. Many people's fondest memories, including my own and those of my family, occur around campfires. This is part of our American Heritage which should not be eliminated. The National Park Service can take the necessary actions to manage overuse of fires in the event it occurs, but simply eliminating fires all together seems like an unreasonable response.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42755

Allowing campfires in wilderness encourages visitors to cut down trees.

Corr. ID: 112

Organization: *Not Specified*

Comment ID: 303553 **Organization Type:** Unaffiliated Individual

Representative Quote: I never have campfires in the wilderness areas of the high Sierra because I know how short the growing season is for trees, and I know that having a campfire is not necessary and even detracts from enjoying an evening in the backcountry. I have observed countless stumps in SEKI where unscrupulous visitors have cut down live or dead portions of trees for fires. I have counted the number of rings on many, and been amazed that a four-inch diameter stump is often on the order of 50 years old.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42756

Campfires are disruptive to visitors who want a solitary wilderness experience.

Corr. ID: 112

Organization: *Not Specified*

Comment ID: 306494 **Organization Type:** Unaffiliated Individual

Representative Quote: Campfires tend to detract from the wilderness experience because they draw one's attention to the fire, not to the surrounding wilderness. They obstruct one's ability to hear and see the surrounding wilderness. They are no longer necessary or desirable for cooking food with the advent of lightweight cooking gear. They also detract from solitude because I can observe and smell other visitors when they have fires nearby, when otherwise I would not be able to detect their presence.

CF1300 - Suggests new or change in alternative(s) for Campfires

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42757

Campfires are not appropriate in areas without wood, but should be allowed in wooded areas.

Corr. ID: 41

Organization: *Not Specified*

Comment ID: 302401 **Organization Type:** Unaffiliated Individual

Representative Quote: Campfires are not allowed in country with sparse timber, and that is appropriate. But it makes no sense to extend the campfire ban to well wooded areas.

Concern ID:
CONCERN
STATEMENT:
Representative

42758

Under alternative 1, the campfire elevation limit should be consistent at 10,000 feet.

Corr. ID: 129

Organization: Balch Park Pack Station

Quote(s):

Comment ID: 304153 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternative 1- Specific problems: campfire elevation should be 10,000 constant (lowering elevation just adds to fuel load in tree area in case of wildfires).

Concern ID:

42760

**CONCERN
STATEMENT:**
**Representative
Quote(s):**

Proposed campfire restrictions are too low and should be up to 10,400 ft in Kings Canyon and up to 10,800 ft in Sequoia National Park.

Corr. ID: 13 **Organization:** Not Specified

Comment ID: 302221 **Organization Type:** Unaffiliated Individual

Representative Quote: Campfires should be allowed. Firewood is abundant. It makes no sense to ban fires at 10,000 feet. Wilderness visitors can differentiate between lodgepole and Foxtail Pine and the fire elevation in Sequoia National Park should be raised. We want campfires up to 10,400 ft in Kings Canyon and up to 10,800 ft in Sequoia National Park.

Corr. ID: 73 **Organization:** Not Specified

Comment ID: 303865 **Organization Type:** Unaffiliated Individual

Representative Quote: The fire restrictions in place at 10,000ft. are too low. Restrictions are not necessary above 10,000ft. where we are tripping over wood and should be raised to 10,400ft in Kings Canyon National Park, and 10,800ft. in Sequoia National Park.

Corr. ID: 75 **Organization:** Not Specified

Comment ID: 302900 **Organization Type:** Unaffiliated Individual

Representative Quote: I support raising the fire restriction to 10,400 in Kings Canyon and 10,800 in Sequoia. Fire restrictions are very important - such as the ban on fires last summer during the extremely dry summer. However, I do not support a blanket NO fire restriction. Several years ago, at Little Whitney Meadow after a huge storm, due to one of these restrictions we were not able to have a fire - the packers were very adamant about complying with the regulations. Everyone was cold, one guest had a wet sleeping bag and I had a torn meniscus. I was grateful for the stove to prepare a hot meal, but a fire would have been very appropriate in that situation for safety (dry that bag) and comfort. I was cold, a little anxious and my knee was the size of a grapefruit! Two years ago, during a huge hail storm - again everyone was wet, one guest was beginning to shiver (pre-hypothermic) we were able to have a fire and it was extremely helpful - we could get our companion warmed up and dry our clothes/gear. Fortunately, we were in an area where fires were permitted. I bring this up because I feel it's necessary to have some discretion in the use of a fire.

Concern ID:

42761

**CONCERN
STATEMENT:**

Restrictions on campfires should be based on areas where downed wood is plentiful, not on elevation. Some areas at higher elevations provide enough downed wood for campfires, while other areas at lower elevations do not.

**Representative
Quote(s):**

Corr. ID: 43 **Organization:** Sierra Club

Comment ID: 302281 **Organization Type:** Unaffiliated Individual

Representative Quote: Campfires should be permitted where fuel is plentiful. This does not always correlate to a specific elevation. There are plenty of places below the limit elevation where fires are banned where I would not build a fire even though permitted. But also some areas above

the limit where there is plenty of down wood.

Corr. ID: 145

Organization: Sierra Club Sierra Nevada
Resilient Habitats Campaign

Comment ID: 304401 **Organization Type:** Conservation/Preservation

Representative Quote: All areas should have a minimum amount of residual dead wood present. Campfires should always be prohibited where dead wood is disappearing. A convenient indicator for unacceptable locations of campfires is the cutting of green trees.

CP1000 - General Comments on Camping: Campsites, Stock Camps, and Camping Night Limits

Concern ID:

42762

**CONCERN
STATEMENT:**

Night limits are unnecessary or unfair.

**Representative
Quote(s):**

Corr. ID: 124

Organization: Not Specified

Comment ID: 303302 **Organization Type:** Unaffiliated Individual

Representative Quote: In general, I don't support the idea of limiting the number of nights allowed. However, I can see where some popular areas would need some limits to ensure opportunities for more users. I think that the NPS should only impose night limits if the problem of semi-permanent camps and monopolization of popular areas has occurred frequently. If night limits are imposed, then they must allow for those who hike the PCT and the John Muir Trail at a leisurely pace. Most hikers on these trails tend to go right through, but the night limits must not limit those who want to explore and take their time along the way. I don't support limiting annual access to our wilderness areas. The more wilderness our society is able to experience, the better off we all will be.

I agree with Alternative 4 for Zone B and a 7-night limit only for places in Zones C and D that are heavily used and need additional regulation in order to provide accessibility to more backpackers.

Corr. ID: 152

Organization: National Forest Recreation
Association

Comment ID: 304482 **Organization Type:** Non-Governmental

Representative Quote: Night Limits' is another bureaucratic regulation that is unnecessary. There are areas that may receive very little use during the year, and may be able to accommodate users for more than a one or two night limit. This is microscopic management that does not result in a positive benefit rather it is exclusive, costly and difficult to manage. Traveling through the wilderness should be a pleasure ' not a nightmare of regulations. There are very few visitors who take long term trips, so the risk of people setting up semi-permanent camps is minimal.

Concern ID:

42763

**CONCERN
STATEMENT:**

New areas need to be evaluated individually on a case by case basis to determine if camping should be allowed at camping destinations closer to trailheads and roads in order to accommodate all visitors.

**Representative
Quote(s):**

Corr. ID: 124

Organization: Not Specified

Comment ID: 303299 **Organization Type:** Unaffiliated Individual

Representative Quote: I agree with creating a zone close to roads and

trailheads where no camping is allowed. However, I think that each area and trail need to be evaluated individually. There are many destinations where backpackers go in the Mineral King area that are less than 6 miles from the trailhead. These areas, where backpackers have historically camped, should still be available for camping. Families with small children, who are just learning to backpack, need destinations that are close, such as Groundhog Flat. Variances should be provided for areas like this.

Concern ID: 42764

CONCERN STATEMENT: The use of designated campsites for stock is not needed, as it forces backpacker and stock conflicts, and limits the locations where stock users are able to go.

Representative Quote(s): **Corr. ID:** 12 **Organization:** Not Specified

Comment ID: 302212 **Organization Type:** Unaffiliated Individual

Representative Quote: Limiting access to just a 'few' group camp sites would prevent all of us who enjoy hiking with stock to have one or two choices, thus limiting our access in the back country.

Corr. ID: 13 **Organization:** Not Specified

Comment ID: 302224 **Organization Type:** Unaffiliated Individual

Representative Quote: And why do we have to use designated camps? Allowing experienced packers to select campsites and grazing areas reduces backpacker and stock users conflicts and leads to better low impact camping techniques.

Corr. ID: 84 **Organization:** Mt Whitney Hikers Association

Comment ID: 303170 **Organization Type:** Unaffiliated Individual

Representative Quote: The park service can limit the numbers of people camping at the most heavily impacted areas so that meadows are not abused, and so that too much trampling does not occur. But beyond that, locking many out to ensure a few others some ill-defined "opportunity for solitude" runs afoul of the intent of the Wilderness Act.

Corr. ID: 115 **Organization:** Rainbow Pack Outfitters

Comment ID: 303442 **Organization Type:** Unaffiliated Individual

Representative Quote: In regard to Stock Use Camps we support Alternative 1, as we feel we have been able to work with on the ground rangers in a cooperative manner, with good results. Designated stock camps vs recommended stock camps may cause conflict between stock users, such as if a designated stock camp is occupied, and the next designated camp is 15 miles away it will cause a hardship. If designated stock camps will be implemented, alternative stock camps should be available in the form of recommended stock camps to avoid additional travel to get to the next designated stock camp.

CP1300 - Suggests new or change in alternative(s) for Camping: Campsites, Stock Camps, and Camping Night Limits

Concern ID: 42765

CONCERN STATEMENT: Additional or previously used such as Sunny Point and Mineral King campsites should be reopened, which would help alleviate use conflicts.

Representative Quote(s): **Corr. ID:** 20 **Organization:** Not Specified

Comment ID: 302291 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe that a possible increase in camping could be accommodated by proper management and maybe reopening Sunny Point Campground or campsites in the upper valley if use increases to the point additional campsites are needed.

Corr. ID: 32 **Organization:** *Not Specified*

Comment ID: 304030 **Organization Type:** Unaffiliated Individual

Representative Quote: More camping sites at Mineral King; there used to be more & you took them away!

Concern ID: 42766

CONCERN STATEMENT: [The current annual limit of 63 days for camping should remain unmodified or be increased slightly.](#)

Representative Quote(s): **Corr. ID:** 10 **Organization:** *Not Specified*

Comment ID: 302188 **Organization Type:** Unaffiliated Individual

Representative Quote: Regarding Table 5 Camping Night Limits: The current annual limit of 63 days should remain unmodified or be increased slightly. I have noticed that some parks are trying to creep this number down gradually over time and there is no reason for it. The fact is that illegal (closed area) and unpermitted backcountry camping is a much greater problem in this park than the handful of people who would ever get wilderness permits totaling 63 days, so address the real issue and leave the annual night limits alone.

Concern ID: 42975

CONCERN STATEMENT: [A maximum on the number of use days on each permit should be limited to 10-14 days.](#)

Representative Quote(s): **Corr. ID:** 16 **Organization:** *Not Specified*

Comment ID: 302244 **Organization Type:** Unaffiliated Individual

Representative Quote: I would also support limits on the maximum number of use days each permit would allow; i.e. 10-14 days maximum.

Concern ID: 42977

CONCERN STATEMENT: [The NPS should consider limiting the number of campers at certain areas.](#)

Representative Quote(s): **Corr. ID:** 42 **Organization:** *Not Specified*

Comment ID: 302395 **Organization Type:** Unaffiliated Individual

Representative Quote: On the last trip the tents had to be very close so snoring kept me awake from my neighbors. The tents were not able to be level so I slide down to the botton because of where the tents could be located. No campfires to have enjoyable talks at night so people went to bed early as we were cold. There is something special about a campfire and the people who surround it at night. All in all the trip turned into a big struggle so I may skip it this year. I usually change my mind as I enjoy the outdoors so much and the trip is usually rewarding. Please reconsider tightening the rules even more as that would reduce the number of people interested in the adventure and eventually put the Pack Trains out of business.

CS1000 - General Comments on Commercial Services

Concern ID: 42767

CONCERN STATEMENT: Commercial outfitters help educate park visitors about wilderness preservation such as leaving no trace.

Representative Quote(s): **Corr. ID:** 12 **Organization:** Not Specified

Comment ID: 302210 **Organization Type:** Unaffiliated Individual

Representative Quote: From my personal observations, you can find no better stewards of the Sierras than RCPS. In every aspect from how they manage their stock, their impact, and their concern for the environment, they educate their hikers about leaving no trace. This is a group of wranglers that know more about the back country, and cares more about the back country than any solo backpacker I have ever met on the trail. They have a history of good stewardship that goes back 50 years or more. Many of the pack staff have been working these trails for decades.

Corr. ID: 18 **Organization:** Backcountry Horsemen of California

Comment ID: 302267 **Organization Type:** Unaffiliated Individual

Representative Quote: I have traveled and packed with several employees of the Rock Creek Pack Station and find them to be impeccable purveyors of Leave No trace/ Gentle User low impact camping with stock, taught by Backcountry Horsemen of California. Their presence in the area and practicing of these skills would also be a de facto education event for others in the area who is not as enlightened.

Corr. ID: 35 **Organization:** citizen

Comment ID: 304056 **Organization Type:** Unaffiliated Individual

Representative Quote: For the last few years my husband and I have enjoyed hiking in the back country with support from Rock Creek Pack Station. They have enabled us to enjoy wonderful areas of the back country which we were not able to experience in our younger days.

Rock Creek employees are very conscientious in choosing campsites and taking care of their stock and guests. When they leave, the campsites are returned to their original condition (or better).

Corr. ID: 78 **Organization:** Sierra Club

Comment ID: 302917 **Organization Type:** Unaffiliated Individual

Representative Quote: Commercial services (including non-profit groups such as the Sierra Club, with significant volunteer staffing) help individuals visit the wilderness in a responsible manner. Well run commercial services practice LNT and can help their participants follow such practices more effectively than such participants going into the wilderness on their own.

Concern ID: 42768

CONCERN STATEMENT: Commercial outfitters are necessary and important because they allow visitors to experience wilderness who could not otherwise access these areas due to age, physical ability, or because they are inexperienced.

Representative Quote(s): **Corr. ID:** 14 **Organization:** Long time avid backpacker & stock assisted hiker

Comment ID: 302230 **Organization Type:** Unaffiliated Individual

Representative Quote: I can no longer hike in the mountains that I love without the assistance of an outfit like Rock Creek Packers. If you restrict operation like theirs, then you restrict an ever growing (aging) segment of the population who use these lands. The packing outfits are so much more

environmental friendly than most users of these public lands. Their stewardship of the areas they use (stock camps & trails) has always been a marvel to me.

Corr. ID: 30

Organization: *Not Specified*

Comment ID: 304007 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a novice rider/outdoors person who would not be able to experience the wonder of our beautiful country if not for the packers and their stock. Why must they be so restricted? They are more responsible in treatment of the land than most hikers, from what I have seen. They are business people and licensed and should be allowed to help people like me have experiences of a lifetime.

Corr. ID: 38

Organization: *Not Specified*

Comment ID: 304125 **Organization Type:** Unaffiliated Individual

Representative Quote: Given my age and physical condition I would not be able to experience the Sierra wilderness without the support provided by packers. Packers have enabled me to have some of the most meaningful and joyful experiences of my life by giving access to wild areas and high rock formations in solitude.

Corr. ID: 65

Organization: *Not Specified*

Comment ID: 302864 **Organization Type:** Unaffiliated Individual

Representative Quote: In contrast, I have gone on 4 stock trips through Rock Creek Pack Station in the past few years, and found those experiences to be exciting, memorable, and thoroughly pleasant. While on horseback, I am able to look around, take photos, and really appreciate my surroundings. With mules carrying the gear, we have been able to pack more and better clothing, camping equipment, and food - further improving the overall experience. Furthermore, I have gone on these trips with a diverse group of friends of various ages and physical abilities. We have formed memories together that would not have been possible on foot, as some are incapable of a hike of that magnitude.

Concern ID:

42769

**CONCERN
STATEMENT:**

Commercial services should be allowed in the park, as they are a historic use and are consistent with the Wilderness Act.

Representative Quote(s): **Corr. ID:** 60

Organization: The Wilderness Society

Comment ID: 302839 **Organization Type:** Unaffiliated Individual

Representative Quote: We seek to insure that traditional, historical and responsible pack and saddle stock use in wilderness areas is recognized, protected, supported and sustained consistent with the capabilities of the land. We attach a copy of our scoping letter on the WSP, dated July 25, 2011, which was submitted jointly with the Backcountry Horsemen of America. Similarly, commercial services including packstock use, mountain climbing and guiding and other wilderness-appropriate services should be allowed consistent with the provisions in the Wilderness Act. The draft alternatives should provide for these varied uses.

Corr. ID: 115

Organization: Rainbow Pack Outfitters

Comment ID: 303450 **Organization Type:** Unaffiliated Individual

Representative Quote: As the Park is under the Department of the Interior, and acknowledges historic resources, we request the Park to consider the Commercial stock users as an integral part of the history of the Park, in both building and maintaining trail, and providing access into remote wilderness area.

Concern ID: 42770
CONCERN STATEMENT: A training and/or certification program should be required for commercial outfitters.
Representative Quote(s): **Corr. ID:** 88 **Organization:** *Not Specified*
Comment ID: 303216 **Organization Type:** Unaffiliated Individual
Representative Quote: As far as a guide's obligation to promote ethical and sustainable use of Public Land: I would encourage the Park to also require that every lead mountain guide hold a current Leave No Trace Master Trainer certificate.
Corr. ID: 88 **Organization:** *Not Specified*
Comment ID: 303215 **Organization Type:** Unaffiliated Individual
Representative Quote: I embrace very high standards for my profession and encourage the Park to adopt the same, specifically when it comes to two requirements: technical training and wilderness impacts. Specific to technical certification: any lead mountain guide operating in the Park should be at least AMGA Rock Guide or Alpine Guide certified. Assistant guides - those who operate under direct supervision - could have a lesser certificate but any guide who operates unsupervised should have the higher certification.

Concern ID: 42771
CONCERN STATEMENT: Commercial users should be allowed in the parks, but these users should pay a fee for each pack animal to alleviate trail maintenance costs.
Representative Quote(s): **Corr. ID:** 128 **Organization:** *Not Specified*
Comment ID: 304150 **Organization Type:** Unaffiliated Individual
Representative Quote: In addition, there should be a substantial fee paid to the park for each pack animal per trip to help pay for trail maintenance as the pack animals tear up the trails much more than a backpacker on foot.

Concern ID: 42772
CONCERN STATEMENT: Commercial services at the park should not be allowed or should be limited (especially to visitors that need these services or in activity areas).
Representative Quote(s): **Corr. ID:** 25 **Organization:** *Not Specified*
Comment ID: 302383 **Organization Type:** Unaffiliated Individual
Representative Quote: Small guided hiking tours are obviously low impact and are currently allowed with special commercial use authorizations or concessions permits. Commercial activity of ANY sort should be discouraged.

The very idea of "commercial" activity is repulsive and brings back memories of the Disney Fantasy that was almost unleashed on this Valley.
Corr. ID: 125 **Organization:** *Not Specified*
Comment ID: 304135 **Organization Type:** Unaffiliated Individual
Representative Quote: Commercial operations, such as pack outfits, on public lands, especially in wilderness areas, should be limited to helping citizens who NEED, NOT DESIRE, those services in order to use the public lands. Commercial operations must be regulated in a way that is fair to all citizens.

Concern ID: 42773

**CONCERN
STATEMENT:**

The pack station at Mineral King should be re-opened or maintained to allow for an additional pack station at the park. Bearpaw Meadow High Sierra Camp should also continue to be operated in a more primitive condition once the historic determination is completed.

Representative Quote(s): **Corr. ID:** 20 **Organization:** *Not Specified*

Comment ID: 302295 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe that the NSP should encourage a vendor to reopen the Mineral King Pack Station. They should be permitted to provide both day and hourly rentals along with multiple day excursions into the back country. Since the season is relatively short, the pack station operation should be allowed to open as soon as the road provides access to the site and continued through until the gates of the road are locked in November. By not providing a Pack Station in the Mineral King valley and the use of stock on trails for hourly, day and multiple day excursions, the NPS is preventing access to the surrounding lakes and back county for the elderly, physically impaired and small children.

Corr. ID: 144 **Organization:** The American Alpine Club

Comment ID: 304382 **Organization Type:** Recreational Groups

Representative Quote: As an authorized concessioner and partner to the NPS, the AAC has considerable expertise operating lodging and campgrounds for climbers. With respect to the Bearpaw Meadow High Sierra Camp, should the determination be made of historic significance and the current concessioner declines to operate this camp, the AAC would consider opportunities to preserve this camp in a more primitive condition.

Concern ID: 42978

**CONCERN
STATEMENT:**

The park should not give preference to commercial use over non-commercial (public) use of the wilderness to allow for permitting equity. Commercially supported visitors should compete for the same permit supply with the same rules. Additionally, commercial outfitters should not be allowed to write their own permits.

Representative Quote(s): **Corr. ID:** 85 **Organization:** *Not Specified*

Comment ID: 303206 **Organization Type:** Unaffiliated Individual

Representative Quote: allowing commercial pack outfits to issue there own permits is grossly irresponsible and should not be allowed.

Corr. ID: 117 **Organization:** Sierra Club Tehipite Chapter

Comment ID: 303398 **Organization Type:** Unaffiliated Individual

Representative Quote: Commercial trip providers should not be able to write their own permits or be without limits on the number of trips they can provide. Preference should be given to those who are using stock on non-commercial trips.

Corr. ID: 125 **Organization:** *Not Specified*

Comment ID: 304134 **Organization Type:** Unaffiliated Individual

Representative Quote: Commercial outfits should not have ANY priority over citizens who do not use their services. All citizens and pack outfits should compete equally for limited permits or access to favored places through a common-pool arrangement. Yosemite has an excellent system: individuals must compete for limited permits, and then hire a packer, if needed.

Corr. ID: 178 **Organization:** *Not Specified*

Comment ID: 304589 **Organization Type:** Unaffiliated Individual

Representative Quote: Given the keen competition for permits, the fact that commercial outfits are monopolizing use that could be available to average citizens is an outrage. There is no doubt that stock have far more impacts on the land than hikers. By reducing or eliminating stock use, far more people could avail themselves of these lands and/or overall impacts could be reduced. Commercial use should always take a back seat to public use--not the other way around.

Corr. ID: 182 **Organization:** *Not Specified*

Comment ID: 304601 **Organization Type:** Unaffiliated Individual

Representative Quote: Commercial stock use should not be allowed where trailhead quotas that restrict entry by hikers are regularly met. Your needs assessment for commercial services in the SEKI backcountry should be guided by one over-riding principle: if use by the general public is currently sufficiently high that trail quotas are routinely filled, then commercial use of those trails should be prohibited.

EN1000 - General Comments on Extent Necessary Determination (END)

Concern ID: 42775

CONCERN STATEMENT: The END process was supported by some commenters for determining management of commercial services, including commercial stock use.

Representative Quote(s): **Corr. ID:** 51 **Organization:** American Mountain Guides Association

Comment ID: 302390 **Organization Type:** Unaffiliated Individual

Representative Quote: Given the degree that our members utilize commercial stock for support of their operations in SEKI, the AMGA supports a reasonable amount of continued stock use. Obviously this is a controversial topic, so we will defer to the END to decide how to manage this important historical use.

Corr. ID: 105 **Organization:** Sierra Mountain Guides

Comment ID: 303751 **Organization Type:** Unaffiliated Individual

Representative Quote: As this process goes forward I hope that it will remain clear that the job at hand is not to reinterpret the Wilderness Act. It is well established that certain commercial uses are necessary in many wildernesses and others are not. Guiding and pack stock supported guiding are historically and legally acceptable commercial uses in SEKI wilderness. The demand for these services is not in decline since the passage of the Wilderness Act, nor have the impacts of these commercial activities been found to be at unacceptable levels such as to deem them as incompatible with Park management. These services are undoubtedly and irrefutably still proper for realizing the recreational and other wilderness purposes of SEKI.

Concern ID: 42776

CONCERN STATEMENT: Commercial services are needed in wilderness to support the public purposes of wilderness use and education, and to foster a wilderness experience.

Representative Quote(s): **Corr. ID:** 17 **Organization:** Southern Yosemite Mountain Guides

Comment ID: 302265 **Organization Type:** Unaffiliated Individual

Representative Quote: Does the commercial service maintain or improve the preservation of wilderness character?

Yes, it ultimately improves the character of the wilderness by having professional guides taking people out into the wilderness. We teach people about being stewards of the wilderness and they come away from all of our trips with a new understanding and appreciation for the wilderness. We take all ages and all walks of life, as well as all races, gender and all income levels.

