

Preliminary Draft Alternatives – Public Comments Full Text



National Park Service
U.S. Department of the Interior

Sequoia and Kings Canyon National Parks
Wilderness Stewardship Plan
12/28/2012

This document includes the full text of all of the comments received during the public review period for the Sequoia and Kings Canyon National Parks Wilderness Stewardship Plan preliminary draft alternatives. Form letters are included at the end of this document. If duplicate letters were received from the same individual or organization, only one of the letters is included. All comments are verbatim; as a result, grammatical and typographical errors have not been modified. The names and addresses of unaffiliated individuals have been removed; names of individuals representing businesses or organizations are included.

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.

The substantive portions of the public comments have been extracted and organized by topic and/or alternative and contained in a public comment summary report (NPS 2013). The substantive comments will be used to refine the draft alternatives for inclusion in the Draft Wilderness Stewardship Plan and Environmental Impact Statement, which will be released for public review in early 2014.

Correspondence ID: 1 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,04,2012 09:19:36
Correspondence Type: Web Form

Correspondence:

I would like to know if area in the park system(back country) night go back to the 99 year least system. the area could be better maintain and protect if the public could least area in the park system. sence money is not avable to maintain the trails and camping places , orgation could lease spot and keep them up like they do with roads and highways , give people pride in knowing that they have help to keep it clean for other to enjoy .

Correspondence ID: 2 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,04,2012 10:33:17
Correspondence Type: Web Form

Correspondence:

My comments and input regarding the following tables and alternatives are as follows: 1) Zones and Permitting/Quotas I SUPPORT ALTERNATIVE 1 NO CHANGES 2) Trails, Bridges, and Signs I SUPPORT ALTERNATIVE 2 4) Party Size: People and Stock I SUPPORT ALTERNATIVE 2 5) Camping: Campsites, Stock Camps, and Camping Night Limits I SUPPORT ALTERNATIVE 2 6) Stock Use: Access and Travel; Camps; Party Size; and Grazing I SUPPORT ALTERNATIVE 1 7) Administrative Facilities: Ranger Stations and Crew Support Facilities I SUPPORT ALTERNATIVE 1 8) Other Facilities: Redwood Canyon, Pear Lake, Bearpaw Meadow High Sierra Camp, and Frontcountry Facilities I SUPPORT ALTERNATIVE 1

Correspondence ID: 3 **Project:** 33225 **Document:** 49956
Outside Organization: MKDA Unaffiliated Individual
Received: Oct,05,2012 17:15:30
Correspondence Type: Web Form

Correspondence:

Thank you for providing these documents and opportunity for comment.

My two brothers and I are cabin owners in West Mineral King, #7. We have looked upon our cabin as a second-home for over 50 years. Our grandfather Homer Hart built our cabin in 1923, and for many years our extended

family occupied cabins all around us. Now, our grown children are also enjoying the cabin and wilderness with their own families. What a tremendous legacy of beauty and history: truly irreplaceable. We have hiked, fished and back-packed the trails and are genuinely vested in the preservation of this natural monument. We acknowledge the need to, and wisdom of sharing this beauty with a public that respects it through mindful enjoyment and preservation.

Over the years we have been able to discuss and compare the changes in superintendents and philosophies, Forest Service and Park Service. We weathered the controversy and discord when the Disney Corporation was planning development, and rejoiced when this action was avoided.

In my opinion, the current NPS administration has had the best relationship to date with cabin owners. In addition, it appears that the NPS is striving to maintain the 'wilderness' and historical atmosphere as well as character of this unique area. We hope that the goals for the new Stewardship Plan continue to "Provide for the most unconstrained wilderness experience and protect wilderness character" through stringent guidelines that reduce negative human impact.

When Mineral King was just a small community, our parents and grandparents taught us the "rules" of existing in a wilderness area safely and respectfully. There was a common-knowledge among cabin owners about how to protect and preserve this natural beauty. Cold Springs was a much smaller establishment back then, and managed easily by the Forest Service. As time has moved on, and more people have "discovered" Mineral King, there has been a noticeable decrease in overall awareness, sensitivity and responsible use of Mineral King by the general public. Speeding on the narrow roads, careless driving, litter, disregard for parking guidelines, lack of "trail etiquette", abuse of trees and other foliage, are just a few symptoms that have appeared as newcomers "enjoy" this special area. If public access increases significantly beyond what is currently allowed, it seems inevitable that this scenic area will suffer great harm. Therefore, we are in support of "Draft Alternatives" that preserve the natural-experience of being in a wilderness environment to the fullest extent possible. This would include the general use and also timing of "prescribed burns" by NPS, which we did not see mentioned in the Draft. Recent burns have caused ongoing unsightly damage to the landscape, as well as serious erosion issues and mudslides during the heavy rains of last year. (One cabin-owner was told that a prescribed burn "skipped", due to winds, and burned an unplanned area. This is the type of planning and foresight we are referring to.)

Again, thank you for this information, publication, and longer period during which comments can be submitted.

Correspondence ID:	4	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Oct,06,2012 09:14:54				
Correspondence Type:	Web Form				
Correspondence:					

Please choose the options that reduce the number of visitors and keep the areas as secluded and untouched as possible. We have ruined Yosemite Valley with so many people; please don't let Sequoia and Kings Canyon National Parks go the way of Yosemite Valley.

Correspondence ID:	5	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Oct,07,2012 12:33:10				
Correspondence Type:	Web Form				
Correspondence:					

Unfortunately, you don't have a single Alternative Plan that I like; so I have picked the Alternative Plans that I like best for each section:

1) Zones and Permitting Quota: Alternative 2 2) Trails, Bridges, and Signs: Alternative 6 3) Campfires, Food Storage, and Human Waste: Alternative 1 4) Party Size: People and Stock: Alternative 4 5) Camping: Campsites, Stock Camps, and Camping Night Limits: Alternative 5 6) Stock Use: Access and Travel; Camps; Party Size; and

Grazing: Alternative 5 7) Administrative Facilities: Ranger Stations and Crew Support Facilities : Alternative 4 8)
Other Facilities: Redwood Canyon, Pear Lake, Bearpaw Meadow High Sierra Camp, and Frontcountry:
Alternative 4

The things I would like to see change the most are:

1. 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.
2. I would like to see stock travel reduced in the wilderness. By the end of the summer some trails are covered with stock feces and urine and are rancid.
3. 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.

Correspondence ID: 6 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,07,2012 21:09:15
Correspondence Type: Web Form
Correspondence:
Superintendent, Death Valley National Park Attn: Wilderness Plan Comments P.O. Box 579 Death Valley, CA 92328

Subject: Public Comment on Proposed Wilderness Plan

After reviewing the Back Country Stewardship Plan four alternatives and Environmental Assessment I feel Alternative I is the best option of the four.

I appreciate the Park Services efforts to protect Death Valley's resources, however, excluding access to them damages the public's ability to enjoy and support the overall concept of the National Parks. I've been visiting Death Valley and surrounding desert since the 1960s and have experienced numerous remote areas. Many of these are no longer accessible except by very long backpacking trips. Those I encounter in the remote areas of the Park are some of its most avid protectors; they recognize its unique geology, flora, fauna and cultural richness. To exclude these enthusiasts would be devastating. As for those who seek to exploit the Park's (public's) resources, closed roads or areas will do little to stop them. The resources need to be managed not isolated. Until details are released explaining how each and every alternative is intended to be implemented at each and every location, there's way too much uncertainty, as such the Park should be operated as it currently is with the least number of restrictions.

The most damaging element to the Park and to those of us who visit and enjoy it, are the low-elevation fly-overs by military aircraft which are numerous and excessively loud. Just because there are laws which allow for these activities it does not mean they're right.

Thank you for your time.

Correspondence ID: 7 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,08,2012 10:16:20
Correspondence Type: Web Form

Correspondence:

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. This is becoming a bigger problem every year.

Correspondence ID: 8 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,09,2012 12:56:00
Correspondence Type: Web Form

Correspondence:

I am pleased to submit the following comments regarding the current Draft of the Wilderness Stewardship Plan for SEKI. It is important to note the context in which I make these comments: My family has been visiting and enjoying Mineral King and surrounding backcountry since the mid 1890's. We have been cabin owners in Mineral King since 1923. My father was the U.S. Forest Service Ranger in Mineral King for most of the 1950's. So, we have seen a lot of this area over the years. Our opinions should count for something and not be disregarded.

*Stewardship of the Mineral King area and surrounding backcountry has deteriorated since the Park Service took control in 1978. Examples: Campgrounds have been reduced, trails not maintained, silly and annoying rules have been enforced by a mentality that seems to assume human beings are not compatible with this region. I cannot recall the last time I asked a Park Service representative a simple question and got a non-evasive answer.

*ZONES & QUOTAS: I prefer alternative A-1 (first, do no harm, leave things as they are), or A-2: Adapt to increased visitor use. 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. The Park Service should use eco-friendly stock animals to re-supply remote trail crews and ranger stations, instead of expensive and noisy helicopters.

*TRAILS, BRIDGES, & SIGNS: 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. For example, I have seen only one sign at Spring Lake, below Glacier Pass. It says "No Wood Fires." How about, "Welcome to Spring Lake?" 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.

*CAMPFIRES, STORAGE, ETC.: 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. I appreciate the bear boxes.

Overall, and I think this is extremely important: The Park Service should see themselves less as a police agency (carrying guns, etc.) and more as an agency which helps people enjoy nature. SEKI is one of the most beautiful and unique areas in the world. Let's all enjoy it together.

Correspondence ID: 9 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,10,2012 22:31:57
Correspondence Type: Web Form

Correspondence:

Clearly the best alternatives are 1 and 2 - 3 on are much too restrictive for access and use by the majority of the public. I prefer alt 1 to 2 in regards to Redwood Canyon - the cabin there should continue in its current ownership/use- it should not be converted to administrative use as per Alt 2

Correspondence ID: 10 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,18,2012 17:01:28
Correspondence Type: Web Form

Correspondence:

1) 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. To repeat, 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. If NPS gets to assume impacts from the fee as part of its baseline, without disclosing what those impacts are or whether NPS even knows what they are, then the firm quotas by zone stated for each alternative in the draft are meaningless, because they are not tied to numeric evidence of actual use under the fee. Rather, the quotas in the draft are simply an arbitrary number to purportedly reduce resource impacts by a certain degree for each alternative. That does not reflect variations in actual use between different zones under the fee, or variations caused by the fee itself, particularly in trailheads/zones that do not exceed CURRENT quota limits. In other words, if the fee is already getting NPS part of the way to its reduced resource impact goal for a given alternative, the draft quotas for the zones in each alternative should reflect that in a transparent, quantitative way.

To be clear, I am NOT commenting that the quotas should be variable based on which trailheads generate more fees going forward. The quotas should be firm. The comment above is directed solely at the numbers that were chosen for the quotas in this draft and the way in which they were chosen (without actual data from the wilderness camping fee).

2) 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.

Correspondence ID: 11 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,25,2012 00:53:28
Correspondence Type: Web Form
Correspondence:

Thank you for the opportunity to comment on your options. I have been using Rock Creek Pack Station to access the Sierra backcountry. I'm a hiker with a bad back and knee problems that preclude backpacking into the wilderness. Over the last ten years, I have been able to hike all of the sections of the Pacific Crest Trail between Cottonwood Pass and Kerrick Meadow along with side trips and access trails with Rock Creek carrying my gear and food. The service has allowed me to access areas of the Sierra that I was never able to reach when I was a weekend backpacker.

In addition to the joy of the backcountry experience, the trips have increased my appreciation of nature and have a much better understanding of the impact we have on the environment. I was an avid backpacker in the 70s and 80s and I have returned to some of the areas in the last few years. What has surprised me is the improvement in many of the areas due to the stewardship those using the backcountry.

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.

My vote is for maintaining the current status. I believe that the controls that have been established for backpackers and stock supported wilderness trips has limited the damage caused by both parties. Use of stock has opened up the backcountry to those who are unable to access it through backpacking. I find that most visitors to the SEKI and Yosemite limit their hiking to a few miles from the trailheads. 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. As such, I find options 4, 5, and 6 to be poor options when one considers the need to make as much of the park as available to as many people as possible. For those who desire isolation, they should brush up on their orienteering skills and spend time in Zone D.

Again, thank you for your efforts to preserve your precious resource and for the opportunity to comment on the Wilderness Stewardship Plan.

Correspondence ID: 12 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,26,2012 10:10:33
Correspondence Type: Web Form
Correspondence:

I'm a native Californian and was introduced to the Sierras as a young child by my grandfather who in the early 1900s would walk from San Francisco to Yosemite each spring to spend his summer backpacking in Yosemite. From my first visit at age 4 I became enchanted with the Sierra Nevadas and since then have visited annually, partaking in educational classes offered through the Yosemite Association, camping, day hiking, and backpacking on my own. For the past 5 years I have traveled through the Sierras with Rock Creek Pack Station. At an age in my

life where I can no longer find partners interested in backpacking, I can find friends who would love to travel the Sierras unencumbered with heavy packs.

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? On all the RCPS trips I have been on, we have never camped near backpackers, nor had any negative interactions with backpackers. 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. A windstorm from November of 2011 knocked down thousands of trees in Yosemite. 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. I'm sure there are hundreds of these stories that could be shared by Rock Creek packing staff; how they have come to the assistance of the Park Service and the lone backpacker to offer help.

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.

The considerations being reviewed; limiting group camp sites, grazing, limiting access, limiting pack stock and group size are without merit in my opinion. As mentioned, RCPS does more to leave no trace in the back country than most backpackers. Allowing stock to roam at night, ensures that they aren't over-grazing in one area. 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. Those 2 choices would be over run in no time, thus causing the type of damage you allege to be reducing.

It would also be favorable if you could lift campfire elevations and open other areas, like Dusy Basin to pack stock. 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. Other than the scenery in the Sierras, one of the fondest memories is getting to know the staff that is working hard, within rules and regulations, to provide the guest with a satisfying back country experience.

Correspondence ID:	13	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Oct,26,2012 11:12:46				
Correspondence Type:	Web Form				
Correspondence:	Dear NPS -				

I'm writing to comment on the Wilderness Stewardship Plan.

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.

But to address the current, even more restrictive proposals: - First - Ever take a horse pack trip in the Sierra back country? 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. Summer use by pack outfitters

barely leaves a footprint on the resource. And horses, mules and outfitters provide access to areas otherwise out of reach to many people. And remember - this land belongs to everyone - not just 25 year old backpackers. Horses in many cases blazed the trails the backpackers use! And this is vast country. The over the top selfishness of some groups who want to keep others out because they have some apparent hatred of horses is hard to fathom.

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. Outfitters can guide guests on what would to use. And what difference does it make if it's dead wood?

We should be allowed access to Wallace Creek and Wallace Lake. Why should the public's access be limited? This is OUR LAND! It belongs to me as much as it belongs to you. . And we would like to be able to camp with stock in Dusy Basin.

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.

Some other points:

- 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/

- I strongly oppose a system of managing use by developing a new system of counting the number of people and livestock. The regulations on party size and stock numbers should be simplified - not made more complex. Keep the current stock size at 20 or 25. Don't restrict grazing in meadows to six stock or less.

- Free grazing of livestock creates less environmental impact than tying horses and mules on the picket line. It's only logical.

Again - anyone who would suggest that outfitters like Rock Creek Pack Station who provide access to the back country should have even more restrictions placed on them has never been on a trip with them! This is vast, unspoiled country - and it has always been used by outfitters.

So think of that - outfitters with livestock have been bringing Americans who own this land into this back country for generations - and the land looks like it always has. In other words - outfitters are not causing any problems. So why are you considering imposing solutions to a problem that does not exist.

I would urge you - take a trip with Rock Creek horseback to these areas under consideration. You'll see why those of us who have can not imagine why you would consider even more unnecessary restrictions.

And again - this land belongs to all Americans - including those of us who love to ride horses. It's always been accessible to horses. There is no problem. Please don't take away my access to my land on horseback.

And please - go there! There's no one back there! Hardly anyone uses these areas! There is lots of room for horses, backpackers - all of us.

This is a non-issue. Please - use common sense - do the right thing - adopt Alternative #1 - Current Management Practices.

Correspondence ID: 14 **Project:** 33225 **Document:** 49956
Outside Organization: Long time avid backpacker & stock assisted hiker Unaffiliated Individual
Received: Oct,27,2012 10:42:41
Correspondence Type: Web Form

Correspondence:

I would like to start by saying that at 65 years of age, I have been hiking in the Sierras for the last 42 years. The experience of having access to this beautiful area both now and for years to come, is to me very much like a religious experience.

For the last approximatly ten years I have been traveling / hiking in the Sierras with the help of Rock Creek Pack Station in Bishop, Ca. 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 enviromental 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.

Since these "stock camps" are away from those use by most regular backpackers, the impact on forest is lessened greatly. I would like to see the restrictions for having an evening fire changes to allow fires above 10,800`. The ability to have an evening fire is an integral part of the camping experience. Also the abundance of "downed wood" especially near the remote stock camps seems to support this change.

Along with the above, I think allowing the stock to free graze lessens the impact on the area around these stock camps. It is also no different from the grazing impact that is posed by the wild "residents" namely the deer that inhabit the same areas. I actually think that it is a good thing since to some degree it helps to manage the grasses.

Having been a backpacker for many years before starting to use the services of packing outfits like Rock Creek Packers, I can tell you that these outfits have always been courteous and respectful of others using the trails. The packers have on many occations been out doing trail maintenance on our layover days. This above and beyond action that shows their commentment to these public lands.

Please consider allowing continuing access to our public lands through the services of packing outfits for those of us who can no longer shoulder a pack! The ever growing, aging population is a segment that should not be discriminated against by restricting our access to our PUBLIC LANDS!

Correspondence ID: 15 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,27,2012 17:35:00
Correspondence Type: Web Form

Correspondence:

I support the continued use of the park with commercial stock for hikers and guests of the wilderness.

