

# Enclosure 4



## United States Department of the Interior

NATIONAL PARK SERVICE  
Sequoia and Kings Canyon National Parks  
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Three Rivers, California 93271-9651  
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IN REPLY REFER TO:

N1623

June 27, 2005

Trail and Commercial Pack Stock Draft EIS  
Inyo National Forest  
351 Pacu Lane, Suite 200  
Bishop, CA 93524

To Whom It May Concern:

Thank you for the opportunity to comment on the *Draft Environmental Statement (DEIS) for Trail and Commercial Pack Stock Management in the Ansel Adams and John Muir Wildernesses*. Thank you also for the extension of the comment period which has allowed us to be thorough in our review of the document. This document is obviously the result of much effort and shows significant professional input of the contributing personnel. Much of the information you have compiled will likely prove valuable to Sequoia and Kings Canyon National Parks (SEKI) in the future as we take steps toward developing our Wilderness Stewardship Plan. It is very evident that you are striving to meet the mandates of your mission of preserving the wilderness resource and character while allowing for appropriate use of the wildernesses. The DEIS and plan treat the issue of commercial stock use fairly and appropriately by recognizing that stock use is traditional and reasonable in the wilderness environment, but that control and regulation is necessary to ensure these areas will remain "*unimpaired for future use and enjoyment as wilderness*." We believe that you have found a good balance of use and preservation and that your DEIS is thorough and your plan takes appropriate steps and has the flexibility to adjust as conditions change and as more information is gathered.

We fully support you in your efforts to provide controls of those activities which have the potential for unacceptable impacts in the fragile wilderness environment. We thank you for implementing controls that assist us in assuring the preservation of the wilderness within these parks. We appreciate the fact that you continue to assist us by implementing a variety of wilderness preservation measures that support us in our mission, such as issuing permits and providing SEKI specific information including regulations and practices for overnight users of these parks who enter through the forest, both stock users and hikers. As you know, we often face the same situations and we also must work to assure that uses are sustainable and do not generate any level of impairment to wilderness resources or character. Our comments below speak to those areas of the DEIS and plan that we feel may have effects on the resources and management of these parks, either directly or indirectly. We request that you strongly consider these comments for inclusion in your final action in order to provide for the continued protection of the wilderness resources of Sequoia and Kings Canyon National Parks. We have

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also included some comments as they relate to Devils Postpile National Monument, as the management of that site is overseen by these parks.

We have reviewed the DEIS and find that there are aspects of different alternatives that we prefer and others that we do not feel are in the best interests of wilderness preservation. These parks have a preference for Alternative 2 on the whole. We believe that destination quotas may provide better options for assuring wilderness preservation, and that the treatment of trails is more appropriate. Our comments on what we feel are relevant aspects follow.

Some specific aspects that we support include:

- The designation of specific stock campsites. We believe this will assure that impacts are controlled and limited to specific areas, and do not increase and spread over wider areas.
- The establishment of primary operating areas. This will assure that operators will have a good knowledge of the geography and conditions of their area, allowing them to minimize impacts.
- The continued closure of the Mt. Whitney trail to private and commercial stock use. The high levels of use and confining topography of this trail do not allow for safe use by both stock and hikers.
- The continuance of issuance of wilderness permits directly by the USFS or specific designated contractor. We believe that the agency should be responsible to assure proper and thorough information, which can change frequently, is being communicated with each permit. We do not support operator issued permits.

Some specific aspects that we do not support are:

- The practice of "sanding." This activity poses several risks, including the introduction of materials to areas where they are not found, and the potential for excavation of materials from "borrow" areas. In other words it is not environmentally sound to bring in outside material or to "borrow" and displace local material to simply speed up accessibility.
- The practice of packing in charcoal and firewood. We strongly oppose the packing in of firewood or charcoal to areas where fires are generally prohibited. This practice would pose a myriad of problems and will not be allowed in SEKI. The practice takes significant risks with minimal rewards at best. By bringing in firewood, there is a risk of importing non-native, and potentially harmful, pathogens and materials, e.g. weed seeds. There is also a compliance issue in that coals/ashes may be dumped counter to instructions to remove these materials. We believe that ecological values should not be subservient to economic values. This practice would have other effects as well, including requiring additional stock to carry the wood/charcoal (which would increase impacts and costs to clients), the false impression that fires are allowed in what are supposed to be "closed" areas to other user groups, and the potential dissatisfaction of those other user groups who subject themselves to citations and may feel that a double-standard exists for the benefit of a commercial entity. On page D-37 of the DEIS, a US Forest Service policy states: *"Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness."* We feel that the packing in of wood or charcoal is not in the best interest of preserving the wilderness resource and urge you to continue with the

decision made in the 2001 Wilderness Management Plan to *"Prohibit. . . packed in firewood, or fire pans within areas closed to wood campfires."*