Corr. ID: 17 **Organization:** Southern Yosemite Mountain Guides

Comment ID: 302266 **Organization Type:** Unaffiliated Individual

Representative Quote: What types and amounts of commercial services might be appropriate to realize the public purposes of wilderness?

There are current regulations and quotas that seem to be working fine for the current demand. If anything, I have seen an increase in demand the last 20 years in this business. We should account for this in the next stewardship plan. People are more "plugged-in" than ever and are going to need protected wilderness and outfitter guides more than ever.

Corr. ID: 17 **Organization:** Southern Yosemite Mountain Guides

Comment ID: 302738 **Organization Type:** Unaffiliated Individual

Representative Quote: Are the public purposes of wilderness (recreational, scenic, scientific, educational, conservation, and historical use) being realized without commercial services?

No. Some people can go on their own but most people aren't comfortable or safe going without a guide. I believe that we shouldn't make it mandatory to have to go with a commercially permitted outfitter. Give people the choice. We are not forcing our services on anyone, yet many people choose to go with an outfitter. I often sight the example of hiring a lawyer for a court case or an accountant to do your taxes or even a plumber to fix the plumbing. Everyone has the right to represent themselves in court, but if I was ever in court I would want a lawyer who knew the law and was an expert in his field and knew how the "system" worked to represent me.

Corr. ID: 103 **Organization:** The American Alpine Club

Comment ID: 303827 **Organization Type:** Unaffiliated Individual

Representative Quote: We recognize that this WSP has the potential to serve park managers around the country with much needed leadership in Extent Necessary Determination (END) for commercial services. As a continuation of our participation in the Stanford University Uncommon Dialogue Conference, Commercial Outfitting and the Wilderness Act, we are eager and poised to contribute to this complex issue. (see endnote #1)

As conveyed in our 2011 comments to the latest revision of Director's Order #41, we recognize the critical role that qualified and appropriately vetted outfitters and guides play in the public's experience and understanding of wilderness. We believe that individuals and groups must have the option to experience wilderness in a style that is appropriate to them. For some, the use of a non-profit or for profit commercial service is an essential option in order to experience wilderness safely and responsibly. We believe guided and structured options for climbing in wilderness should be made available to respond to the needs of the public for each individual park. To this end, the AAC supports necessary and appropriate levels of commercial use on public lands in order to 1) serve the public's growing need for education and responsible, safe recreation and 2) help improve the manner in which public wilderness is utilized for recreational and educational purposes. Furthermore, we recommend

dynamic management strategies enabling the ratio of guided to non-guided climbers to vary with key factors including total carrying capacity and public demand.

Concern ID: 42777

CONCERN STATEMENT: Commercial stock use is not necessary in the wilderness, and should be evaluated by the NPS.

Representative Quote(s): **Corr. ID:** 112 **Organization:** *Not Specified*

Comment ID: 303556 **Organization Type:** Unaffiliated Individual

Representative Quote: As such, I question whether any of the existing commercial stock use is necessary, and I hope that the Park Service will carefully and honestly evaluate the extent to which commercial stock use is necessary in the SEKI Wilderness.

Concern ID: 42778

CONCERN STATEMENT: The preliminary alternatives are flawed because they allow for unlimited stock use.

Representative Quote(s): **Corr. ID:** 130 **Organization:** *Not Specified*

Comment ID: 304159 **Organization Type:** Unaffiliated Individual

Representative Quote: Following the federal ruling earlier this year that NPS violated the Wilderness Act by adopting a General Management Plan that allowed unlimited commercial stock use through the majestic Sequoia-Kings Canyon wilderness, I am dismayed that NPS has, without first doing a needs assessment of the extent of commercial stock use necessary, proposed flawed Preliminary Alternatives that all essentially allow unlimited stock use to continue in SEKI's wilderness.

Concern ID: 42779

CONCERN STATEMENT: The NPS must complete the END process for commercial stock prior to developing alternatives.

Representative Quote(s): **Corr. ID:** 159 **Organization:** *Not Specified*

Comment ID: 304531 **Organization Type:** Unaffiliated Individual

Representative Quote: The draft alternative is premature in that SEKI has not made a determination about how much (if any) commercial stock use is necessary to meet the intent of the Wilderness Act, as recently ordered by the courts. Levels of commercial stock use (and administrative stock use) will have significant bearing on whether the various other provisions of the alternatives would be necessary and appropriate. I strongly urge you to withdraw the draft alternatives until this needs assessment has been completed.

Concern ID: 42780

CONCERN STATEMENT: Commercial stock use should be evaluated against impacts and determine if necessary to meet the purposes of the wilderness.

Representative Quote(s): **Corr. ID:** 112 **Organization:** *Not Specified*

Comment ID: 303465 **Organization Type:** Unaffiliated Individual

Representative Quote: I hope that the SEKI staff take this planning opportunity to (1) honestly disclose and evaluate the impacts from permitting commercial stock use within the SEKI wilderness and (2) to evaluate in good faith the extent to which permitting commercial packstock is necessary to meet the Purpose of the Wilderness Act (i.e., to preserve wilderness character "to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does

not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition").

Concern ID: 42781

**CONCERN
STATEMENT:**

The END process should consider carrying capacity, public demand impacts of commercial services on resources, adaptive management, educational and recreational uses, and the outfitters' role in wilderness to help determine levels of commercial use.

Representative Quote(s): **Corr. ID:** 51

Organization: American Mountain Guides Association

Comment ID: 302389 **Organization Type:** Unaffiliated Individual

Representative Quote: Specifically regarding the END, the AMGA would like to see the continuation of diverse opportunities for the public to choose a guide. We believe that public demand for guided educational and recreational wilderness use can, in large part, help determine the appropriate levels of commercial and private wilderness use allocations.

Corr. ID: 103

Organization: The American Alpine Club

Comment ID: 303829 **Organization Type:** Unaffiliated Individual

Representative Quote: #1: With respect to the END assessment method for commercial services, we offer the following considerations:

1. What is the total carrying capacity of different park zones and routes? (quantitative)
2. How can we effectively and legally factor public demand into our methodology?
3. What are the unique resource impacts of commercial services and how are we measuring these impacts relative to baseline data? (quantitative)
4. How can adaptive management strategies like group size limits, seasonal and geographical limits and commercial free zones provide greater options to the public? How can these approaches help us implement "appropriate ratio" as cited in Director's Order #41 proposed revision. (quantitative)
5. How do we define the outfitter/guide role in wilderness at SEKI? (qualitative)

Concern ID: 42782

**CONCERN
STATEMENT:**

All non-motorized traditional wilderness activities (e.g. camping, hiking, backpacking, stock-supported hiking, fishing, skiing, climbing, and mountaineering) are proper in wilderness.

Representative Quote(s): **Corr. ID:** 17

Organization: Southern Yosemite Mountain Guides

Comment ID: 302737 **Organization Type:** Unaffiliated Individual

Representative Quote: What activities are proper for enabling visitors to realize the recreational and other purposes for which the Sequoia-Kings Canyon and John Krebs wilderness areas were established?

My answer is all non motorized traditional wilderness activities such as camping, hiking, backpacking, stock supported hiking, fishing, skiing, climbing, mountaineering.

Concern ID: 42980

**CONCERN
STATEMENT:**

Commercial stock services should be limited to visitors who need this service because they cannot hike or carry a backpack.

Representative Quote(s): **Corr. ID:** 143

Organization: High Sierra Hikers Association

Comment ID: 304353 **Organization Type:** Recreational Groups
Representative Quote: Regardless of "zone," commercial stock services should be limited to those persons or groups who truly need commercial stock support (i.e., those who cannot hike or carry a backpack). Further, regardless of "zone," commercial stock services should be limited to spot and dunnage trips where the animals do not remain in the wilderness for more than one night.

EN1100 - Comments on Types of Commercial Services

Concern ID: 42783

CONCERN STATEMENT: Commercial services, including pack stock and stations, mountain climbing, and guiding should be allowed in the park.

Representative Quote(s): **Corr. ID:** 8 **Organization:** *Not Specified*

Comment ID: 302181 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly hope that the Park Service will encourage the survival and flourishing of pack stations, including overnight trips, day trips, and deer hunting trips in the National Forest. Not everyone is able to hike into the backcountry and needs the option (under the Americans with Disabilities Act) of riding a horse or mule.

Corr. ID: 137 **Organization:** The Wilderness Society

Comment ID: 304268 **Organization Type:** Non-Governmental

Representative Quote: Similarly, commercial services including packstock use, mountain climbing and guiding and other wilderness-appropriate services should be allowed consistent with the provisions in the Wilderness Act. The draft alternatives should provide for these varied uses.

Corr. ID: 152 **Organization:** National Forest Recreation Association

Comment ID: 304486 **Organization Type:** Non-Governmental

Representative Quote: Commercial packing services have been ' and continue to be- necessary to provide access to the wilderness areas for many Americans and international visitors. Their use should not be restricted or reduced in any way.

Congress was very clear in establishing the Sequoia-Kings Canyon Wilderness Addition and John Krebs Wilderness Area that pack and saddle stock must not be precluded, and this included both recreation and commercial use.

Concern ID: 42784

CONCERN STATEMENT: Commercial stock use should not be allowed in the park as these stock parties degrade streams, meadows, and campsites more than other user groups.

Representative Quote(s): **Corr. ID:** 112 **Organization:** *Not Specified*

Comment ID: 303464 **Organization Type:** Unaffiliated Individual

Representative Quote: In my many experiences hiking throughout SEKI, I have observed that the vast majority of resource and social impacts to the SEKI Wilderness are due to commercial stock use. These groups tend to be larger than private, non-stock supported parties. The stock cause far more trail damage and require trails to be built to a much higher "standard," requiring far larger structures and effort than constructing trails for foot-travelers. Stock parties tend to have large,

eroded campsites that are eyesores to all that pass by. Stock graze meadows, erode stream banks, and indiscriminately defecate in and near water.

Concern ID: 42785

CONCERN STATEMENT: Commercial stock should not be allowed in the park because the visitors that often use these services do not require stock in order to access the wilderness, and instead use stock to transport luxury items.

Representative Quote(s): **Corr. ID:** 112 **Organization:** *Not Specified*

Comment ID: 310598 **Organization Type:** Unaffiliated Individual

Representative Quote: In my experience encountering many commercial stock parties and talking to the people that use commercial stock, these visitors do not need to be stock supported. Rather, they are able-bodied individuals that have chosen to hire stock to either (1) obtain a permit, (2) to bring luxury items and supplies that they could not carry on their backs, and (3) because it is easier than planning a trip on their own. None of these reasons impress me as lawful reasons to permit commercial use under the Wilderness Act.

FS1000 - General Comments on Food Storage

Concern ID: 42786

CONCERN STATEMENT: Bear boxes or lockers should be used in wilderness. These boxes protect wildlife from obtaining human food, keeping wildlife away from campsites, and keeping visitors safe as well.

Representative Quote(s): **Corr. ID:** 129 **Organization:** Balch Park Pack Station

Comment ID: 304154 **Organization Type:** Unaffiliated Individual

Representative Quote: Food Storage: food lockers protect the animals from human food, they do not increase use and keep campers and bears safer. To remove something placed there at such a huge cost makes you guys look real bad. Nor does it do anything constructive.

Corr. ID: 157 **Organization:** *Not Specified*

Comment ID: 304529 **Organization Type:** Unaffiliated Individual

Representative Quote: Regarding bear boxes--the few places where I've seen them have been places that made sense, that help keep the bears wild--for example, a campsite near a High Sierra camp.

Concern ID: 42787

CONCERN STATEMENT: Bear boxes or food lockers are consistent with the Wilderness Act, as they reduce the impact of visitors on wilderness by making it easier for visitors to properly store food.

Representative Quote(s): **Corr. ID:** 105 **Organization:** Sierra Mountain Guides

Comment ID: 303734 **Organization Type:** Unaffiliated Individual

Representative Quote: Food Storage lockers may impact wilderness character but not significantly when in high use areas. High use areas already have more people and established campsites that affect wilderness character. They are often more frequented by bears as a result, and not having bear proof systems can lead to much greater impacts. Food lockers conform to the Wilderness Act by enabling people to more easily be responsible overnight users and to leave the wilderness less affected by their passage.

Concern ID: 42788

**CONCERN
STATEMENT:**

Bear Canisters require additional compliance and enforcement, and are not practical for visitors who need to carry enough food for longer trips. These cans may also be carried away by bears and other animals.

Representative Quote(s): **Corr. ID:** 105

Organization: Sierra Mountain Guides

Comment ID: 306499 **Organization Type:** Unaffiliated Individual

Representative Quote: Requiring bear cans is one that requires compliance and enforcement to be effective. Cans are so heavy, bulky, and expensive that many refuse to carry them even where required. For one person, a large bear can really only hold 3-5 days of food. If out for a longer trip it is impractical to carry an additional bear can and still fit personal equipment into a backpack. When rules are uninformed and impractical, people tend to ignore them altogether. Cans can also get carried away by bears and other animals. This leaves a plastic can of rotting food lost in the wilderness. Food lockers have their own set of issues and challenges, but this seems the lesser of two evils.

Concern ID: 42789

**CONCERN
STATEMENT:**

Bear boxes/food storage lockers should not be permitted in the wilderness. The boxes create high-impact use areas that concentrate visitors and encourage large groups to camp at the same location.

Representative Quote(s): **Corr. ID:** 112

Organization: *Not Specified*

Comment ID: 303552 **Organization Type:** Unaffiliated Individual

Representative Quote: I am disappointed that the Park Service has installed large, metal food lockers throughout the SEKI wildernesses. Not only are these an eyesore that detract from solitude and wilderness character whenever they are encountered, they concentrate use and camping around them, and detract from the need for self-reliance and planning by visitors.

Corr. ID: 182

Organization: *Not Specified*

Comment ID: 304596 **Organization Type:** Unaffiliated Individual

Representative Quote: Further, the placement of these storage lockers has created a series of high-impact sacrifice areas in the SEKI backcountry. Hikers are naturally drawn to the storage lockers because of their convenience. Consequently, human use gets concentrated to the point that the backcountry experience is not far removed from a car-camping experience in terms of camper density.

I have on several occasions encountered storage lockers that were filled to capacity because there were 10-12 groups camped in essentially the same location (e.g., Bubbs Creek near the Lake Reflection trail, and Vidette Meadows).

Concern ID: 42790

**CONCERN
STATEMENT:**

Food storage lockers impact the wilderness character at the park. They should not be used at SEKI particularly as other suitable alternatives such as bear canisters are available.

Representative Quote(s): **Corr. ID:** 112

Organization: *Not Specified*

Comment ID: 303466 **Organization Type:** Unaffiliated Individual

Representative Quote: I also hope that SEKI staff will evaluate the compatibility and necessity of installing metal food storage lockers throughout the wilderness. The adjacent National Forest wildernesses do not install these mechanical trappings of civilization, but instead require visitors to carry their own food storage containers. I see no justification

food storage lockers in wilderness when alternatives that do not impact wilderness character are efficacious and proven.

Corr. ID: 112 **Organization:** *Not Specified*

Comment ID: 310600 **Organization Type:** Unaffiliated Individual

Representative Quote: No doubt they also require the use of helicopters to transport them into wilderness, which is not permitted under the Wilderness Act. Certainly, these lockers are not the minimum tool, nor necessary, to preserve wilderness character and protect bear populations from human encroachment. Please do not sacrifice our treasured wilderness for your administrative convenience!

Corr. ID: 182 **Organization:** *Not Specified*

Comment ID: 310601 **Organization Type:** Unaffiliated Individual

Representative Quote: With respect to food storage lockers, I strongly favor the elimination of the 89 lockers that have proliferated throughout the SEKI backcountry. These lockers are human structures that run contrary to the definition of wilderness. They are intrusive and ugly, and they domesticate the wilderness. With the advent of personal bear canisters, they are simply not necessary.

FS1300 - Suggests new or change in alternative(s) for Food Storage

Concern ID: 42791

CONCERN STATEMENT: [The use of bear canisters in SEKI should be mandatory.](#)

Representative Quote(s): **Corr. ID:** 102 **Organization:** *Not Specified*

Comment ID: 303368 **Organization Type:** Unaffiliated Individual

Representative Quote: FOOD STORAGE - I have noticed that more and more back packers are using the food storage containers (Garcia,etc). Since this is so, I recommend that the park make it manditory that all back packers be required to use these containers. Use of them is easier than hanging food and more reliable. If this is possible then food storage lockers would not have to be provided, except for trail crews who need a large amount of food supply.

Corr. ID: 112 **Organization:** *Not Specified*

Comment ID: 310599 **Organization Type:** Unaffiliated Individual

Representative Quote: Ever since the adjoining national forests began requiring backpackers to carry food canisters, I have happily done so and I have never had an issue with bears getting to my food, although they have visited my campsites. The Park should require all visitors to carry proper food storage equipment, and should vigorously enforce policies to protect bears from humans.

Concern ID: 42792

CONCERN STATEMENT: [There are alternative food storage techniques to bear lockers and bear canisters that are adequate for wilderness.](#)

Representative Quote(s): **Corr. ID:** 115 **Organization:** Rainbow Pack Outfitters

Comment ID: 303437 **Organization Type:** Unaffiliated Individual

Representative Quote: In regard to Food Storage we support Alternative 1 but feel that as long as someone is in attendance of the food (alert guard) it should be considered adequate.

Corr. ID: 182 **Organization:** *Not Specified*

Comment ID: 304595 **Organization Type:** Unaffiliated Individual

Representative Quote: The food storage alternatives are both impractical and, in some cases, directly violate the intent of the Wilderness Act. First, the practicality issue. I wholeheartedly support a requirement that visitors carry portable bear-proof canisters. However, I object to the Park Service considering alternatives that would prohibit counter-balancing as an acceptable means of food storage (see Alternative A). The Park Service must surely recognize that a bear canister holds at most 5-6 days worth of food (particularly if you factor in the need to store sunscreen, toothpaste, and other "smelly" items). And surely the Park Service must realize that even there is no way that an individual hiker cannot carry two bear canisters at once (the capacity of modern packs simply is inadequate to allow this, and the additional weight would also be prohibitive).

On my 10-12 day trips, my hiking partners and I each carry a canister, and we make every effort to put as much food into these as possible. But the fact remains that we often still need to hang food using the counter-balance method to deal with food and toiletries that cannot fit in the bear canister.

Concern ID: 42793

CONCERN STATEMENT: [Regulations on food storage and the use of canisters should not be limited to commercial services, but should be enforced for all visitors.](#)

Representative Quote(s): **Corr. ID:** 152

Organization: National Forest Recreation Association

Comment ID: 304475 **Organization Type:** Non-Governmental

Representative Quote: It is reasonable to request visitors be diligent with their food storage. There are reasonable bear-proof food storage equipment options available for hikers and stock users. Any regulation pertaining to food storage should pertain to all users and not be limited to just the commercial outfitters. Food storage lockers should continue to be placed in high use areas. Additional lockers should be placed in other areas as well to help disperse use.

Concern ID: 42794

CONCERN STATEMENT: [More bear lockers should be added into the wilderness to allow for additional food storage.](#)

Representative Quote(s): **Corr. ID:** 32

Organization: *Not Specified*

Comment ID: 304029 **Organization Type:** Unaffiliated Individual

Representative Quote: More bear lockers: Monarch, Crystal, Franklin, Emerald, Pear. Crystal, Franklin for example.

Corr. ID: 124

Organization: *Not Specified*

Comment ID: 304669 **Organization Type:** Unaffiliated Individual

Representative Quote: Proper food storage is critical in the backcountry. I think that maintaining food storage lockers in their current locations, replacing those that no longer work, and adding them in heavily used areas and in areas where bears have become familiar with human food is important. Food storage lockers do not detract from a wilderness experience. They do help to prevent animals from getting human food and to encourage visitors to properly store their food. Areas, such as Monarch Lake, Franklin Lake, and Eagle Lake in the Mineral King area, which get a high number of visitors, should have several lockers in working order. Other areas include Pinto Lake, Big 5 Lakes, Little Claire Lake, and along the John Muir trail at heavily used campsites

Concern ID: 42795
CONCERN STATEMENT: If bear canisters are required in certain areas the canisters should be available for rent.
Representative Quote(s): **Corr. ID:** 117 **Organization:** Sierra Club Tehipite Chapter
Comment ID: 303400 **Organization Type:** Unaffiliated Individual
Representative Quote: We approve of the presence of food storage lockers in high-use camping areas, and the requirement in some areas for users to have bear-proof food canisters, so long as the park service can make such canisters available by rental at permit stations.

HW1000 - General Comments on Human Waste

Concern ID: 42796
CONCERN STATEMENT: Pack-out kits should not be used in wilderness because they place a burden on hikers who visit on longer trips, and pose a significant health concern.
Representative Quote(s): **Corr. ID:** 159 **Organization:** Not Specified
Comment ID: 304535 **Organization Type:** Unaffiliated Individual
Representative Quote: many of the draft alternatives contain ludicrous provisions such as the requirement that people pack out their fecal wastes. I understand and accept that in extreme cases, such as the Mt. Whitney area, the use of pack-out waste kits may be necessary (because the Forest Service and Park Service are apparently unwilling to establish protective limits on the number of visitors to this area). But to suggest I as a hiker might have to pack out a 10-14 day accumulation of human waste (the typical duration of one of my hiking trips) is simply ludicrous. Handling that much waste for such a prolonged period would be an unacceptable burden, not to mention posing a significant health risk.

Concern ID: 42797
CONCERN STATEMENT: Instead of the use of pack-out kits, there are other alternative methods for dealing with waste that could be used. Commenters suggested that toilets were a preferred alternative, and others felt that waste should be buried underground in wilderness areas.
Representative Quote(s): **Corr. ID:** 99 **Organization:** Not Specified
Comment ID: 304115 **Organization Type:** Unaffiliated Individual
Representative Quote: Human waste should be buried underground while in wilderness areas.
Corr. ID: 118 **Organization:** Not Specified
Comment ID: 303351 **Organization Type:** Unaffiliated Individual
Representative Quote: Toilets are much preferred to pack-out waste kit bags.

Concern ID: 42798
CONCERN STATEMENT: Pack-out kits should not be used in wilderness because human waste is a small consideration when compared to the waste generated by stock use. Stock waste is more important to address than human waste.
Representative Quote(s): **Corr. ID:** 148 **Organization:** Not Specified
Comment ID: 304639 **Organization Type:** Unaffiliated Individual
Representative Quote: Currently, for instance, wag bags are encouraged in the Crabtree area to carry out human waste. They are contemplated to

be required elsewhere in the parks. However, no consideration whatsoever has been given to removing or reducing manure generated by stock in spite of the fact that the potential ecological impact of tons of manure is thousands of times more than that of human waste.

Concern ID: 42799

**CONCERN
STATEMENT:**

Pack-out kits should be used in high-use areas, and NPS should encourage but not require the use of these kits in other areas.

Representative Quote(s): **Corr. ID:** 78

Organization: Sierra Club

Comment ID: 302923 **Organization Type:** Unaffiliated Individual

Representative Quote: I prefer that pack-it out waste kit requirements be limited to high use areas. I don't favor it's required use everywhere as in alternative 5, though I would approve of it's use being encouraged everywhere.

Concern ID: 42800

**CONCERN
STATEMENT:**

Commenters were under the impression that human waste was not addressed in the proposed alternatives.

Representative Quote(s): **Corr. ID:** 103

Organization: The American Alpine Club

Comment ID: 303828 **Organization Type:** Unaffiliated Individual

Representative Quote: In reviewing Table 3. Preliminary Draft Alternatives by Key Topic - Campfires, Food Storage, and Human Waste, we were unable to locate any specific alternatives addressing human waste in SEKI; however, human waste management does appear within the scope of this WSP. We recognize this is a growing problem for all wilderness land managers and the climbing public, especially in high traffic areas such as Mount Whitney.

HW1300 - Suggests new or change in alternative(s) for Human Waste

Concern ID: 42801

**CONCERN
STATEMENT:**

If the quotas are changed in the Mt. Whitney area then a review of pack-out kits should be made.

Representative Quote(s): **Corr. ID:** 16

Organization: Not Specified

Comment ID: 302247 **Organization Type:** Unaffiliated Individual

Representative Quote: Current human waste management practices should be maintained however, if trailhead quotas and exit quotas were significantly reduced in the Whitney zone, a review of the "wag" bag requirement might be made in the future by NPS.

Concern ID: 42802

**CONCERN
STATEMENT:**

Human waste disposal should not be managed by zone, and all areas should require catholes, with pack-out kit requirements for the areas of highest use.