Correspondence ID: 16 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,29,2012 21:06:36
Correspondence Type: Web Form

Correspondence:

The alternatives outlined by the NPS are comprehensive and provide a list of possible alternatives that should help guide the future of Sequoia and Kings Canyon National Parks. As a backcountry visitor to these parks since 1960, I have seen significant backcountry visitor use increases and additional restrictions imposed by the NPS to deal with these visitor use increases. Not all visitors have the same impact on the backcountry; i.e. horse parties, while historical, do negatively impact the fragile ecosystem of the wilderness to a greater extent than hikers. As such, I believe that some areas need to be closed to any stock use. I support alternative 5 in this respect, though I have no problem with stock use along existing trail corridors. I believe that this restriction could also comfortably fit into

Alternative 4 as well and I would support this change.

I support the reduction of trailhead quotas at high use access points which would deflect use to the less crowded trailheads which would spread out visitor use while providing some overall reduction in wilderness users. I would also support limits on the maximum number of use days each permit would allow; i.e. 10-14 days maximum. Further, I support the reduction in the maximum party size to 8 or fewer.

I support the current camp fire restrictions and food container regulations as outlined in Alternative 3. I do not see these as impacting the wilderness character of the parks to a great extent and thus making such changes detract from the wilderness experience without a commensurate improvement in wilderness values. 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.

Current structures in the parks such as ranger stations, bridges, etc. should remain to provide for the safety and protection of visitors and the resource. I cannot support assigned camps with the exception of those popular areas within a short distance of trailheads and at popular trail junctions. I support the removal of existing backpacker or horseman camps and restoration of the wilderness character of these areas. Users need to be educated in no impact and stealth camping techniques to spread out visitors and provide for greater solitude and to preserve the wilderness character of the parks.

As you can see from the above, I find it difficult to support any one alternative in its entirety, rather I support elements of alternatives three, four and five which, I believe, will make for a better wilderness experience, protect the wilderness character of the backcountry and enhance visitor enjoyment.

Correspondence ID:	17	Project:	33225	Document:	49956
Outside Organization:	Southern Yosemite Mountain Guides Unaffiliated Individual				
Received:	Oct,30,2012 00:00:00				
Correspondence Type:	Web Form				
Correspondence:					

I was recently asked to give an official declaration to the court in the lawsuit which set off the matter at hand, the "Extent Necessary Determination," ironically initialed "END" in the official documents. They asked for my opinion as it pertained to commercial services in particular services that used pack stock. I have included the letter below for the comment period. The same principles apply for commercial services that don't include pack stock as well. The Commercial Services Evaluation of the Wilderness Steward Plan document asks these questions:

Considerations and questions that may be asked to formulate the END include: - 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.

- Does the commercial service provide for the specific needs of a particular activity, i.e. special skills, equipment, safety issues, introductory experiences, etc.- Yes, we do on all accounts. We supply the needed equipment, guides with special skills, as well as the safety net of a well managed, professionally organized group. This gives the average client from anywhere in the US and across the world for that matter the ability to enjoy the wilderness safely. Our guides are all trained in wilderness medicine, know how to manage people in a surrounding (the wilderness) that the guests are unaccustomed to and often uncomfortable in.

- 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.

- 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. Everyone is welcome to do their own taxes, but most people hire an expert to help them through often confusing tax codes, rules, laws, regulations, timing, etc because they are experts in their field. Even the plumbing example is a "fitting" one. How many of us have spent a few weekends and many trips to the hardware store to fix a leak, then have to call in the plumber finally anyway. I know I have, and I know I have missed my kid's soccer games to save a little money. Looking back on it, I should have just hired the plumber in the first place. The exact same rationale applies to hiring an outfitter guide. If you mess up your legal defense or your taxes or even your plumbing, there are consequences, and the same with going into the wilderness if you are not an expert! Why wouldn't you hire a guide for these activities or perhaps more importantly, why should anyone tell anyone else that they can or can't have the option. Guides are needed, serve as valuable partner with federal land managers and are appreciated. They shouldn't be deemed un "necessary."

- 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.

- Should appropriate commercial services be managed differently in different management zones- Sure. No guides would ever want to see the resource over-used and the quality diminished for commercial gain. No guides I know do what they do for the "money," which I guarantee you is not great. They do it because they love the wilderness and they love sharing it with others. If this meant less use somewhere than that would be acceptable.

Here is a copy of the letter submitted that helps tell the story of just one part of commercial use:

04/20/12 To: United States District Court Fr: Southern Yosemite Mountain Guides, Ian Elman Re: Plaintiff's Motion for Injunction: Pack Stock usage HSHA v SEKI NP

Dear Judge Richard Seeborg- I have personal knowledge of the facts described below: I am writing to you today in regards to the letter sent recently about the court's ruling in the lawsuit against SEKI as it pertains to the Wilderness Act and pack stock usage. I co-founded and have been operating Southern Yosemite Mountain Guides (SYMG) since 1991 in Oakhurst, Ca. SYMG guides hiking, backpacking, rock climbing, fly-fishing, and winter activities and holds OG permits in Yosemite, Sierra and Inyo National Forests, as well as SEKI. I employ between 15-20 people each year. I also have a unique insight into this issue because I am not a packer or pack station owner. My experience is first hand and I can unequivocally say that pack stock usage is indeed necessary in order to allow access and usage of the SEKI. SYMG has shown thousands of people, over the last 20 years, the beauty of the wilderness areas all throughout the Sierra, with SEKI being arguably the most remote and most special of all those places. Some people don't need to use stock and can carry everything they need on their backs day after day and for those people we offer backpacking trips. But for many people - perhaps the majority of average Americans - additional support is needed, especially into the remote wilderness of SEKI. By offering an option to have the help of pack stock on some of our departures, we aid certain populations of people to experience their own wilderness areas that they wouldn't normally get to see. Our two biggest user groups for pack-stock supported trips are families with young children and an "aging" population of Sierra lovers and enthusiasts. It isn't uncommon for us to lead trips that have 8-10 year olds on them with their parents. Another common demographic is the late 60- late 70 year olds. This year we have a group scheduled for a trip that has 3 generations on it: A grandfather, his

sons and his grandsons. In this example he has been on a few backpack trips with us. However, this year his knees and back weren't up for the rigors of backpacking so we decided to plan a pack trip. He is so excited to share the beauty of the wilderness with his extended family, especially his young grandsons. Pack stock is making this possible. I had a woman on a trip last summer that had been in leg braces for nearly 20 years as she suffered from rheumatoid arthritis since she was a young adult. The trip we went on was the first thing of this nature she had been able to do. Pack stock made this possible for her. Needless to say it was an emotional trip for everyone and a lot of tears were shed. Life changing. Made possible by stock. On yet another trip we had a hiker with Sleep Apnea who needed his battery powered C-Pap machine to sleep for his health and safety. Each battery pack weighed 15 lbs and lasted 3-4 days without charging. He had to bring 4 battery packs (60 lbs worth) to make it for his 2-week journey through Sequoia Kings on the John Muir Trail. Pack stock made this possible. These are just a few of examples of the many, many people that we have taken to various parts of SEKI NP with the aid of pack stock. In addition to these people, every one of our pack-stock supported trips is filled with people who believe that they are physically or emotionally unable to access SEKI or other wilderness otherwise. In my experience 85 to 95 percent of the people who travel with SYMG to visit the SEKI using pack stock would be unable to experience this wilderness if such trips were not available and they had to carry all of their gear and supplies on their backs. To address the specific "restrictions" proposed by the HSHA, although I applaud their willingness to come to some sort of compromise on this issue, some of these requests are extreme and go way beyond the core issue at hand: #1 Limit of commercial days = 80% of 2007 level. I would hope that the average would be chosen on a wider set of data. I know 2007 was a wet year resulting in low usage. Exact amount of usage should be regulated and limited, I agree, however what that limit is needs to be fair and balanced based on conditions, a factual study of impact to protect the resource coupled with demand and economic viability. #2 and #3- Grazing in Meadows over 9700' including Evolution Valley. Again to this, I say show me evidence of the damage. I would hope that these decisions are based on factual impact studies not whether one person thinks Evolution Valley is more beautiful than LeConte Canyon for example. Remember too, if the mules can't graze, that means the packers need to pack in feed for the animals, which ultimately means more packing. #4 A ban on transporting certain equipment, such as ice chest, chairs, tables, and amplified music. In my experience ice chests are needed to keep food and sometimes medicines cool and fresh. (Please note we have custom made bear proof panniers that carry our small coolers). We have had diabetics on trips that need insulin that we can store in the coolers. In addition to meds, it is important for people to eat well to be safe while traveling in the wilderness. As guides, we are always aware of nutrition and caloric intake/output, which are 2 very important factors for safe and enjoyable travel in the backcountry. To this end, we do use coolers when we have mules to pack them. If it is the potential "eye-sore" of seeing a cooler in a wilderness camp setting, then perhaps a suggestion is that they are required to be packed away in their bear proof panniers when not in use (a practice we currently engage for bear safety). As for chairs, in addition to the obvious comfort-factor they serve as important "rests" for people's muscles. For most people in their 40's-70's, the joints and back don't bounce back like they used to. By having a simple lightweight chair to sit in each night versus sitting on the ground, it replenishes people's strength for the next day's hike. Again, as guides, we feel this is so important we supply them for our clients, so they have the best possible chance of enjoying their wilderness trip in a safe manner. Our chairs are very streamlined for camping and are not an eyesore. Maybe we forbid 'beach chairs' and make camping chairs ok- #4 Amplified music. Yes, I would be in favor of banning this. As we all do: backpackers, horseman, or hikers who use stock, we are typically after an experience that is "unplugged" and free from civilizations' noise. To this end we forbid our clients from bringing any amplified music and don't supply it as guides. #5 A tracking system of when and where the trips are and reports. This is already in place. We have wilderness permits and always leave our itineraries with the ranger station that we pick up our permit from. We also report to the commercial use office our itineraries and actual use. In addition, I urge you to consider the costs and burdens if pack stock rules are suddenly changed. We run dozens of annual trips all over the Sierra and provide a large economic benefit to many communities and an unforgettable experience to hundreds of people annually from all over the country and world. I understand and even prefer regulations for wilderness to preserve the enjoyment by all, but pack stock usage is one of the ways it can be enjoyed by all. This summer's trips have been planned for months, and sometimes years. If this Court finds that laws or mandates weren't followed by the National Park Service, then by all means let's allow them to get back in compliance. However, in the meantime, we feel it unreasonable to cut off all usage right away with no grace period or chance for businesses to fulfill their commitments to their clients (especially for this season coming upon us in a couple of weeks). In conclusion, I think we all know what will happen to the Pack Stations if this lawsuit doesn't allow the Park Service to authorize stock use, they will go out of business! As for the outfitters that utilize the pack stations we will also be handed

some hard economic times in an already tough economic climate. However, the real loser in this scenario is the average American trying to enjoy his or her own wilderness through the assistance of pack stock. This would be the biggest tragedy to have to say to people "you can only see the beautiful places in the wilderness if you can carry a heavy backpack!" In the meantime, I urge you to maintain the status quo of usage to the permitted outfitters until a final decision is made for the future. Thank you for your time on this matter. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. This document was executed on April 20, 2012, at Santa Cruz, California. Sincerely, /s/ Ian Elman, President Southern Yosemite Mountain Guides

Correspondence ID: 18 **Project:** 33225 **Document:** 49956
Outside Organization: Backcountry Horsemen of California
Received: Oct,30,2012 20:32:37
Correspondence Type: Web Form
Correspondence:

October 29, 2012 Greetings, Thank you for the opportunity to comment on the plans for the Sequoia Kings Park Wilderness Stewardship Plan. While I have not yet had the opportunity to travel in the areas covered by this plan in development, the reports from those who do entice me make plans for the future of my retirement years. However, 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. I have seen this effect when I draw my rake out at trailheads. Suddenly, others are reaching for theirs to scoop their own manure too. This area was set aside for the people of the United States to be able to enjoy in Perpetua, even as we get older and less physically capable, or are from another area, which is where commercial packers become valuable. 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. Thank you, Carrie Johnen, M. ED. Board Member, Mother Lode Unit, BCHC 2nd Vice President, Backcountry Horsemen of California Wilderness Rider, Class of 2007

Correspondence ID: 19 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,31,2012 12:29:10
Correspondence Type: Web Form
Correspondence:

There are several things not quite in balance in the proposal:

1. 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.
2. The equivalence between a human rider, and a stock animal seems bizarre. 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. 3. 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.

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. The NPS seems to take an approach of running from the public, and keeping dissent under wraps. This has proved ruinous, and creates the impression of disenfranchisement.

Correspondence ID:	20, 21	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Oct,31,2012 12:47:25				
Correspondence Type:	Web Form				
Correspondence:					

I support keeping Mineral King cabins and uses in the valley as they are currently. 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. I also am a strong supporter of allowing horses, mules, donkeys and pack stock to all the Mineral King lake basins and over the passes to the surrounding wilderness areas. 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 country for the elderly, physically impaired and small children. In fact, this action is discrimination against such groups. I also support continuing existing fisheries in all the lakes and rivers where fish currently exist regardless of whether they were originally native or planted. Furthermore, Fish and Game should be allowed to restock the heavier fished areas of the Kaweah River and surrounding lakes in Mineral King.

Correspondence ID:	22	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Oct,31,2012 13:23:48				
Correspondence Type:	Web Form				
Correspondence:					

Table 1. Preliminary Draft Alternatives by Key Topic - Zones and Permitting/Quotas: I support Alternative 1 continue current practices. Table 2. Preliminary Draft Alternatives by Key Topic - Trails, Bridges and Signs: Alternative 1 no action continue current. Alternative 1 no action maintain current practices.1 Table 3. Preliminary Draft Alternatives by Key Topic - Campfires, Food Storage, and Human Waste: Alternative 1 no action continue current. Table 4. Preliminary Draft Alternatives by Key Topic - Party Size: People and Stock: Alternative 1 no action current Table 5. Preliminary Draft Alternatives by Key Topic - Camping: Campsites, Stock Camps, and Camping Night Limits: Alternative 2 - Protect wilderness character while accommodating increased visitor use and allowing for expanded facilities for visitor and administrative support. Table 6. Preliminary Draft Alternatives by Key Topic -Stock Use: Access and Travel; Camps; Party Size; and Grazing: Alternative 1 no action continue current or allow more day use in areas like Mineral King. Table 7. Preliminary Draft Alternatives by Key Topic - Administrative Facilities: Ranger Stations and Crew Support Facilities: Alternative 1 continue current. Table 8. Preliminary Draft Alternatives by Key Topic -Other Facilities: Redwood Canyon, Pear Lake, Bearpaw Meadow High Sierra Camp and Frontcountry Facilities: Alternative 1 continue current.

Correspondence ID: 23, 147 **Project:** 33225 **Document:** 49956
Outside Organization: Access Fund Unaffiliated Individual
Received: Oct,31,2012 14:23:53
Correspondence Type: Web Form
Correspondence:
October 31, 2012

RE: Access Fund Comments for Sequoia and Kings Canyon National Park Wilderness Stewardship Plan,
Preliminary Draft Alternatives

Dear Ms. Taylor-Goodrich,

The Access Fund appreciates this opportunity to comment on the Preliminary Draft Alternatives of the Wilderness Stewardship Plan (WSP) proposed for Sequoia and Kings Canyon National Park (SEKI) wilderness. We understand that this WSP will not contain alternatives for managing rock climbing, but that it may provide guidelines for its management.(i) The Access Fund can provide climbing management expertise, funding, and community outreach to assist the National Park Service (NPS) manage climbing within the SEKI's wilderness areas.

Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)3 non-profit supporting and representing over 2.3 million climbers nationwide in all forms of climbing-rock climbing, ice climbing, mountaineering, and bouldering-the Access Fund is the largest US climbing organization with over 11,000 members and affiliates. We currently hold memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service to help define rules for how climbing will be managed on federal land.(ii) California is our largest member state and many of our members regularly travel to climb in California, including within SEKI's wilderness areas. For more information about the Access Fund, visit www.accessfund.org. COMMENTS

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.

The Access Fund believes: - 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.

BLM was the first to incorporate the Negotiated Rulemaking Committee's findings into a national policy in BLM Instruction Memorandum No. 2007-084- Use of Permanent Fixed Anchors for Climbing in Designated Wilderness Areas Managed by BLM. The Forest Service has yet to propose a national rule or policy regarding fixed anchor use in wilderness. The issue has generated controversy since the 1990s. 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 replacing existing fixed anchors without arbitrary bolting standards or complex permitting processes.

Climbing and Cultural Resources

The Access Fund advocates for land management policies that support climbing access and conservation of public lands. We believe in protecting cultural resources and Native American heritage, and recognize that public land managers must balance recreational access with resource protection which sometimes may include restrictions to protect cultural resource values. The Access Fund supports management decisions based on a thorough understanding of public use patterns and their effects on known and identifiable cultural resources. 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. The Access Fund Climbing Preservation Grant Program provides funds for research, monitoring, educational outreach, and stewardship projects at climbing areas around the country. Specific climbing management related components of this Draft Plan may be appropriate for Access Fund grant support. The Access Fund and local climbers can provide volunteers, funding, educational outreach and local expertise.

Best management practices are well established regarding climbing access and cultural resource protection. The Access Fund supports protective measures that minimize access restrictions, including posting appropriate educational information about the resource, constructing physical barriers to protect specific locations, and limiting climbing within an appropriate buffer around a discrete cultural resource site. Regarding sacred sites with no discrete cultural resources, the Access Fund supports clear management policies that accommodate ceremonial use of Native American sacred sites and avoid adverse effects to the site's physical integrity. The Access Fund opposes landscape-scale closures or restrictions for sacred site protection based solely on religious preferences where specific cultural resources are not present or may be protected by other means. The Access Fund supports voluntary limits on climbing on or around designated sacred sites in conjunction with public educational efforts concerning the sensitivities of these locations. The Access Fund can help educate climbers about the area's cultural

significance and the appropriate use.