- The classification of Trail 3004C, Lamarck Col, as Trail Class 2. We previously communicated our concern that stock support will contribute to the amount of use over the Col and into a fragile and untrailed area of Kings Canyon National Park. This area has received notable resource impacts, including multiple braided use trails and user-built cairns, and a demand for emergency medical services to people who become injured due to their ability not meeting the technical nature of the route. Though the level of use facilitated by stock may seem small, we believe that each incremental effect adds up to an undesirable cumulative impact. We again encourage you to designate Trail 3004C as "Trail Class 1\*, Not Suitable for Commercial Stock."
- The non-treatment of commercial stock use over Cottonwood Pass. With the controls proposed in all alternatives, we fully expect that commercial stock operators will at times seek other areas in which to operate. This will have an effect on SEKI, specifically in the area of Cottonwood Pass in the Golden Trout Wilderness. We have seen an increase near 50% of commercial stock use in the meadows of Sequoia National Park in this area after the implementation of the 2001 plan (for the years 2002-2004), which utilized service days. We do not feel this level of use is sustainable. We would urge you to incorporate the Cottonwood Pass Trail in this analysis and alternative process, specifically as it pertains to any service days allotted to those operators who receive outfitter-guide permits (as opposed to resort permits). Though the Golden Trout and John Muir Wildernesses have a distinct political border, we do not feel that this border should preclude you from incorporating decisions that are directly related to this proposed action. If Alternative 2 is chosen, Cottonwood Pack Station would be the primary operator, and we would expect destination quota numbers similar to those for Sequoia Kings Pack Trails and Kearsarge Pass. If Alternative 3 is chosen, we would expect quota numbers also similar to Kearsarge Pass for commercial stock, and retaining the quota for the general public of 40 (or less).
- The absence of analysis for commercial stock use over New Army Pass. Currently operators leaving the Horseshoe Meadow area prefer utilizing Cottonwood Pass, but if controls were put on Cottonwood Pass, some operators may seek to enter SEKI via New Army Pass. New Army and Cottonwood passes should be considered together to assure appropriate levels of use are determined. This is more of an issue if Alternative 3 is chosen which controls the area via a general trailhead quota, and less of an issue if Alternative 2 is chosen. It appears that if Alternative 2 is chosen, no commercial use would be permitted over New Army Pass as the destination is Cottonwood Basin. We would support only a very small amount of commercial use over New Army Pass.
- The holding of exit quota spots, from Trail Crest east, for commercial operator clients as specified for Alternative 3. We feel that all visitors should compete equally for exit quota spots.
- Daily party sizes and yearly totals for these select passes:
  - Taboose Pass in Alternative 3 – A single quota with 10 people/day and 50 stock/year allowed is proposed. We feel that the narrow and rocky condition of the trail, does not allow for safe passage of large stock groups and hikers and would encourage you to place a limit of 10 head/day on this trail. The annual limit as specified is acceptable.

Shepherd Pass in Alternative 3— A single quota of 15 people/day and 100 stock/year allowed is proposed. We feel the narrow, rocky condition of the trail does not allow for safe passage of large stock groups and hikers, and that the fragile nature of the high country accessed does not support this level of stock well and would encourage you to place a limit of 10 head/day and a seasonal limit of 80 stock/year. The high meadow areas accessed by this trail have seen a notable increase in use in the past three years and they will not be able to sustain this level of use.

Shepherd Pass in Alternative 2 – A destination quota of 18 trips per season is allotted. Due to the reasons stated above, we would encourage you to set the quota at 10 trips in order to assure that meadows in the area do not become overused.

(NOTE: we feel the other quotas and use numbers as delineated in Alternatives 2 and 3 are acceptable at this time. We will continue to enforce our group size limits of 15 people and 20 stock as well as our monitoring efforts and may need to enact further control of use in these parks if impacts to resources and experiences so warrant.)

- The level of signing for trails designated as “Not recommended for Stock.” In general, wilderness should be as free from human installations as possible. Since these trails are primarily limited to commercial operators, it is reasonable to expect these operators to know where they can and cannot go. To place signs to assure no use seems unnecessary and counter to wilderness management practices.

If we determine that stock impacts in the parks are not acceptable, we of course reserve the right to utilize our authorities to enact additional controls, primarily through our Incidental Business Permits (IBPs) with these operators. We have already enacted the policy of not issuing IBPs to any new stock operators pending the development and implementation of our upcoming Wilderness Stewardship Plan.

In regards to how the DEIS relates to the management of Devils Postpile National Monument (DEPO):

- It does not appear that a thorough evaluation of the carrying capacity and impacts of the 1500 annual day use riders to Rainbow Falls has been conducted. The use of this area by commercial stock operators has been conducted via the NPS’s Incidental Business Permit system. DEPO will be developing a General Management Plan in the upcoming years, and will address carrying capacity and resource impact issues in connection with this use. We are willing to accept the use numbers as allotted in the DEIS and Plan, but reserve the right to control and regulate use in DEPO pursuant to resource impacts determined through future monitoring and analysis.
- We also feel that trails which lead into DEPO, specifically those sections of trail number 2000.3 (Ref. #'s I-24 and I-25) should be classified no higher than Trail Class 3. These are classified as Trail Class 4 in Alternatives 1 and 2. These trails are in wilderness, and the higher level of trail class has conditions that we feel are not appropriate in wilderness. Trail Class 3 more accurately reflects the current condition and the maintenance level that we work to accomplish.

Thank you considering our comments and for your cooperation in working toward mutually beneficial solutions. Your efforts in the management of wilderness use, whether by stock users or hikers, are critical to these parks preserving our portion of these contiguous wildernesses. We fully support you in your efforts and feel that the alternatives of this plan will work toward

those ends. I believe that through cooperation we are better able to effectively and professionally achieve our missions. Through our collaborative efforts the preservation of our contiguous wildernesses is being better accomplished than at any time in the past. This leads to improving the quality of park and forest resources and visitor experiences on public lands. Please feel free to contact me or my staff if we can provide any further information or for clarification of any of these issues.

Sincerely,

A handwritten signature in cursive script, reading "Russel J. Wilson", followed by a horizontal line.

Russel J. Wilson  
Acting Superintendent