Representative Quote(s): **Corr. ID:** 159

Organization: Not Specified

Comment ID: 304537 **Organization Type:** Unaffiliated Individual

Representative Quote: The bottom line is that the human waste disposal issue is not something that should be managed by zone. The "cathole" method should be uniform throughout the wilderness, and the "waste pack" requirement should be the extreme exception that is applied only where it is currently applied on the Mt. Whitney trail.

If managers think that waste accumulation is becoming a significant problem in an area, then you either need to regulate the number of people more strictly, or remove the structures (Le., bear boxes; see comment 6 below) that are creating the human waste problems by concentrating use. Any other schemes should be should be stricken from all alternatives.

Concern ID: 42803

**CONCERN
STATEMENT:**

Toilets and privies should be maintained, and more toilets should be added at certain areas. It was suggested that NPS should charge a fee for the use of these toilets, and that visitors should be properly educated about using privies.

Representative Quote(s): **Corr. ID:** 32

Organization: *Not Specified*

Comment ID: 304027 **Organization Type:** Unaffiliated Individual

Representative Quote: Put a toilet at Crystal Lake, White Chief, and Franklin lake. Redo the toilets at Mineral King. Allow people to use the Ranger toilet at Hockett Meadow or place another one. PUT TOILETS BACK AT MT WHITNEY & charge for it. Increase permit cost or for use of a bathroom.

Corr. ID: 124

Organization: *Not Specified*

Comment ID: 303278 **Organization Type:** Unaffiliated Individual

Representative Quote: Regarding human waste management, I strongly support keeping, rebuilding, and constructing privies in areas of high use and in areas where it is difficult to dig a cathole. Franklin Lake, Monarch Lake, and Eagle Lake are good examples of areas that are heavily impacted by users and need privies to protect the environment. The privies need to be maintained in order for visitors to use them. Visitors should be told where they are located and that they are expected to use them when getting their permits. Educating the visitors can help minimize the trash that gets put into the privies. While it is more desirable to eliminate privies in our wilderness areas, the popularity of some areas requires them in order to protect the natural resources in these areas.

LP1000 - Laws and Policies Relating to Wilderness and Wilderness Management

Concern ID: 42804

**CONCERN
STATEMENT:**

The non-impairment clause applies as defined in NPS Management Policies to all parklands, including designated wilderness.

Representative Quote(s): **Corr. ID:** 47

Organization: *Not Specified*

Comment ID: 302203 **Organization Type:** Unaffiliated Individual

Representative Quote: Allow me to speak here also to the logical objection to the above, which is that it does not adequately speak to the condition of natural resources. The answer, I believe, is found in Section 4(a)(3) of the Wilderness Act, which states that wilderness designation of national park lands "shall in no manner lower the standards evolved for the use and preservation of such park(s)...in accordance with the Act of August 25, 1916..." In other words, the non-impairment clause applies as defined in NPS Management Policies applies to all park lands, including designated wilderness. The SEKI WSP has no statutory authority to allow any management action or use that impairs park resources. This is a higher standard of natural resources than is offered in the Wilderness Act and, by law, this higher standard must prevail.

Concern ID: 42805
CONCERN STATEMENT: Designated stock camps or any camps that ban particular users would violate 16 U.S.C. § 45.d, and result in the designation of parts of SEKI for only certain visitors.

Representative Quote(s): **Corr. ID:** 136 **Organization:** The Garden Law Firm, P.C.
Comment ID: 304279 **Organization Type:** Business
Representative Quote: With regard to stock camps, BHC HSU opposes any alternatives which include mandatory stock camps as well as camps which ban any particular type of user. These types of restrictions would result in designating parts of SEKI for the exclusive use of certain visitors, which would violate 16 U.S.C. § 45d.

Concern ID: 42807
CONCERN STATEMENT: Stock use should be allowed to continue as it is clearly indicated as a form of wilderness recreation in the Wilderness Act and the Sequoia and Kings Canyon National Parks Back-Country Access Act.

Representative Quote(s): **Corr. ID:** 136 **Organization:** The Garden Law Firm, P.C.
Comment ID: 304276 **Organization Type:** Business
Representative Quote: Congress recently was very clear in establishing the Sequoia-Kings Canyon Wilderness Addition and John Krebs Wilderness Area that pack and saddle stock recreation must not be precluded. Public Law 111-1, § 1903 (March 30, 2009). In fact, Congress very resoundingly reiterated this strong support of pack and saddle stock activities in wilderness areas of SEKI when it enacted the Sequoia and Kings Canyon National Parks Back-country Access Act, H.R. 4849, 112th Cong. (2012)("SEKI Access Act"). The SEKI Access Act was specifically passed to prevent attempts by other user groups to impede pack and saddle recreation in SEKI. The fact that this Act was passed quickly and by an extraordinary majority from both political parties in this era of political diversity further demonstrates not just the clear Congressional support for continuing historic pack and saddle stock activity, but the strong displeasure by Congress with attempts by other user groups to restrict it.

Concern ID: 42808
CONCERN STATEMENT: Although stock use is allowed under the Wilderness Act and should be allowed, certain restrictions, such as the requirement that stock parties carry in feed, are necessary to protect fragile resources such as meadows and streams.

Representative Quote(s): **Corr. ID:** 47 **Organization:** Not Specified
Comment ID: 302228 **Organization Type:** Unaffiliated Individual
Representative Quote: The Wilderness Act clearly indicates that stock use is an appropriate form of wilderness recreation ("primitive and unconfined type of recreation" [Section 2(c)(2)]), and there is no need to debate that pack stock users should continue to access the SEKI Wilderness. This continued ability to enjoy a traditional wilderness form of travel, however, does not logically or inevitably translate into grazing policies that allow the consumption of fragile native flora. There is long historical precedent for such use, but in a time of climate change there is no legal justification for such use under the non-impairment clause of the Act of August 25, 1916. Neither can such use be allowed under the "untrammelled" clause of the Wilderness Act (Section 2(c)). Nearly all other national park units in the American West require that stock parties carry feed for their animals. Such a requirement is long overdue in the

Sierra Nevada.

I also cannot accept the continued logic that the impacts of native-flora grazing are primarily biological. There most definitely are biological impacts (locally severe in my long experience), but your plan must also address the fact that wild-plant grazing most definitely impacts wilderness experiences for the 95% of wilderness users who chose to walk rather than ride. Heavily grazed meadows, damaged stream banks, and chewed-up trails damage visitors' ability to enjoy a wilderness where "the earth and its community of life are untrammelled by man..." (Section 2(c)). You cannot ignore this.

Concern ID:

42809

**CONCERN
STATEMENT:**

Food storage lockers are contrary to the intent of the Wilderness Act, and should not be used at SEKI. A legal and environmental argument needs to be made to justify the use of these lockers.

Representative Quote(s): **Corr. ID:** 47

Organization: *Not Specified*

Comment ID: 302223 **Organization Type:** Unaffiliated Individual

Representative Quote: Food storage lockers are obviously contrary to the general intention of the Wilderness Act ("without permanent improvements" [Section (2)(c)]), and it is therefore unclear why half of your alternatives propose to either continue or even expand their presence. No other wilderness area in the Sierra Nevada finds it necessary to provide these intrusions. You should expect to make both a legal and an environmental argument for their continued presence in the EIS if you feel it necessary to justify that direction.

Concern ID:

42810

**CONCERN
STATEMENT:**

NPS DO 41 outlines the management of fixed anchors in wilderness, and fixed anchors should be allowed in SEKI to allow for climbing opportunities.

Representative Quote(s): **Corr. ID:** 23

Organization: Access Fund

Comment ID: 306505 **Organization Type:** Unaffiliated Individual

Representative Quote: In January 2011, the National Park Service released a draft version of Director's Order 41 Wilderness Stewardship (DO 41) for public review. DO 41, Section 7.2 Climbing reflects the consensus reached by the Negotiated Rulemaking Committee for managing fixed anchors in wilderness. Subject to a few concerns, the Access Fund generally supports the policy for managing fixed anchors in wilderness espoused by DO 41 and BLM Instruction Memo No. 2007-084- Use of Permanent Fixed Anchors for Climbing in Designated Wilderness Areas Managed by BLM.

In addition to DO 41, NPS can utilize the proven wilderness climbing management plans and policies used by Rocky Mountain, Zion, and Yosemite National Parks as models for SEKI's wilderness. Each of these National Parks is a world-renowned climbing destination that has experience successfully managing climbing and preserving wilderness characteristics. Each of these plans provide programmatic guidance for placing new and re-placing existing fixed anchors without arbitrary bolting standards or complex permitting processes.

Concern ID: 42811

CONCERN STATEMENT: Elevation restrictions on grazing are not consistent with 16 U.S.C. § 45b, as they would not allow for the "freest use" of the area while preventing degradation of the area.

Representative Quote(s): **Corr. ID:** 136 **Organization:** The Garden Law Firm, P.C.

Comment ID: 307211 **Organization Type:** Business

Representative Quote: BHC HSU adamantly opposes any blanket restriction on grazing based solely on a selected elevation. A blanket restriction of this nature would not be based on any site-specific conditions and appears unjustified in light of the improved conditions and decreased use. Furthermore, given Congress' mandate that NPS ensure the "freest use" of the areas within SEKI subject only to appropriate restrictions to protect the resources, a blanket-type restriction such as one based on elevation would not be consistent with this legal mandate unless it can be justified that every area above that elevation must be closed to grazing. 16 U.S.C. § 45b (regulations for SEKI must be primarily aimed at the "freest use" of the area for recreation while preventing spoliation of the area). A demonstration that every area above a specific elevation must be closed to grazing has not been, and we believe, cannot be made.

MT1000 - Miscellaneous Comments: General Comments

Concern ID: 42812

CONCERN STATEMENT: Invasive species introduction from stock is a concern at SEKI. Commenters suggested measures to reduce this risk, such as weed-free feed, and checking stock for seeds before they enter SEKI.

Representative Quote(s): **Corr. ID:** 119 **Organization:** *Not Specified*

Comment ID: 303335 **Organization Type:** Unaffiliated Individual

Representative Quote: As an amateur botanist, I worry about invasive plants becoming established in the wilderness. In my life, I've seen many special places overrun with a monoculture of invasive plants, stripping those places of the biodiversity that made them so wonderful. The Park Service should inspect all stock animals entering the Sequoia-Kings wilderness for invasive weed seeds to prevent such tragedies.

Corr. ID: 128 **Organization:** *Not Specified*

Comment ID: 304151 **Organization Type:** Unaffiliated Individual

Representative Quote: There is also the issue of pack animals bringing in non-native invasive weeds on their hooves and in their feed. There needs to be some regulation that addresses this problem.

Corr. ID: 178 **Organization:** *Not Specified*

Comment ID: 304590 **Organization Type:** Unaffiliated Individual

Representative Quote: For any areas that might be left open to stock users, the use of weed free food should be required. I worked as a hunting guide in Montana back in the 1970s and even back then we were required to have weed free food for our horses. There is no reason that national parks shouldn't have at least this as a minimum requirement. There should be no stock grazing on these lands.

Concern ID: 42813
CONCERN STATEMENT: Invasive species introduction other than from stock is also a concern at SEKI.
Representative Quote(s): **Corr. ID:** 142 **Organization:** UC Davis Medical Center
Comment ID: 304319 **Organization Type:** University/Professional Society
Representative Quote: we initiated an analysis and cataloging of algae species in 2010 in SEKI. To complete this work several years of ongoing field investigations will be needed and we urge you to support such work. We are concerned, in part, that the invasive species of algae *Didymosphenia germinata* may take foothold. Preliminary field observations have heightened our concern, and a definitive study should be undertaken. We are convinced that SEKI wilderness plan does not address the serious risk for invasive algae. This is not just an academic exercise.

Concern ID: 42814
CONCERN STATEMENT: Regulations are needed for food packaging brought in to SEKI, as wrappers and tin foil were commonly seen.
Representative Quote(s): **Corr. ID:** 165 **Organization:** *Not Specified*
Comment ID: 304455 **Organization Type:** Unaffiliated Individual
Representative Quote: Back Country Food Packaging Regulations need to be added. The amount of foil I extract from fire pits and take out on my own is significant. This kind of packaging should not be allowed as there is no enforcement of its removal. A thorough review of food packaging in general should be made.

Concern ID: 42815
CONCERN STATEMENT: Suggestions for changes to the public process for the SEKI WSP were made, including suggestions of ways for NPS to communicate with the public. One commenter noted issues with downloading material from PEPC.
Representative Quote(s): **Corr. ID:** 19 **Organization:** Univ Southern Calif (USC)
Comment ID: 302740 **Organization Type:** Unaffiliated Individual
Representative Quote: I would hope that the NPS takes a more proactive approach to reaching out to the public on this plan moving forward. Using the various discussion boards (which the Public Information Office uses for SAR operations), which reaches many thousands of Park users, is far more likely to get inclusion into the process, and tend to forestall litigation.

It would also be very helpful to have various group's comments, such as Wilderness Society, Backcountry Horsemen, Sierra Club, NRDC, Volunteers in Parks (even your backcountry rangers)....perhaps based upon impact of usage?....presented, much as arguments for Ballot Initiatives in elections are presented.

Corr. ID: 86 **Organization:** *Not Specified*
Comment ID: 304017 **Organization Type:** Unaffiliated Individual
Representative Quote: Range of Alternatives. The PEPC link to the Purpose and Need Poster was broken, so I couldn't see what the alternatives were supposed to be addressing.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42816

A Meadow Management Plan should determine how wilderness resources are managed to protect meadows impacted by stock.

Corr. ID: 19 **Organization:** Univ Southern Calif (USC)

Comment ID: 302283 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no mention of protection of high mountain meadows, which are heavily impacted by stock, and have little time to recover from use. It seems to me that inclusion of certain meadows in each watershed in a protection/exclusion plan would be in the best interests of wilderness preservation, with little impact upon stock users.

Corr. ID: 60 **Organization:** The Wilderness Society

Comment ID: 302842 **Organization Type:** Unaffiliated Individual

Representative Quote: The Park Service should make clear in its communications to the public the role of science and natural resource management, such as the Parks' "Meadow Management Program," in helping to determine the management of wilderness resources that will allow for sustained use and enjoyment of the wilderness resource by visitors for generations to come.

Corr. ID: 126 **Organization:** *Not Specified*

Comment ID: 304138 **Organization Type:** Unaffiliated Individual

Representative Quote: Also I would like to see more done to keep meadows open and not encroached upon by trees.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42817

Commenters disliked the behavior of stock parties in the wilderness, and felt these groups were noisy.

Corr. ID: 72 **Organization:** *Not Specified*

Comment ID: 303857 **Organization Type:** Unaffiliated Individual

Representative Quote: Pack trains are loud, noisy, and interfere with the wilderness experience.

Corr. ID: 143 **Organization:** High Sierra Hikers Association

Comment ID: 304342 **Organization Type:** Recreational Groups

Representative Quote: Stock parties also substantially disrupt and degrade the experience of wilderness visitors due to noisy "cowbells" placed on horses at night, ugly and cumbersome fences installed throughout SEKI's wilderness primarily for the convenience of stock users, and the often loud, raucous behavior of stock parties.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42818

Commenters offered suggestions about terms used in the WSP.

Corr. ID: 86 **Organization:** *Not Specified*

Comment ID: 304020 **Organization Type:** Unaffiliated Individual

Representative Quote: Visitor access. That term doesn't work for me; it sounds like planning jargon. When I hear "visitor access," I think trailheads; but I believe that you are also including some measure of visitor use levels. Is there a clearer way of communicating the concept that you are trying to get across?

Concern ID:	42819
CONCERN STATEMENT:	Fixed anchors are allowed under the Wilderness Act and should be used, as climbing is a recreational activity provided for in wilderness. The use of fixed anchors would not degrade the wilderness character.
Representative Quote(s):	<p>Corr. ID: 23 Organization: Access Fund</p> <p>Comment ID: 302377 Organization Type: Unaffiliated Individual</p> <p>Representative Quote: The government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be permitted as climbing is one of the unique recreation opportunities wilderness is intended to provide. Allowing the use of fixed anchors, if properly managed, does not degrade wilderness characteristics.</p>
Concern ID:	42820
CONCERN STATEMENT:	Permit stations should be staffed for longer hours, and permits should be available to be picked up in boxes.
Representative Quote(s):	<p>Corr. ID: 5 Organization: Not Specified</p> <p>Comment ID: 302177 Organization Type: Unaffiliated Individual</p> <p>Representative Quote: I would like to see the NPS allow overnight permits to be picked up in a night box in Inyo National Forest because some of the trailhead are at low elevations and require a start earlier than the ranger stations open (not everyone has the luxury of going the day before to get their permits). In addition, the Inyo National Forest Ranger Stations are not staffed sufficiently to issue permits in a timely manner for entry of the morning of the hike - the wait for a permit can exceed an hour in the morning.</p> <p>Corr. ID: 117 Organization: Sierra Club Tehipite Chapter</p> <p>Comment ID: 303401 Organization Type: Unaffiliated Individual</p> <p>Representative Quote: We also feel that it is essential for permit stations to be staffed for longer hours, especially early in the morning, so that users do not have to go to the extra expense of camping overnight in order to get an early start on the trail, not to mention taking up a valuable campsite that thus becomes unavailable to other non-wilderness park visitors.</p>
Concern ID:	42821
CONCERN STATEMENT:	The ban on watercraft in the park should be lifted.
Representative Quote(s):	<p>Corr. ID: 110 Organization: American Whitewater</p> <p>Comment ID: 303535 Organization Type: Unaffiliated Individual</p> <p>Representative Quote: Our 2011 comments also highlight and seek the lifting of the ban on all watercraft on the Wild and Scenic South Fork of the Kings River between its confluence with Bubbs Creek and the Kings Canyon National Park border (see pages 3-4). This reach flows in part through the Sequoia-Kings Canyon Wilderness Area, from the Confluence of Bubbs Creek and the South Fork Kings River to the Wilderness boundary located ¼ mile east of the Roads End Permit Station. The total length of the river closure is approximately nine miles, with approximately three of those being in Wilderness.[FN3] Language regarding this closure is located in the Superintendent's Compendium, which states:</p> <p>"The management of this portion of the South Fork of the Kings River must meet the needs of all park users, including but not limited to</p>

photographers, fishermen, and those visitors wishing to see undisturbed sections of a free flowing river. The use of flotation devices, boats, and rafts is contrary to the needs of other park users. This closure is also necessary due to safety hazards-such as fallen trees-to floaters, boaters, and rafters. Removal of these hazards would be contrary to park resource management policy, so this portion of river is unsafe for floating, boating, or rafting."

American Whitewater again respectfully requests that a fresh look be taken at this highly unusual closure, whether through the Wilderness planning process or other means. All visitors and recreationists should be treated equally throughout the park, and the closure on the South Fork Kings River overlooks the impact of denying access to an important and growing recreational group. Lifting the ban would contribute to completely welcoming a broad and diverse constituency of visitors to SEKI.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42822
[Dogs should be allowed in the park.](#)

Corr. ID: 141 **Organization:** *Not Specified*

Comment ID: 304289 **Organization Type:** Unaffiliated Individual
Representative Quote: Every time I see a train of stock animals, I cannot BELIEVE that the National Park Service thinks that my dog does more damage or ruins other people's experience more than a string of 20 mules!!!! Have a certification process (the owner pays!) for those well-behaved dogs that don't chase animals, bark incessantly, or bite other hikers. The Delta Society and other therapy and service animal organizations have rigorous dog + handler tests that would permit people like me to enjoy the mountains with my canine friend while preserving the safety of park animals and visitors.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42823
[Goats should be allowed in wilderness as pack animals.](#)

Corr. ID: 149 **Organization:** Alpine Urology

Comment ID: 304429 **Organization Type:** Business
Representative Quote: 'Pack animals' should include goats. They are much easier on the trail and browse on bushes and so do not promote erosion. There should be no daily limit on goat Packing but again a limit on size of the party to 4 (that would be 4 goats.). They could stay in the wilderness and not be required to leave after a drop. Goats are not yet popular enough to require limits. Horses and mules require limits.

Concern ID:
CONCERN
STATEMENT:

42824
[NPS fees for wilderness camping should not be allowed, though some commenters felt that fees in order to reserve a campsite were appropriate. Such fees should be analyzed to determine if they would impact visitation at various sites in SEKI.](#)

Representative
Quote(s):

Corr. ID: 10 **Organization:** *Not Specified*

Comment ID: 302189 **Organization Type:** Unaffiliated Individual

Representative Quote: Regarding Table 1 Zones and Permitting Quotas: The effect of the wilderness camping fee should be considered as part of the quota alternatives, for the following reasons and in the following manner.

First, the draft currently proceeds by assuming, without evidence, that the necessary quotas for each alternative would not be impacted if the wilderness camping fee were varied. This is untrue, or at least unsupported by evidence. If the wilderness camping fee were raised, it is obvious that quotas would not need to be so strict. Vice versa, if the fee were lowered or abolished, stricter quotas may be more appropriate.

Second, and relatedly, even if the fee is continued unchanged, there has been no public analysis of whether it has a deterrent effect that affects certain "popular" trailheads/zones more or if it affects all trailheads/zones equally across the board (i.e., given the fee, stricter quotas may be appropriate on some trailheads/zones, but more lenient quotas may be appropriate on others).

Third, no consideration been given to what effect, if any, a reasonable addition to the wilderness camping fee program such as an "annual pass" for wilderness like at Grand Canyon (\$40-50), would have. I request that the quota alternatives and direct quota effects and cumulative impact analysis in this plan include the foregoing aspects of the wilderness camping fee. The draft should state that the wilderness camping fee was taken into account in determining the quotas for each zone for each alternative and show quantitatively how that occurred. Further justification is provided in the next paragraph.

If NPS is going to assume the continued existence of the wilderness camping fee, the quota alternatives analyzed in this wilderness stewardship plan should look different than what the draft presents. The quotas in the draft should be determined according to actual evidence of how the fee operates and an understanding of how it could or would probably operate in the reasonably foreseeable future.

Corr. ID: 59 **Organization:** Great Old Broads for Wilderness

Comment ID: 302835 **Organization Type:** Unaffiliated Individual

Representative Quote: We generally oppose the imposition of fees such as fee demo and those allowed per the Federal Lands Recreation Enhancement Act as many of our members are on fixed retirement incomes or social security and we feel should not have to pay additional fees for the privilege of hiking into THEIR Wilderness lands.

Corr. ID: 59 **Organization:** Great Old Broads for Wilderness

Comment ID: 302836 **Organization Type:** Unaffiliated Individual

Representative Quote: Reservation" fees may be appropriate for popular areas in order to assure opportunity but free permits should be available for those who are willing to take their chances and show up. There should not be a fee to enter or camp in Wilderness.

Corr. ID: 145 **Organization:** Sierra Club Sierra Nevada
Resilient Habitats Campaign

Comment ID: 304397 **Organization Type:** Conservation/Preservation

Representative Quote: We urge Sequoia/Kings Canyon NP to rescind its summer wilderness camping fee. The current Wilderness Stewardship Plan is a good opportunity to do so. The amount of revenue actually received for this must be very small relative to the impact on visitor experience and

to philosophy of the relationship between Americans and their wilderness resources. Institutionalizing such a fee would NOT be not a good way to start the celebrations for the upcoming 50th anniversary of the Wilderness Act

Concern ID: 42825
CONCERN STATEMENT: NPS should charge fees for wilderness access in order to pay for better ranger enforcement in popular and high use areas.
Representative Quote(s): **Corr. ID:** 84 **Organization:** Mt Whitney Hikers Association

Comment ID: 303172 **Organization Type:** Unaffiliated Individual
Representative Quote: Another tool: Charge more fees to pay for more rangers to patrol the popular and impacted areas.

NA1000 - General Comments on No Action - Current Management Practices

Concern ID: 42826
CONCERN STATEMENT: Current management at SEKI is supported, and only minor changes in management need to be made.
Representative Quote(s): **Corr. ID:** 77 **Organization:** Not Specified

Comment ID: 302909 **Organization Type:** Unaffiliated Individual
Representative Quote: I would like to note that I have been satisfied with current management. It appears from the alternatives listed that there may need to be some small changes made, but they are in areas of the park I am less familiar with.
Corr. ID: 117 **Organization:** Sierra Club Tehipite Chapter
Comment ID: 303402 **Organization Type:** Unaffiliated Individual
Representative Quote: In summary, we do not want to see an increase in quotas, nor a general increase in restrictions, hence our advocacy for Alternative 1, with some minor allowances for change.