Commercial Guiding in SEKI's Wilderness Areas

The Access Fund supports allowing continued opportunities for the public to access SEKI's wilderness with an accredited rock climbing guide. Hiring a professional guide allows climbers the opportunity to experience wilderness while learning valuable safety and Leave-No-Trace skills. Carefully managing the number of and requirements to obtain a guiding permit are the best means for preserving the wilderness climbing experience within SEKI.

Access Fund Assistance

Please contact us for assistance developing a climbing management plan for the SEKI wilderness areas. Our publication, *Climbing Management: A Guide to Climbing Issues and the Development of a Climbing Management Plan* and website www.climbingmanagement.org, have proven to be a useful tools for land managers across the country.(iv) The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related trail system and other management needs. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program(v) or assistance from our Conservation Team(vi) which helps maintain climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy. * * * Thank you for your consideration of climbing management for SEKI wilderness. The Access Fund has the experience, local contacts, and resources to help planners craft policy that encourages climbing while protecting wilderness characteristics. The Access Fund looks forward to participating throughout the entire planning process and in the future when climbing management is more fully considered. Please keep us informed as the planning process proceeds. Feel free to contact me via telephone (303-545-6772 x113) or email (rd@accessfund.org) to discuss this matter further.

Best Regards,

R.D. Pascoe Policy Director Access Fund

Cc: Brady Robinson, Access Fund, Executive Director Scott Massey, American Mountain Guide Association
Leigh Goldberg, American Alpine Club Torey Ivanic, Southern Sierra Climbers Association

i. Climbing - Technical rock climbing within SEKI's wilderness is relatively common. The WSP will not explore alternatives for this activity, but may provide guidelines for its management. The NPS is currently updating Director's Order 41 (Wilderness Management), which will address climbing in wilderness. When enacted, SEKI will use it to guide the management of climbing activities, such as the placement of bolts and the use of power drills, in wilderness. A Climbing Management Plan may be developed in the future. Supplemental and Background Information (330.7 KB, PDF file) page 4. <http://parkplanning.nps.gov/document.cfm-parkID=342&projectID=33225&documentID=49956>

ii. http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm

iii. See <http://www.fs.fed.us/t-d/pubs/htmlpubs/htm01232826/page03.htm> iv. See <http://www.accessfund.org/atf/cf/%7B1F5726D5-6646-4050-AA6E-C275DF6CA8E3%7D/CM-web.pdf>

v. See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000903/k.9722/Grants_program.htm.

vi. See http://www.accessfund.org/site/c.tmL5KhNWLrH/b.7653393/k.AEEB/Conservation_Team.htm.

Correspondence ID: 24 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Oct,31,2012 18:53:12
Correspondence Type: Web Form

Correspondence:

My family and I are owners of a historic cabin in Mineral King. The Krebs wilderness was established recently. Apparently, during the planning process for this, the basic provisions of the wilderness act were ignored as the area designated as wilderness was clearly not "untrammeled"there is much evidence of development, roads, and other items clearly demonstrating fairly intensive human activity. This wilderness area was established by ignoring the requirements of the wilderness act. What this demonstrates is that the effort to establish wilderness in areas that are not appropriate is the goal and following the law is not. Naming this wilderness after the person who spent much energy to try to kick out all of us cabin owners is an insult and evidence of contempt for legitimate land use and a community of cabin owners who consistently demonstrate their care for the Mineral King area. Thank you very much for listening to my views.....I do not represent anyone but myself

Correspondence ID: 25 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,01,2012 00:47:18
Correspondence Type: Web Form

Correspondence:

I am the grandson of Jeff Davis who is one of the legendary pioneers who lived in Mineral King from the first thaw until the snow drove him out of the valley. He ran a pack-station and three of his sons Roy Davis, Laurence Davis, and Phil Davis all had pack stations and took tourists back into the back country. Our cabin was so very unfortunately destroyed by the NPS (1969?) ...it was near the corner of the bend in the road at Harry's Bend just down from Monarch Falls. Across the road at the base of the trail to Timber Gap is my grandfather's brother's cabin...and where our historical cabin (the old butcher shop) used to be, there is now a parking lot. The majesty and spiritual intensity of Mineral King is unquestionable. Mineral King is in my blood. There should be NOTHING established to "enhance, encourage, educate, feed, house, or otherwise cater to" tourists. The area is one of the last pristine natural wonders of California and any building or concession would destroy what is there. The use of stock (horses and pack animals) is historical yet obviously needs to be limited and carefully regulated. 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. 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. Any attempt to enhance or "make the outdoor experience" easier is simply a step toward destroying the very natural abundance that exists. Keep the NPS bureaucrats out...keep the Corporations out...do not meddle with this last bit of paradise. LEAVE IT ALONE.

I had a dream (a terrible nightmare) that there were condominiums from our old cabin site all the way toward Farewell Gap. The very idea of "commercial" activity is repulsive and brings back memories of the Disney Fantasy that was almost unleashed on this Valley. "For Profit\$" does not in any way coincide with the spiritual, GOD INSPIRED power of that valley and I trust that there are those within the NPS ranks who realize this and can work for the protection of MINERAL KING from the profiteers. Thank you very much.

Correspondence ID: 26 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,02,2012 07:57:36
Correspondence Type: Web Form

Correspondence:

I would like to see the Park continue to allow use of stock / pack animals in the parks. It allows those with disabilities to be able to go into the back country.

Correspondence ID: 27 **Project:** 33225 **Document:** 49956
Outside Organization: CA State Parks Foundation; Tahoe Rim Trail Association; Tuesday Hikers
Unaffiliated Individual
Received: Nov,06,2012 01:12:29
Correspondence Type: Web Form
Correspondence:

As a younger woman I backpacked wilderness areas with my family, carrying my share of necessities and taking out everything we brought in. We imbued respect and care for our outdoor home in our boys which they carried into their Boy Scout years and on with their own families. I am still backpacking in my senior years (75 and counting)and enjoying the High Sierras as much as ever thanks to Rock Creek Packers easing my load some. I have packed with them for ~8 years now and am very impressed with RC staff's consistent conscientious care of their animals, grazing sites, water sources, campsites and us. I have trekked in the Himalaya, hiked Patagonia, landed in Antarctica, been to the North Pole, dored the Grand Canyon, visited remote islands in the South Pacific all with professional groups. Consistently, these professional guides are passionate about "their" place, sharing their love of the particular environment, and caring for it so that it will remain pristine for succeeding generations. We have always been well instructed and supervised to leave no footprint. Rock Creek Packers embody that passion. In my many wilderness experiences, I sometimes see individuals/independent groups less conscientious, disregarding altitude limits on campfires, not meticulous about site clean up, cutting off trails, camping, peeing too close to water, etc. I believe professional groups provide good insurance for continued sustainability of our wilderness areas. Well managed pack animals do not harm the environment where the grazing sites have been carefully selected and are rotated. Allowing pack animals in the wilderness allows many of us Seniors to continue hiking in Heaven. Remember, we're retired and have the time and interest and resources to take part in volunteer activities which help support and sustain our State and National parks and wilderness areas.

Correspondence ID: 28 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,06,2012 20:27:55
Correspondence Type: Web Form
Correspondence:

For the past two years I have had an awesome experience in the back country with the support of the Rock Creek Pack Station staff and stock. Several friends and I have done hiking trips using them as our pack mules and cooks. We are a group of ladies that love hiking and being in the backcountry but are unable to carry heavy packs. I do hope that you will keep the areas open to groups and stock so that others will be able to go where it is inaccessible unless in top shape. Though we are in top shape for hiking long distances daily, without the aid of the stock we would not be able to do what we have done. I would like all the areas kept open to the stock so that in the years to come we may continue to use them to allow us to hike in our most beautiful state! It would be nice if you are making changes to allow us to have fires above 10,000 feet for the warmth and comfort they provide. Allowing the stock to graze freely is wonderful and natural. Please take these suggestions into consideration for our future enjoyment in the wilderness. Thank you for your time.

Correspondence ID: 29 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,07,2012 10:47:03
Correspondence Type: Web Form
Correspondence:

I have hiked the Sierras for many years and love the mountains.I still do some backpacking at my age. 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. What a wonderful world there is in the back country! Several nights we had to do with out a fire, do to elevation, and it is every cold! Hard on an old gals system!Every year I am sad the leave the mountains at the end of summer,but look forward to the following season to see my old friend,the mountains. I hope to be able to enjoy them a few more years, if the new regulations don't prevent it. please consider some of us "oldies" that love the

mountains too, as you come up with new management plans for Sequoia-Kings wilderness use. Thank You for an Ear

Correspondence ID: 30 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,07,2012 23:46:48
Correspondence Type: Web Form
Correspondence:

It seems many times the issue of stock in the back country of our wilderness has been addressed and here we are again. 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. Otherwise, who will enjoy the wonders of our wildernesses? Thank you for your consideration.

Correspondence ID: 31 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,08,2012 14:20:28
Correspondence Type: Web Form
Correspondence:

I am writing to provide comments on the preliminary alternatives you have developed for the Wilderness Stewardship Plan for Sequoia-Kings Canyon NP. I am not entirely satisfied with any of the preliminary alternatives you have developed so far. Instead, I would like to see an alternative that is a blend of choices 1-6 with the following characteristics. For the permits topic, I support requiring permits for overnight use only. For quotas, I support leaving them largely unchanged, but with possible reductions based on actual, ongoing "on-the-ground" analysis of both near-trailhead and destination area impacts. Under no circumstances should quotas be increased. I support destination area quotas as well. The key is to ensure the overall health of the wilderness. I believe campfires should be banned above 8500 feet wilderness-wide. Generally, I think a simple rule without exceptions is easier for the public to understand and follow. For the food storage topic, I support requiring containers for all overnight users, and the elimination of all food storage lockers. This will make Sequoia-Kings Canyon consistent with Yosemite NP, which, again, I think makes it easier for the public to understand and follow the rule. Party size should remain the same. Finally, for the stock use and grazing topic, I support no stock use in Zone D and no stock grazing.

I characterize my alternative as one in which trail quotas essentially remain the same, with ongoing monitoring to ensure that wilderness resources are not being degraded by this level of use. If it is determined that degradation is occurring, then your plan should have clear procedures to reduce quotas. This monitoring and analysis should take into account cumulative impacts at destination areas like Dusy Basin, Rae Lakes, or Sixty Lakes Basin.

Thank you for consideration of my views.

Correspondence ID: 32 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,08,2012 15:26:19
Correspondence Type: Web Form
Correspondence:

I strongly vote for alternative 2. Those wishing to reduce visitors can simply walk further out in the wilderness to find solitude. If you preserve everything in its original state (virtually impossible as nature erodes), you are bordering on obsessive-compulsive disorder! The NPS is NOT the final vote on what constitutes HOW we should enjoy our wilderness-it is our wilderness and compromises are made to allow everyone to enjoy it. Again, there is PLENTY of space for those wishing solitude. Just hike a little bit further and then they won't find a trace of anyone. Encourage those city dwellers by making it MORE user friendly. Free handouts that include not just the mileage of a hike but also the elevation gain. Institute an INSURANCE as the French do when people go off trail (hors piste). Those who buy is are covered for rescue and those that don't pay the FULL COST of rescue. As you

aim to use your dollar resources more wisely, please consider NOT allowing your superintendents to retire at 50 something and get their salary for the rest of their lives. This is simply unconscionable. They have had INCREDIBLE jobs in nature, and that should be part of their retirement package and NOT being able to sit on their behinds and collect much too generous salaries for WAY TOO LONG. The abuse of tax payer dollars is disgusting. Put a toilet at Heather Lake where the majority of traffic goes. The pit toilet was closed down recently. Contact Septic Solutions West 559-783-3031. They have updated their products and have solar solutions for the electricity that is normally needed. 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. 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). More bear lockers: Monarch, Crystal, Franklin, Emerald, Pear. Crystal, Franklin for example. More camping sites at Mineral King: there used to be more & you took them away! Why would improving Bearpaw station with a structure be only for alt #3. Why not also for #2 alt? Why remove infrastructure at Redwood Canyon? who is it hurting? Why obligate people to go up to Lodgepole in SEKI to get their permits? Let them get them at Ash Mountain. COORDINATE your software- just copy a normal national hotel operation that updates spots in real time! Why not allow people to book in advance for high use trails and keep a record so that others who have never been on the trail get to go. Why reduce signage when you want to encourage more 'city' (less experienced) hikers who generally will buy the yearly pass while others only buy for their area (SEKI). Put multiple destination possibilities on signs. Improve winter signs. Improve Alta trail signs in Giant Forest. If you allow increased forest fires, it will clear underlying brush which you generally want to do. A no brainer. Improve Colony Mill trail. Offer shuttles so that people don't have to shuttle themselves by working with Visalia shuttle. If they know they are empty going down the hill to the Memorial bldg they could help hikers get back to their car. How would you encourage stock use and why overlap with hiking/tent sites? Money can discourage or encourage use. 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. Finally, consider reducing your paperwork and the mentality that your employees have that government is administratively bogged down and not that efficient. This attitude comes from the top guy and needs an adjustment!

Correspondence ID:	33	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,08,2012 15:39:37				
Correspondence Type:	Web Form				
Correspondence:					

I request that mule supported hiking and camping be allowed to continue in the National Parks. After three knee operations, my wife is no longer able to carry a 40 pound back pack for any amount of time. As I approach 80 years old, I can no longer carry her and my food, tent, bedding , and water over great or even short distances. Without mule supported trips to the Sierras, we would be unable to participate in our great love of the outdoors. My grand children are too young to carry all of their own equipment for the distances required to see some of the most spectacular scenery in the world. I hope to teach them to love the parks and camping as much as my wife and I do. We have found the packers from Rock Creek Pack Station to be very careful in protecting the environment of the parks. Please allow them to continue to support us on our camping trips to the Sierras.

Correspondence ID:	34	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,08,2012 15:48:36				
Correspondence Type:	Web Form				
Correspondence:					

I am 61 years old and I have been enjoying the beauty of the Sierra backcountry every summer since I was 14. The only thing that has changed in recent years is that now I ride instead of walk. At my age I can no longer walk 10 to 15 miles a day on the PCP or JMT with a 40 lb. pack. I ride now with a pack outfit. These packers are magnificent stewards of the Sierra Wilderness. They love the Sierra as much or more than anybody that I have met on the trail. Please don't limit the opportunity for grazing higher altitude meadows. Protect the meadows but don't close them. When you limit access for stock you limit access for people as well. Park visitation is declining among the young

and the last thing the parks need is to limit access to anyone of any age. Two years ago I rode the entirety of the John Muir trail on horseback. It was the greatest experience of my life and would not have been possible had further grazing restrictions been implemented. Please don't deny access to ANY responsible party.

Nights in the mountains get mighty cold before bed time. Not such a problem when I was young but it is now. A fire is nice and I hope that there will be no restrictions other than those already in place.

Correspondence ID: 35 **Project:** 33225 **Document:** 49956
Outside Organization: citizen Unaffiliated Individual
Received: Nov,09,2012 15:58:04
Correspondence Type: Web Form
Correspondence:

I would like to continue the Current Management Practices (Alternative 1)

For the last few years my husband and I have enjoyed hiking in the back country with support from Rock Creek Pack Station. When we were younger we were able to backpack, but now that we are older (68 and 78) we are not able to carry heavy packs nor hike 20 miles a day. They have enabled us to enjoy wonderful areas of the back country which we were not able to experience in our younger days.

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. 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).

I think free grazing of livestock is less harmful to the environment than picket lines especially in sparsely populated areas. Similarly, it would be better for the environment not to have designated campsites and allow some grazing in upper elevation meadows. Experienced packers would have more choices and be able to minimize the interaction between backpackers and stock users.

Thank you for working to preserve our beautiful wilderness areas and allowing us to comment.

Correspondence ID: 36 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,09,2012 16:08:21
Correspondence Type: Web Form
Correspondence:

Thank you for this opportunity to comment on the preliminary draft alternatives of the Wilderness Stewardship Plan. It is clear that those involved in the planning process read, considered, and incorporated the public scoping comments into this preliminary draft.

I belong to no organization nor am I affiliated with any business that has dealings with the National Park Service; my opinions are entirely my own. I have been camping and backpacking in the Sierra Nevada wilderness for 36 years. I have hiked and backpacked the SEKI wilderness from the northern to southern boundary and east and west from the Inyo National Forest to the western boundary. I have also done extensive off-trail travel, including Palisades Basin, Ionian Basin, Kaweah Basin, Darwin Canyon, and Lakes Basin. My comments reflect what I have observed and learned.

For my comments, I will follow the structure of the maps. I assume this will make it easier to digest and incorporate them into the next draft. Each alternative is described precisely enough that additional elucidation is usually not necessary.

Permitting/Quotas: Alternative 3

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.

Destination Quotas: Alternative 3

Trails, Bridges, and Related Structures: Alternative 3

Campfires: Alternative 3

Food Storage: Zones A, B: Alternative 3 Zones C and D: Alternative 4

Human Waste: Alternative 3

Party Size: Alternative 4

Party Size Stock: Alternative 4

In my over 40 years of wilderness travel in the United States, I've observed that the size of the party is the largest contributor to the destruction of the natural features.

Campsites: Zone A: Alternative 3 Zone B: Alternative 4 Zone C: Alternative 3 Zone D: Alternative 2

Stock Camps: Zone B and C: Alternative 3 Zone D: Alternative 4

Night Limits: Zone A: Alternative 3 Zone B, C, D: Alternative 2

Stock Access: All Zones: Alternative 3

Stock Use, Camps: Zone A: Alternative 2 Zones B, C: Alternative 3 Zone D: Alternative 4

Administrative Facilities. Ranger Stations, Crew Support Facilities: All Zones: Alternative 3

Other Facilities: Redwood Canyon: Alternative 3 Pear Lake: Alternative 2 Bearpaw Meadow: Alternative 4

Please maintain your stewardship over the SEKI wilderness and allow this altogether unique area to remain unchanged except by the forces of nature with the absolute minimum of human interference and destruction. Thank you for your consideration.