Concern ID: 42827
CONCERN STATEMENT: The current restrictions are already unnecessary, and restrictions do not need to be increased.
Representative Quote(s): **Corr. ID:** 13 **Organization:** Not Specified
Comment ID: 302217 **Organization Type:** Unaffiliated Individual
Representative Quote: I am writing to urge you to adopt Alternative #1 - Current Management Practices. Actually, that is being generous as far as I'm concerned, because some of the current restrictions are already unnecessary.
Corr. ID: 45 **Organization:** Not Specified
Comment ID: 302262 **Organization Type:** Unaffiliated Individual
Representative Quote: I would definitely favor at least maintaining the current regulations and controls and, in fact, would prefer less restrictive regulations when it comes to stock numbers and access.
Corr. ID: 73 **Organization:** Not Specified
Comment ID: 303859 **Organization Type:** Unaffiliated Individual
Representative Quote: From my perspective, the current restrictions are onerous and in many cases unnecessary

Concern ID: 42828
CONCERN STATEMENT: Management practices must take the current and future use into account. With an increase in use at SEKI, current management methods may no longer be sufficient, or may become outdated.
Representative Quote(s): **Corr. ID:** 105 **Organization:** Sierra Mountain Guides
Comment ID: 303725 **Organization Type:** Unaffiliated Individual
Representative Quote: Wilderness Stewardship Planning should take into consideration current and future anticipated use and demand. As outdoor recreation industry participants, we believe that demand for use in SEKI is still growing. That means current management methods may soon be outdated or insufficient. We believe that Alternative 1 is not preferable in this case.

OF1300 - Suggests new or change in alternative(s) for Other Facilities: Redwood Canyon, Pear Lake, Bearpaw Meadow High Sierra Camp and Frontcountry

Concern ID: 42829
CONCERN STATEMENT: Operations at some of the current facilities should be continued, and these facilities should be preserved.
Representative Quote(s): **Corr. ID:** 97 **Organization:** Sierra Club
Comment ID: 304108 **Organization Type:** Unaffiliated Individual
Representative Quote: I also would like to mention my specific support for continuing current management practices with regard to the Bearpaw Meadow High Sierra Camp. I have been fortunate enough to enjoy several visits and again have found staff there dedicated to the wilderness. From the Camp, an array of superb backcountry is available for day hiking. The Camp represents another kind of backcountry access for those of us who can no longer carry backpacks.
Corr. ID: 103 **Organization:** The American Alpine Club
Comment ID: 303826 **Organization Type:** Unaffiliated Individual
Representative Quote: We support Alternative 3 for the Redwood Canyon Cabin and cache, the Pear Lake Ski Hut, and Bearpaw Meadow High Sierra Camp. As an authorized concessioner and partner to the NPS, the AAC has considerable expertise operating lodging and campgrounds for climbers. With respect to the Bearpaw Meadow High Sierra Camp, should the determination be made of historic significance and the current concessioner declines to operate this camp, the AAC would consider opportunities to preserve this camp in a more primitive condition.
Corr. ID: 105 **Organization:** Sierra Mountain Guides
Comment ID: 303730 **Organization Type:** Unaffiliated Individual
Representative Quote: On the other hand, hardened backpacker campsites in high use areas seems like a good idea. I think that Bearpaw should remain as is as it fits into a model of exposing people, especially the unskilled or uninitiated to SEKI and the recreational opportunities it provides. This is a great place to have a positive educational impact on future potential visitors to the wilderness.
Corr. ID: 124 **Organization:** Not Specified
Comment ID: 303311 **Organization Type:** Unaffiliated Individual
Representative Quote: The Bearpaw Meadows High Sierra Camp should be retained and operated as it has been. An historic assessment should be conducted and the camp be preserved based on its findings

Concern ID: 42830
CONCERN STATEMENT: Facilities in SEKI should be evaluated on an individual basis, but no new construction should occur.
Representative Quote(s): **Corr. ID:** 102 **Organization:** *Not Specified*
Comment ID: 303374 **Organization Type:** Unaffiliated Individual
Representative Quote: OTHER BACKCOUNTRY FACILITIES - These facilities should be evaluated individually. No new construction should be recommended.

Concern ID: 42831
CONCERN STATEMENT: The Bearpaw station should be improved under multiple alternatives, not just alternative 3.
Representative Quote(s): **Corr. ID:** 32 **Organization:** *Not Specified*
Comment ID: 306513 **Organization Type:** Unaffiliated Individual
Representative Quote: Why would improving Bearpaw station with a structure be only for alt #3. Why not also for #2 alt?

Concern ID: 42981
CONCERN STATEMENT: The Bearpaw High Sierra Camp caters to only visitors who can afford the camp, and should not be paid for by taxpayers as it is not needed in wilderness. Because of this the NPS should consider closing the camp and restoring the area to a natural condition. In addition the camp is not necessary for visitors to experience wilderness.
Representative Quote(s): **Corr. ID:** 54 **Organization:** *Not Specified*
Comment ID: 302541 **Organization Type:** Unaffiliated Individual
Representative Quote: I also object to the fact that my taxes subsidize the Bearpaw Meadow Camp for trail maintenance yet I cannot afford to stay there. This is simply another way that the taxpayer subsidizes the well-to-do. Basically my taxes subsidize all stock travel since permits do not cover trail maintenance costs. I would be surprised if the concessionaire actually paid their portion of trail maintenance to the Park Service or even in taxes.
Corr. ID: 112 **Organization:** *Not Specified*
Comment ID: 303577 **Organization Type:** Unaffiliated Individual
Representative Quote: The Park Service should consider closing the Bearpaw High Sierra Camp, and restoring the site to natural conditions. The Camp is an eyesore and is not necessary for visitors to experience and recreate in wilderness. It caters to those that can afford to pay to be catered to, and provides an experience that is available outside wilderness (i.e., one that is not wilderness-dependent).

PN1000 - General Comments on Purpose and Need

Concern ID: 42832
CONCERN STATEMENT: There is no need for changes to current management. The success of the current plan should be evaluated. It is unclear why the WSP was being completed now, and commenters questioned if the document was required.
Representative Quote(s): **Corr. ID:** 107 **Organization:** *Not Specified*
Comment ID: 303666 **Organization Type:** Unaffiliated Individual
Representative Quote: The Preliminary Plan does not mention the condition of the Park Wilderness when the 1986 Stock Management Plan

was adopted as compared to now. It is essential to evaluate the success of the current plan. Why does the Park need to restrict stock access, designate camps and create whole new levels of regulations if there is no need?

Corr. ID: 120 **Organization:** *Not Specified*

Comment ID: 303328 **Organization Type:** Unaffiliated Individual

Representative Quote: My first concern with the plans as presented is that I don't understand their particular reason for the Plan being done right now. It is not clear to me from the supporting documents whether or not the WSP is a required document that the Parks are just now getting around to completing, or if there are pressures on the Parks that require an update of an existing WSP (that's not present in the supporting documentation). (It appears to be the former, but I'm not completely sure.) Without this understanding of the precipitating event, I find it hard to support any sort of changes in current practices.

PP1000 - General Comments on Party Size

Concern ID: 42982

CONCERN

STATEMENT:

Representative Quote(s): **Corr. ID:** 4

Party size limits should be kept low to protect the visitor experience and resources. Commenters often noted the impact and noise of larger groups.

Organization: *Not Specified*

Comment ID: 302141 **Organization Type:** Unaffiliated Individual

Representative Quote: Please choose the options that reduce the number of visitors and keep the areas as secluded and untouched as possible.

Corr. ID: 104 **Organization:** *Not Specified*

Comment ID: 303776 **Organization Type:** Unaffiliated Individual

Representative Quote: Limit visitation to a level low enough that you don't have to worry about accumulations of human waste, even in current "high-use" areas

Corr. ID: 135 **Organization:** *Not Specified*

Comment ID: 304261 **Organization Type:** Unaffiliated Individual

Representative Quote: Third, the preliminary group size limits for commercial outfitters are extremely high'as high as 35 people and 20 stock animals per group'and do not make sense. Research scientists have recommended much lower size limits.

Corr. ID: 177 **Organization:** *Not Specified*

Comment ID: 304583 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm concerned that the zoning plan in the current draft will allow too large groups to use the fragile areas inside the zones. They are too destructive and inherently unsafe. (my brother was lost on a Sierra Club hike with 50 people) The stock and people combination is too rough on the wilderness and conservation principles of limiting use should be applied to the whole wilderness.

Concern ID: 42983

CONCERN

STATEMENT:

Representative Quote(s): **Corr. ID:** 19

The proposed party size limitations should be altered to reflect the greater impact of stock compared to humans.

Organization: Univ Southern Calif (USC)

Comment ID: 302285 **Organization Type:** Unaffiliated Individual

Representative Quote: I remain perplexed by the concept that 15 people should be a maximum impact, but we can throw a bunch of stock in as

though it doesn't matter.

Corr. ID: 19

Organization: Univ Southern Calif (USC)

Comment ID: 302284 **Organization Type:** Unaffiliated Individual

Representative Quote: There can be no doubt that the literature supports that stock create far more damage to trails than humans walkers, but the proposed allowance of a mixture to a set number of both makes no scientific sense. I cannot believe that there is anything that supports that a 18-animal and 2-person group is equal in impact to an 18-person and 2-animal group. That is nonsensical, with no real-world basis.

Corr. ID: 84

Organization: Mt Whitney Hikers Association

Comment ID: 303167 **Organization Type:** Unaffiliated Individual

Representative Quote: The wilderness plan counts one horse as equal to one person. However, the impact is anywhere between 10 to 50 times as bad! Horses turned loose to graze can trample and ruin an entire meadow in a few days. Much of the wilderness plan treats one horse or mule the same as one person. Commercial packers and people bringing their own stock in should be required to pack some or all food for the stock as well.

Concern ID:

42984

**CONCERN
STATEMENT:**

Party size limits should be kept the same, as many smaller groups have a larger impact than fewer groups of a larger size.

Representative Quote(s): **Corr. ID:** 38

Organization: Not Specified

Comment ID: 304129 **Organization Type:** Unaffiliated Individual

Representative Quote: In all my trips, I have never felt there were too many people on the trails to make my wilderness experience feel like anything less than wilderness. I don't see that too many people are accessing the back country at one time and feel that quotas should be kept as they are.

Corr. ID: 107

Organization: Not Specified

Comment ID: 303708 **Organization Type:** Unaffiliated Individual

Representative Quote: There is less impact if you have larger groups of people than multiple small groups. The Park has never done the environmental work to show that breaking the groups up into smaller sizes helps the environment.

Concern ID:

42985

**CONCERN
STATEMENT:**

Smaller group sizes may place a financial burden on visitors who prefer to use commercial services, as the cost of a trip is split amongst the participants, and visitors would have to pay more in a smaller group.

Representative Quote(s): **Corr. ID:** 78

Organization: Sierra Club

Comment ID: 302919 **Organization Type:** Unaffiliated Individual

Representative Quote: I feel the current temporary group size restriction of 8 in five areas should be removed. I see that in some alternatives. I believe 8 is too small, as it starts to impose a financial barrier to the ability of some to visit the wilderness, especially those using commercial guides--such groups have fixed costs that are divided among the participants. With a smaller group each participant's share increases. It would be unfortunate for wilderness access to be difficult for those with fewer economic resources. Some individuals do not have the back-country skills to explore the wilderness without a guide, especially in more remote areas. Well run commercial services that practice and teach good practices such as LNT allow them to, but reductions in group size may make such services unaffordable for some.

PP1300 - Suggests new or change in alternative(s) for Party Size

Concern ID: 42986

CONCERN STATEMENT: Party size limits should be seasonal, so that high levels of use by larger groups do not coincide with high use periods of smaller groups, spreading the impacts.

Representative Quote(s): **Corr. ID:** 78 **Organization:** Sierra Club

Comment ID: 302918 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm concerned about group size restrictions for off-trail. One alternative that wasn't offered, might be to have seasonal restrictions on off-trail group size rather than making them the same for the entire year. Maybe larger groups such as up to 12 or 15 might be allowed everywhere after Labor Day. There are typically fewer users of the wilderness at that point in the backpacking season and the impact of a group on vegetation is reduced because it is dryer. The seasonal approach allows for larger group activity but restrictions it to times with less overall use.

Concern ID: 42987

CONCERN STATEMENT: Destination limits, rather than group size limits, would be a better alternative, as commenters felt that several smaller groups were more disruptive than one larger group.

Representative Quote(s): **Corr. ID:** 78 **Organization:** Sierra Club

Comment ID: 302920 **Organization Type:** Unaffiliated Individual

Representative Quote: I would rather see destination limits than restrictive group size because the total number of users in a particular area is the real issue, rather than just the maximum size of a very few larger groups. To some, encountering a single group of 12 one time is less disruptive than running into 3 groups of 4 a total of three times.

Concern ID: 42988

CONCERN STATEMENT: Commenters suggested group size limits for the different management zones, or suggested that party size should not be based on zones but should be consistent for various areas.

Representative Quote(s): **Corr. ID:** 124 **Organization:** Not Specified

Comment ID: 303291 **Organization Type:** Unaffiliated Individual

Representative Quote: I have found that large groups do adversely impact a wilderness experience. Not only do they tend to be loud, but their large numbers can result in harm to natural resources. It can be difficult for them to find places to camp large enough to accommodate them without damage to vegetation. I have come across many large boy scout groups in the backcountry that decreased my enjoyment and solitude. In order to preserve the quality of the wilderness experience and adequately protect natural resources, the party size for Zone A and Day Use should be a limit of 15; for Zone B and C, it should be a limit of 12; and for Zone D, it should be 8. I support decreasing these numbers for specific areas as deemed appropriate based on usage, time of the year, and impacts on natural resources.

Corr. ID: 128 **Organization:** Not Specified

Comment ID: 304152 **Organization Type:** Unaffiliated Individual

Representative Quote: I also have a suggestion for the maximum group size for backpackers, as group size for everyone is an important issue in the parks. I would suggest that backpacking groups be restricted to a maximum of 8 people. Any more than that is too large an impact on campsites and their camping neighbors.

Corr. ID: 148 **Organization:** *Not Specified*

Comment ID: 304444 **Organization Type:** Unaffiliated Individual

Representative Quote: Management policies have to be as easy to explain and understand as possible. Party size should be consistent and not zone dependent: one party size number for all trails; one number for cross country travel and both based on the trailhead quota.

Concern ID: 42989

**CONCERN
STATEMENT:**

Limits on group size should be only for on-trail and off-trail impacts, and group size limits should be based on the type of trail use.

Representative Quote(s): **Corr. ID:** 143 **Organization:** High Sierra Hikers Association

Comment ID: 304345 **Organization Type:** Recreational Groups

Representative Quote: There need be only two broad categories of rules for. SEKI's wildernesses: on-trail vs. off-trail, Group size limits would be higher on trails (perhaps 8-12 persons per group, maximum), and lower off trails (perhaps 4-6 persons per group, maximum).

PQ1000 - General Comments on Permits and Quotas

Concern ID: 42833

**CONCERN
STATEMENT:**

Current quotas for visitation are adequate, and no changes are needed. Visitation has not increased enough to warrant additional restrictions.

Representative Quote(s): **Corr. ID:** 152 **Organization:** National Forest Recreation Association

Comment ID: 304471 **Organization Type:** Non-Governmental

Representative Quote: It is our view that the quota system does not need to be added to or expanded. The actual visitor use in the wilderness areas has declined significantly since the inception of the quota system in the 1970's. Quotas are not even needed on many remote trailheads, as they are rarely met or exceeded. Quota systems are extremely costly to administer and we believe the funding would be far better spent maintaining trails, improving trailhead facilities and other improvements that are meaningful and that are more effective at providing visitor enjoyment and resource protection. Quotas add another layer of regulations and restrictions, which in turn, takes manpower and dollars away from more productive uses.

Concern ID: 42834

**CONCERN
STATEMENT:**

There are issues and concerns with the proposed permit regulations, including concerns about the hours of the day-use permits, and how the park would implement, enforce, and pay for the permit system.

Representative Quote(s): **Corr. ID:** 36 **Organization:** *Not Specified*

Comment ID: 304065 **Organization Type:** Unaffiliated Individual

Representative Quote: Day Use:

Day users should never be required to obtain permits. The administrative and educational costs would be extremely high and divert money from

more worthy areas.

Corr. ID: 99

Organization: *Not Specified*

Comment ID: 304111 **Organization Type:** Unaffiliated Individual

Representative Quote: Zone, Permitting and Quotas: Actual from what I say on the map, I think you did a pretty good job on establishing zones on the map for day use, major trails, secondary trails, and cross country. I think that permits should only be issued for overnight backpacking trips. If the NPS doesn't make day hiking trips available to all individuals, I think the amount of day trips will go down. And the whole reason for a trip to the national park is to explore the wilderness in its element. And I do understand why there should be quotas for trials, but only for overnight visitors. Overnight backpackers are the ones that do more erosion to the wilderness thru extended visits to the area.

Corr. ID: 117

Organization: Sierra Club Tehipite Chapter

Comment ID: 303396 **Organization Type:** Unaffiliated Individual

Representative Quote: The current process of setting user quotas by trailhead is both appropriate and efficient. However, we object to the application of wilderness use fees (as opposed to reservation fees), as are now a part of the operating plan of Sequoia National Park. Entry into the wilderness ought to remain free, in order to encourage access by the broadest range of demographics of the country's population. We do not want the wilderness to become the domain of an elite or privileged group.

Corr. ID: 121

Organization: *Not Specified*

Comment ID: 303323 **Organization Type:** Unaffiliated Individual

Representative Quote: At the meeting in Visalia there was an indication that how a permit system would be implemented was an administrative issue and outside the scope of the Wilderness Stewardship Plan. A number of permit implementation issues directly affect the wilderness experience and environment, and should be addressed in the plan. The proposed Alternatives already identify two permit alternatives--overnight and day use. Without further explanation, these definitions are unclear and may not result in additional resource protections. Is day use sunrise to sunset? Midnight to midnight? What if I start a hike at 8:00PM and finish at 1:00AM and I do not camp? Will I need an overnight permit? What about setting up a tent during the day? Is it camping you are trying to limit or the total hours an individual spends in wilderness?

The current permit system clusters wilderness entry at the time permit stations open. This is a negative impact on the wilderness experience. I do not care how permits are implemented, but there need to be Alternatives to enter wilderness at any time of the day.

Concern ID:

42835

CONCERN

STATEMENT:

Destination quotas should be put in place as reducing trailhead quotas seems unnecessary.

Representative Quote(s): **Corr. ID:** 11

Organization: *Not Specified*

Comment ID: 302192 **Organization Type:** Unaffiliated Individual

Representative Quote: With the exception of the John Muir and Sierra Trails, I find most of the backcountry trails are fairly lightly used and I can walk quite a while without seeing other hikers. Reducing trailhead quotas seems unnecessary and destination quotas would better fulfill the goal of limiting overuse of some destinations.

Concern ID: 42836
CONCERN STATEMENT: The document should be revised to better clarify quotas under each alternative.
Representative Quote(s): **Corr. ID:** 86 **Organization:** *Not Specified*
Comment ID: 304021 **Organization Type:** Unaffiliated Individual
Representative Quote: Permits. Page 3 of Table 1 is pretty clear that the use and distribution controls are being implemented primarily via trailhead quotas. In addition, destination quotas will sometimes be necessary to protect resources or wilderness character. The application of these destination quotas differ by alternative. It would be helpful to use parallel language, especially for Alternatives 2-4, so that the reader can tell how the alternatives differ in the use of destination quotas, if they differ at all. Alternative 5 potentially increases the areas with destination quotas. Alternative 6 has no destination quotas at all. But it appears that Alternatives 2-4 may have identical prescriptions for destination quotas; they just use different language to describe their approach.

Concern ID: 42837
CONCERN STATEMENT: SEKI quotas for permits should be consistent with the permits in Sequoia National Forest.
Representative Quote(s): **Corr. ID:** 152 **Organization:** National Forest Recreation Association
Comment ID: 304472 **Organization Type:** Non-Governmental
Representative Quote: We believe SEKI is inconsistent when they state they want to seek similar regulations (and quotas) with the neighboring national forests. If that were the case, SEKI would drop quotas to be consistent with the Sequoia National Forest. And we believe it is presumptive to ask the Sequoia National Forest to change the management of their wilderness areas to be in line with SEKI. As you know, SEKI also does not have the same group and party size as the neighboring forests.

Concern ID: 42990
CONCERN STATEMENT: The quotas on hikers are too strict and unfair, while those for stock, and particularly for commercial stock use, are not stringent enough given the impacts of stock compared to the impact of hikers.
Representative Quote(s): **Corr. ID:** 143 **Organization:** High Sierra Hikers Association
Comment ID: 304348 **Organization Type:** Recreational Groups
Representative Quote: Further, given the high impacts of stock use, and the fact that foot travelers (who create far less environmental impact than stock users) are being turned away in droves due to use quotas, it should be acknowledged that many more persons could visit SEKI's wilderness, with less cumulative impact, if stock animals were not used.

PQ1300 - Suggests new or change in alternative(s) for Permits and Quotas

Concern ID: 42838
CONCERN STATEMENT: Quotas or permits should be increased at particular areas, for the number of nights allowed for a permit, or during high-use periods such as weekends and holidays.
Representative Quote(s): **Corr. ID:** 102 **Organization:** *Not Specified*
Comment ID: 303365 **Organization Type:** Unaffiliated Individual

Representative Quote: QUOTAS - In some trails in the park, the use is extremely high during certain times in the summer especially over holiday week-ends. This causes extremely high density in some areas. At these times there could possibly be a special quota to enhance the pleasure of the visitors and also reduce damage to the environment and resources. Other trail quotas should remain essentially unchanged.

Corr. ID: 118 **Organization:** *Not Specified*

Comment ID: 303340 **Organization Type:** Unaffiliated Individual

Representative Quote: Additionally, SEKI should add cross country "trailhead" permits where it is feasible. Yosemite has such permits - Budd Creek and Nelson Lake. There may be no suitable places in SEKI for such "trailheads" in High Sierra though.

Corr. ID: 118 **Organization:** *Not Specified*

Comment ID: 303339 **Organization Type:** Unaffiliated Individual

Representative Quote: Instead, SEKI should add additional permits for entering wilderness and traveling the first day beyond popular areas close to the trailhead. I.e., the first night must be spent further than these popular destinations. Yosemite has few permits like this (Glen Aulin Pass Thru, Happy Isles Pass Thru, Mono Meadow). A candidate for such additional quota could be Lakes Trail. A portion of such permits should be reservable.

Corr. ID: 118 **Organization:** *Not Specified*

Comment ID: 303343 **Organization Type:** Unaffiliated Individual

Representative Quote: For areas where human impact is small enough, SEKI should consider increasing quota. This could be done gradually, studying the effect of the change.

Concern ID: 42839

**CONCERN
STATEMENT:**

Management and quotas around Mt. Whitney should be changed.

Representative Quote(s): **Corr. ID:** 112 **Organization:** *Not Specified*

Comment ID: 303658 **Organization Type:** Unaffiliated Individual

Representative Quote: The Park Service should consider further restricting the number of people permitted into the Mt. Whitney zone. During each of the three times I have climbed it, I have encountered 40 to 50 people on top of Mt. Whitney. This is not solitude, and not compatible with wilderness.

Concern ID: 42840

**CONCERN
STATEMENT:**

The park should consider the use of destination quotas for managing high-use areas.

Representative Quote(s): **Corr. ID:** 86 **Organization:** *Not Specified*

Comment ID: 304042 **Organization Type:** Unaffiliated Individual

Representative Quote: The Supplemental Information pdf contains a paragraph that explains how the alternatives will manage for Visitor Capacity. That paragraph implies that the visitor capacity controls will be achieved solely through trailhead quotas. This seems unnecessarily constraining; why not allow the use of destination quotas and other tools for this purpose? Don't constrain your toolbox unnecessarily, especially when it comes to management of use at high-use areas.

Concern ID: 42841

CONCERN STATEMENT: Destination quotas should not be expanded, and the guidance about destination quotas should be clarified.

Representative Quote(s): **Corr. ID:** 86 **Organization:** *Not Specified*

Comment ID: 304041 **Organization Type:** Unaffiliated Individual

Representative Quote: Once I've got my permit, I'm free to wander and choose my camping spot as the spirit moves me. In general, I am opposed to destination quotas except for high-use areas like Emerald and Pear Lakes. The park needs a good justification to expand the use of destination quotas. As written, some of the draft alternatives use very hazy language such as "consider implementing." At the least, the plan should provide guidance about when and for what purpose destination quotas would be implemented.

PS1000 - General Comments on Party Size: with Stock

Concern ID: 42992

CONCERN STATEMENT: Group party size should not be restricted. One commenter noted that stock party size limits were too small for families.

Representative Quote(s): **Corr. ID:** 52 **Organization:** *Not Specified*

Comment ID: 302393 **Organization Type:** Unaffiliated Individual

Representative Quote: The children enjoy the company of other kids their age if I take 4 kids and I'm one, 5 in one party is half a trip if you lower the regulations on party and stock size, years ago there were 25 guests and horses , the opportunity to meet more people was a better option.,

Concern ID: 42993

CONCERN STATEMENT: Group party sizes with stock should be limited or reduced, either by a reduction in the size of the party, the number of groups, or the duration the groups are allowed to stay in wilderness.

Representative Quote(s): **Corr. ID:** 141 **Organization:** *Not Specified*

Comment ID: 304285 **Organization Type:** Unaffiliated Individual

Representative Quote: You need to have at least ONE alternative that limits the number of stock animals. It is my understanding that the Court ordered the NPS to establish limits and this document doesn't indicate any attempt at really looking at this issue!

Corr. ID: 149 **Organization:** Alpine Urology

Comment ID: 304425 **Organization Type:** Business

Representative Quote: So, size of parties and length of stay of the animals should be limited

Corr. ID: 154 **Organization:** *Not Specified*

Comment ID: 304504 **Organization Type:** Unaffiliated Individual

Representative Quote: The preliminary group size limits are not even close to being reasonable with 35 people and 20 stock animals per group; I'm not sure how anyone can reach a conclusion that groups of that size will not have a big negative impact on the quality of the park.

Corr. ID: 155 **Organization:** Wilderness Watch

Comment ID: 304521 **Organization Type:** Conservation/Preservation

Representative Quote: The preliminary group size limits are excessively permissive (as high as 35 people, and 20 stock animals per group) and

appear to be completely arbitrary. NPS should evaluate group size limits recommended by research scientists, which are much lower.

Corr. ID: 164 **Organization:** *Not Specified*

Comment ID: 304551 **Organization Type:** Unaffiliated Individual

Representative Quote: Unlimited stock use needs to end. Group sizes need to be much lower

Corr. ID: 166 **Organization:** *Not Specified*

Comment ID: 304554 **Organization Type:** Unaffiliated Individual

Representative Quote: While the quota system limits the number of hikers entering the wilderness every day, there are no limits on the number of commercial outfitters, stock trips, or commercial clients allowed daily. This is not only unfair, but affords a preferred status to a user group with a very high negative impact on the land. Horses and mules leave large piles of excrement along the trails, pollute water sources and chew up the earth, leaving a legacy of dust and flies behind wherever they go. Humans generate less waste and generally manage to hide it pretty well, too. I would really like to see meaningful and enforceable limits on stock use in all of the alternatives; stock are no more "natural" in wilderness than humans.

Concern ID:

42994

**CONCERN
STATEMENT:**

The current stock party size limits should be maintained.

**Representative
Quote(s):**

Corr. ID: 31 **Organization:** *Not Specified*

Comment ID: 304012 **Organization Type:** Unaffiliated Individual

Representative Quote: Party size should remain the same.

Corr. ID: 56 **Organization:** *Not Specified*

Comment ID: 302750 **Organization Type:** Unaffiliated Individual

Representative Quote: 4. I want to minimize the current regulations related to party and stock numbers and retain the current stock size at 20 to 25

PS1300 - Suggests new or change in alternative(s) for Party Size: with Stock

Concern ID:

42995

**CONCERN
STATEMENT:**

Specific numbers of stock that should be included in the party size, or ways in which stock numbers should be decided such as 10 - 12 people and 6 head of stock, 15 people with 25 head of stock, 4 animals and 4 people, and a 1.5 to 1 stock to person ratio were suggested by commenters.

Representative Quote(s): **Corr. ID:** 37

Organization: *Not Specified*

Comment ID: 304086 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe 1.5 to 1 stock to person ratio is just about perfect. It makes it a challenge sometimes to pack all the things we need to pack but it keeps us packers thinking. With that ratio we can give the back country experience to lots of folks who may not be able to otherwise and keep the stock to a minimum to avoid damage to the environment. If we keep our stock to a limit of 20 to 25 head that is a manageable number of animals on a full satisfying days work for any pack worth their weight.

Corr. ID: 91 **Organization:** *Not Specified*

Comment ID: 304090 **Organization Type:** Unaffiliated Individual

Representative Quote: Your ideas of group size must not have been even thought about. 35 people and 20 stock animals? Seriously? Did anyone ask a back-country ranger their thoughts on group size and how that effects the condition of the wilderness? I think not. In my experience 10-12 people in a group is an enormous crowd. and damages camp areas. Pack animals significantly trash the trails and camps-you'd know this if you spoke to your back-country rangers. This must explain why the designated camp spaces with bear boxes looked they way they did decades ago when I hiked the Rea lakes loop trail. After my first night I camped off trail as the designated camp sites were disgusting. Dust, powered soil, denuded vast areas of charcoal dirt, and manure. Not a wilderness experience I would chose to have. I would propose no more than 10-12 people maximum as a group size, and no more than 6 stock animals as a "group." Pack animals cause way to much damage to be allowed off trail. They cause enough damage on trail, which my tax dollars pay to restore.

Corr. ID: 128 **Organization:** *Not Specified*

Comment ID: 304146 **Organization Type:** Unaffiliated Individual

Representative Quote: Pack animal groups should be very small to reduce their impact - 4 animals and 4 people maximum.

Corr. ID: 152 **Organization:** National Forest Recreation Association

Comment ID: 304478 **Organization Type:** Non-Governmental

Representative Quote: The stock use party size should be the same as the Sequoia National Forest to be consistent with groups coming into the Parks from the neighboring forest. There should NOT be a total party size, and since NFRA is opposed to zoning, the group and party size should be the same throughout the wilderness. It makes it nearly impossible to plan a traveling trip throughout the area when there are a myriad of regulations that change every few miles. With use down in the wilderness and continuing to decline, the Park Service should be looking to attract visitors, rather than detract. Group and party size should be no less than 20 head of stock and no less than 15 people.

Corr. ID: 182 **Organization:** *Not Specified*

Comment ID: 304598 **Organization Type:** Unaffiliated Individual

Representative Quote: And again, the zoning scheme proposed makes the group-size issue overly complicated. With a simple two-tier scheme (trail and off-trail), the alternatives would be much clearer and infinitely more practical. Further, group size limits should acknowledge the disproportionate impact of stock by considering the "heartbeat approach" that places a limit on the combine number of human and equine "heartbeats." The current system makes absolutely no sense: a group of 16 hikers is deemed unacceptably large, but 15 people with 25 head is entirely legal and acceptable! Where is the logic in that? Having a "heartbeat limit" puts the onus on stock users to reduce unnecessary luxury items to maximize the number of people in their group.

Concern ID: 42996

**CONCERN
STATEMENT:**

The rationale and numbers presented for party size with stock and people is confusing and unclear.

Representative Quote(s): **Corr. ID:** 73 **Organization:** *Not Specified*

Comment ID: 303870 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly oppose a system of managing use by

developing a new system of counting the number of people and livestock. Minimize the complexity of regulations on party size and stock numbers. Keep the current stock size at 20 or 25.

Corr. ID: 86

Organization: *Not Specified*

Comment ID: 304054 **Organization Type:** Unaffiliated Individual

Representative Quote: Stock use equivalents. In two different places (page 2 of Table 4, and page 4 of Table 6), the draft alternatives imply that 1 head of stock is equivalent to 1 person. That is, 1 packer with 19 head of stock is considered to be equivalent to 10 people with 10 head of stock. It isn't clear what the rationale is for making this equivalency; is it being made on a social or a resource basis? Possibly the park has social science research showing that they are equal on a social basis. That is, that any of those combinations will have an relatively equivalent impact on a hiking party. But 1 person is most certainly not equal to 1 head of stock from a resource impact standpoint. If the park is committed to pursuing this route (1 person = 1 head of stock), then provide some rationale for your thinking.

SA1000 - General Comments on Stock Use: Access and Travel

Concern ID: 42998

CONCERN

STATEMENT:

Stock access at the park should be reduced or severely limited.

Suggestions included that stock access should only be for trail maintenance purposes, delivery of food to hikers, and that stock should only be used by backcountry rangers.

Representative Quote(s): **Corr. ID:** 49

Organization: *Not Specified*

Comment ID: 302290 **Organization Type:** Unaffiliated Individual

Representative Quote: Finally, I know one specific issue that actually would have to be included in the two issues I stated above is the impacts of stock use on the natural resources and on the visitors wilderness experience. Whatever alternatives develop concerning stock use and the impacts of stock use by both private and commercial users must also include full disclosure of NPS stock use and consider alternatives for NPS use of stock in SEKI.

Corr. ID: 54

Organization: *Not Specified*

Comment ID: 302539 **Organization Type:** Unaffiliated Individual

Representative Quote: Stock may be necessary for backcountry rangers, for rescue, for taking food to through hikers and backcountry campers or for trail maintenance, but the trails they use should be seriously limited.

Corr. ID: 61

Organization: *Not Specified*

Comment ID: 302848 **Organization Type:** Unaffiliated Individual

Representative Quote: Without effective enforcement with real analysis of stock animal use and damage, no one can determine which trails, if any, are resilient enough for stock animal abuse. And the only thing worse for nature than stock animal trail damage is stock animal off trail damage. I've lost track of how many times we've been passed by a train of pack animals and then seen the damage and short cuts they took through trail corners and switch backs. It can make the fragile soil slopes look like plowed farm fields including the fresh fertilizer.

Corr. ID: 85

Organization: *Not Specified*

Comment ID: 303208 **Organization Type:** Unaffiliated Individual

Representative Quote: also, more strict regulations on the areas where stock are allowed to access as well as areas of grazing should be

implemented. It is my opinion that the character of SEKI would be better served by reducing the number of stock animals used by commercial interest as well as a greater discretion on the part of the NPS in its own use of animals

Corr. ID: 125

Organization: *Not Specified*

Comment ID: 304136 **Organization Type:** Unaffiliated Individual

Representative Quote: Clearly, pack stock have an obvious and major adverse impact on wilderness, thus stock access to and numbers in SEKI Wilderness must be strictly limited and regulated.

Concern ID:

42999

CONCERN

STATEMENT:

Stock access should not be limited, and should remain the same as under current conditions or be increased.

Representative Quote(s): **Corr. ID:** 18

Organization: Backcountry Horsemen of California

Comment ID: 302268 **Organization Type:** Unaffiliated Individual

Representative Quote: I came into stock ownership later in life and have been able to enjoy areas that I would not have had the physical stamina to access, but for the assistance of my equine friend. We return our gratitude and pack for trail maintenance crews on our local forest, as well as engage in the projects sawing, trimming, etc. Therefore, I believe I would like to see the levels of stock use and access remain the same or increase responsibly, which can be achieved through education on Gentle Use principles, not restriction on responsible users.

Corr. ID: 66

Organization: *Not Specified*

Comment ID: 303842 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe that limiting the access of stock and the people riding is counter-productive to the goals of the National Parks Service and U. S. Department of the Interior. The Parks Service is reliant on the support of the public, and the more people that are exposed to the wonders of nature, the more people will be in favor of funding the forestry and parks programs.

Corr. ID: 127

Organization: *Not Specified*

Comment ID: 304142 **Organization Type:** Unaffiliated Individual

Representative Quote: Note: Existing leases, back country Stock uses should be continued as grand fathered in.

Concern ID:

43000

CONCERN

STATEMENT:

Access for stock should be continued, as many elderly and disabled visitors would not be able to travel into the wilderness without the use of stock.

Representative Quote(s): **Corr. ID:** 12

Organization: *Not Specified*

Comment ID: 302207 **Organization Type:** Unaffiliated Individual

Representative Quote: The Wilderness should be open and available to all. Some people cannot traverse the back country without the assistance of stock. Why should those people be denied access? Why are you trying to limit stock locations? The backpackers we have met while traveling with stock have all been receptive and positive in our use of stock. Not only that but the packers from RCPS have given assistance to backpackers on every trip I have been on.

Corr. ID: 29 **Organization:** *Not Specified*
Comment ID: 304006 **Organization Type:** Unaffiliated Individual
Representative Quote: The last few years I have also enjoyed horse packing. The fact that I am in my sixties limits my ability to enjoy the mountains by just hiking. When I was able to get on a horse I could get back to places I had never seen before. The pack leaders always helped us to be mindful of the environment, taking care not to destroy the beauty we came to see.

Corr. ID: 102 **Organization:** *Not Specified*
Comment ID: 303372 **Organization Type:** Unaffiliated Individual
Representative Quote: Stock in the both parks have been historically used to transport people and supplies. In recent years, there have only been a few pack stations within the park. In the Mineral King area, there has been no pack station for approximately 5 years or more. I hope that a pack station will soon be available for the use of the disabled and elderly.

Corr. ID: 116 **Organization:** *Not Specified*
Comment ID: 303429 **Organization Type:** Unaffiliated Individual
Representative Quote: Pack animals provide essential access to the wilderness for older persons and the disabled. Eliminating the use of pack animals into Sequoia and Kings Canyon would discriminate against us on the basis of age and disability.

Concern ID: 43001
CONCERN STATEMENT: [Stock animals negatively impact the park visitors' experience.](#)

Representative Quote(s): **Corr. ID:** 72 **Organization:** *Not Specified*
Comment ID: 303856 **Organization Type:** Unaffiliated Individual
Representative Quote: I think the only need for stock use in any national park is for trail maintenance, park ranger and rescue support. Horses used for this purpose should be recognized as unnatural to the environment as they are not native species, and should be taken back out of the wilderness area as soon as possible after their jobs have been accomplished. They should not be allowed to graze the alpine meadows at all because the damage do by even one of these horses is not naturally repaired for a long time.

Corr. ID: 143 **Organization:** High Sierra Hikers Association
Comment ID: 304341 **Organization Type:** Recreational Groups
Representative Quote: The use of stock animals (i.e., horses and mules) in SEKI's wildernesses substantially impairs scenery and water quality, results in the introduction and spread of invasive weeds, and significantly harms wildlife and the experience of numerous park visitors. In spite at these (and other) significant adverse impacts, SEKI's staff has already concluded, without any detailed analysis at all, that stock use will be continued under current policies. A careful and honest reassessment is sorely needed.

Concern ID: 43002
CONCERN STATEMENT: [The Park should educate stock users on how to reduce overall stock use, and provide incentives for visitors to reduce the amount of equipment transported and to reduce stock numbers. An incentive suggested was to allow caching of feed in certain locations.](#)

Representative Quote(s): **Corr. ID:** 132 **Organization:** Sierra Mountain Center
Comment ID: 304167 **Organization Type:** Business

Representative Quote: As well as looking at limits I would suggest that the Park work to educate all stock users. Pack stock can be used to transport equipment to make the hiking experience easier. However not everything needs to be carried. Provide incentives to packers to reduce the quantities of stock and the amount of equipment transported to reduce over all stock numbers. One of these might be to allow some caching of feed in certain locations.

Concern ID: 43003

CONCERN STATEMENT: Stock use damages trails causing impacts such as mud and dust. This damage and the presence of manure degrade the experience for other visitors and require intensive repair efforts.

Representative Quote(s): **Corr. ID:** 54 **Organization:** *Not Specified*

Comment ID: 302537 **Organization Type:** Unaffiliated Individual

Representative Quote: I have hiked the entire John Muir trail in addition to many other trails in SEKI and have been appalled over the years at the damage to the backcountry from horses. Some magnificent camping sites are unfit for human use due to droppings. It is not uncommon for a single hoofprint to sink 6 inches into the mud, which undoubtedly adds cost to trail maintenance. From what I have seen, the majority of damage to trails is done by stock animals. Horses and other stock are not natural to the park areas and in fact are the antithesis of preserving a park for generations to come, due to destruction of vegetation, introduction of weed seeds and diseases, to say nothing of the filth and flies, the manure dust which those of us closer to the ground have to breathe.

Corr. ID: 119 **Organization:** *Not Specified*

Comment ID: 303331 **Organization Type:** Unaffiliated Individual

Representative Quote: However, on many of these trips in Sequoia-Kings, I've encountered the effects of too many stock animals. Miles of dusty, manure-laden trails detract from the wilderness experience and make for very unpleasant travel, despite the grandeur of the Sierra. The passage of too many stock animals can also damage trails, necessitating intensive repair. Because of issues like these, I'd like to see a class of trails designated for foot travel only.

Concern ID: 43004

CONCERN STATEMENT: Stock Use results in adverse impacts on water quality, including pollution of water with bacteria and other pathogens, erosion of streambanks, and eutrophication from nutrient addition. These impacts can cause health risks for humans.

Representative Quote(s): **Corr. ID:** 53 **Organization:** High Sierra Hikers Association

Comment ID: 302536 **Organization Type:** Unaffiliated Individual

Representative Quote: In my experience throughout the years, stock use on the trails results in extremely dusty conditions further marred by deposits of manure and urine, which can then be washed into and contaminate streams when it rains.

Corr. ID: 142 **Organization:** UC Davis Medical Center

Comment ID: 304317 **Organization Type:** University/Professional Society

Representative Quote: stock use results in significant adverse effects to water quality in SEKI and elsewhere in the Sierra Nevada. Research has documented pollution of water in stock use areas by bacteria and other pathogens, and has demonstrated a link between stock use and bacterial pollution. It is our considered opinion that this pollution represents a

potentially serious health risk to humans.

Corr. ID: 142

Organization: UC Davis Medical Center

Comment ID: 307213

Organization Type: University/Professional Society

Representative Quote: Scientific literature has overwhelmingly demonstrated that horses and mules (hereafter referred to as "stock" and/or "pack animals") have a very negative impact on the natural ecology of wilderness and backcountry areas, especially the degradation of water quality. Our own research documents that stock animal use in SEKI and elsewhere in the Sierra causes shifts in aquatic ecosystems and poses a significant risk to human health by polluting water with bacteria and other pathogens.

In addition to importing microbial pathogens in large quantities into wilderness environments in their manure, the cumulative impact of tons of nutrients, primarily nitrogen and phosphorus, damages lakes and streams, by stimulating excessive growth of algae. Both suspended and attached algae (periphytic algae) growth is greatly stimulated by the fertilizing effect of manure from stock that is often washed into nearby waterways, or directly deposited. This causes the eutrophication or greening of pristine mountain lakes and streams. The trampling of stream and lake banks by stock also contributes to erosion, resulting in increased sediment transport to down-stream areas.

Concern ID:

43005

**CONCERN
STATEMENT:**

Stock, including commercial stock, should be required to wear manure catchers, and pack parties should be required to remove this manure from SEKI. Commenters noted displeasure with finding stock manure on trails, and felt the impacts of stock waste were greater than those of human waste.

Representative Quote(s):

Corr. ID: 57 **Organization:** Not Specified

Comment ID: 302756 **Organization Type:** Unaffiliated Individual

Representative Quote: Finally, the NPS needs to require "manure catchers" on all stock animals to keep manure off the trails and surface water. Animal waste is routinely deposited on the trail, in campsites, in wetlands, and directly into lakes and streams. The lack of manure catchers helps spread disease and would be relatively simple for stock to use. Certainly, the NPS must be interested in reducing waste and filth in our national parks.

Corr. ID: 62

Organization: High Sierra Hikers Association

Comment ID: 302850 **Organization Type:** Unaffiliated Individual

Representative Quote: My enjoyment of hiking in the Sequoia & Kings Canyon National Parks is lessened by the manure left by stock animals. Requiring "manure catchers" on all stock animals would improve the environment and the experience of all hikers. The stock animal owners should be required to dump the manure away from trails, campsites, and watercourses.

Corr. ID: 138

Organization: Not Specified

Comment ID: 304264 **Organization Type:** Unaffiliated Individual

Representative Quote: I respectfully request the National Park system consider sharply curtailing the number of stock animals and commercial clients and their access to off-trail sites allowed in the wilderness area. Included in the regulations for commercial use should be the requirement for use of manure catchers for all animals.

Corr. ID: 165 **Organization:** *Not Specified*
Comment ID: 304446 **Organization Type:** Unaffiliated Individual
Representative Quote: The Double'Standard on waste management needs to be eliminated If hikers need to camp and bury waste away from trains and water, or need carry out their waste, then stock should be held to the same standard. I don't defecate and urinate on the trail or in camp sites and steps should be taken to prevent stock from doing this. Just because that's the way it's always been isn't a reason, it's an excuse. An option to require manure catchers on all stock animals (see, for example, bunbag.com) to keep manure off trails and out of streams, lakes, and campsites needs to be seriously considered and would significantly enhance the wilderness experience for hikers.
Corr. ID: 166 **Organization:** *Not Specified*
Comment ID: 304555 **Organization Type:** Unaffiliated Individual
Representative Quote: Manure on the trails is a problem which could, and should, be solved, not tolerated. All stock should be required to wear a manure catcher while on any trail, and the contents well buried later, well away from any streams or lakes.

Concern ID: 43006
CONCERN STATEMENT: [Manure catchers should not be used, as manure provides fertilizer.](#)

Representative Quote(s): **Corr. ID:** 149 **Organization:** Alpine Urology
Comment ID: 304430 **Organization Type:** Business
Representative Quote: I don't think manure catchers are practical. It seems to me that is good fertilizer.

Concern ID: 43007
CONCERN STATEMENT: [Bells on stock should not be allowed in wilderness areas, as they are disruptive to visitors and lessen the wilderness experience.](#)

Representative Quote(s): **Corr. ID:** 165 **Organization:** *Not Specified*
Comment ID: 304448 **Organization Type:** Unaffiliated Individual
Representative Quote: Prohibit bells on stock animals, which shatter the natural quiet, and disrupt the sleep of wilderness visitors. Stock woke me up last summer.
Corr. ID: 175 **Organization:** *Not Specified*
Comment ID: 304579 **Organization Type:** Unaffiliated Individual
Representative Quote: Bells should also be prohibited since they are not a natural part of the wilderness.
Corr. ID: 183 **Organization:** *Not Specified*
Comment ID: 304469 **Organization Type:** Unaffiliated Individual
Representative Quote: prohibit bells on stock animals, which shatter the natural quiet, and disrupt the sleep of wilderness visitors

Concern ID: 43008
CONCERN STATEMENT: [Fences used to contain stock animals should not be allowed in wilderness areas. These fences are difficult for some visitors to cross and impact wilderness character.](#)

Representative Quote(s): **Corr. ID:** 165 **Organization:** *Not Specified*
Comment ID: 310871 **Organization Type:** Unaffiliated Individual
Representative Quote: the wire fences installed throughout SEKI's wilderness for the convenience of stock users detract from the

untrammeled scenery and are a hassle for backpackers to cross. Stock users should be responsible for their own animals, without the need for fences or the stock shouldn't be there.

Corr. ID: 178

Organization: *Not Specified*

Comment ID: 304591 **Organization Type:** Unaffiliated Individual

Representative Quote: Any features such as fences that are set up to facilitate stock use should be eliminated. It is not the concern of the NPS if stock users have to work harder to keep their animals in line. IF they refuse or can't do this, than this is obviously an inappropriate use in wilderness areas.

Corr. ID: 183

Organization: *Not Specified*

Comment ID: 310875 **Organization Type:** Unaffiliated Individual

Representative Quote: remove all fences from SEKI's wilderness. The wire fences installed throughout SEKI's wilderness for the convenience of stock users detract from the untrammeled scenery and are a hassle for visitors to cross.

SA1300 - Suggests new or change in alternative(s) for Stock Use: Access and Travel

Concern ID:

43009

CONCERN

STATEMENT:

Representative

Quote(s):

Some trails and other areas should be closed to stock access to allow hikers and backpackers to have a stock-free wilderness experience.

Corr. ID: 71

Organization: *Not Specified*

Comment ID: 302880 **Organization Type:** Unaffiliated Individual

Representative Quote: First of all if there is going to be a classification system there should be a class for hikers only. Heavy stock use does serious damage to trails, and there should be specific trails designated, designed, and maintained for stock use. Additionally, stock should have to stay on these designated trails and not allowed to roam throughout the wilderness, damaging the environment and spreading invasive plant species.

Corr. ID: 86

Organization: *Not Specified*

Comment ID: 304048 **Organization Type:** Unaffiliated Individual

Representative Quote: Stock use. The draft alternatives seem to propose regulation of stock use largely to minimize resource impacts. I agree that has to be the primary reason for regulating stock, but I think that there should be more emphasis in each of the action alternatives on regulating stock use for social reasons. That is, providing non-stock users with access to meadows that are stock-free. The alternatives provide that experience by giving an elevational cut-off line for stock. Hikers who go to high elevations can enjoy meadows that are free of the impacts of stock. But I would like to think that the parks could find the space in many of its lower-elevation watersheds to set aside at least some meadows specifically for the enjoyment of hikers.

The parks should be able to provide some natural meadows for hikers to appreciate throughout the mid- and lower elevations. Perhaps the alternatives are already doing this; but if so, it isn't clearly being called out.