Correspondence ID:	37	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,09,2012 23:06:24				
Correspondence Type:	Web Form				
Correspondence:					

I believe that everyone should be able to enjoy the back country. One of the best parts about getting out in the woods and enjoying nature is telling stories around the campfire. Nothing warms up a cool morning or a cold day like a hot cup of coffee by the fire. Have you ever woken up covered by snow and thought "Hey a fire sure would make this morning a little better". Then you crawl out of your bed roll and look at the one burner stove and realize you are above 10,000 ft. I believe the fire line being set at 10,000 ft is way to low. There is plenty of wood to burn

at higher elevations if you know how to make a fire. Access to Wallace Lake and Wallace Creek would be pretty nice. I have never had the chance to go up to the lake but I have been told it is very nice. I have stumbled upon Wallace Creek one time while bring my stock home I had to stop and just stare. "WOW" I thought I love my job and I love this back country.

I believe 1.5 to 1 stock to person ratio is just about perfect. I 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 other wise 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. Makes for the best night sleep I have ever had.

I have always wondered why I never see big game in the parks. I asked around and the found that there use to be deer and elk a plenty a long time ago. What happened to them and how does that affect the environment? 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.

I have spent many days and nights in the the back country and hills from the Smokey Mountains to the Sierra Nevada and from Idaho to southern Arizona. My favorite place and one of the most beautiful places I have ever been is the Sierra, only being rivaled by the Grand Tetons. I spent a lot of nights under the stars in the Sierras and wish to return and spend many many more up there, but if the stock ever stops running those glorious hills part of my soul will die and many others and I will never returns to the parks. I hope and pray I will never live to see the day that the one thing that built it be taken from it. Remember we did not inherit the earth but borrowed it from our grandchildren. Let mine enjoy it the same way I do and let yours enjoy it the same you have and always will. If you have never slept under the stars or crossed one of the many beautiful passes you will never understand the love of the land. Work together we will make a lot farther.

Correspondence ID:	38	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,10,2012 17:34:20				
Correspondence Type:	Web Form				
Correspondence:					

I wish to submit comments on Wilderness Stewardship Plan and Environmental Impact Statement (WSP) for Sequoia and Kings Canyon National Parks. I feel that the current controls meet the intentions and goals of The Wilderness Act that mandates access for public use while preserving the wilderness. I have done several hiking trips to the Immigrant Wilderness and Kings Canyon. They have all been mule assisted trips. To be able to truly experience back country wilderness, one must be able to through hike and be away from trail heads and heavy use by day hikers. It is a totally different experience than day hiking with car camping. 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. I find that packers are knowledgeable and caring about wilderness areas and are careful to set camps in appropriate areas and minimize impacts in how they provide food and water for hikers and graze their animals. Privies minimize human waste impacts. Fires are only made where they are appropriate for safety and ample fuel. Camps sites are left clean as found, ready for use by the next campers. 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. I have never found evidence of heavy impacts from mules at any campsites I have stayed in. Packers have a vested interest in taking care of these areas and do a great job. 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. I don't feel that trails are overused or eroded or excessive in size due to overuse. I feel that back country access should be there for all who want to make the commitment to be there. People who go into these areas care and provide good stewardship to protect what is precious to them. I urge you to keep Sequoia and Kings Canyon accessible as they are now by maintaining the current controls.

Thank you for the opportunity to be heard on this important issue and hope you will keep our wild areas accessible to all who want to experience them.

Correspondence ID: 39 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,10,2012 19:21:28
Correspondence Type: Web Form
Correspondence:

I am 54 years old and have been able to experience the back country only through the support of mules and packers. I truly feel like my life experience would not be nearly as rich without that opportunity. I want to be able to enjoy all areas of the back country, the fires, friendship, beauty, and respect that comes with this exposure. I feel it has made me much more aware of the gift of the wilderness and the importance it should play in everyone's life. Please support the right to keep the back country open for all hikers, even those needing the aid of mules and horses.

Correspondence ID: 40 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,11,2012 14:04:35
Correspondence Type: Web Form
Correspondence:

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. During the years that I was employed by the park there were numerous times that I was in meetings where statements were made that the topic needed to be resolved in the WSP. Well, now that time is here. I do not remember all the issues that needed WSP guidance, but some thoughts that I believe to be important follow. In some cases, I suspect that the topic was not included since it will be addressed in the Resource Stewardship Plan (RSP). However, in some cases, the WSP needs to set the context for the RSP. 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 untrammeled. 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 "untrammeled", as well as identify circumstances where "untrammeled" might be a priority, if anywhere. Personally, I believe that "natural" should always take priority over "untrammeled", but I am only one opinion. Details of management of exotics would belong in the RSP and other documents. I believe that codifying a Park policy regarding the conundrum between "natural" versus "untrammeled" is one of the most important tasks that the plan needs to address.

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. Research and monitoring are critical activities needed to facilitate our understanding of the wilderness resources, threats to those resources, and our efficacy at managing those resources. Research is even identified in the Wilderness Act as one of the purposes of wilderness. Never-the-less, I have seen countless hours of discussion regarding various projects that might have been quickly resolved with some clear park wilderness policy regarding acceptable/non-acceptable activities and when/where/how they apply. The distributed information says that this will be dealt with in the minimum requirement analysis. The process sometimes becomes bogged down in the diversity of opinions and interpretations regarding either the propriety or necessity/value of a project. Having once been part of that process, I believe that clear guidance in the WSP could facilitate the process. 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.

This leads to my next point. I propose that the Park take this opportunity to consider a fifth zone (Zone E) that sets a wilderness standard that exceeds the Wilderness Act, a zone that I would call "pristine". This might be a zone that emphasizes "natural" and has NO wilderness structures - no trails, no signs, no ranger stations, no food lockers, no permanent (or long-term) research markers, no permanent environmental monitoring equipment, nothing. These might even be areas where aircraft are not used for any purpose, including emergencies. Active management might occur to mitigate anthropogenic impacts - especially removal of non-native species, but no hardware remains when the work is completed. I would not recommend extensive areas, but some areas of the Parks' wilderness could (and should) be identified for such a standard - the highest standard possible for wilderness management. The selection of such areas would need to be done with great care, and preferably would include entire drainages. Under no circumstances would I want to discourage use of any portion of the wilderness. However, perhaps visitors to a pristine area should not expect to get flown out on a helicopter if they are injured - at least not until they are manually transported to the edge of the pristine zone. Zone E could make SEKI's wilderness one of the most special or unique in the system, and Zone E would offset some of the more intrusive minimum requirement activities (like building bridges and ranger stations) in Zones A and B. The Parks' wilderness is big. Already there are areas (even near the front country) that receive little use. This could be done. 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. I think that I fully understand why the park is taking this position, but are you sure that you do not want to address some aspects of use of technology?

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. I propose that the WSP provide tighter guidance regarding emergencies specific to the different alternatives and management zones.

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.

While I think that all of the alternatives developed have merit, I suspect that fewer alternatives would not only be sufficient, but desirable for both the document prep by the park and review by the public. 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. I think that it is critical to the long-term survival of our wilderness that people love our wilderness. Public love of our wilderness is facilitated by people seeing our wilderness, feeling our wilderness, using our wilderness. Without use, future society may establish other uses for this land. What a former Congress created, a future Congress could eliminate. 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). For example, a single alternative might encourage increased use in certain management zones (like A) or certain geographic areas (perhaps Rae Lakes Loop) and at the same time discourage use in other more-pristine zones (like D or my proposed E), not with quotas or restrictions, but with differences in ease of travel (differing trail standards, differing requirements or facilities for waste management, differences in availability of facilities like bridges, food lockers, signs, etc.) including complete lack of facilities in areas where wilderness use needs to be light to protect resources. 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. I understand the tendency to stay with variations of the "tried and true" (quotas), but it may be advantageous to present some alternatives that reflect other approaches, and great new ideas sometimes come from thinking outside the box.

Again, I commend the WSP planning staff for a great beginning, and I look forward to the next product for public comment. Thank you for this opportunity to comment.

Correspondence ID:	41	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,11,2012 18:44:19				
Correspondence Type:	Web Form				
Correspondence:					

RE: Wilderness Stewardship Plan Draft Alternatives

Dear Superintendent Taylor-Goodrich:

I submit these comments on the Wilderness Stewardship Plan Preliminary Draft Alternatives for Sequoia and Kings Canyon National Parks.

I am a 50-year resident of Berkeley and then Kensington, California. For that same period of time I have been associated with the University of California, as Provost and Senior Vice President - Academic Affairs of the University (1995-2004), and previously Professor of Chemical Engineering, Chair of the Department of Chemical Engineering, Dean of the College of Chemistry, and Provost - Professional Schools and Colleges at the University of California, Berkeley. I am now retired, but re-employed part-time as Director of the Center for Studies in Higher Education on the Berkeley campus. I was also for eleven years (1976-1987) Scoutmaster of Boy Scout Troop 100 in Kensington, California.

I am seventy-eight years old. My wife of fifty-five years, [REDACTED], lives with me, is seventy-seven years old, and in 2011 suffered a severe shoulder break which required a partial shoulder replacement. She has limited mobility of the left shoulder joint as a result of that having happened.

Since we moved to California in 1963 we have been inveterate hikers and backpackers. This includes my having led eleven nine-day Boy Scout Fifty-Milers in all parts of the Sierra Nevada mountains, with much off-trail component and coverage of much of the territory of Sequoia and Kings Canyon National Parks. I have been on multiday trips in the Sierra Nevada mountains every one of the forty-nine summers that we have resided in California.

For seventeen years now, since reaching the ages of 60 and 61, respectively, my wife and I have been users of the services of Red's Meadow Pack Station, Rock Creek Pack Station, and Mt. Whitney Pack Trains for week-long trips in the Sierra Nevada mountains, again with much use of Sequoia and Kings Canyon National Parks. For the past fifteen years we have organized groups of people in our age group, usually eight to twelve people in the group. Through me, our groups contract with the pack station for the trip.

Our trips typically enter from the east side of the Sierra Nevada over a pass, and then travel several days north or south along the John Muir Trail or other established trails, following which the exit to the east side of the Sierra Nevada mountains over another pass. Our trips have included the full north-south length of Kings Canyon and Sequoia National Parks, and the use of Cottonwood, New Army, Kearsarge, Sawmill, Bishop and Piute Passes, as well as Muir, Mather, Pinchot, Glen, Forester, and Guyot Passes.

For these trips, the pack train carries our gear and the food, and we carry day packs with what we need during the day. The packer supplies a cook and cooking services as well. We and nearly all other members of our groups are

now well past that point where we could do these trips and continue our enjoyment of the unique and magnificent high country of Sequoia and Kings Canyon National Parks in any other way. To remove, encumber or make uneconomical packer access and through-trip capabilities from those areas would mean that we would be left with no way to continue our lifetime enjoyment of the prime, high Kings Canyon-Sequoia high country, which is the pinnacle of scenery and unique in the Sierra Nevada mountains. To my mind, that would be clear discrimination on the bases of age and infirmities. There are no good alternatives to these trips that move continuously through the prime and pristine areas of the Sierra Nevada mountains for a duration of order a week.

Having been on extended trips in the Sierra Nevada mountains (primarily in Sequoia and Kings Canyon National Parks) for forty-nine years now, and having designed and led nearly all of those trips, I have seen many camps, many campers, and many sorts of groups traveling in the wilderness. I consider myself well able to judge environmental impacts of various types of usage. My conclusion is that current packer-supported trips are no more harmful, and probably substantially less harmful, to the environment than the same amount of usage by backpackers. I base that statement on the much better control of human body waste by the packers, the fact that packer camps are defined and restricted as to location, the much better control of food wastes and wrappers by packers, and the fact that backpackers still often build and leave newly created fire rings, as well as leaving debris in them.

I believe that the limits placed upon pack trips presently are sufficient for controlling environmental impact. That corresponds to Alternative 1 within the document that is currently out for comment. Alternatives 2 through 6 will impose unnecessary hardships that will seriously diminish the wilderness experience for those of us who can access the prime country only with the services of a packer and/or impair the economics of operation such that it will no longer be financially feasible for packers to provide the services that are essential for us to take part in the wilderness experience in prime country.

Within this, several specific concerns are the following. - Regulations with respect to packer access must take into account where camping is needed to enable packer-supported hikers to access prime country. An example is Wallace Lake and Wallace Creek, at which camping is needed if one is to reach much prime country. There are numerous other instances; this is just an example. - 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. - Grazing regulations should be based upon consideration the distance which those of us in our seventies can hike in a day. In the alternatives beyond Alternative 1 the ability of older, packer-supported hikers to string camps together for a loop trip would be substantially precluded. - Creation of zones has an effect similar to more severe grazing regulations. It would serve to preclude access at all for older and infirm hikers into the higher-numbered zones. - Current group-size regulations should not be lowered. Otherwise, it will not be possible to put together a group of sufficient size to share the fixed costs associated with packer services and thereby keep trips financially doable. The same applies to alternatives limiting the number of stock that can travel with a group more severely.

Correspondence ID:	42	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,12,2012 10:57:18				
Correspondence Type:	Web Form				

Correspondence:
I have been going on trips with Frontier Pack Trains and Rock Creek Pack Station for over 15 years. I am over 70 years old and it would be impossible for me to hike to the places I have seen in wonderment. Too much work. I enjoy the total experience such as trout fishing, little hiking, beautiful mountain scenery, living in a tent, riding horses and the groups. I have noticed as you continue to restrict the Pack Stations on number of people, where we can camp, campfire restrictions, and other rules and regulations that the trip is becoming less enjoyable. 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.

Correspondence ID: 43 **Project:** 33225 **Document:** 49956
Outside Organization: Sierra Club Unaffiliated Individual
Received: Nov,12,2012 21:28:33
Correspondence Type: Web Form
Correspondence:

I appreciate the opportunity to comment on you wilderness plans for Sequoia and Kings Canyon National Parks. I started camping with my parents in the Sierra in the late 1930's and my first backpack trip in the Sierra was in 1948. Since that time I have backpacked in the Sierra every year, some years as much as four or five weeks on the trail. I have hiked most of the trails and much cross country from Lake Tahoe in the North to Domelands wilderness in the South. I have led many Bay Area Chapter backpack trips for the Sierra Club with many of these in the Sierra. When I retired in 1996, while continuing to backpack, I started leading National Sierra Club trips. The first years we had the packer take us to base camps. In subsequent years the packer used mules to carry the gear with the trip members hiking from campsite to campsite. The passing years have made backpack trips much more difficult, especially to the more remote areas since the miles per day have decreased substantially which means more days on the trail and the resulting increase in pack weight. In addition the requirement for the bear canisters adds about five pounds to the pack weight on any trip over about 4 or 5 days. The only way for older people like myself to continue to enjoy the remote areas of the Sierra is by using the packers with their mules to carry the load.

For the Sierra Club trips I have used the packer at Kennedy Meadow to lead trips in the Emigrant Wilderness and Yosemite, and more recently the Rock Creek Pack Station for trips in the John Muir Wilderness, Sequoia and Kings Canyon National Parks and Golden Trout Wilderness. The age of members of these trips ranges from about 50 to about 80, with the majority in the 60 to 70 year range. Most would no longer be able to backpack at all, and probably none (myself included) would be able to cover the territory that we have traveled on these trips. In all my years of backpacking in the Sierra, I can't recall having a negative feeling toward those using the packers. I guess there was a little resentment of the extra luxury, but the effort of doing it the hard way seemed for me to enhance the enjoyment of the environment.

I believe the existing regulations are pretty close to what should be in place to benefit all users. Limitations on grazing should only be enforced on observable degradation of the meadows. 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. If group size is reduced much below the present levels, our Sierra Club trips will become more expensive to the point where it will greatly limit participation. A reduction in number of stock allowed will make it difficult to continue the trips, especially those of longer duration. The packers are sensitive to the environment and try to do a good job of minimizing the effects of the stock in the wilderness.

Correspondence ID: 44 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,12,2012 21:49:10
Correspondence Type: Web Form
Correspondence:

I am writing in favor of continuing to permit assisted trekking using pack animals such as horses, mules or lamas. For last several years I have been able to enjoy the back country wilderness because assisted trekking has been available via Sierra Club. It has been my experience that the packers are trained professionals and understands the importance of preserving the wilderness for generations to come. They understand that their livelihood depends on it. They love the wilderness and their animals. People of all ages should be allowed to enjoy the back country. For those of us who are seniors (I am seventy six) and cannot carry the back pack as we used to, assisted trekking is the only way to continue to enjoy the wilderness for a few more years. I commend Park Service for having a

permit system for the packers. Park Service should focus on ways to assist packers so that damage if any to the fragile environment is prevented or minimized rather than preventing them from providing an essential service to a significant segment of population. Thank you very much.

Correspondence ID:	45	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov, 12, 2012 21:51:10				
Correspondence Type:	Web Form				
Correspondence:					

I have been on over 20 horse pack trips into the Sierra Nevada over the past 30 years on trails which crossed through Kings Canyon and Sequoia National Parks, as well as the surrounding wilderness areas. Over this period of time I have noticed that the number of backpackers I have met on the trail has steadily declined. In the early to mid 80's it was common to pass backpackers taking their lunch break as our pack train crossed every north-south pass on the Pacific Crest Trail. In the past decade on five different pack trips I recall seeing backpackers (five) on exactly one occasion while going over Glen Pass and none at any of the other passes. This decline in numbers of backpackers is evident even on our moving days as most days our riding group never sees anyone else on the trails. Why there are continued attempts to put further restrictions on horse pack trips to "preserve the wilderness" is illogical as the overall use must have been declining for the past two or even three decades.