Corr. ID: 106

Organization: *Not Specified*

Comment ID: 303718 **Organization Type:** Unaffiliated Individual

Representative Quote: Outside of wilderness areas, in urban areas, there is a growing recognition that cars and bicycles deserve separate routes: the same should be true in SEKI wilderness, with most trails restricted to foot travel, and stock permitted only on a few lower-elevation designated "super-trails." (Or better yet, think of most backcountry trails as the equivalent of pedestrian-only urban sidewalks.)

Corr. ID: 166 **Organization:** *Not Specified*

Comment ID: 304557 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposed system of three trail classes does not make much sense if stock are allowed on all trails. What is actually needed are some trails reserved for hikers only, i.e., restrictions on which trails can be utilized by commercial stock. Horses and mules should only be allowed on trails specifically designed to withstand their impacts, and not permitted to degrade the backpacking experience we put so much time and energy into creating for ourselves every summer.

Concern ID:

43010

**CONCERN
STATEMENT:**

NPS supply runs and commercial stock services should be allowed to drop off packs in the wilderness but then should have to leave the wilderness after dropping off materials.

**Representative
Quote(s):**

Corr. ID: 119 **Organization:** *Not Specified*

Comment ID: 303334 **Organization Type:** Unaffiliated Individual

Representative Quote: I'd like to see the Park Service better manage the stock animals that it uses to resupply trail crews. Currently after the stock animals drop off supplies, they often stay in the wilderness, grazing in sensitive meadows. I believe I saw this occur near Cartridge Pass in 2010, where there were many drift fences set up near a trail crew camp and horses scattered about. Instead, after the supplies are dropped off, the stock animals should depart the wilderness rather than remaining there.

Corr. ID: 149 **Organization:** Alpine Urology

Comment ID: 304427 **Organization Type:** Business

Representative Quote: But lately as we have aged, we have used pack animals to carry our packs in 7 miles and drop them at a designated spot. The animals turn around and descend to the park boundaries the same day. I think this use should continue for hikers as well as for NPS stock in support of trail crews.

Corr. ID: 150 **Organization:** *Not Specified*

Comment ID: 304459 **Organization Type:** Unaffiliated Individual

Representative Quote: When the Forest Service packer delivered supplies to the trail crew, stock feed was packed in and/or the packer returned to station after the delivery to avoid impact on nearby meadows. I also advocate using established stock campsites and not create new ones. These are solid reasonable stock management practices the Park Service should adopt.

Concern ID:

43011

**CONCERN
STATEMENT:**

Stock should be allowed to access all trails, and should not be prohibited from wilderness areas.

**Representative
Quote(s):**

Corr. ID: 12 **Organization:** *Not Specified*

Comment ID: 304654 **Organization Type:** Unaffiliated Individual

Representative Quote: It would also be favorable if you could lift

campfire elevations and open other areas, like Dusy Basin to pack stock.

Corr. ID: 129 **Organization:** Balch Park Pack Station

Comment ID: 304156 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative 1- Stock use comment "some area closed some trails not allowed" is very vague. As evident in past actions, the public wants access to all areas by horseback. There is not an exclusive resort in the back country for hikers only.

Corr. ID: 152 **Organization:** National Forest Recreation Association

Comment ID: 304483 **Organization Type:** Non-Governmental

Representative Quote: Stock users should be able to camp and travel on trails the same as other users. They are entitled to the same 'wilderness experience' as any other user, which should include a sense of discovery and privacy. They should not be relegated to camping in corridors where everyone is traipsing through their campsite. The continued use of drift fences, hitch rails, and other improvements are positive aids in resource protection.

Concern ID:

**CONCERN
STATEMENT:**

**Representative
Quote(s):**

43012

Stock access should be limited by zone, location, specific times, and/or in terms of the items that may be transported.

Corr. ID: 32 **Organization:** *Not Specified*

Comment ID: 304035 **Organization Type:** Unaffiliated Individual

Representative Quote: Since Lakes trail is a heavy used trail, allow stock on trail every other weekend or only early in the am to miss the majority of crowd & post times so others can avoid stock if they so wish.

Corr. ID: 80 **Organization:** *Not Specified*

Comment ID: 302933 **Organization Type:** Unaffiliated Individual

Representative Quote: In looking over the Preliminary Alternatives for the Wilderness Stewardship plan, I question allowing unlimited pack animal use in any area, let alone all areas of the park. There is a major difference between an occasional small pack train coming through and being constantly inundated by huge pack strings. My preference would be allowing pack animal assistance/stocking on some of the major trails on alternating days with hikers only on the others. Pack animals should be limited to trails which are deemed suitable, ones that are able to withstand their impacts without degradation. Pack animals should not be allowed to degrade off trail areas that are the home and feeding areas of wild inhabitants.

Corr. ID: 106 **Organization:** *Not Specified*

Comment ID: 303715 **Organization Type:** Unaffiliated Individual

Representative Quote: The status quo is not acceptable for SEKI wilderness preservation: many heavy used and/or high elevation areas cannot accommodate stock without serious environmental degradation. This includes Dusy Basin, Guitar Lake, Vidette Meadows, and the list goes on and on.

Corr. ID: 165 **Organization:** *Not Specified*

Comment ID: 304456 **Organization Type:** Unaffiliated Individual

Representative Quote: Non-Essential Supplies should be limited or eliminated to reduce stock requirements. Stock supply encourages delivery of non-essential items like ice coolers full of refrigerated food, seats, tables, canned food, bottled and canned drinks, etc., requiring more stock

than necessary. Backpackers wouldn't carry these because they're too heavy and non-essential.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43013

Stock should not be allowed off-trail in SEKI.

Corr. ID: 119

Organization: *Not Specified*

Comment ID: 303333 **Organization Type:** Unaffiliated Individual

Representative Quote: Despite my concerns about the damage done by too many stock animals on the trails, I much prefer that stock be required to remain on established trails and be prohibited from cross country travel. Many times I've hiked hard to get to a remote corner of the Sequoia-Kings backcountry only to encounter horse manure. Also, very high meadows, creeks, and shorelines are particularly susceptible to damage by stock animals.

Corr. ID: 145

Organization: Sierra Club Sierra Nevada Resilient Habitats Campaign

Comment ID: 304399 **Organization Type:** Conservation/Preservation

Representative Quote: Pack stock should not be allowed in all parts of the wilderness. Most off-trail cross-country areas should be off limits to stock, with some possible site-specific exceptions where limited cross-country travel may connect certain trails and lead to reasonable campsites.

Corr. ID: 183

Organization: *Not Specified*

Comment ID: 304464 **Organization Type:** Unaffiliated Individual

Representative Quote: I am concerned about the impacts of stock animals at SEKI, and feel that no new developments should be constructed to facilitate stock use. Your plan should instead focus on reducing the current levels and impacts of stock use.

Stock animals should be required to remain on trails that are designated, designed, constructed and maintained to withstand the erosive forces of stock animals. No off-trail or "cross-country" travel by stock should be allowed. This simple measure has been recommended by scientists for decades, but the preliminary draft alternatives fail to present any such alternative.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43014

Enforcement of regulations regarding stock access is needed to assure that rules are followed.

Corr. ID: 154

Organization: *Not Specified*

Comment ID: 304503 **Organization Type:** Unaffiliated Individual

Representative Quote: These "alternatives" should be should include strict limits and a means of measuring and enforcing these limits on stock use. It is shocking that backpacking is limited while stock use continues unfettered, the latter causing much more ecological damage which is easily demonstrable even from the viewpoint of an amateur naturalist as myself. Even more appalling is that the stock animals are not limited to trails and are permitted to trample and defecate on formerly pristine meadows.

Corr. ID: 169

Organization: *Not Specified*

Comment ID: 304558 **Organization Type:** Unaffiliated Individual

Representative Quote: Both the Zoning idea and the Preliminary Alternatives are so confusing and deceptive that they should both be replaced with rules for protecting the whole wilderness that are easy to understand and enforce. Without effective enforcement with real analysis of stock animal use and damage, no one can determine which trails, if any, are resilient enough for stock animal abuse. And the only thing worse for nature than stock animal trail damage is stock animal off trail damage

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

43015

The WSP should provide an alternative that prohibits stock access in SEKI.

Corr. ID: 162

Organization: *Not Specified*

Comment ID: 304546 **Organization Type:** Unaffiliated Individual

Representative Quote: The impact of pack animals needs to be reduced by greater limitations on the permits for their use, perhaps restricting the transport of excessive supplies and amenities (tiki torches, inflatable rafts and furniture?) and even able bodied visitors who would greatly benefit from some exercise. Where they are regarded as necessary, the filth and damage caused by pack animals could be reduced with the use of manure catchers, and perhaps some foot only trails could be provided in areas that receive the heaviest non human traffic. Routes dedicated to foot traffic can be created with minimal impact and engineering and would require little maintenance in the absence of the destructive effects of hooves

Corr. ID: 178

Organization: *Not Specified*

Comment ID: 304587 **Organization Type:** Unaffiliated Individual

Representative Quote: I also have worked for outfitters and used horses in the past, however, I strongly recommend that any plan be designed to preserve wildlands characteristics of these magnificent parklands--and should consider eliminating pack stock use entirely from the SEKI.

SC1000 - General Comments on Stock Use: Camps and Party Size

Concern ID:
CONCERN
STATEMENT:
Representative Quote(s):

43016

Stock users and pack outfitters are respectful of campsites and do not create negative impacts.

Corr. ID: 11

Organization: *Not Specified*

Comment ID: 302190 **Organization Type:** Unaffiliated Individual

Representative Quote: When I start using the pack station to carry my supplies, I was concerned about the impact of the stock on the environment. I was pleasantly surprised by the care the Rock Creek employees took in grazing the stock, establishing picket lines, setting up privies, building fires, and cleaning up camp. They take immense pride in leaving the campsites pristine for the next campers and show their guests how to return their part of the campsite to a natural appearance. I believe they take much better care of the campsite than most backpackers due to knowledge, dedication, love of the wilderness, and the equipment they can carry.

Corr. ID: 38

Organization: *Not Specified*

Comment ID: 304128 **Organization Type:** Unaffiliated Individual

Representative Quote: I have never found evidence of heavy impacts from mules at any campsites I have stayed in.

Concern ID: 43017
CONCERN STATEMENT: Stock users and pack outfitters have an adverse impact on campsites, including the disruption of other visitors.
Representative Quote(s): **Corr. ID:** 162 **Organization:** *Not Specified*
Comment ID: 304544 **Organization Type:** Unaffiliated Individual
Representative Quote: The practice of releasing stock to roam free at night, draped with clanging bells is a nuisance and a danger. I have had groups of these animals invade my camp in the dead of night, stomping around my tiny tent, and have been frequently awakened before dawn by wranglers attempting to round them up, galloping past my camp. If they must bring stock into the vicinity of camps, pack operations must find ways to do so without disturbing the peace and quiet or endangering other visitors.

Concern ID: 43018
CONCERN STATEMENT: The distance between stock camps is often too far apart for visitors who travel more slowly.
Representative Quote(s): **Corr. ID:** 68 **Organization:** *Not Specified*
Comment ID: 302868 **Organization Type:** Unaffiliated Individual
Representative Quote: One of the things that I hope might be looked at by your committee would be the distance between some of the allowable stock camps on the PCT. More than once, as we became slower with advancing maturity, my companions and I had real difficulty getting from one camp to the next in a single day's hike. Once, by the time we got to camp, it was dark for hours. Other times the packers had to come to be sure we got into camp. We just couldn't walk fast, anymore. But we could walk.

Concern ID: 43019
CONCERN STATEMENT: Designated camp sites create conflict, as stock users may have to ask non-stock users to move out of the campsites.
Representative Quote(s): **Corr. ID:** 152 **Organization:** National Forest Recreation Association
Comment ID: 304481 **Organization Type:** Non-Governmental
Representative Quote: Designated' camps have proven to be controversial and the cause for unnecessary conflict. If stock users can only use those camps, they have to ask others to move out should they not be a stock party. This is not a good situation and sets up the stock users to have to camp elsewhere and risk a citation, or it causes hard feelings with the group that has to relocate. In most cases, the users sort themselves out.

SC1300 - Suggests new or change in alternative(s) for Stock Use: Camps and Party Size

Concern ID: 43020
CONCERN STATEMENT: Separated or designated stock use camps should be implemented, as they provide a better experience for backpackers, with fewer conflicts. Designated campsites could be mandatory at certain sites or parkwide.
Representative Quote(s): **Corr. ID:** 75 **Organization:** *Not Specified*
Comment ID: 302902 **Organization Type:** Unaffiliated Individual

Representative Quote: Designated camps - In some areas, such as behind Whitney, everyone should be in a designated campsite due to the high usage. However, in other areas, I strongly feel that the experienced packer is better suited to select an appropriate campsite and grazing areas at any given time.

Corr. ID: 124 **Organization:** *Not Specified*

Comment ID: 303301 **Organization Type:** Unaffiliated Individual

Representative Quote: Regarding stock campsites, I fully support all of the statements that are common to all alternatives. As Alternative 3 states, stock camps and backpacker camps should be separate so that the wilderness experience of backpackers is not adversely affected. Stock users should be required to camp in designated stock camps in Zones B, C and D.

Corr. ID: 124 **Organization:** *Not Specified*

Comment ID: 303293 **Organization Type:** Unaffiliated Individual

Representative Quote: In addition to limiting stock party size, I strongly feel that there should be designated campsites for their use and/or areas where stock parties are not allowed to camp due to high usage by backpackers and/or sensitive natural resources.

Concern ID: 43021

CONCERN STATEMENT: Designated campsites for stock should not be included in the plan, and the plan should only include recommended campsites for stock.

Representative Quote(s): **Corr. ID:** 152 **Organization:** National Forest Recreation Association

Comment ID: 304480 **Organization Type:** Non-Governmental

Representative Quote: There should not be 'required' or mandatory stock camps. Stock camps should be recommended, but stock users should be able to have a sense of freedom to explore the wilderness just as any other user

SG1000 - General Comments on Stock Use: Grazing

Concern ID: 43023

CONCERN STATEMENT: There are concerns about NPS administrative grazing and stock practices.

Representative Quote(s): **Corr. ID:** 64 **Organization:** *Not Specified*

Comment ID: 302861 **Organization Type:** Unaffiliated Individual

Representative Quote: None of the alternatives in the current Wilderness Stewardship Plan separate grazing and meadows from pack stock usage in general. Also, stock use by the National Park Service is not addressed. Park service stock travel needs to be considered along with commercial stock travel.

Corr. ID: 132 **Organization:** Sierra Mountain Center

Comment ID: 304195 **Organization Type:** Business

Representative Quote: The current system of a, total limit of grazing days not help guides stock groups while NPS draws also from the same pool. It happens that we can book a trip for September in May, but when September arrives the NPS crews have used all of the grazing days and significant changes have to be made to itineraries.

Corr. ID: 143 **Organization:** High Sierra Hikers Association

Comment ID: 304350 **Organization Type:** Recreational Groups

Representative Quote: It is no secret that the Ash Mountain "pastures" have become badly damaged due to overgrazing by NPS's own stock, and that SEKI's backcountry "administrative pastures" have become infested with invasive weeds (no doubt imported by stock animals themselves). Nor is it any secret that NPS stock graze throughout the summer in SEKI's wildernesses simply because NPS prefers to avoid the cost of feeding its own animals.

Concern ID: 43024

CONCERN STATEMENT: The current regulations for grazing should remain in place for SEKI, or new additional areas should be opened to grazing.

Representative Quote(s): **Corr. ID:** 37 **Organization:** Not Specified

Comment ID: 304087 **Organization Type:** Unaffiliated Individual

Representative Quote: I think that allowing our stock the graze all the meadows, both high and low elevation, they are replacing the big game animals in the ecosystem. They knock the sprouted seed from the grass and til it into the earth with there hoofs, just like the deer and elk once did. The fertilize the meadows with there scat just like the deer and elk once did.

Corr. ID: 136 **Organization:** The Garden Law Firm, P.C.

Comment ID: 304283 **Organization Type:** Business

Representative Quote: In addition, if an elevation restriction such as a 9,700 foot restriction were implemented for grazing, it would have a very significant impact on the commercial packers who access the parks from the east side of the Sierras. These individuals will not be able to access the areas west of the crestline unless they carry their own stock feed. This will increase their and their clients' costs. In addition, if they carry their own stock feed, they will have to use more stock to carry it which will have greater impact. Thus, this restriction appears to have a counterproductive impact by actually promoting impacts rather than seeking to reduce them.

Concern ID: 43025

CONCERN STATEMENT: Preventing grazing at high elevations is not the most effective way to preserve wilderness, as it would force packers to concentrate stock in smaller areas.

Representative Quote(s): **Corr. ID:** 81 **Organization:** Not Specified

Comment ID: 303995 **Organization Type:** Unaffiliated Individual

Representative Quote: Therefore, imposing strict regulations preventing grazing at high elevations, arbitrarily limiting the number of people per trip, etc. is not the most effective way to preserve the wilderness. It is my belief this will result in unintended consequences such as forcing the packers to utilize more picket lines which concentrates the stock in smaller areas, etc. The commercial packers are the best ones to regulate these types of things to minimize degradation.

SG1300 - Suggests new or change in alternative(s) for Stock Use: Grazing

Concern ID: 43026

CONCERN STATEMENT: Free grazing of stock should be used, as this disperses the impacts of stock grazing.

Representative Quote(s): **Corr. ID:** 13 **Organization:** Not Specified

Comment ID: 302218 **Organization Type:** Unaffiliated Individual

Representative Quote: I have - and have been amazed anyone would object to horses and mules. First of all - the areas are very lightly used to begin with. The meadows are vast with abundant grass for grazing.

Don't eliminate grazing in the upper elevation meadows. These meadows are vast. It's a head scratcher to visit these areas and think that someone thinks grazing should be eliminated. It is completely unnecessary.

Free grazing of livestock creates less environmental impact than tying horses and mules on the picket line. It's only logical.

Corr. ID: 38 **Organization:** *Not Specified*

Comment ID: 304127 **Organization Type:** Unaffiliated Individual

Representative Quote: I feel that free roaming grazing makes more sense than rope lines so that use is spread out and avoids damage by repeated use in one place.

Corr. ID: 66 **Organization:** *Not Specified*

Comment ID: 303845 **Organization Type:** Unaffiliated Individual

Representative Quote: By limiting the grazing areas you are over taxing one area. If, on the other hand, you would open up more area to grazing and give some discretion to the packers as to where to graze the animals, you might see animals using more areas with less of an impact in any one given area.

Concern ID:

**CONCERN
STATEMENT:**

**Representative
Quote(s):**

43027

Stock users should be required to carry in feed that is weed-free, and should not be allowed to graze in SEKI. Pack outfitters should be allowed to store cubes if grazing restrictions occur.

Corr. ID: 107 **Organization:** *Not Specified*

Comment ID: 303706 **Organization Type:** Unaffiliated Individual

Representative Quote: The Park needs to allow those of us who use livestock to store cubes and leave them unattended. The Park has been reducing grazing days and making the on dates for grazing later. This essentially is closing the Park to stock users. The Park needs to address this issue and provide storage boxes or allow stock users to stash cubes.

Corr. ID: 141 **Organization:** *Not Specified*

Comment ID: 304287 **Organization Type:** Unaffiliated Individual

Representative Quote: I've seen some really stomped-on meadows and think it would be a good idea to require the pack outfits to bring in food for their animals, rather than letting them graze wherever they choose.

Corr. ID: 172 **Organization:** *Not Specified*

Comment ID: 304567 **Organization Type:** Unaffiliated Individual

Representative Quote: Please consider an alternative to prohibit grazing by domestic stock animals anywhere at SEKI. Many other national parks prohibit all grazing by domestic stock, and SEKI's 1971 Master Plan called for phasing out all grazing. Stock users could still visit the park, if they carry weed-free "feed" for their animals, as required by many other parks.

Concern ID:
CONCERN
STATEMENT:

43028

Grazing should be limited to certain areas. Suggestions included limiting grazing at certain elevations, in low altitude meadows, and limiting grazing in at least one meadow in each canyon.

Representative
Quote(s):

Corr. ID: 143

Organization: High Sierra Hikers Association

Comment ID: 304352 **Organization Type:** Recreational Groups

Representative Quote: To summarize, an outline for a range of reasonable alternatives for stock use is as follows:

2. No Grazing (park-wide).

2(a). No Grazing Except for Essential Administrative Uses

2(b). No Grazing Except for Essential Administrative & Non-Commercial Uses

3. No grazing (wilderness-wide).

3(a). No Grazing Except for Essential Administrative Uses

3(b). No Grazing Except for Essential Administrative & Non-Commercial Uses

4. No Grazing above 9,700 feet elevation.

4(a). No Grazing above 9,700' Except for Essential Administrative Uses

4(b). No Grazing above 9,700' Except for Essential Administrative & Non-Commercial Uses

5. No Grazing above 9,700 ft. plus No Grazing in Representative Meadows at Lower Elevations. (This alternative is identical to Alts. 4, 4(a), and 4(b) but prohibits grazing at a series of selected meadows below 9,700 feet, so park visitors traveling along SEKI's trails may enjoy the entire range of meadow types without the harmful impacts of grazing.)

Corr. ID: 148

Organization: *Not Specified*

Comment ID: 304453 **Organization Type:** Unaffiliated Individual

Representative Quote: While establishing an elevation limit for grazing is an alternative worth considering, it does not guarantee full protection for iconic Sierra meadows should grazing be closed in elevations above those meadows. It is imperative that Alternatives 3, 4 and 5 contain wording that at least one or more meadows will be completely closed to grazing in each canyon ecosystem. Such permanent closure would be determined based on the meadow's ecological, aesthetic and social importance to that canyon ecosystem.

Concern ID:
CONCERN
STATEMENT:

43029

Grazing should remain the same or be expanded, and areas where grazing is restricted should only be limited temporarily. Appropriate areas where grazing has previously been restricted should be reopened.

Representative
Quote(s):

Corr. ID: 34

Organization: *Not Specified*

Comment ID: 304050 **Organization Type:** Unaffiliated Individual

Representative Quote: Please don't limit the opportunity for grazing higher altitude meadows. Protect the meadows but don't close them.

Corr. ID: 107

Organization: *Not Specified*

Comment ID: 303668 **Organization Type:** Unaffiliated Individual

Representative Quote: The Park should allow stock use and grazing in the Darwin Bench. This is essential to protect Colby Meadows and Evolution. This was a historic use area for stock and should never have been closed to grazing.

Corr. ID: 152

Organization: National Forest Recreation Association

Comment ID: 304485 **Organization Type:** Non-Governmental

Representative Quote: In regard to Stock Use and Grazing, NFRA supports grazing to continue. Any curtailment should be temporary and instituted only with a plan and a date for re-opening. There are grazing areas that were previously closed that should be appropriate to reopen. This would allow for more dispersed use

Concern ID:

43030

**CONCERN
STATEMENT:**

Grazing restrictions should be developed on an area-specific basis that takes into account the protection of natural resources at a site. Stock camps at these locations should be regularly evaluated and access should be modified when necessary for resource protection.

**Representative
Quote(s):**

Corr. ID: 101

Organization: Not Specified

Comment ID: 303249 **Organization Type:** Unaffiliated Individual

Representative Quote: However, the effects of grazing in meadows MUST be addressed, because a damaged meadow affects EVERYBODY. Again, FREEDOM is the essence of the wilderness experience; while the freedom to use animals to travel is important to some, the freedom to enjoy an undisturbed meadow is important to ALL. There are alternative methods of feeding stock that do not damage pristine meadows. Also, a generic altitude-limit on grazable meadows is a bad idea. Meadow management should occur on a case-by-case basis.

Corr. ID: 124

Organization: Not Specified

Comment ID: 303305 **Organization Type:** Unaffiliated Individual

Representative Quote: In regards to grazing, restrictions should be developed on an area-specific basis, taking into account protection of meadows, vegetation, and endangered species. Stock camps need to be regularly evaluated and access should be modified if necessary to protect wilderness resources. Grazing should be allowed where possible.

Concern ID:

43032

**CONCERN
STATEMENT:**

The NPS packstock should be required to leave the park between resupply trips rather than grazing in the park, in order to protect meadows.

**Representative
Quote(s):**

Corr. ID: 57

Organization: Not Specified

Comment ID: 302755 **Organization Type:** Unaffiliated Individual

Representative Quote: Fourth, the Preliminary Alternatives do not address the problem of "administrative" grazing by NPS stock. NPS stock should leave the mountains between re-supply trips, rather than grazing in the park's fragile meadows all summer long.

Corr. ID: 146

Organization: Not Specified

Comment ID: 304368 **Organization Type:** Unaffiliated Individual

Representative Quote: NPS should reduce the impact of SEKI owned stock by requiring the stock to leave the mountains instead of grazing on fragile meadows between resupply trips.

Corr. ID: 155

Organization: Wilderness Watch

Comment ID: 304520 **Organization Type:** Conservation/Preservation

Representative Quote: Currently, SEKI owns numerous stock animals that are allowed to graze and trample the park's fragile meadows all summer long. NPS packers periodically haul fresh food to trail crews, but then leave the animals to graze in the wilderness until time to exit the mountains to fetch another load of supplies. It should be the opposite: NPS stock should leave the mountains between re-supply trips, not graze the park's fragile meadows all summer long.

Concern ID:

**CONCERN
STATEMENT:**

**Representative
Quote(s):**

43033

Grazing should be restricted to only one or two days in high meadows, as this would protect these sites and require that less feed be carried in.

Corr. ID: 87

Organization: Sierra Club

Comment ID: 303213 **Organization Type:** Unaffiliated Individual

Representative Quote: If the stock are allowed to graze in the high meadows area for a day or two at a time, they will not damage the meadows, and less feed would have to be packed in. Also, if grazing is further restricted, daily hikes to reach the next destination get longer and longer, again eliminating the possibility of reaching them, especially for older hikers or children.

Concern ID:

**CONCERN
STATEMENT:**

**Representative
Quote(s):**

43034

Grazing should not be restricted based on elevation limits. Areas that are suitable for stock use can be located above these elevations, and such restrictions would hurt livestock users. The use of hay feed at such elevations has additional impacts.

Corr. ID: 107

Organization: Not Specified

Comment ID: 303694 **Organization Type:** Unaffiliated Individual

Representative Quote: More restrictive grazing restrictions are unnecessary and essentially close the Park to livestock users. Some have suggested elevational closures above 9,700 ft.

The requested remedy of eliminating grazing in Evolution Valley and above 9,700 ft in the Park eliminates the ability to travel the John Muir/PC Trails. The only grazing available will be in Le Conte Canyon, portions of Wood Creek and Lower Rock Creek. In order to service clients it is necessary to graze the animals almost every night as you travel the length of the John Muir Trail. Although packers can pack feed for an occasional campsite where grazing is not permitted, the sections of the Park are practically inaccessible to re-supply needed forage for livestock.

Using the arbitrary 9,700 ft. elevational closure in reality closes grazing along the John Muir Trail. Sequoia and Kings Canyon National Parks are in a much more southern latitude than areas of the Yosemite and most portions of the John Muir Wildernesses. And, Sequoia National Park is in the rain shadow of the Great Divide. The vast majority of meadows of the Upper Basin and Tyndal Creek (Upper Kern) have southern exposures and are wide open expanses that promote dry meadows suitable for grazing early in the summer. The vast meadow expanses of the Upper Basin, Upper Kern, Tyndal Creek and the Wright Creek drainages are between 10-12,000ft. This huge area supports grazing in an area ideally suited for pack stock grazing.

Concern ID:
CONCERN
STATEMENT:

Representative
Quote(s):

43035

The use of feed instead of grazing would result in additional impacts. Carrying in feed requires additional stock and concentrates stock impacts in a smaller area.

Corr. ID: 63 **Organization:** none

Comment ID: 302855 **Organization Type:** Unaffiliated Individual

Representative Quote: #4 Grazing in higher elevations should not be restricted anymore than it is now. Having to bring in hay cubes is hard on an animals digestive system. Keeping stock picketed for feedings impacts the soil and harder to dispose of manure in your current method. Please don't make it any harder for grazing.

Corr. ID: 79 **Organization:** *Not Specified*

Comment ID: 302930 **Organization Type:** Unaffiliated Individual

Representative Quote: Doesn't free grazing create less environmental impact, in actuality, than the picket line method? It seems to me that carrying hay cubes and extra grain for the picket line would require additional stock to carry this extra feed and create more impact on the forest floor as the stock would be standing for long periods of time in the same small area encompassed by the picket line.

Corr. ID: 107 **Organization:** *Not Specified*

Comment ID: 310944 **Organization Type:** Unaffiliated Individual

Representative Quote: It is not environmentally sound to eliminate grazing. While additional mules can transport feed for the livestock and animals can go without food for several days, it is not a practical solution. Each animal needs about 25 pounds of cubes per day. As an example, if you had twelve animals on an eight day trip it would take an additional 16 mules to carry the 2400 lbs of food to feed those twelve animals. And, if you had to feed those 16 pack animals plus the two additional riding animals it would require even more mules. If you then start carrying enough feed for the re-supply packers and mules you will logarithmically increase the number of pack mules on the trail.

Concern ID:
CONCERN
STATEMENT:

Representative
Quote(s):

43036

Grazing should not be restricted by elevation limits. Such limits are arbitrary and do not adequately protect park resources.

Corr. ID: 47 **Organization:** *Not Specified*

Comment ID: 302229 **Organization Type:** Unaffiliated Individual

Representative Quote: I cannot accept your proposal to limit grazing by altitude. Such a proposal does not meet legal requirements for protecting park resources (note that the park does not believe that grazing is appropriate in the middle altitude meadows of the Giant Forest), nor does it protect the scenic and wilderness characteristics of middle altitude wilderness meadows.

Corr. ID: 148 **Organization:** *Not Specified*

Comment ID: 304640 **Organization Type:** Unaffiliated Individual

Representative Quote: The draft alternatives suggest that the primary management tool to completely close meadows to grazing will be by a yet to be determined elevational limit. This is not sufficient to provide for the ecological integrity and aesthetic enjoyment of the meadows that might be below such limits.

Corr. ID: 152 **Organization:** National Forest Recreation Association
Comment ID: 304484 **Organization Type:** Non-Governmental
Representative Quote: Elevational meadow closure is not an appropriate method of management, as it does not address the specific meadow condition itself, nor does it allow for on the ground management by meadow specialists.

TC1000 - General Comments on Topics/Elements Common to All Alternatives

Concern ID: 42842

CONCERN STATEMENT:

Visitors should be educated on how to care for the environment either through online education or additional education strategies and visitor outreach at SEKI.

Representative Quote(s):

Corr. ID: 84 **Organization:** Mt Whitney Hikers Association

Comment ID: 303171 **Organization Type:** Unaffiliated Individual

Representative Quote: Wilderness visitors should be educated. Here's a suggestion: Provide online tests to be taken every few years to certify people understand:

- *the principles of Leave No Trace.
- * which activities cause the most damage
- * how to create a camp site, then "unclear" it so they have not changed things.
- * how to properly dispose of toilet paper.
- * how to carry out all plastic and metal trash (educate people about how long it takes to disappear.)
- * how they can find that sacred "opportunity for solitude" (Hint NOT on a popular trail!)

Corr. ID: 124 **Organization:** *Not Specified*

Comment ID: 303259 **Organization Type:** Unaffiliated Individual

Representative Quote: One key area that I feel is missing from the Preliminary Draft Alternatives is how the public is educated about how to take care of the wilderness. Currently, there are several ways that visitors are educated about what to do and not do when hiking and backpacking. However, despite the signage and the discussion when getting a permit, trash is still left at campsites, campsites are found too close to lakes, campfires are used in prohibited areas, and camping still occurs at trailheads. SEKI needs to come up with additional educational strategies in order to ensure that visitors are doing the best they can to "not leave a trace". SEKI can come up with all sorts of new regulations to manage the wilderness areas, but they won't have any effect if the public hasn't been adequately educated about them and recognizes the importance of following them.

Concern ID: 42843

CONCERN STATEMENT:

There is a need to regulate technology and electronics in wilderness.

Representative Quote(s):

Corr. ID: 7 **Organization:** *Not Specified*

Comment ID: 302179 **Organization Type:** Unaffiliated Individual

Representative Quote: Wilderness regulations should be changed to address the use of electronic entertainment, i.e. iPods or similar devices.

Playing of music or other electronic sounds should not be audible to other wilderness users at any time of day or night. Headphones or earbuds should always be used.

Corr. ID: 40 **Organization:** *Not Specified*

Comment ID: 304248 **Organization Type:** Unaffiliated Individual

Representative Quote: The public review materials and the workshop presentation acknowledged public use of technology in wilderness, but indicated no intention to actively manage that use other than recommend that people consider traveling without technology. I do not have a strong feeling about this; but somehow, it is odd that high-tech complex electronics are more permissible in wilderness than use of the wheel, a technology that has been around for thousands of years.

Concern ID:

**CONCERN
STATEMENT:**

**Representative
Quote(s):**

42844

Regulations put in place in the WSP should be consistent with regulations from the U.S. Forest Service in Sequoia National Forest.

Corr. ID: 60 **Organization:** The Wilderness Society

Comment ID: 302840 **Organization Type:** Unaffiliated Individual

Representative Quote: SEKI and the U.S. Forest Service should strive for consistent management of Kings Canyon and Sequoia National Parks wilderness areas and the adjacent Forest Service wilderness areas (i.e., John Muir Wilderness, Golden Trout Wilderness, Monarch Wilderness and Jenny Lakes Wilderness). While we recognize the differing missions and wilderness regulations of the agencies, management consistency where feasible and appropriate will help reduce visitor confusion and improve management of wilderness resources such as the endangered Sierra Nevada bighorn sheep, which utilize both the national park and adjacent national forest wilderness areas.

Concern ID:

**CONCERN
STATEMENT:**

**Representative
Quote(s):**

42845

Air tours and military flyovers are disruptive and should be minimized or restricted at SEKI.

Corr. ID: 69 **Organization:** *Not Specified*

Comment ID: 302870 **Organization Type:** Unaffiliated Individual

Representative Quote: I do not want to see any air tours over this park like they have in the Grand Canyon, its bad enough with these military flyovers in these mountains. I wish some thing can be done about these low flying jets that happen all the time.

Corr. ID: 124 **Organization:** *Not Specified*

Comment ID: 303260 **Organization Type:** Unaffiliated Individual

Representative Quote: The military overflights are disruptive and significantly decrease the quality of the wilderness experience in SEKI. They are loud, often frequent, and are at complete odds with the characteristics of a wilderness area. They need to be banned from SEKI. In addition, I strongly agree that SEKI should be removed from the air tour list.

Corr. ID: 145 **Organization:** Sierra Club Sierra Nevada Resilient Habitats Campaign

Comment ID: 304389 **Organization Type:** Conservation/Preservation

Representative Quote: We fully support opposition to all wilderness overflights for commercial air tours. We urge the NPS to maintain its current annual quota of zero overflights. And we urge the agency to keep

up its commendable efforts with the military to minimize military overflights below the allowable distance above ground level.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42846

Cultural resources should be addressed in the WSP.

Corr. ID: 124

Organization: *Not Specified*

Comment ID: 303262 **Organization Type:** Unaffiliated Individual

Representative Quote: While the emphasis in this document is on protecting natural resources, the cultural resources located in the Wilderness Area also need to be preserved and protected. These sites include existing cabins, cabin sites, bridges, dams, mines, and mining sites. Visitors need to be educated about protecting these sites. SEKI needs to ensure that these sites are maintained and protected. The preservation and protection of these sites is not at odds with the goals and values of a wilderness area.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42847

There should be a minimum requirement for tools and helicopter use, or alternatives to these items.

Corr. ID: 8

Organization: *Not Specified*

Comment ID: 304849 **Organization Type:** Unaffiliated Individual

Representative Quote: The Park Service should use eco-friendly stock animals to re-supply remote trail crews and ranger stations, instead of expensive and noisy helicopters.

Corr. ID: 40

Organization: *Not Specified*

Comment ID: 304250 **Organization Type:** Unaffiliated Individual

Representative Quote: Furthermore, I propose that the alternatives address "helicopter" versus "stock use" for administrative movement of materials that cannot be carried safely (or reasonably) by backpack. This is another issue that might find distinctions between the alternatives and the management zones.

Corr. ID: 40

Organization: *Not Specified*

Comment ID: 304249 **Organization Type:** Unaffiliated Individual

Representative Quote: The Wilderness Act permits emergency operations which has given managers extensive latitude in dealing with wildfires, SAR, etc. There have been times that I've felt that some of the flights conducted under this loophole in the Wilderness Act reflected an extremely loose interpretation of an emergency.

Corr. ID: 124

Organization: *Not Specified*

Comment ID: 303308 **Organization Type:** Unaffiliated Individual

Representative Quote: I strongly oppose the construction of helicopter landing sites within a wilderness area. Supplies to backcountry rangers should be delivered by stock. Helicopters should only be used in emergency situations.

Corr. ID: 145

Organization: Sierra Club Sierra Nevada
Resilient Habitats Campaign

Comment ID: 304390 **Organization Type:** Conservation/Preservation

Representative Quote: We support a strict interpretation of the minimum tool requirement and oppose the use of helicopters and chainsaws except when absolutely necessary.

Concern ID: 42848
CONCERN STATEMENT: The WSP should provide more stringent guidance for emergencies specific to the various alternatives and management zones.
Representative Quote(s): **Corr. ID:** 40 **Organization:** *Not Specified*

Comment ID: 310602 **Organization Type:** Unaffiliated Individual
Representative Quote: I propose that the WSP provide tighter guidance regarding emergencies specific to the different alternatives and management zones.

Concern ID: 42849
CONCERN STATEMENT: Some trails at SEKI may be eligible for the National Register of Historic Places.
Representative Quote(s): **Corr. ID:** 115 **Organization:** Rainbow Pack Outfitters

Comment ID: 303451 **Organization Type:** Unaffiliated Individual
Representative Quote: Many trails could be considered for the National Register of Historic Places, uniquely traveled on by stock, mule trains, and the people that love them.

Concern ID: 42850
CONCERN STATEMENT: Climate change should be considered in the WSP.
Representative Quote(s): **Corr. ID:** 66 **Organization:** *Not Specified*

Comment ID: 303848 **Organization Type:** Unaffiliated Individual
Representative Quote: That being said you may be over looking one very important fact, which is heavily debated in many circles, and that is global climate change.

Corr. ID: 137 **Organization:** The Wilderness Society

Comment ID: 304272 **Organization Type:** Non-Governmental

Representative Quote: The Wilderness Society would like to see the WSP address how climate change may alter wilderness resources in the future, and what steps the Park Service and its sister agencies will take to manage, alleviate and document the effects of climate change on designated wilderness areas in the central and southern Sierra.

Corr. ID: 145 **Organization:** Sierra Club Sierra Nevada Resilient Habitats Campaign

Comment ID: 304387 **Organization Type:** Conservation/Preservation

Representative Quote: We recognize that climate change will affect the Parks and support monitoring and adaptive management to allow park resources to adapt to the effect of climate change. However, we know that the "untrammelled:" quality of wilderness, the freedom of wilderness lands from human control and manipulation requires restraint in interfering with nature in wilderness areas.

TC1200 - Suggests new Topic for Common to All

Concern ID: 42852
CONCERN STATEMENT: Human porters could be used to carry essential supplies to ranger stations trail crews and resupply locations to help reduce impacts on the

wilderness.

Representative Quote(s): Corr. ID: 165

Organization: Not Specified

Comment ID: 304457 **Organization Type:** Unaffiliated Individual

Representative Quote: The NPS should investigate creation of a human porter option, possibly hiring students or seasonal help to deliver only essential supplies to ranger stations trail crews, and resupply locations. Rotating trail crews should be carrying their own essential supplies to their camps. Initiating human porter supply to the ranger stations and sierra camps, with essential items only, would be a great start and demonstrate commitment to reducing impact on the wilderness. Steaks and beer are clearly non-essential supplies in the wilderness.

TC1300 - Suggests a Topic that would warrant the development of alternatives

Concern ID: 42853

CONCERN STATEMENT: Backcountry ski touring and fastpacking should be considered as topics for future resource planning.

Representative Quote(s): Corr. ID: 105

Organization: Sierra Mountain Guides

Comment ID: 303753 **Organization Type:** Unaffiliated Individual

Representative Quote: It should be understood that backcountry ski touring and fastpacking (ultralight backpacking) are quickly growing activities that should be considered carefully in future resource planning.

TO1000 - Topics Related to Future Planning Efforts

Concern ID: 43037

CONCERN STATEMENT: The WSP should consider rock climbing management, especially the use of fixed anchors.

Representative Quote(s): Corr. ID: 23

Organization: Access Fund

Comment ID: 302376 **Organization Type:** Unaffiliated Individual

Representative Quote: We understand that this WSP will not contain alternatives for managing rock climbing, but that it may provide guidelines for its management.

Wilderness Climbing and Fixed Anchors

The use of fixed anchors is a significant need for climbers and sometimes a concern for land managers, especially in designated wilderness areas. Since 1989, the Access Fund has been working with all of the federal agencies to resolve the issue of how fixed anchors should be managed in wilderness. We also have negotiated directly with land managers and the environmental community to achieve broad support for a national policy which allows, but limits, the use of fixed anchors in wilderness.

Fixed anchors are a significant tool for resource management: they can be strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife in wilderness areas. This function is sacrificed if any use of fixed anchors is prohibited.

In addition to DO 41, NPS can utilize the proven wilderness climbing management plans and policies used by Rocky Mountain, Zion, and Yosemite National Parks as models for SEKI's wilderness.

Corr. ID: 23

Organization: Access Fund

Comment ID: 302742 **Organization Type:** Unaffiliated Individual

Representative Quote: Some level of fixed anchor use must be allowed wherever climbing is allowed. The appropriate level of use should be established on an area-by-area basis. - Climbers guided by clear policy and local ethics, not the government, bear the primary responsibility for determining when to place and re-place fixed anchors and how to use these tools. - The government has authority under the Wilderness Act to permit fixed anchors in wilderness, and this use should be permitted as climbing is one of the unique recreation opportunities wilderness is intended to provide. Allowing the use of fixed anchors, if properly managed, does not degrade wilderness characteristics. - Fixed anchors are a significant tool for resource management: they can be strategically placed to minimize climbing impacts to fragile soils, vegetation, and wildlife in wilderness areas. This function is sacrificed if any use of fixed anchors is prohibited. - The Access Fund supports the ban on power drills in wilderness and actively promotes the concept that in wilderness bolts are a "tool of last resort."

In 1996, the Sawtooth National Forest Supervisor made a controversial decision to prohibit the placement of new fixed anchors in the Sawtooth Wilderness. The Access Fund immediately appealed the decision, and the Forest Service responded by instituting a negotiated rulemaking process to clarify national policy about fixed anchor use in wilderness areas. In 2000, the Secretary of Agriculture established a negotiated rulemaking committee called the Fixed Anchors in Wilderness Negotiated Rulemaking Advisory Committee (the Negotiated Rulemaking Committee). The Negotiated Rulemaking Committee comprised of 23 stakeholders including the Access Fund, Forest Service, National Park Service (NPS), Bureau of Land Management (BLM), and U.S. Fish and Wildlife Service (FWS) was formed to develop recommendations for a proposed rule regarding fixed anchors in designated wilderness.

The Negotiated Rulemaking Committee reached the following consensus:(iii)

- Bolt-intensive climbing is generally incompatible with wilderness. - Leave-no-trace or clean-climbing ethics should be integrated into a rule. - Via a climbing management plan, the limited use of fixed anchors should be allowed. - Crafting a rule allowing fixed anchor use in wilderness is permissible under the Wilderness Act.

Concern ID:

43039

CONCERN

[Well maintained trails should be considered in the plan.](#)

STATEMENT:

Representative Quote(s): **Corr. ID:** 103

Organization: The American Alpine Club

Comment ID: 303824 **Organization Type:** Unaffiliated Individual

Representative Quote: We strongly encourage SEKI to conduct a planning process for both a Climbing Management Plan (CMP) and Trails Management Plan (TMP) following the adoption of a new WSP in order to sufficiently address the management of climbing opportunities and access in these parks. As guidance from Director's Order #41 becomes finalized by the Washington Office, we support park planners in integrating guidelines pertaining to the management of fixed anchors in wilderness climbing areas. In addition, proven strategies from other NPS units such as Rocky Mountain, Zion, and Yosemite National Parks serve as effective models for SEKI. The AAC remains committed to supporting

park planners in developing these guidelines further, engaging our members in CA to provide input to this planning process, and educating climbers about SEKI's new policies.

Corr. ID: 107 **Organization:** *Not Specified*

Comment ID: 303673 **Organization Type:** Unaffiliated Individual

Representative Quote: Trail maintenance reduces resource problems. Well maintained trails reduce water erosion which is the number one problem. The Plan should encourage spending more money for Park staff to maintain and improve trails.

Concern ID: 43040

CONCERN STATEMENT: Management consistency with the park and the adjacent National Forest wilderness will improve management of resources.

Representative Quote(s): **Corr. ID:** 137 **Organization:** The Wilderness Society

Comment ID: 304269 **Organization Type:** Non-Governmental

Representative Quote: SEKI and the U.S. Forest Service should strive for consistent management of Kings Canyon and Sequoia National Parks wilderness areas and the adjacent Forest Service wilderness areas (i.e., John Muir Wilderness, Golden Trout Wilderness, Monarch Wilderness and Jenny Lakes Wilderness).

Corr. ID: 137 **Organization:** The Wilderness Society

Comment ID: 304270 **Organization Type:** Non-Governmental

Representative Quote: While we recognize the differing missions and wilderness regulations of the agencies, management consistency where feasible and appropriate will help reduce visitor confusion and improve management of wilderness resources such as the endangered Sierra Nevada bighorn sheep, which utilize both the national park and adjacent national forest wilderness areas.

TR1000 - General Comments on Trail, bridges, signs

Concern ID: 42856

CONCERN STATEMENT: The trails at the park are not being maintained properly.

Representative Quote(s): **Corr. ID:** 5 **Organization:** *Not Specified*

Comment ID: 302175 **Organization Type:** Unaffiliated Individual

Representative Quote: The way the trails are maintained. The trails are overly engineered and continuously improved by adding endless switchbacks and huge steps even in fairly gentle areas and then rubble is put on the trail in other areas. These improvements might make travel easier for stock, but they make it more difficult for humans and encourage humans to people to walk outside the trail and cut switchbacks. This method increases the impact of human travel in the wilderness.

Corr. ID: 8 **Organization:** *Not Specified*

Comment ID: 302182 **Organization Type:** Unaffiliated Individual

Representative Quote: The conditions on most trails I've used in recent years have gotten worse, not better. I rarely see a Trail Crew. Primary trails (e.g. from the Mineral King Valley over Franklin Pass into Rattlesnake Canyon) should be maintained so as to permit safe travel by both backpackers and stock animals. Signs should be more prevalent and welcoming.

Concern ID: 42860

CONCERN STATEMENT: Signs in the wilderness should be banned, limited, and/or wooden only; the WSP should also analyze the effects of including signs along the wilderness boundary.

Representative Quote(s): **Corr. ID:** 25 **Organization:** *Not Specified*

Comment ID: 302384 **Organization Type:** Unaffiliated Individual

Representative Quote: Advertising and signage that would accompany any venture must be banned...the park doesn't need any sort of "intervention" to enhance the outdoor experience.

Corr. ID: 69 **Organization:** *Not Specified*

Comment ID: 302872 **Organization Type:** Unaffiliated Individual

Representative Quote: Trails: I like to see Class 2 trails throughout the park. And I would only like to see signs at trail junctions and trailheads only not on passes, peaks, and meadows.

Corr. ID: 86 **Organization:** *Not Specified*

Comment ID: 304055 **Organization Type:** Unaffiliated Individual

Representative Quote: Signing. The plan/alternatives should address whether the wilderness boundary will be signed. Many visitors aren't aware when they are in the wilderness, particularly when they are relatively near the frontcountry. There are park employees who are also unaware that they are working in the wilderness. It's hard to appreciate or be a steward of a resource unless you are aware that it is there and you are in it. I think that the wilderness boundary should be signed in all the alternatives; this should be a feature common to all the action alternatives.

Corr. ID: 102 **Organization:** *Not Specified*

Comment ID: 303366 **Organization Type:** Unaffiliated Individual

Representative Quote: SIGNS - Historically, all signs have been wooden and i believe that the park should continue on that basis. Signs in the back country/wilderness should be kept to a minimum. All other current management practices should continue

Concern ID: 42861

CONCERN STATEMENT: Signage should be used in the wilderness, and more signage should be added.

Representative Quote(s): **Corr. ID:** 74 **Organization:** *Not Specified*

Comment ID: 302894 **Organization Type:** Unaffiliated Individual

Representative Quote: I am in favor of more signage and better maintained trails within the parks.

Concern ID: 42862

CONCERN STATEMENT: Regarding trails, the term "abandoned" should be defined in the WSP.

Representative Quote(s): **Corr. ID:** 55 **Organization:** *Not Specified*

Comment ID: 302744 **Organization Type:** Unaffiliated Individual

Representative Quote: I do, however, have a comment related to trails. One statement refers to "abandoned" trails, but the term "abandoned" is not defined. It is also not clear what criterion are used for declaring a trail "abandoned". I have seen some trails in the Sierra "abandoned" because they are not maintained properly. The lack of maintenance results in the lack of use which results in the trail being declared "abanonded". A government agency should not be allowed to declare a trail abandoned

because it cannot maintain it. Since the term "abandoned" is used in the "common to all action alternatives", it should be defined.