Carrying my own backpack over a 12,000 foot pass was never a good option for me. Being a rather slightly built Oriental with an office job severely limited my walking range in the Sierra Nevada in past decades. With the onset of moderate to severe arthritis in both my knees, backpacking is simply impossible today. The only way I can continue to enjoy the beauty and peace of the back country today is from a horse. The increasing restrictions on where pack animals can go is really a discrimination policy against a certain class of wilderness users - those with some sort of physical impairment. With the interests of the younger generations being increasingly centered on electronic recreation, I do not see anything but a continued decline in wilderness use by the general population over the next few decades.

Having used Rock Creek Pack Station for three decades, I have appreciated the company's efforts to police their campsites, leaving them as pristine as possible for future users. I have noticed on about half a dozen occasions when a ranger, checking on our travel and campsite, upon finding that it was Rock Creek Pack Station, has assumed based on his own past experience that everything was done correctly and completely by our outfitter crew. It was a reputation built up over decades of outfitting through the Parks and wilderness.

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. Decreasing the maximum number of stock allowed just drives up the price significantly for the actual "customers" of a typical horse pack trip. Decreasing the choice of campsites, grazing areas, and stock movement all really have the same intent, to lessen or restrict horse pack trip users within the National Parks and wilderness areas. Even over the past three decades there have been many camping and grazing restrictions that have essentially blocked off my being able to see many sections of the Sierra Nevada.

The policy of no campfires over 10,000 feet (or other elevations for specific areas) has always seemed like a one policy fits all situations type of regulation. It just does not make sense in areas beyond a weekend backpack trip from an entry portal. Once you get some distance from any entry point into a National Park or forest, the available amount of firewood from downed trees above 10,000 feet can be significant. In some cases it would take decades to clear away all such downed wood for campfires, if it ever could be used up at all. From my own perspective a wood campfire in the evening and especially at dawn when there is ice in the water bucket can add immensely to one's comfort and well-being.

I have never seen any Park or wilderness use proposal which did not try to further restrict stock use in every way possible and put additional burdens even on backpackers. From my general read of the proposals, this is really no different. If there is a true need to preserve the "wilderness character", then even individual backpackers and all

other users should not be allowed into those specific areas. My observation over 30 years is that it is a few idiotic backpackers who make all the rubbish, cause all the damage, and who ignore the regulations. I have never seen anything like that being done by the customers and crew of any horse pack trip I have ever taken in the Sierra Nevada.

Correspondence ID: 46 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,13,2012 14:56:20
Correspondence Type: Web Form
Correspondence:

For many years I have enjoyed pack trips in the Eastern Sierra's with Rock Creek Pack Station. I am an avid horseback rider and my trips up to the wilderness where thankfully there is no cell phone reception for my work to track me down, is one of the highlights of my year.

We take every preventitive measure possible to leave the wilderness in the same condition that we left it.

On a few occasions we have had cold nights because campfires are not allowed. I think the fire elevation should be raised as only experienced outdoorspeople are in those higher elevations and they know how to be careful with fires.

Somehow using a predestined camping location takes away from the wilderness experience. I think nature is better preserved if campsites are selected randomly, there is less chance of the area becoming damaged. Again, only experienced outdoorspeople are in these areas.

I believe free grazing of livestock creates less environmental impact than horses and mules tied to picket lines. Before the park service regulated this, wild horses grazed freely in this area.

My vote is for current management practices. I think this is the best choice available and will cause the least impact on the environment. More restricive policies may hamper the ability for us city folk to enjoy and appreciate the beauty that is the eastern sierra wilderness.

Thank you for your consideration.

Correspondence ID: 47 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,13,2012 15:36:11
Correspondence Type: Web Form
Correspondence:

INTRODUCTION:

The following comments are based upon more than four decades of continuous personal wilderness use in Sequoia and Kings Canyon National Parks. I have enjoyed more than one hundred wilderness trips within the parks both as a backpacker and (less frequently) as a user of stock services. I am still an active user of the SEKI wilderness.

OVERALL CHARACTER OF THE PRELIMINARY ALTERNATIVES:

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.

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.

Again, 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.

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 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.

COMMENTS ON SPECIFIC ISSUES:

Food Storage: 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.

Stock Use: Your draft alternatives merge two issues that should, and must, be seen separately. The first of these is the use of pack stock in the wilderness both to provide human access and to move necessary supplies and

materials. The second issue is whether (not just how) stock should be allowed to graze in the SEKI wilderness.

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.

Moving on, for the reasons outlined in the previous two paragraphs, 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.

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.

Moving into yet another issue related to stock use, I am disappointed that your preliminary alternatives do so little to encourage changes in the nature (and thus the resultant impacts) of stock use. I offered the following comment in July 2011, and the issue remains pertinent:

- It is appropriate for the NPS to implement policies that encourage wilderness use by small parties using stock selectively and traveling lightly. Such parties, with perhaps 1-3 animals for 2-6 persons, can travel in a way that results in relatively light impact upon trails or natural resources. This form of travel, which is not currently much in vogue, should be encouraged as a supplement to and, when appropriate an alternative to, traditional ("heavy") stock use.

The current debate over stock use in the SEKI wilderness seems to be an "all-or-nothing" argument. This is unfortunate. There are other ways to approach this question, and the NPS ought to encourage some of them.

Further, I am deeply uncomfortable with the concept you introduce in the stock use and grazing section of your preliminary alternative matrix in which, for purposes of overall group size, human beings and riding/pack animals are proposed to be interchangeable. To propose that an 800-lb. riding animal is functionally equivalent to the 200-lb. person in the wilderness makes no sense whatsoever. I urge you to withdraw this un-defendable proposal and define and limit stock use in terms of actual animals present.

Trails: In your proposed zoning system, your alternatives incorporate the idea of zones centered around "major trail corridors" and "secondary trail corridors." This concept is useful as far as it goes, but your definitions of these zones and how they should be used do not seem to incorporate the ability of the trails involved to support the proposed uses. This is an important point. To renew my comments of July 2011:

- The trail system at SEKI should be analyzed and zoned into at least three categories that reflect the ability of the trails to sustain use. (This concept is not included within the USFS Class-1-2-3 system you propose to incorporate into the plan.) My three categories would include (1) appropriate for stock use, (2) appropriate for limited (small-party-only) stock use, (3) not appropriate for stock use. This zoning should be based on the character of the trail

and its ability to sustain the passage of stock without incurring damage that makes the trails harder to walk safely upon or more prone to erosion. Engineered, well-graded trails with good grades and water-diversion bars would generally fall into category 1. Lightly built trails that nevertheless have easy grades and good drainage would fall into category 2. All other trails would fall into category 3. This last category would include all steep, poorly engineered trails as well as trails passing through meadows or other areas that cannot sustain the physical impact of stock. These marginal types of trails should be limited to foot use only.

To reiterate, the preliminary draft alternatives proposes corridor zoning for trails without considering the ability of those trails physically to sustain that use over time. This must be corrected.

On another trails issue, I am pleased to see that proposals to close some heavily-used wilderness trails to stock use made it into your matrix, but by placing this concept almost only in the alternatives that call for reduced use, you have the effect of marginalizing the idea and thus insuring that it does not receive genuine consideration. (This relates very closely to my comments regarding the overall character of your alternatives.) Providing the possibility of hiking-only trails in busy areas, without reductions in overall use, needs to be considered further.

Destination Quotas: I have read your language on this subject with great care and must admit that it is very hard to discern your intentions. This being the case, I will simply go on record by saying that destination quotas and binding route limitations should be applied with the great care. One of the enduring pleasures of hiking in SEKI is the ability to wander freely across the landscape and follow one's curiosity. This is a fundamental characteristic of a wilderness experience and must be preserved. The obvious exceptions are a very small number of (usually) first-night destinations that receive very heavy use. In these few areas, additional limitations are justified. Otherwise, entry into the wilderness (under quotas) ought to lead to open-ended wilderness adventure.

Thank you for the opportunity to comment on the Draft Preliminary Alternatives for the SEKI Wilderness Stewardship Plan.

Correspondence ID:	48	Project:	33225	Document:	49956
Outside Organization:	Sierra Club Unaffiliated Individual				
Received:	Nov,14,2012 11:40:55				
Correspondence Type:	Web Form				
Correspondence:					

I am a lifetime member of the Sierra Club. I have gone on "High Trips," "Basecamps" and "Highlights" since the early 1950s. The High Sierra experience means more to me than I can describe verbally. All of my trips have been with the assistance of mules to carry supplies, food and duffel bags. I am now 63 years old. I have had three shoulder arthroscopies, a knee and a hip replacement. I have kept myself in excellent physical shape; I am a full time high school dance and physical education teacher at a Los Angeles independent school, a job I have held for 35 years. However, at this time, I could not backpack into the back country without assistance of mules to carry gear. Without the mules, I couldn't return to the back country at all.

Current management practices are the best choice. Mules should be allowed into back country and be allowed to free graze. Picket lines aren't good for the environment or the mules.

Also, campfires should be allowed up to 10,400 feet. Campfires with no fire, just flashlights are depressing, not an experience one can remember with the pleasure one gets from the smell, the warmth and the crackling sound of a campfire.

Adding more restrictions would prevent access to the back country for me and an entire generation of baby boomers who have stayed in good physical shape and wish to spend summers in the High Sierra they love.

Correspondence ID: 49 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,14,2012 14:36:35
Correspondence Type: Web Form

Correspondence:

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. 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

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.

Remember all conceivable issues and alternative need not be considered in detail. Just because joe blow says something is a problem for him does not mean you have to consider it in detail. You can consider it and decide it is not an issue (with a proper rationalization.) 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.

Finally good regulations are easy to follow! Alternatives should, in the end, be simple, easy to follow, and reasonable. Regulations resulting in nearly 100% compliance are much better than complex regulation that results increased management surveillance, 50% compliance and 50% of the users becoming criminals is not good management.

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.

Correspondence ID: 50 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,14,2012 00:00:00
Correspondence Type: Web Form

Correspondence:

Please amend the next to the last paragraph of comment id: 815521-49956/59 to read

Finally good regulations are easy to follow! Alternatives should, in the end, be simple, easy to follow, and

reasonable. Regulations resulting in nearly 100% compliance are much better than complex regulation that results in increased management surveillance, 50% compliance and 50% of the users becoming criminals.

Correspondence ID:	51	Project:	33225	Document:	49956
Outside Organization:	American Mountain Guides Association Unaffiliated Individual				
Received:	Nov,14,2012 16:12:41				
Correspondence Type:	Web Form				
Correspondence:	11/14/12				

Dear Ms. Taylor-Goodrich:

The American Mountain Guides Association (AMGA) would like to thank you for the opportunity to comment on the Preliminary Alternatives of the Sequoia-Kings Canyon (SEKI) Wilderness Stewardship Plan (WSP). We are excited to be a partner in the planning process, and look forward to supporting both the mountain guiding profession and SEKI. In general, the AMGA supports Alternative 3, with its balanced approach to providing for visitor experiences and access, while maintaining Wilderness character and protecting the amazing natural resources of the parks.

About the AMGA The American Mountain Guides Association (AMGA) is a national 501(c)(3) non-profit organization that has been supporting mountain professionals for over 30 years. The AMGA inspires an exceptional client experience by being the premier source for training, credentials, resource stewardship and services for professional mountain guides and climbing instructors in the United States. The AMGA is an educational institution, an accrediting body, and a standard setting organization that is our nation's sole representative to the twenty-five member-countries International Federation of Mountain Guides Associations (IFMGA), the international governing body responsible for guiding standards around the world. Since its genesis in 1979, the AMGA has grown to represent over 2,500 members that are represented in 49 states and 13 countries, over 30 Accredited Guide Services and educational institutions, and 60 Corporate Partners. Each year the training provided by the AMGA reaches over 700,000 people through direct contact between certified guides, climbing instructors, accredited programs, and their clients. The AMGA provides education, training and certification in the disciplines of alpine climbing, rock climbing, and ski mountaineering. It also raises the standards of guide services and climbing schools with regard to safety, Leave No Trace practices, client care, education, and wilderness stewardship. The AMGA adheres to the strictest of standards that are rigidly enforced to ensure our certified guides, climbing instructors, and accredited programs are the nation's preeminent experts on climbing and ski mountaineering best practices.

Specific Comments The AMGA supports the ideas embodied in Alternative 3, as essential tools for properly maintaining Wilderness character, which is the defining element of American mountain guiding. Unlike guiding in Europe, where there is extensive infrastructure to support climbers and mountaineers, American guides excel both in the ability to navigate terrain with minimal or no infrastructure (huts, lifts, etc.), but also in providing education about the value of Wilderness and techniques to leave the least impact on this amazing resource. The ideas expressed regarding zones, use quotas, trail signage, and party size limits in this Alternative are all very reasonable, and contribute greatly to Wilderness protection. We also support the decision to not generate alternatives regarding climbing into the WSP, but to integrate the guidance from the pending DO#41, as that becomes available. The specific section that we would like to direct the AMGA's comments is the Commercial Services Evaluation. We recognize the importance of the Extent Necessary Determination (END), in complying with the Wilderness Act and other applicable legislation. - Due to the increasing numbers of climbers who, for various reasons are not able to learn all of the skill sets involved in this lifetime sport, there is a corresponding need for professional mentors - the credentialed mountain guide. It takes year or decades to develop the skills and judgment to operate in alpine terrain, such as SEKI possesses. Style preferences, risk tolerance, skill level, terrain knowledge and equipment expertise vary widely amongst the public. The AMGA believes the public must have the option to experience the outdoors in a style that is appropriate for them. For some, the use of a non-profit or for-profit guide service is an essential option in order to experience the wilderness safely and responsibly. -

Perhaps due to the language employed by the Wilderness Act regarding "commercial services", there has developed among many land managers an underlying bias against the members of the public who choose to utilize a guide. It should be noted that all climbers are recreational members of the public, regardless of whether they are guided or self-guided. Hence, a certain amount of commercial services are necessary for realizing the public purposes of wilderness. - Guided climbing and mountaineering are necessary and appropriate in SEKI due to the challenges (difficulties, commitment level) of the terrain, the existence of objectives such as Mt. Whitney that provide an attraction unique to SEKI, and the above mentioned factors that lead the public to choose a guided trip. - Guided climbing and mountaineering fulfill at least two Wilderness purposes: recreational and educational. In addition to the obvious recreational purposes realized by conducting appropriate activities, mountain guides fulfill the educational purpose by conducting formal education: advanced skill training, such as rock climbing, mountaineering, and backcountry skiing; wilderness training, such as wilderness values and ethics, and natural and cultural history. - AMGA credentialed guides improve Wilderness character. In essence, they are a Resource to the Resource. They facilitate the public's access to opportunities for solitude or primitive and unconfined recreation. They connect the public with the natural, undeveloped world. They integrate Leave No Trace principles into their teaching and their leadership, setting an example for both the guided and self-guided public. For example, many guides incorporate human waste pack-out solutions even in areas where it is not required by their permit. - 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. - The AMGA supports the use of both non-profit and for-profit commercial services - provided they are trained and qualified at the industry standard - as essential options for the public to experience the wilderness. - AMGA credentialing is, and should continue to be, an application prerequisite for mountaineering and backcountry skiing Commercial Use Authorizations (CUAs). Using this internationally recognized standard is an excellent method of assuring that permitted guiding operations maintain the highest standards of public safety and resource stewardship. - 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. Thank you very much for the opportunity to provide comments on this important planning process. The AMGA welcomes the chance to provide input to our partners in the NPS. Please do not hesitate to contact me for additional information, or with questions.

Sincerely, Scott Massey Outreach and Advocacy Director advocacy.director@amga.com

Cc: SP Parker - Sierra Mountain Center
Howie Schwartz - Sierra Mountain Guides
RD Pascoe, Jason Keith - Access Fund
Leigh Goldberg - American Alpine Club

Correspondence ID:	52	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,14,2012 22:05:36				
Correspondence Type:	Web Form				
Correspondence:					

The first time I went to the Sierra back-country was 40 years ago with Rock Creek Pack Station. I have been many times since, with my daughter when she was 10 years old and now with her children ages 9 and 12. We were just talking about going in 2013 with all 4 of my grand kids. They only want to go if they can have a fire. They roast marsh- mallows and of course have smores. We read ghost stories around the fire and stay up late. I am too old and get cold without a fire. These kids would never experience the wilderness without grandma taking them on horseback with the pack station. We would like to go to higher elevations in the future and the free grazing of livestock is less of an environmental impact than tying horses and mules to a picket line. 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., But please let us have fires at 10,800 ft. Camping without a fire is missing the whole experience of the wilderness.

Correspondence ID: 53 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,15,2012 15:55:37
Correspondence Type: Web Form
Correspondence:

I am commenting on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan.

Sequoia and Kings Canyon National Parks have been a major part of my life since I moved to California in 1968 and began hiking and backpacking there. I have regularly visited both parks in the intervening years.

Before putting out Preliminary Alternatives, the NPS should first conduct a needs assessment to determine whether and to what extent commercial stock use is necessary and justified in SEKI's wilderness.

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. Manure catchers would be a welcome step in preventing this, as long as the manure thus collected is disposed of away from trails, campsites, and streams.

Bells of stock grazing in meadows at night disturb the quiet atmosphere that we come to the wilderness to enjoy, not to mention making it difficult to sleep. These should be prohibited.

Some trails should be reserved for hikers only, and stock animals should be prohibited from traveling off the trails.

Large stock trains are highly disruptive and inappropriate, and the numbers allowed should be smaller than those proposed in the Preliminary Alternatives, in line with scientific recommendations. Please rewrite your alternatives to include measurable and enforceable ceilings on stock use.

The proposed zoning scheme is too complicated. An effective Wilderness Stewardship Plan should fully preserve the wilderness character of all of SEKI's wilderness.

Please prepare a new set of Preliminary Alternatives for SEKI's Wilderness Stewardship Plan that will actually preserve the character of our precious wilderness and not give packers free reign with their stock.

Correspondence ID: 54 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,15,2012 20:03:19
Correspondence Type: Web Form
Correspondence:

As a 25 year backpacker in Sequoia Kings Canyon, I attended the Visalia information meeting. It was a little too much to digest all those alternatives but I appreciate the chance to attend and to give input. 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. In Mount Rainier Park there are certain trails for stock use and others for hikers only. This is what I would like to see in SEKI. 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. Stock should not be allowed at all on short day hike trails such as Ladybug. Ladybug has one place where one horse could wipe out the entire trail, and yet I see horse droppings

there! This trail is heavily used by day hikers. Also there should be a few trails in Mineral King entirely closed to horses. It is a fragile and small area, a short growing season and easily damaged. Perhaps this fits into the zoning concept. 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. One member at the meeting said horses should be allowed on all trails. This is a blatant disregard of the purposes of a national park either due to self-interest or economic interests. Horses and stock animals were not part of the natural environment and do not belong in a wilderness at all. Right now only the most remote and inaccessible trails are free of stock. Please allow some places below 10,000 ft where hikers and backpackers can enjoy the wilderness without manure and flies. I believe stock should not be in a wilderness but am willing to compromise only if stock use becomes much more limited than it is now.

Correspondence ID:	55	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,15,2012 22:29:50				
Correspondence Type:	Web Form				
Correspondence:					

The list of alternatives as presented appears to be complete and include all points of view. The team that compiled the list should be congratulated for a job well done.

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.

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-man 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 historial record would have been destroyed.

Thanks for listening.

Correspondence ID:	56	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,16,2012 08:54:46				
Correspondence Type:	Web Form				
Correspondence:					

I recommend Alternative # 1 - Current Management Practices is the best choice.

1. When visiting the wilderness I want to have a campfire and would prefer to have a camp fire at 10,400 feet or below. When visiting the wilderness I see plenty of firewood available at this elevation and below. Keeping warm in the wilderness is important and having a safe regulated campfire is essential. Hypothermia is possible and restricting the use of a campfire is unsafe and ruins the camping experience. 2. When visiting the wilderness I believe using non-designated camp sites actually help the environment by causing a lower impact when the use is spread around with experienced users.

3. Free grazing creates less environmental impact than tying horses and mules on a picket line. I see this time and time again when restrictions are placed on stock.

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

5. Restricting grazing is problematic to only 6 stock or less. Holding stock back from eating after a long days ride is unfair to the animals and should not be part of the Wilderness Stewardship Plan regulations.

Correspondence ID: 57, 135 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,16,2012 15:33:04
Correspondence Type: Web Form
Correspondence:

I am writing to comment on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan. I have spent years hiking in SEKI and the wilderness provides a wonderful and special way to experience the magnificence of California's Sierra Nevada mountains.

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.

Second, the Preliminary Alternatives ignore the question on commercial stock use and allow unlimited stock use to continue. No limits on the number of stock animals, trips, outfitters, or clients have been proposed.

There needs to be a limitation on stock use, just as there are limits on human use by the number of hiking permits that are issued each year. I am constantly saddened by the number of stock that I see on the trail and the destruction and debris they leave.

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.

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.

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.

Correspondence ID: 58 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,16,2012 15:43:21
Correspondence Type: Web Form
Correspondence:

Thank you for the opportunity to provide comment on the preliminary draft alternatives for the Wilderness Stewardship Plan for Sequoia and Kings Canyon National Parks. Over the last seven years, I have been traveling with Rock Creek Pack Station every summer into the backcountry. These trips have taken me to parts of the wilderness that I never would have dreamed of accessing without being on horseback and without the skilled guidance of the Rock Creek packers. Not only have these trips been transformative for me in terms of my exposure

to and appreciation of the wilderness, but they have been eye opening in terms of what I have learned from the Rock Creek staff about respecting the wilderness and minimizing my footprint as much as possible in these pristine areas. On all trips, the well trained staff of Rock Creek educate guests in best practices for the wilderness and follow best practices themselves. Without exception, the staff have a deep attachment to the wilderness and have been well trained in how to care for the land they love. This extends to the care they take in how they graze the stock, establish picket lines, build and oversee campfires, set up privies, and clean up camp, often leaving it in better condition than when we arrived.

I have reviewed the literature and studied the tables outlining the various alternatives. In all cases, my preference is to maintain current management practices as described in Alternative 1. I would hate to see further restrictions to campfires beyond existing restrictions. Fire restrictions are necessary but don't make sense in areas where there is an abundance of wood. During my trip last summer, there were two nights in which we were not able to have campfires due to existing restrictions. The restrictions were understood and adhered to but not being able to have a campfire really put a damper on the group's enjoyment of the evening. Some members of our group were in their 60s and one was in his 70s. While it was difficult for all of us to enjoy the evening without a fire, it was especially hard on the older folks who chose to retire immediately after dinner.

I would also hate to see further restrictions to or elimination of grazing as it is arguable that free grazing of livestock creates less environmental damage than using picket lines. Grazing at higher elevation trails is necessary because it's impossible to hike 10 - 15 miles between camps on the Pacific Crest Trail.

Thank you for the opportunity to comment and for your continued efforts to preserve and yet make accessible the wonderful resource of our wilderness.

Correspondence ID:	59	Project:	33225	Document:	49956
Outside Organization:	Great Old Broads for Wilderness				
Received:	Nov,16,2012 16:36:18				
Correspondence Type:	Web Form				
Correspondence:					

I write as Associate Director of Great Old Broads for Wilderness, a national wilderness advocacy organization that uses the voices and activism of elders to preserve and protect wilderness and wild lands. With more than 4,500 members in all 50 states we give voice to the millions of older Americans who values wilderness and want these places preserved for future generations.

Let me begin by thanking the National Park Service for doing a good job with the management of wilderness within Sequoia and Kings Canyon National Parks. Managing high use areas while ensuring the intention of the Wilderness Act is met is a challenging job.

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. We believe all wilderness should be managed with the same goals for maintaining land health and wilderness character. Areas of heavier impacts or use that require more intensive management or restrictions can be identified without broad zone classifications that create different wilderness expectations.

As with all non-developed public lands, we believe Wilderness should be accessible to all Americans at no charge. 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. Fees for developments such as campgrounds, marinas, etc. are appropriate as are the long standing National Park system entry fees. "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.

The use of packstock in Wilderness is not without controversy especially in light of the impacts that such use can cause. It is imperative to address this use in such a way that impacts are reduced to the extent possible, especially in meadows and in riparian areas. Good trail conditions and healthy land conditions that protect habitat are essential to sustaining Wilderness values.

We appreciate the work and thought that has gone into the proposals to date but are concerned with the segmentation of Wilderness that the Zoning implies. We look forward to the continued development of management strategies.

Sincerely, Rose Chilcoat Associate Director Great Old Broads for Wilderness

Correspondence ID:	60, 137	Project:	33225	Document:	49956
Outside Organization:	The Wilderness Society				
Received:	Nov,16,2012 00:00:00				
Correspondence Type:	Web Form				
Correspondence:					

Original on letterhead submitted to Karen Taylor-Goodrich, with attachment.

November 16, 2012

Karen Taylor-Goodrich Superintendent Sequoia-Kings Canyon National Parks 47050 General's Highway Three Rivers, CA 93271 Sent via Email & submitted via website

RE: Sequoia-Kings Canyon National Parks Wilderness Stewardship Plan, Preliminary Draft Alternatives

Dear Karen,

The Wilderness Society offers the following comments on the preliminary draft alternatives for the Sequoia and Kings Canyon National Parks (SEKI) Wilderness Stewardship Plan (WSP).

The WSP should protect wilderness character while providing reasonable and diverse means of access for all visitors wishing to experience and enjoy SEKI's wilderness, consistent with the Wilderness Act. 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.

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.

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.

It is our understanding that the National Park Service is simultaneously determining baseline resource conditions for Park resources which will be folded into a separate but complimentary "Resource Stewardship Strategy." This resource information is critical to the management of the wilderness areas, and it should be integrated into and help drive management direction in the WSP. 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.

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.

Thank you for the opportunity to comment. We look forward to seeing the draft management alternatives and continuing to be involved in the process to develop the WSP.

Sincerely,

Sally Miller Senior Conservation Representative P.O. Box 442 Lee Vining, CA 93541 Sally_miller@tw.s.org

Attachment: The Wilderness Society-Backcountry Horsemen of America scoping letter, July 25, 2011

Correspondence ID:	61	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,16,2012 21:50:37				
Correspondence Type:	Web Form				
Correspondence:					

I'm commenting on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan out of respect for students and their future. SEKI's wilderness is special and important because it belongs to all people and is part of an increasingly rare and valuable wilderness areas. This is because businesses are sometimes allowed to abuse these public places for private profit. Over time, these areas suffer immensely and everyone else loses including our kids and their kids.

Steel tipped hooves with hundreds of pounds of pressure are like shovels and are particularly damaging with unauthorized off trail use. People with stock animals can't help but damage nature. A few pack trains of animals can have the impact of a few hundred backpackers who don't leave urine soaked manure piles on the trail and in sensitive wetlands. It even seems these folks don't care about nature. So is nature important? Yes, if you care about kids. And their kids. Those who really care about education understand nature is more than important. It is crucial for physical and mental health and an important part of gaining a complete education. You can tell it is valuable because these private companies abuse it for their own profit. Politicians care about companies and money. Leaders care about people and families.

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. 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.

My students and I often study exotic invasive plant species whose documented introduction was by stock animals. There's no place for bells on animals in nature. It is difficult to explain to the kids why these animals can leave manure right on the trail while we carefully walk so far away and pack out waste. Some of my students have gotten physically ill noting stock animals defecate right into lakes and streams just like where we filtered drinking water. We've seen manure catch bags being used in some parks, and wondered why not here.

Even my students understand how rare real leadership is. They know that's what's needed, and that's what they and their kids deserve.

Correspondence ID: 62 **Project:** 33225 **Document:** 49956
Outside Organization: High Sierra Hikers Association Unaffiliated Individual
Received: Nov,17,2012 10:33:30
Correspondence Type: Web Form
Correspondence:

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. Thank you for your consideration of this request.

Correspondence ID: 63 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,17,2012 12:32:07
Correspondence Type: Web Form
Correspondence:
Greeting,

My feeling is to keep in place the current management practices. I am a retired packer with over 20 years of experience in the park area in question. My dealings with park rangers and trail crews had been a pleasant and informative experience. We have exchanged many constructive conversations on many of topics concerning management practices. You only have to ask Erica at Rock Ck. Rob at Crabtree, Dave at Evolution Valley, Dario at Rae Lakes and other rangers whose names I have forgotten of my stewardship practices and the continued use of the Park for all visitors. My name is [REDACTED] and went by the name [REDACTED]. I will try to make this short and to the point and maybe not.

#1 Campfires should be considered up to 10,400 ft. in Kings and 10,800 in Sequoia NP. Old people and hikers get very cold with age and I cared less about the cosy feeling of a campfire. They froze at high elevations and in turn I froze giving up my sleeping bag to keep them warm.

#2 Limiting access in Wallace Creek area is critical. Having to travel from Tyndal Creek to Crabtree is too long for older guests on horseback without camping in the Wallace Creek area. To compound this extra travel, Crabtree grazing for stock is limited anyway. In two ways, we will be hurt. I have had to use Strawberry Trail Crew camp to supply graze for my stock and it is a mile down canyon from Crabtree area. This makes for a double long day for guests then to hike or be dropped off into Guitar Lake for the Mt. Whitney ascend. I have done this type of day many times from Tyndal Creek without laying over at Wallace Ck. and have left Guitar Lake for the 4 miles to Strawberry in the dark with stock, just unsafe and brutal.

#3 Designated stock camps end up unsanitary and get pounded into powder and really do not recover in spring. They are close to backpackers who at many times challenged my right to be in a stock camp. I guess they don't read signs ? I do like the idea of high line cables for stock tether. Packers can and do a good job in our own picked camps for seasonal flora and camp recovery.

#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. 6 stock or less in meadows, really, you prepose this disaster for pack stations to operate. Does this measure impact your park trail crews too or do we have a double standard in consideration ? A good packer can handle 20 head of stock on graze or more. But we have a wrangler too, to help us do a stellar job. You have hard rules in place for Pack Stations as it is, due to time frames on opening areas for graze and grass condition and moisture.

#5 Numbers for stock and people work now as they are. Pack Stations have a hard enough time making some sort of profit. Do you want to doom them ? With grazing changes and having to use reduced stock numbers to bring in hay cubes there would be no room for guests. Do you see the picture ?

#6 I carried regulations the size of the yellow pages phone book. Make the regulation simple. They hurt my horses back carrying them. Ha...

I'm concerned and mean to be informative from years of experience.

Correspondence ID:	64	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,17,2012 13:09:13				
Correspondence Type:	Web Form				
Correspondence:	Supplement to Previous Comments				

I realize my previous comments on the Wilderness Stewardship Plan may not have conveyed all my opinions about this process. In my previous comments, I confined myself to the structure of the maps as the framework and declared my preferred alternative for each of the specific subjects. I assumed that was all that was requested for comment. It has come to my attention that this is not the case.

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.

I will divide my supplementary comments into three areas.

1. Party Size

The zone system does not adequately correspond to actual travel in the SEKI wilderness. There are areas of Zone 3 that are cross country and areas of Zone 4 that contain clear, easy to follow, trails - they are even on the zone map included in the comment documents. As I mentioned in my original comments, party size is the most important determining factor for causing harm to the wilderness. You can have six different parties of one, two, or three people in a cross-country area and, in most instances, they will do little or not harm - "leave not trace." One party of 15 people even in a well-traveled area will often leave destruction that lasts for the rest of a season and possibly for years.

In the next stage of comments, each alternative should clearly state what the party size limits will be for well-traveled trails, less-traveled trails, and cross-country travel. As mentioned above, the currently defined zones fail to do this. My firm belief is that party size should be limited to a maximum of 12 for even heavily used trails and 6 for cross country travel.

2. Stock Grazing and Meadows

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.

Stock travel through an area is very different from overnight stock use and grazing. The destruction that results from an overnight party is far worse than a party passing through. The current alternatives do not address this issue. Certain meadows need to be permanently closed to grazing. Other meadows need to be rotated for grazing use. There needs to be more careful analysis of the ecology of all the meadows in the SEKI wilderness to determine what meadows are never appropriate for grazing, what meadows are always appropriate for grazing, and what meadows need to be on a rotation basis.

3. Issues and Outcomes

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.

I thank you for this opportunity to supplement my earlier comments. The SEKI wilderness is too important to become simply a bureaucratic designation for the determination of human use. The SEKI wilderness is a unique place that provides humans the opportunity to reconnect to the essence of life.

Correspondence ID:	65	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,17,2012 13:10:14				
Correspondence Type:	Web Form				
Correspondence:					

I would like to respectfully offer my opinions in opposition to the proposed limits on stock usage in the wilderness.

I am relatively young and fit, but after trying several-day backpacking trips a few times in the past, I have decided that I personally am unable to fully enjoy the wilderness in that manner.

While lugging a heavy pack, I ended up staring at the calves of the hiker in front of me, and not enjoying the scenery. The sense of accomplishment of climbing using my own power has been offset by the physical pain experienced during and after these trips, and the inability to take in my surroundings while hiking. Dedicated backpackers surely feel differently, but for me, exploring the wilderness on foot is not a very enjoyable option. For those with more limited mobility, it is simply not an option at all.

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.

I believe that the proposed restrictions on stock party size, stock camping locations, trail access by stock, and

grazing are unnecessary and would be detrimental to the ability of the public to enjoy the wilderness. In my experience, Rock Creek has been responsible about their stock and campsite management, and have provided my friends and I with unique experiences (such as observing wild mustangs mating!) that would not be possible on foot.

Correspondence ID:	66	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov, 17, 2012 15:50:34				
Correspondence Type:	Web Form				
Correspondence:					

Since 1965 I have enjoyed fishing, camping and the outdoors throughout California and the Western U.S. I have seen the misuse and abuse of the lakes, streams, rivers and wilderness by the general public. I have also seen private citizens walk along the rivers and lakes picking up trash and cleaning areas that others have littered. Never have I seen a more remarkable group of such concerned people then the employees at Rock Creek Pack Station. They are truly stewards of the land; concerned not only about the health and welfare of the people they guide, but also for educating and informing people about nature, wild life and the world around them. 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. During my time in the mountains and the Eastern Sierras I have talked to people from not just California and U.S. but all over the world; Europe, Australia, Asia and Africa. By limiting the number of people and stock permitted in the back country you are limiting exposure and contact of a large number of people that only have a short period of time to spend in this environment. You are also limiting a major source of foreign revenue to the local economies at a time when the national economy is having problems. This summer while cooking breakfast on the trail and I started talking to a man going out on a five day pack trip with Rock Creek. One thing that came up on the conversation was the fact that some hikers have a very negative attitude about livestock in the mountains. He eventually admitted that he used to be one of those hikers but since he has had hip surgery he can no longer walk more the two hours, so going by horse back is the only way that he can get back to the areas that he so loved to go fishing.

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. What do you say when people ask; "There is all this dead wood around here and we can't have a fire?" They raise the point that all this dead wood is more of a fire hazard, a greater risk to the environment than it is an aid to saving the environment. Now some people may say that part of the wilderness experience is toughing it out and that is all good and well, but on the same note you do not want people to be miserable and suffer. At 10,000ft and even 8,000ft elevation it can be 80°F in the sun and 60°F in the shade, it can be up in the 80's during the day and the low 30's at night. It is hard enough for people to adjust to the elevation change, but when you further deprive them from heat you have a situation that can create serious health issues. Consider what would happen in the middle of June while on a pack trip, two days from any place, and it starts to rain and then that rain turns to snow. We have put up a tarp for shelter to keep us dry but we can't build a fire to keep us warm. We are drinking coffee and hot tea by the bucket-full to keep us warm from the inside but our feet and hands are freezing and we are rapidly losing body heat. We all shrink back in our tents and sleeping bags in the dark, hoping that we can somehow sleep through the cold, thinking how nice it would be to wake to a fire to warm us in the morning when it is the coldest, yet knowing that we cannot.