Concern ID: 42863

CONCERN STATEMENT: The WSP should have a trail and bridge classification system in order to develop a plan for maintenance.

Representative Quote(s): **Corr. ID:** 99 **Organization:** *Not Specified*

Comment ID: 304112 **Organization Type:** Unaffiliated Individual

Representative Quote: Trails, Bridges, and Signs: I would think that trails have to have some sort of classification, so one can develop a plan on when to do maintenance on them. Bridges would be the same. But signs, I think they should keep the historic feel of the old ones as much as humanly possible.

Concern ID: 42864

CONCERN STATEMENT: Currently trails are in acceptable shape and are not overused.

Representative Quote(s): **Corr. ID:** 35 **Organization:** citizen

Comment ID: 304057 **Organization Type:** Unaffiliated Individual

Representative Quote: Except for the heavily traveled main trails such as the John Muir and a few miles in from trail heads, most of the trails are sparsely traveled and there is little interaction with other hikers or packers.

Corr. ID: 38 **Organization:** *Not Specified*

Comment ID: 304130 **Organization Type:** Unaffiliated Individual

Representative Quote: I don't feel that trails are overused or eroded or excessive in size due to overuse.

Concern ID: 42991

CONCERN STATEMENT: Commercial pack trips often contribute to trail maintenance efforts and help improve trails.

Representative Quote(s): **Corr. ID:** 12 **Organization:** *Not Specified*

Comment ID: 302209 **Organization Type:** Unaffiliated Individual

Representative Quote: On our pack stock trip from Tuolumne to Twin Lakes this past July, a section of trail at Benson Lake was littered with hundreds of downed trees that the Park Service hadn't yet cleared. It was very difficult and dangerous for backpackers to traverse (as communicated by backpackers we met on the trail) and impossible for pack stock. Our head wrangler made the decision to change our itinerary so he could clear the trail. Along with his assistant and an axe, they cleared the trail of downed trees from the base of Benson to the top of the pass, improving access for all users in the back country at that time.

Corr. ID: 14 **Organization:** Long time avid backpacker & stock assisted hiker

Comment ID: 302232 **Organization Type:** Unaffiliated Individual

Representative Quote: I can tell you that these outfits have always been courteous and respectful of others using the trails. The packers have on many occasions been out doing trail maintenance on our layover days. This above and beyond action that shows their commitment to these public lands.

TR1300 - Suggests new or change in alternative(s) for Trail, bridges, signs

Concern ID: 42865

CONCERN STATEMENT: Designating trails as "foot traffic/hiker" only would discriminate and preclude certain visitors from having the same wilderness experience as hikers.

Representative Quote(s): **Corr. ID:** 107 **Organization:** *Not Specified*

Comment ID: 303671 **Organization Type:** Unaffiliated Individual

Representative Quote: The Wilderness was created for both hikers and riders. There shouldn't be separate trails for hikers and riders. All of the Park should be open to all users.

Corr. ID: 152 **Organization:** National Forest Recreation Association

Comment ID: 304473 **Organization Type:** Non-Governmental

Representative Quote: Any deviation from the current trail system should be thoroughly analyzed through NEPA. This analysis is needed due to the historical importance of the trail system including the construction, the uses, and future needs. Trails should not be exclusively reserved for one type of wilderness user, with the exception of the Mt. Whitney Trail from Whitney Portal to the Summit, where stock use is currently not allowed. There should not be any 'hiker only' trails. That would preclude users who need to travel by pack and saddle stock due to disabilities from having the same experience as able bodied visitors. This would most certainly create a sense of discrimination. Granting exclusive privileges to certain user groups is generally not an acceptable Park Service practice.

Concern ID: 42867

CONCERN STATEMENT: Not all abandoned trails should be restored to natural conditions, and therefore this action should not be encompassed under the "common to all alternatives" section.

Representative Quote(s): **Corr. ID:** 55 **Organization:** *Not Specified*

Comment ID: 302745 **Organization Type:** Unaffiliated Individual

Representative Quote: Perhaps trails should be treated as other man-made historical structures in the wilderness such as the Pear Lake Ski Hut, Redwood Canyon cabin, etc. One of the "common to all action alternatives" states that "abandoned" trails can be restored to the natural conditions. This is fine for trails that have to be rerouted to protect the natural conditions, but should not be a "common to all" alternative for other "abandoned" trails. Such trails are part of the park's history, just like other man-made structures. I have had opportunities to reflect on the park's history, while hiking cross country in sections of the park that once had trails, to come across very short sections of the "abandoned" trails. Had these "abandoned" trails been restored to natural conditions as the "common to all alternatives" states, this historical record would have been destroyed.

WC1000 - General Comments on Wilderness Character

Concern ID: 42868

CONCERN STATEMENT: Some elements of the WSP that are not consistent with the Wilderness Act and would degrade wilderness character include stock use, campfires,

and large party size.

Representative Quote(s): **Corr. ID:** 60

Organization: The Wilderness Society

Comment ID: 302838 **Organization Type:** Unaffiliated Individual

Representative Quote: Wilderness character should be preserved across the broad spectrum of proposed management "zones" for the SEKI wilderness, and we appreciate SEKI's acknowledgement of this fundamental requirement for the management of our nation's wilderness areas.

Corr. ID: 112

Organization: *Not Specified*

Comment ID: 303549 **Organization Type:** Unaffiliated Individual

Representative Quote: During the scoping for this Plan you asked the public to comment on what types of activities do you consider important and appropriate in wilderness? The answer, not my answer but rather the answer of the framers and enactors of the Wilderness Act, is activities that require self-reliance, humility, respect for nature, strength, planning, and perseverance are appropriate. Activities that provide for the convenience and comfort of visitors are inappropriate. Activities that infringe on opportunities for solitude or that impact wilderness character are inappropriate. Activities that infringe on the experience of other visitors, including those to come in the future are inappropriate. Activities that are based on outdated and refuted notions of wilderness and how to recreate in the wild (e.g., expecting to have campfires no matter what, especially at inappropriately high elevations; expecting to fish in waters where fish were never present naturally and their presence impacts native fauna; expecting to be able to graze non-native packstock and allow them to defecate in the water we drink) are inappropriate. Administrative activities that do not rely on the minimum tool are inappropriate (e.g., using helicopters to transport people or gear when it could be done by backpacking or with stock; using chainsaws or drills to maintain and construct trails when non-mechanical methods would suffice). Administrative activities that provide for the economy and convenience of agency staff, but that are unnecessary to protect wilderness character, are inappropriate. I do not see in the preferred action of your "Plan" that you have proposed meaningful restrictions on any of these inappropriate activities.

Corr. ID: 117

Organization: Sierra Club Tehipite Chapter

Comment ID: 303390 **Organization Type:** Unaffiliated Individual

Representative Quote: Restricting high-altitude fires, the proliferation of permanent campsites, large stock parties, and other damaging practices is entirely appropriate to preserve the quality and character of the wilderness.

Concern ID:

42869

CONCERN

STATEMENT:

Wilderness character should be paramount to the WSP, and no activities that alter wilderness should be allowed.

Representative Quote(s): **Corr. ID:** 112

Organization: *Not Specified*

Comment ID: 303500 **Organization Type:** Unaffiliated Individual

Representative Quote: There is only one lawful and effective strategy for protecting wilderness resources: always protect wilderness character. By this I mean no human activity should be permitted that encroaches on and alters natural functions and processes within the wilderness, nor that thwarts opportunities for solitude and primitive, unconfined recreation. Wilderness designation is a profound expression of humility that acknowledges that we should allow certain areas of the planet to exist free

of human interference and manipulation.

Concern ID: 42870

CONCERN STATEMENT: Biological research in the wilderness is compromising wilderness character, and more appropriate research methods could be employed.

Representative Quote(s): **Corr. ID:** 112 **Organization:** Not Specified

Comment ID: 303657 **Organization Type:** Unaffiliated Individual

Representative Quote: I am also specifically concerned that Park biologists and the California Department of Fish and Game are using frontcountry approaches and methods to study and manipulate wildlife populations in the SEKI Wilderness. More wilderness-appropriate methods could and should be used. The Park Service should not be using helicopters and GPS collars to monitor bighorn sheep, nor poisoning lakes to eradicate fish planted by predecessor biologists. In wilderness, wildlife conservation and management requires a different calculus than in the frontcountry. Preserving single species is not paramount; preserving wilderness character is.

Concern ID: 42871

CONCERN STATEMENT: Trammeling is a concern in the wilderness.

Representative Quote(s): **Corr. ID:** 40 **Organization:** Not Specified

Comment ID: 304245 **Organization Type:** Unaffiliated Individual

Representative Quote: However, in some cases, the WSP needs to set the context for the RSP [Resource Stewardship Plan]. Ideally, these two documents would be developed jointly and concurrently. As an example of how these documents need to work together, consider non-native species management, a topic that showcases the potential conflict between two of the legally defined characteristics of wilderness - natural versus untrammelled. Removing non-native species involves a high level of trammeling, and some organizations are offended at the park engaging in such activities. Without such trammeling, some of the wilderness communities are far from "natural". The WSP needs to provide clear policy on circumstances/geographic locations/etc where the need for managing introduced species takes priority over the need for "untrammelled", as well as identify circumstances where "untrammelled" might be a priority, if anywhere.

ZO1000 - Comments on Zoning

Concern ID: 42872

CONCERN STATEMENT: The wilderness should not be zoned since all wilderness should be managed with the same goals.

Representative Quote(s): **Corr. ID:** 59 **Organization:** Great Old Broads for Wilderness

Comment ID: 302833 **Organization Type:** Unaffiliated Individual

Representative Quote: In your development of management strategies you are framing issues via "zones" that would allow for varying amounts of use or management or permitted degradation. While the rationale may be sound we would ask to refrain from "zoning" the wilderness. This sort of tiered labeling and management may lead to de facto "classes" of wilderness with some areas being sacrificed and others elevated to higher protections.

Corr. ID: 107 **Organization:** *Not Specified*
Comment ID: 303665 **Organization Type:** Unaffiliated Individual
Representative Quote: First, zoning is inconsistent with the Wilderness Act. Wilderness should be managed with the same standards whether it is one mile from the roadhead or thirty miles in the middle of the Park.

Corr. ID: 145 **Organization:** Sierra Club Sierra Nevada Resilient Habitats Campaign
Comment ID: 304394 **Organization Type:** Conservation/Preservation
Representative Quote: Sierra Club opposes the "zoning" of wilderness, and we urge the Sequoia/Kings Canyon Wilderness Stewardship plan to refrain from "zoning" wilderness. Compartmentalizing wilderness into "zones" of differing amounts of use of levels requiring different levels of intense management or amounts of degradation permitted may be well-meaning but it can lead too easily to allowing inappropriate uses in the "lesser" zones, and managers thinking -- it's ok here as long as we keep it out of the most protective, or remote zones. This can lead to de facto higher "classes" and lower of wilderness. Well, the Wilderness Act doesn't call for different classes or zones of wilderness.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42873
The proposed zoning should not be adopted because the definition of the zones is too confusing or complicated, and needs to be simplified.
Corr. ID: 61 **Organization:** *Not Specified*

Comment ID: 302847 **Organization Type:** Unaffiliated Individual
Representative Quote: Both the Zoning idea and the Preliminary Alternatives are so confusing and deceptive that they should both be replaced with rules for protecting the whole wilderness that are easy to understand and enforce.

Corr. ID: 159 **Organization:** *Not Specified*

Comment ID: 304539 **Organization Type:** Unaffiliated Individual
Representative Quote: Instead, the draft alternatives are cluttered with excessive details about which areas in which zones might be open or closed to stock use. One would have to spend weeks to decipher these tables. You need to simplify the zoning structure (trail and off-trail areas), specify general stock management prescriptions for these two zones, and include multiple alternatives that prohibit stock (or grazing) entirely.

Corr. ID: 175 **Organization:** *Not Specified*

Comment ID: 304578 **Organization Type:** Unaffiliated Individual
Representative Quote: The proposed zoning scheme is too complicated. All trails should be equally accessible, except some trails should be for foot travel only so hikers can be free of stock which are an unnatural presence in wilderness.

Concern ID:
CONCERN
STATEMENT:
Representative
Quote(s):

42874
The zoning regulations in the WSP should be adopted, as these regulations would guide appropriate research and monitoring for different areas.
Corr. ID: 40 **Organization:** *Not Specified*

Comment ID: 304246 **Organization Type:** Unaffiliated Individual
Representative Quote: Two more topics for which the WSP needs to provide contextual policy are research and monitoring. Again, the RSP and other documents will contain the details of these activities, but the

WSP needs to address those aspects that result in significant (and sometimes long-lasting) discussions regarding the propriety of various research and monitoring activities.

The WSP might broadly define what types of research are appropriate for the different management zones under each alternative. I was very pleased with the parks management zones, and I think that they could become integral to recognizing the types of research/monitoring allowed in various areas. For instance, the day-use zone (Zone A) might tolerate research that would not be acceptable in the cross country zone (Zone D), even though all research needs to be compatible with the Wilderness Act. The park might simply set a higher standard for research in Zone D than in Zone A.

APPENDIX A: CORRESPONDENCE INDEX OF ORGANIZATIONS

Note: In many instances, the organization type was not defined by the commenter; therefore, organizations were listed as “Unaffiliated Individuals”.

Correspondence ID	Form Letter	Name	Organization
Federal Government			
187	No	Exline, John D.	Sierra National Forest
Business			
105	No	Schwartz, Howie	Sierra Mountain Guides
115	No	Allen, Greg and Ruby	Rainbow Pack Outfitters
129	No	Shew, Diane	Balch Park Pack Station
132	No	Parker, Robert SP	Sierra Mountain Center
136	No	Garden, Kevin R.	The Garden Law Firm, P.C.
149	No	Horan, Anthony	Alpine Urology
Conservation/Preservation			
145	No	Fontaine, Joe	Sierra Club (Sierra Nevada Resilient Habitats Campaign)
155	No	Proescholdt, Kevin	Wilderness Watch
Non-Governmental			
60	No	Miller, Sally	The Wilderness Society
137	No	Miller, Sally	The Wilderness Society
Recreational Groups			
23	No	Pascoe, R.D.	Access Fund
51	No	Massey, Scott	American Mountain Guides Association
76	No	Keyes, John R	California Equestrian Trails and Lands Coalition
100	No	McGlenn, Mike	Back Country Horsemen of America
103	No	Goldberg, Leigh	The American Alpine Club
110	No	Steindorf, Dave	American Whitewater
143	No	Browning, Peter	High Sierra Hikers Association
144	No	Goldberg, Leigh	The American Alpine Club
147	No	Pascoe, R.D.	Access Fund
152	No	Reese, Marily	National Forest Recreation Association
University/Professional Society			
142	No	Derlet, Robert W., MD and Charles R. Goldman, PhD	UC Davis Medical Center

Correspondence ID	Form Letter	Name	Organization
Unaffiliated Individual			
2	No	Bissiri, Mark H	Individual
3	No	Taylor (nee Reynolds), Michele R	MKDA
14	No	Evans, Robert W	Long time avid backpacker & stock assisted hiker
17	No	Elman, Ian	Southern Yosemite Mountain Guides
18	No	Johnen, Carrie	Backcountry Horsemen of California
19	No	Murray, Ken	University of Southern California (USC)
27	No	Draeger, Loree	CA State Parks Foundation; Tahoe Rim Trail Association; Tuesday Hikers
33	No	Ficklin, Billy	Retired
35	No	Williams, Marilyn F	Citizen
43	No	Schinnerer, Marvin L	Sierra Club
44	No	Vasavada, Ravindra C	Self
48	No	Rosenfeld, Judy	Sierra Club
53	No	Johnston, William H	High Sierra Hikers Association
59	No	Chilcoat, Rose	Great Old Broads for Wilderness
62	No	Kanter, Fred	High Sierra Hikers Association
63	No	Leonti III, Phillip D	None
78	No	Kept Private	Sierra Club
84	No	Cosner, Steve	Mt Whitney Hikers Association
87	No	Blais, Susan	Sierra Club
89	No	Cunningham, John	High Sierra Packers Ass.
97	No	Merritt, Karen	Sierra Club
117	No	Turner, Robert S	Sierra Club Tehipite Chapter
186	No	Anthes, David	None

APPENDIX B. INDEX BY ORGANIZATION TYPE

Note: N/A represents individuals who did not submit their first or last name.

Correspondence ID	Form Letter	Organization	Name
1	No		Volmer, Larry
2	No	MARK BISSIRI INDIVIDUAL	Bissiri, Mark H
3	No	MKDA	Taylor (nee Reynolds), Michele R
4	No		Conforti, Susan S
5	No		Wing, Kathleen T
6	No		Duncan, Dan
7	No		Hengst, Alice
8	No		Reynolds, Brian A
9	No		Frazier, Joyce
10	No		N/A, N/A
11	No		N/A, N/A
12	No		Hawkins, Sue
13	No		Bedor, Mark
14	No	Long time avid backpacker & stock assisted hiker	Evans, Robert W
15	No		Kay, Bernadette
16	No		Neumann, David A
17	No	Southern Yosemite Mountain Guides	Elman, Ian
18	No	Backcountry Horsemen of California	Johnen, Carrie
19	No	Univ Southern Calif (USC)	Murray, Ken
20	No		Bissiri, Ellen N
21	No		Bissiri, Ellen N
22	No		Bissiri, Ellen N
23	No	Access Fund	Pascoe, R.D.
24	No		Burdick, John R
25	No		Dalgleish, Kenneth H
26	No		Johnson, Ann
27	No	CA State Parks Foundation; Tahoe Rim Trail Association; Tuesday Hikers	Draeger, Loree
28	No		Chavous, Linda
29	No		Heisey, Gail G
30	No		Little, Kathryn
31	No		McLaughlin, Robert J
32	No		Luxenberg, Diana L
33	No	RETIRED	Ficklin, Billy
34	No		Ace, John B
35	No	citizen	Williams, Marilyn F
36	No		Brauer, Laurence
37	No		Christenson, Brent
38	No		DeWind, S. Victoria
39	No		N/A, N/A
40	No		Werner, Harold W
41	No		King, C. Judson

Correspondence ID	Form Letter	Organization	Name
42	No		Hammill, Richard
43	No	Sierra Club	Schinnerer, Marvin L
44	No	self	Vasavada, Ravindra C
45	No		Kawamoto, Thomas M
46	No		Rosenquist, Bobbi P
47	No		Tweed, William
48	No	Sierra Club	Rosenfeld, Judy
49	No		Williams, Michael L
50	No		Williams, Michael L
51	No	American Mountain Guides Association	Massey, Scott
52	No		Dachel, Susan
53	No	High Sierra Hikers Association	Johnston, William H
54	No		Merriman, Mary
55	No		Terkelsen, Lee
56	No		N/A, N/A
57	No		Stephens, Norman R
58	No		Kilgour, Kimberly
59	No	Great Old Broads for Wilderness	Chilcoat, Rose
60	No	The Wilderness Society	Miller, Sally
61	No		N/A, N/A
62	No	High Sierra Hikers Association	Kanter, Fred
63	No	none	Leonti III, Phillip D
64	No		Brauer, Laurence
65	No		N/A, N/A
66	No		Kunstmann, Eugen G
67	No		N/A, N/A
68	No		Healy, Mary L
69	No		Hylton, Steve A
70	No		Brettell-Vaughn, Marianne
71	No		Hiemstra, Raymond
72	No		Grove, David M
73	No		Assereto, Andy J
74	No		Reynolds, Les H
75	No		Main, Deborah L
76	No	California Equestrian Trails and Lands Coalition	Keyes, John R
77	No		Brown, Jill
78	No	Sierra Club	Kept Private
79	No		Wegner, Betsy
80	No		Harris, Sid A
81	No		Reden, Brent W
82	No		Wegner, David
83	No		Cook, David
84	No	Mt Whitney Hikers Association	Cosner, Steve
85	No		N/A, N/A
86	No		Austin, John
87	No	Sierra Club	Blais, Susan
88	No		Vogel , Todd
89	No	High Sierra Packers Ass.	Cunningham, John
90	No		Pennington, Gena C

Correspondence ID	Form Letter	Organization	Name
91	No		Gossweiler, Ron
92	No		Devol, Sharon
93	No		Dixon, Shirley
94	No		Keenan, Joanne
95	No		Heimer, Warren H
96	No		Heimer, Warren H
97	No	Sierra Club	Merritt, Karen
98	No		Welch, Juliet
99	No		Cochrun, Ann M
100	No	Back Country Horsemen of America	McGlenn, Mike
101	No		N/A, N/A
102	No		Cochrun, Mary G
103	No	The American Alpine Club	Goldberg, Leigh
104	No		Carlson, Jim
105	No	Sierra Mountain Guides	Schwartz, Howie
106	No		Kalish, Stephen
107	No		London , Craig A
108	No		Kumano, Ralph F
109	No		Farrell, Sean
110	No	American Whitewater	Steindorf, Dave
111	No		Bennett, Diane
112	No		Kane, Jeffrey M
113	No		Ralston, Jim
114	No		Inkley, Benson
115	No	Rainbow Pack Outfitters	Allen, Greg and Ruby
116	No		Zusman, Ami
117	No	Sierra Club Tehipite Chapter	Turner, Robert S
118	No		Kept Private
119	No		Anderson, Steve A
120	No		Rodrigues, Steven
121	No		Rasmussen, Marcia & John
122	No		N/A, N/A
123	No		Chisholm, Sarah
124	No		N/A, N/A
125	No		Clark, Malcom
126	No		Kaminski, Joe
127	No		Kennedy, Ronald Douglas
128	No		Nelson, James
129	No	Balch Park Pack Station	Shew, Diane
130	No		Dormanen, Susan
131	No		Helms, John
132	No	Sierra Mountain Center	Parker, Robert SP
133	No		Akagi, Joan
134	No		Harford, Greg
135	No		Stephens, Norman
136	No	The Garden Law Firm, P.C.	Garden, Kevin R
137	No	The Wilderness Society	Miller, Sally
138	No		Valentine, William L
139	No		Cole, Stephen
140	No		George, Roy

Correspondence ID	Form Letter	Organization	Name
141	No		Oakeshott, Jeanne
142	No	UC Davis Medical Center	Derlet, MD and Goldman, PhD, Robert W. and Charles R.
143	No	High Sierra Hikers Association	Browning, Peter
144	No	The American Alpine Club	Goldberg, Leigh
145	No	Sierra Club Sierra Nevada Resilient Habitats Campaign	Fontaine, Joe
146	No		Edlund, David
147	No	Access Fund	Pascoe, R.D.
148	No		Durkee, George
149	No	Alpine Urology	Horan, Anthony
150	No		Benner, Joan
151	Yes (815962)		Anthes, David
152	No	National Forest Recreation Association	Reese, Marily
153	No		Uyehara, Marilyn
154	No		Uhlig, Roger
155	No	Wilderness Watch	Proescholdt, Kevin
156	No		Bush, Derek
157	No		Hadley, Mary Lou
158	No		Anderson, Steven A
159	Master		N/A, N/A
160	No		Douglas, Renee
161	No		Otter, John
162	No		Gebhart, Ann
163	No		Pisani, Mary Alice
164	No		Felciano, Celeste
165	Yes (815962)		Douglas, Graham
166	No		Holden, Ellen
167	No		Cole, Gerald
168	No		Kane, Jeffrey M
169	No		Lindsey, I.E.
170	Yes (815962)		Stevens, Mark
171	No		DeRidder, Mitch
172	No		Godin, RJ
173	Yes (815962)		Lindsey, I.
174	Yes (815962)		Pellegrin, Ph.D., Lisa C
175	No		Robbins, Jack
176	Yes (815962)		Talbert, Robert
177	No		Visher, David
178	No		Wuerthner, George
179	No		Pellegrin, Ph.D., Lisa C
180	Yes (815962)		Rudolph, Lucy
181	No		Rudolph, Lucy

Correspondence ID	Form Letter	Organization	Name
182	Yes (815927)		Spence, Brian
183	Master		Whitaker, Howard J
184	No		Whitaker, Howard J
185	No		Young, Bradley L
186	No		Anthes, David
187	No	Sierra National Forest	Exline, John D.
188	No		Selke, Alia
189	No		Spence, John and Donna
190	No		Braun, Jonathan
191	No		Pennington, Paula
192	No		Pottinger, Dallas
193	No		Sinclair, Jane
194	No		Hicks, Charles
195	No		Thaw, Steven
196	No		Early, Diane
197	No		Redmon, Floyd
198	No		Clum, Carole
199	No		Pasturel, Marc and Ragni
200	No		Hoffmann, Janet
201	No		Wheeler, Bryce and Wilma