Why do we have to use designated camps? The guides and packers at Rock Creek are some of the best trained and experienced guides that I know. One of their main goals is to keep the lands that they travel as natural and pristine as possible. It is in their best interest to keep the wilderness wild. But at the same time they must take care of their livestock by feeding and watering them. If you take a look at wild mustangs and their habits you would see that they do not graze in the same area all the time but look for better grazing when and where they can. Any

animal will do the same, look for good feed and easy feed. 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. Believe me when I say that I do understand your reasoning behind the rules and regulations that you want to put in place.

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. Now the reason behind climate change can be debated, but the fact that the climate is indeed changing cannot. The annual rain and snow we receive is becoming less and less, the streams and lakes are going dry, and the smaller ecosystems are deteriorating. No matter what restrictions you place on backpackers and stock, these restrictions will not save these ecosystems. On the other hand, when more people see how climate is affecting the environment, the more people will take action and put pressure on the politicians to enact regulations that could slow or reverse the change in climate. There is no substitute for exposing people first hand and having them see for themselves that the weather has an undeniable impact upon nature and the world around us. I sincerely do hope that you will reconsider the changes that are being proposed and keep the current status as is. In fact I would humbly recommend that more areas be opened to the public so that they can see just what nature and the world have to offer and what they could be losing in the wake of global climate change.

Thank You for your time

Correspondence ID:	67	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,17,2012 16:12:41				
Correspondence Type:	Web Form				
Correspondence:					

I am writing to comment on the Preliminary Alternatives for the new Wilderness Stewardship Plan for Sequoia and Kings Canyon National Parks. My primary concern is the lack of any significant limitations on the use of stock animals within the parks. As a regular visitor to the backcountry in both Sequoia and Kings Canyon, I have witnessed the impact of large commercial pack trips on trail conditions and camp areas. It is appropriate to allow some pack animal use in these area, to allow people unable or uninterested in backpacking to experience the beauty of the high country. However, the primary long-term goal of a national park should be preservation of that wilderness for future generations. Stock animals clearly have a far greater negative impact on the wilderness than individual humans, and consequently it is only sensible that limits on stock animal use be imposed as part of a Wilderness Stewardship Plan. Thank you.

Correspondence ID:	68	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,17,2012 16:41:46				
Correspondence Type:	Web Form				
Correspondence:					

All my life I enjoyed walking in the hills of Southern California. Thirty years ago my neighbor (and walking companion) and I signed up with our community college to go on a week long hike with pack stock in the High Sierra. We had, up until then, been homemakers and mothers. At last, our kids were old enough to take care of things at home without us for a few days. It was the most amazing week! The beauty we discovered was beyond anything we could have predicted. We learned quickly what equipment we needed to take the following year and we came back again. I was about 40 years old and she was 50. As the summers passed we returned to the mountains and we enjoyed hiking most of the John Muir Trail over the years. We made many friends on these trips who joined us as the years progressed. Some of these ladies were older than we were. I took my adult children hiking with pack stock. They were thrilled at the sights they saw. When my grandsons came along and were old enough to hike a few miles, I introduced them to the Sierra Nevada by taking them on hiking with pack stock trips. They loved the wilderness experience, too. In my earlier years I backpacked a few times with my kids, but was never strong enough to go very far from the road. I would have never seen all I got to see, had it not been for the pack stations. I was always impressed by the concern the packers showed for insuring the wilderness areas we visited stayed unharmed. If one of us tried to put a tent on a meadow or too close to the water, we were instructed

by the packers where else to put the tent. We were taught how to clean up after a dusty hike without putting soap and stuff into the streams and lakes. I have seen our packers pick up left behind backpacker trash and once a used diaper that was left near our camp and pack it out. Once one of our packers got off her horse, scrambled across a ledge to retrieve a mylar balloon that had blown up from some city below. In my experience they are good stewards of the wilderness. 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. I also would wish that some of the past fire restrictions could be looked at. Some no-fire camps seem to have plenty of fallen wood. It is sure a lot more pleasant to be able to sit near a fire on a cold night. Thank you for reading my letter and taking my thoughts into consideration. I hope all future hikers will have the wonderful experiences my pals and I were able to have.

Correspondence ID:	69	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,17,2012 20:44:42				
Correspondence Type:	Web Form				

Correspondence:

Here are my opinions on Wilderness: 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. Another thing I do not like to see are those ugly radio repeaters sitting on top of certain peaks it just does not blend in with the trees. I also have no problem with temporary closers to some facilites to save the park money like ranger stations,visitor centers, High Sierra camps, and especially pack stations. I also read a thing on summit registers. Im a peak climber and I do not like to see these registers removed I have come across some that are over 50 years old, so I say leave summit registers alone. Comercial Services: OK in the frontcountry but please not in a wilderness. Alternative 4 on the Zone and Permiting Quotas I would like to see some Quotas decreased in some areas. Im just seeing to many people in some places. 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. Food Storage Lockers: No new ones installed leave current ones in place. Human Waste: Pack it out!Give everyone that are going in the backcountry Wagbags and use them!! Stock Use: Alternative 5. Ban grazing!! No stock camps any where in the park. Day rides only,in fact I would like to see some pack stations closed for good. Backcountry Ranger Cabins: No new ones built.Get rid of the Tent and Platform ones and just use the hard-sided ones. Save money! No High Sierra Camp on the Hockett Plateau,just use Bearpaw Mdw

Correspondence ID:	70	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,18,2012 09:25:11				
Correspondence Type:	Web Form				

Correspondence:

Hi there! I live in Bishop and hike in the Sierras alot. I am not fond of pack animals on the trails AT ALL and we tend to hike cross country or on non pack animal traveled trails because its so bad. Hiking with the lovely smell of horse urine on the trail in the hot summer is a drag and they are so big and heavy that they trample and damage wherever they go. I know the packers in Bishop have been here a long time and I have horse riding friends,but I still am not into the horsepackers without quotas and pretty much given free reign in the wilderness. Caving into special interest groups maybe? Protecting our "heritage" as horse country? I don't think its any way to manage the wild spaces. Please do not have this letter "disappear" Thank you,

Correspondence ID: 71 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,18,2012 09:37:21
Correspondence Type: Web Form
Correspondence:
To whom it may concern,

I am writing to comment on the Preliminary Alternatives presented in the Sequoia & Kings Canyon Wilderness Stewardship Plan. I have been a life long visitor to Sequoia & Kings Canyon National Park, and enjoy both the developed and wildernes areas of the park on a regular basis. My comments on the alternatives presented in the plan will focus on the use of stock animals in the wilderness. As a hiker who is getting older (and a wife unable to walk long distances)I understand the desire to be able to take a easier route into the wilderness. However I have also seen the serious impacts to the wilderness environment and experience that results from large groups and heavy use of stock animals.

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 mus be adressed 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.

I think the zoning plan as it relates to stock animals should be scrapped and the plan should be rewritten to protect the entire wilderness from overuse by stock animals. As an example of the flaws in the zoning, huge groups of stock animals would be allowed in areas up to six miles into the wilderness. As a older hiker, I do not want to have to walk over six miles to camp in a area that is not subject to hoards of stock animals.

This feeds into my next comment, on trail classes. 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. I do not support the designation of stock only camps. Parties utilizing stock should maintain camps in a wilderness character including the removal of all animal waste. I should not be able to tell if a camp was previously occupied by either a party utilizing stock or that hiked in. It is the heart of the saying "leave no trace" that is an axiom for wilderness use.

In closing I would like to state that I support the continued use of stock animals in the wilderness, just at a more appropriate level and with greater care to the environment and wilderness experience. I look forward to using the wilderness without overgrazed meadows, the annoiance of bells waking me up in the night, or devastated "stock camps" along the trail. Stock groups should be small, less than ten animals and have so little impact that I dont know they were there unless I see them, the same that is expected of hikers.

Correspondence ID: 72 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,18,2012 12:46:57
Correspondence Type: Web Form
Correspondence:

To those planning the future use of Sequoia Kings Canyon NP Wilderness, I heard that there was a wilderness use planning activity that was ongoing and wanted to comment on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan. I have been visiting Sequoia / Kings Canyon NPs since 1985. I loved the area and spent most of the summer of 1989 hiking in the wilderness of the parks. It is such a beautiful area and I have been very happy to return many times since then, including a trip in 2010 during which I climbed several high peaks near Mt. Stanford. Although I love the area, from day 1, I was disgusted by the continuous necessity of stepping over, around and sometimes in horse manure. I have always respected the rights of other trail users and have waited

many times as large pack trains pass on the trails in the SEKI Wilderness Area. Although at first, the only thing I realized was how disgusting the horse manure and associated flies were, after many experiences in the wilderness, I have also realized how many of the pristine, higher elevation meadows have been trampled by the horses and how much damage these pack trains do to the trails. I have seen trails churned up by a pack train, and conclude that a single pack train does more damage to a trail than a year's worth of backpackers even for the trails with high hiker quotas. I love the wilderness area and do not want anyone to be restricted from using it. I also have several friends who love horses. I think the usage of national parks' wilderness areas should be appropriate. 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. Pack trains are loud, noisy, and interfere with the wilderness experience. It was different when John Muir was going on trips into this wilderness because nobody else was going to these places, and equipment for hiking was extremely limited. Now equipment is inexpensive and lightweight and anybody who truly desires to visit the wilderness in the national parks (especially SEKI) should have no trouble getting there on foot. I know there is a desire to provide funding for the national parks through the horse packers, but the destruction these pack trains do to the wilderness and the wilderness experience just does not seem appropriate in return for a few dollars. I guess I do not see any difference between allowing ATV's in the wilderness area. They do not even cause all the same problems as pack stock. They do not carry diseases and invasive plant species. They do not leave poop all over the trails. ATV's are equivalent in destroying the wilderness trails and the wilderness experience. I'm sure that you could make money by offering permits to the ATV users and allow them in specified "zones" and limiting their destruction to specific areas. I know that wheeled vehicles are prohibited in wilderness areas, but my point is that if the destruction and loss of wilderness experience caused by them is no different than that caused by pack stock, shouldn't the use of pack stock be limited only to what is absolutely necessary? If people want experiences of riding horses in the Sierra Nevada, there are so many other places to go. Why do you have to allow them to trample our national parks? If people really want to visit our national parks wilderness areas, I am all for it. If they only want to visit our national parks' wilderness areas if a pack train carries all the amenities of home for them and they do not have to put out any effort to get to where they want to go, they do not really WANT to go to the wilderness and maybe should just stay in a hotel and drive into the parks while stopping at the scenic turnouts. I hope to visit the SEKI Wilderness again in the near future and hope I do not have to worry about huge piles of horse manure on the trails, in my campsite, and in the streams from which I'll be drinking. Thank you for allowing me to comment.

Correspondence ID:	73	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,18,2012 13:55:13				
Correspondence Type:	Web Form				
Correspondence:					

Hi, my name is [REDACTED] and I have worked the past four seasons as a packer, wrangler, and cook, for Rock Creek Pack Station. Thank you for the opportunity to comment on The Wilderness Stewardship plan options. First let me say that the Park Service has done an excellent job of managing the wilderness. From my perspective, the current restrictions are onerous and in many cases unnecessary. The range of alternatives implies that by selecting the more restrictive alternatives 3-5 you are somehow "protecting the wilderness character" in a better way. Not necessarily true. Many of the guest on are trips are older, late fifties to seventy plus. Our guests are well educated, very much so environmentally connected. Many our avid members of the Sierra Club. Some of the comments I have heard made by our guests include how pleasantly surprised they are by the care the Rock Creek employees take in grazing the stock, establishing picket lines, setting up privies, building fires, cleaning and mantianing a camp. As a packer I take great pride in leaving my campsites pristine for the next campers. I also show our guests how to return thier part of the campsite to a natural apperance. One must realize that as packers we spend almost as much time in the Wilderness as do the Park Rangers. With this in mind my vote is for maintaining the current status, with a few changes. 1. The fire restrictions in place at 10,000ft. are to low. Restrictions are not nessary above 10,000ft. where we are tripping over wood and should be rasied to 10,400ft in Kings Canyon National Park, and 10,800ft. in Sequoia National Park. 2. We should have access to Wallace Creek, and Wallace lake. Don't limit the public's use of less traveled areas in the park. I feel we should be allowed to camp with stock at Dusy Basin. 3.

Why do we have to use designated camps? This make no sense at all. By allowing experienced packers to select campsites and grazing areas, it reduces backpacker and stock user conflicts, (which I have never experienced) and leads to lower impact camping techniques. 4. Don't eliminate grazing in the upper elevation meadows. It is my experience that free grazing of livestock creates less enviromental impact than tying horses and mules to a picket lines. Don't restrict grazing in meadows to six stock or less. 5. 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 sise and stock numbers. Keep the current stock size at 20 or 25. When developing your Wilderness Stewardship Plan ask yourself these questions. 1. Does commercial stock usage enable visitors to realize the recreational purpose of the park? Yes. 2. Does commerical stock usage provide for the specific needs of a particular activity? Yes. 3. Does commercial stock usage maintain or improve the preservation of wilderness character? Yes. 4. Does commercial stock usage meet the "necessary and appropriate" criteria of the NPS Concessions Management Improvement Act of 1998? Yes. 5. Are the public recreational and scenic purposes of wilderness being realized without commercial stock use? No. Thank you for your efforts to preserve our precious resource, and the opportunity to comment on the Wilderness Stewardship Plan. Keep up the good work. Take care,

Correspondence ID:	74	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,18,2012 14:41:37				
Correspondence Type:	Web Form				
Correspondence:	Dear NPS:				

Please see my comments below on the WSP for Sequoia & Kings Canyon National Parks.

#1 Permits and Zone Quotas I am in favor of Alternative #2. I believe there should be increased use by the public.

#2 Trails, Bridges, & Signs I am in favor of Alternative #2.

#3 Campfires, Food Storage, & Human Waste I am in favor of Alternative #2.

#4 Party Size, People, & Stock I am in favor of Alternative #2.

#5 Camping, Campsites, Stock Camps, etc. I am in favor of Alternative #2.

#6 Stock Use, Access: Access, Travel, etc. I am in favor of Alternative #2.

#7 Administrative Facilities: Ranger Stations, etc. I am in favor of Alternative #2.

#8 Other Facilities, Redwood Canyon, etc. I am in favor of Alternative #2.

In summary, I would like to say that I am in favor of more public use and enjoyment of the national parks and public lands, rather than less. I am in favor of commercial as well as private stock use within the parks. I am in favor of more signage and better maintained trails within the parks. I am in favor of more amenities for visitor use within the parks. Solitude and isolation can still be found within the parks, without compromising accessibility and enjoyment by the average visitor. I am in favor of the parks doing more outreach programs to bring more visitors to the parks.

Correspondence ID: 75 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,18,2012 14:50:07
Correspondence Type: Web Form
Correspondence:

To: Superintendent Karen Taylor-Goodrich Re: Comments for Wilderness Stewardship Plan

Thank you for allowing me to share my perspective on the management of Sequoia and Kings Canyon national Parks. I have had the pleasure of using the National Parks all my life. My family's annual vacations were camping and fishing in Tuolumne. As an adult I became an avid backpacker and mountaineer - I taught the Sierra Club BMTC and MTC classes for over 10 years, climbing over 53 peaks in the Sierras. These classes promoted safe mountain travel, emphasizing minimal impact usage. During the past 7 years I've been packing with Rock Creek Pack Station - at least 6 weeks each the summer. As a backpacker and horse packer I feel I have a unique perspective on the use of stock in the National Parks.

Sequoia and Kings Canyon already do an excellent job of managing stock and human usage in the park. Therefore I highly recommend and support the First Alternative. I would like to make a few modifications on that choice.

1. 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 its necessary to have some discretion in the use of a fire. The packers are extremely careful. They dig a hole in a safe location to make the fire, illuminating the unsightly blackened rocks/fire ring. During clean up, the fire is completely drenched and buried, leaving the spot looking untouched as well as intact. 2. Please do not limit the access to Wallace Creek and Wallace Lake by horse and mule. I love that area and really want to fish in Wallace Lake pack in the Dusy Basin region- one of areas where I haven't been by horse. 3. 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. They are the eyes and boots on the ground. This will lead to better low impact camping and grazing techniques. Free grazing creates less environmental impact than tying horses and mules to a picket line. The use of the same camp will lead over time does wear it out. 4. Please do not eliminate grazing in the upper elevations. I am 65 years old and if that happens I won't be able to travel in those areas. Also, I think you should minimize the complexity of regulations on party and stock size. (That way I can afford to take these trips - as they will stay affordable!) I am a teacher and will retire this year. My retirement dream is to ride in the Sierras as much as I can.

In conclusion, I'd just like to mention that during the past 58 years I've been in the Sierras, I have observed an explosion of human foot travel in the Park areas all over the Sierras. Backpacking and climbing gear/clothing have become a multi-million dollar business. While over the past century, the commercial stock usage has significantly decreased. I really feel that in light of these verifiable statics, it is extremely inappropriate to single out for exclusion the commercial stock camping and travel. This is a traditional as well as historic form of travel, which I just love. Everyone goes to these mountains to experience the peaceful renewal that this beautiful wilderness provides.

I live in Three Rivers and would really like to discuss these issues further with you. Please feel free to contact me.

Correspondence ID: 76 **Project:** 33225 **Document:** 49956
Outside Organization: California Equestrian Trails and Lands Coalition
Received: Nov,18,2012 16:26:56
Correspondence Type: Web Form

Correspondence:

The California Equestrian Trails and Lands Coalition is a coalition of 15 equine organizations that represent over 40,000 horse owners and trail advocates.

CET&LC is very concerned with many of the Stock Use Alternatives in this draft, as we feel these are just another step in the slow removal of people and livestock from Our National Parks. CET&LC has been following this slow removal process since before 2002 when many Roadless Issues occurred, and many Monuments were issued through the Antiquities Act.

Livestock has always been a historical part of Our National Parks and we feel this slow removal of Our Rights on Our Public Lands without true scientific planning is not a move we (CET&LC) can agree with at this time.

For decades professional and private packers, and other stock users, have helped the National Parks maintain trails, but during these decades more and more restrictions have been placed on stock users; restrictions that have been placed on stock users by non-scientific means and placed because a certain group has pressured the National Park Service to place these restrictions.

CET&LC has read the Alternatives and we feel that the Alternative that "remains the same" should be used, because any further reduction of trails and trails heads would possibly cause Us (CET&LC) to look for other means to fight these restrictions.

John Keyes

Chairman: CET&LC California Equestrian Trails and Lands Coalition

Correspondence ID: 77 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,18,2012 18:34:19
Correspondence Type: Web Form

Correspondence:

I am a seasonal user of Sequoia National Park and have been for almost 40 years. After reviewing the documents, I have the following comments:

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.

Overall I believe any plan should support park use and that restrictions should not be increased. Most of the options in Alternatives 3-6 of all topics change current management by increasing restrictions while lowering support. This also seems counterproductive from a budgetary standpoint since these options would require more "policing" and paperwork while discouraging visitors.

TRAILS AND SIGNS - Alternative 1 makes the most sense, though some provisions in Alternative 2 appear to address some current issues.

FIRES - Alternative 2 seems to allow for reasonable use of fires with caution to prohibit fires when not safe.

HUMAN WASTE MANAGEMENT - Alternate 2 allows for the ability to control human waste in higher traffic

areas in specific zones.

STOCK - The use of stock in the parks allow elderly and physically impaired visitors to have a wider park experience. Alternatives 1 and 2 seems to fit allowing the appropriate use of stock in the park system.

CAMPING - In this case, Alternative 1 makes the most sense. Alternative 2 seems to restrict use in some areas and widen use in others.

As I mentioned before, Alternative 1 and 2 on all topics are the most reasonable. All other alternatives discourage visitors while increasing restrictions. I believe this would result in requiring additional staff to remove structures and police new restrictions while lowering revenue by discouraging visitors.

Correspondence ID: 78 **Project:** 33225 **Document:** 49956 **Private:** Y
Outside Organization: Unaffiliated Individual
Received: Nov,18,2012 00:00:00
Correspondence Type: Web Form
Correspondence:

If possible, I prefer my personal identifying information be withheld, although I understand you cannot promise this will occur.

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.

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.

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.

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.

I like the fact that some of the old abandoned trails are in Zone D and are not maintained at all. They really represent routes. I hope this continues as I value them being less well marked and accessible.

I like the fact that stock is not allowed in Zone D for alternative 5.

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.

I favor limits on campfires such as alternative 5 which doesn't allow them in the wilderness.

I favor a requirement to have portable food storage containers by all overnight visitors.

Correspondence ID:	79	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,18,2012 19:33:57				
Correspondence Type:	Web Form				
Correspondence:					

I appreciate the opportunity to voice my opinion and concern about options 4,5 and 6 of the Wilderness Stewardship Plan. I came to California in 1988 from the state of Maryland. I was quickly introduced to the awesome outdoor experiences the Sierra back country offers and found myself hiking, backpacking and horsepacking most seasons since. I have enjoyed many horsepacking trips with the Rock Creek Pack Station, finding the staff to be conscientious stewards of our back country beauty and deeply respectful of the eco-system found there. As an outdoorswoman, I feel that my mountain trips that I so cherish are threatened by these options currently proposed and I am seriously concerned about how they will cripple my back country experiences if adopted. I am also concerned, as I listen to the concerns of pack station owners, that pack stations may be forced to close or limit their trips due to these cumbersome, expensive and, in some cases, unnecessary restrictions.

Several years ago, I had the privilege of sharing the trail with a young man named Michael and his 71 year old mother. Michael was an inspiring rider who suffered with cerebral palsy, but came undaunted by his compromised abilities. His specially equipped saddle complete with personally designed stirrups enabled him to bask in the delight of the back country experience the same as anyone else. If it was not for the services and livestock of the pack station, Michael would not have had full access to the mountain trails. Likewise, his mother, at her age, would not have been able to share in this inspiring experience with her son without the pack station services. As a former special education teacher, I truly understand the importance of full access to our country's wonders for those of us who are differently-abled. As my own arthritis advances and backpacking becomes progressively difficult, I am developing a deeper and deeper understanding of why continued access to the back country by stock is so precious. It would be tragic if tighter and tighter restrictions drove pack stations out of business and destroyed the opportunity for wilderness access by people not only like myself, but especially for those like Michael.

Specifically, I am opposed to the current restrictions on campfires above 10,000 feet. A back country experience is not complete without the long standing tradition and camping heritage of people circled around the evening campfire after a day on the trail. I believe, in full consideration of wood availability, a limit of 10,400 feet is more reasonable.

I am also opposed to added restrictions that would eliminate grazing in upper elevation meadows. Unless, of course, the meadow is particularly fragile.

In addition, I believe that restricting free grazing of livestock or restricting meadow grazing to 6 head is unwise. 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.

I am also strongly opposed to any options that create a new system of counting the number of people and stock on back country trails. As I travel on the trails, I do not see an over abundance of horsepackers or backpackers. The trails appear to be safe from overuse so I think the current numbers of 20 and 25 are reasonable. Keeping the current system also would minimize regulations to avoid unnecessary complexity in administration of those

regulations by the pack stations.

I support the current regulations (alternative #1) and feel that they protect our awesome wilderness while allowing for access by all citizens. Thank you for the opportunity to comment on the Wilderness Stewardship Plan and I pray that you will continue to protect our back country in such a way that it's wonders will remain accessible to all.

Correspondence ID: 80 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,18,2012 20:26:20
Correspondence Type: Web Form
Correspondence:

I would like to take this opportunity to help shape the Sequoia/Kings Canyon GMP. My wife and I have spent the last 27 summers hiking within this beautiful park, with trips ranging from 10 days to three weeks in length per year. Using both Eastside and Westside trailheads, we travel by foot without pack animal assistance. It is truly our favorite place in the world. 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. I foresee problems with the zoning proposal. This is counter to the intent of the Wilderness Act's definition of Wilderness. Allowing certain areas to selectively degrade by stock is not an option. The wilderness area is a zone in total. The proposed 3 trail "classes" should definitely include trails where stock are excluded for all but trail crew assistance and emergencies. I strongly believe that stock animals should be required to be fitted with manure catchers. Having manure-free trails would improve the trail experience for hikers and stock assisted visitors alike. Thank you for your consideration. I hope my comments were helpful.

Correspondence ID: 81 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,18,2012 20:35:27
Correspondence Type: Web Form
Correspondence:

To Whom It May Concern:

I am able to provide a unique perspective on the Wilderness Stewardship Plan that is under consideration. I have a strong love of the wilderness and am avid outdoorsman and have spent my entire life enjoying the outdoors including fishing, hiking, backpacking, etc. in wilderness areas throughout the country as well as Canada, the rain forest in Costa Rica, and several mountain ranges in Europe. I had the privilege of working for Rock Creek Pack Station as a packer for three full seasons in the early 1980s. (1980 - 1983) During this time, I spent nearly the entire time in the backcountry and packed in every area that Rock Creek Pack Station operated. These areas included the ones addressed in the preliminary Wilderness Stewardship Plan. After working for three years at the pack station, I pursued another career and am currently a Deputy Attorney General with the California Department of Justice. As a result of being furloughed by the State of California over the past couple of years, I offered to work on a part time basis for Rock Creek Pack Station the last two seasons. I did not enter any of the areas that Rock Creek Pack Station operated between 1983 and 2011, with the exception of hiking Mount Whitney. During these last two seasons I was able to return to a number of the same backcountry areas that I had not seen in nearly 30-years. I was highly impressed by the fact that the areas looked exactly the same as they did 30-years ago. I did not observe any adverse effects to the wilderness from the nearly 30-years of Rock Creek Pack Station operating in these areas. This is a testament to the commitment the operators of Rock Creek Pack Station has in maintaining the backcountry in a pristine state as well as the resilience of the mountains.

It is also my experience that the packers who both own and operate the commercial packing companies and their employees are avid outdoors people. These individuals have a great love and passion for preserving the

backcountry for future generations. The owner of Rock Creek Pack Station, Craig London, is also adamant that the backcountry areas be protected by his employees. For example, Mr. London had me read and become very familiar with the current rules and regulations for minimizing impact to the backcountry. He made sure I was familiar with the regulations pertaining to campfires, grazing, the picketing of stock, areas to cross, etc. I also sat in a number of meetings with Mr. London and other employees where such topics were discussed. Mr. London also made it clear to his employees that he expected them to leave campsites in pristine condition when a trip was concluded. This demonstrates the commitment of the commercial packers to not only the technical aspect of the law, but an effort to fully protect the backcountry.

There is no question that the backcountry wilderness needs to be preserved through reasonable regulations. However, the basis for the regulations needs to be drafted in such a manner that is not so restrictive to impair the wilderness experience for the people who visit it. The regulations also need to take into account that the commercial operators in the backcountry are quite often the best judges with respect to the effects of human impact on the backcountry. Consequently, the commercial packers can effectively regulate themselves and modify their practices to preserve the backcountry. It is my experience that the commercial packers are the ones with the most motivation to preserve the pristineness of the backcountry since their very livelihood depends on it. Commercial packers know that they will not customers if they are operating in an area of degradation of the wilderness. People pay commercial packers to bring them to pristine wilderness and the packers fully understand that that there very livelihood depends on these areas remaining pristine. I have been fortunate in entering the back country with packers who have worked for decades in the backcountry and have personally observed them take steps to minimize their impact on virtually every occasion that I entered the backcountry with them. The packers observe the backcountry on a daily basis and see for themselves whether there are problems resulting from such things as excessive burning of wood, excessive grazing, etc. 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. These strict restrictions will also limit the number of people who will have access to the backcountry such as the elderly and handicapped. Many people are unable to hike into these areas, but are able to ride a horse into the areas. The regulations need to also take into account and provide the National Park Service the necessary regulatory function of imposing restrictions on the commercial packers who are creating an adverse impact. However, simply banning activity such as fires, grazing at high elevations, imposing a strict formula for the number of pack stock, etc. is not the answer.

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.

Please feel free to contact me if you have any questions or if I can be of assistance.

Correspondence ID:	82	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,18,2012 21:52:54				
Correspondence Type:	Web Form				
Correspondence:					

Thank you for the opportunity to comment on the options for the Wilderness Stewardship Plan. I have been on many back country trips in the Sierra Nevada. I began backpacking in 1969. I started traveling into the wilderness with pack stock from Rock Creek Pack Station in 1991. I have been on a trip with pack stock almosy every year since 1991. Many of my horsepacking trips have been into SEKI & Yosemite Parks. I have had extensive experience in the back country and I think I'm well versed on proper use and respect of our wilderness treasure. I have been very impressed with the staff of Rock Creek Pack Station and their attention to protecting the sensitive

wilderness areas in the parks. I have personally witnessed the staff stop and answer questions for backpackers as well as inviting backpackers into camp on occasion to have dinner with the staff and and guests. Due to my long history of both backpacking and horsepacking I think I'm in a valid position to make a judgement. I feel the wilderness areas of the parks and elsewhere are in better and more pristine condition now than when I began my travels. Therefore I'm in favor of maintaining the current status of management. I feel that my back country experience would be at risk with the other options. I'm 65 years of age and it's getting increasingly difficult to backpack and the day will come when the only way I'll be able to travel in the backcountry will be by stock. I further think that restricting free grazing is unwise. I personally believe that the stock will make less impact on the ecosystem with free grazing as opposed to any other alternative. I also am opposed to any other options of counting the number of people and stock on trails. My experience tells me that the existing system for trail and stock quotas works well as I've not seen excessive numbers of travelers on any trips I've taken. I respectfully submit these comments and I appreciate your consideration of them. Thank you for managing our beautiful and unique Sierra wilderness.

Correspondence ID: 83 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,18,2012 23:24:09
Correspondence Type: Web Form
Correspondence:

I have always enjoyed the outdoors. During Yosemite visits with my family, I would do day hikes in the high country--I found the experience, the scenery was awesome.

Eight years ago, some friends invited me on a 10 day hike through the Sierra backcountry, some of which was on the PCT, using Rock Creek Packers to carry our gear. The experience and the beauty was astounding! I would never have had the opportunity to see such magnificent country without using stock to carry my gear. My appreciation of the environment, and understanding of the impact mankind has on it has been deepened with my trips into the wilderness. I am much more conscious of how my actions impact our globe as a result of my visits to the backcountry.

I am now 71 years old. I have done 8 annual trips (including the 2012 trip) using Rock Creek Packers to carry our gear. Every one of their crew has been very conscious that they are stewards of the backcountry. They respect the environment and land, and demand that we do the same. Camps are always left in a pristine condition,--including carrying out previous campers garbage. Rock Creek also takes good care of their stock, exercises care in setting picket lines and grazing the animals in approved locations. An evening around an outdoor campfire with friends, all warming our bones following an afternoon rainshower in the mountains is never forgotten.

My vote is to continue the current status. Existing controls for backpackers and stock supported wilderness trips have resulted in minimal damage, if any, to the environment. Other than on the John Muir and PCT, I have found on all my trips that there are very few people in areas that we visit. We camp in designated areas which allow us to access lightly used side trails and areas. We rarely see other people in such areas.

Thank you for your efforts to preserve our precious outdoors, and for the opportunity to comment on the Wilderness Stewardship Plan.

Correspondence ID: 84 **Project:** 33225 **Document:** 49956
Outside Organization: Mt Whitney Hikers Association
Received: Nov,19,2012 01:56:16
Correspondence Type: Web Form
Correspondence:

I am concerned with two primary areas: use of stock and Trail quotas

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. People have to carry in all their food, why not stock, too? Some entire meadows in primary drainages should be completely off limits to stock. The plan allows too many meadow areas to be grazed.

As for trail quotas: Keeping people out of the wilderness should be the LAST RESORT when managing the wilderness. Protecting the wilderness by preserving it unchanged and undeveloped for future generations is the primary goal of the Wilderness Act. I am quite sure the legislative intent of the Wilderness Act was NOT to keep people out. There are many tools that can be used to maintain the wilderness character that should be used BEFORE setting tight quotas on trail heads.

The fact that back country use is about half that of 40 years ago, while the population has increased significantly, is a primary indicator that the wrong methods are being used to manage the wilderness. 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.

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!)

Educated and trained hikers would have much less impact.

Another tool: Charge more fees to pay for more rangers to patrol the popular and impacted areas.

The Wilderness Act was written with the phrase "has outstanding opportunities for solitude or a primitive and unconfined type of recreation". That phrase is actually used to DEFINE wilderness. It is NOT a mandate that a park wilderness plan enforce solitude on a trail. It is insanity to create a trail and then bar most people from using it. Enforcing tight quotas does the opposite of providing outstanding opportunities for solitude. The effect is to completely prevent any opportunity for solitude whatsoever.

Conclusion: Solitude is only a very small part of "Wilderness Character." The Wilderness Act does not require restrictive trail quotas. Such quotas should be the LAST resort when it comes to managing a wilderness.

Correspondence ID:	85	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 07:56:20				
Correspondence Type:	Web Form				

Correspondence:
there is a definite conflict between the idealogs of wilderness management and commercial enterprises. should management succumb to the wants of the commercial enterprises the pristine state of wilderness would be imperiled. proper stewardship demands a curtailment of these commercial interests by limiting the number of groupsize and especially the number of stock allowed. allowing commercial pack outfits to issue there own permits is grossly irresponsible and should not be allowed. my recommendation is that seki allow no more than 10 persons in a group and stock be limited to 8 head. 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. thank you for this opportunity to comment on the upcoming wilderness plan.

Correspondence ID: 86 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 08:41:02
Correspondence Type: Web Form

Correspondence:

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. Alternatives 5 and 6 were interesting in concept, but don't really seem practical to implement. That leaves Alternatives 2-4 as the only action alternatives that are being seriously considered by the park. - Alternative 3 seems to be similar to current management action, but with a number of relatively minor improvements. - Alternative 2 allows for higher visitor use, but no evidence is presented to suggest that the park is experiencing or expecting a significant increase in wilderness use. So this alternative isn't very realistic, plus it would have higher impact levels. Analyzing this alternative isn't very helpful since the park isn't likely to select it. - Alternative 4 provides a reduced need for development by decreasing visitor access and increasing restrictions. That seems like a useful alternative to consider.

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.

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?

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.

One of the great things about hiking in the SEKI wilderness is that park management doesn't provide controls about where visitors can go. 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.

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.

The text should also discuss the relationship of the visitor capacity controls being proposed in the Supplemental Information section with the use and distribution controls being proposed in Table 1. They both seem to have the same objectives: protecting resources and wilderness character, plus they use essentially the same tools to achieve those objectives. These are not separate and distinct issues.

Day use permits. The park should not propose any alternative that it cannot reasonably expect to implement given

current resources. I find it hard to believe that the park will be able to enforce wilderness permits in popular dayuse areas, especially those near campgrounds. We've all been in situations where a few people played by the rules while many others scoffed at the rules.

Why is the park implementing dayuse permits anyway? Presumably the permits are being implemented to achieve some goal. State that goal. Is the idea to achieve a particular level of wilderness character in the dayuse areas of SEKI's wilderness (e.g., Little Baldy). Don't design a system that looks good on paper, but is impractical to implement.

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.

I love to enjoy the meadows when I'm in the SEKI wilderness; that seems to me like a basic part of wilderness character. It is not possible to enjoy a meadow that has been trashed by stock. I'm not implying that all stock-grazed meadows feel like they are trashed; most feel pretty good overall. But we've all seen spots in those meadows that were less than aesthetic. And even at their best, a recently grazed meadow is very different than an ungrazed meadow. 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.

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.

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.

Correspondence ID:	87	Project:	33225	Document:	49956
Outside Organization:	Sierra Club Unaffiliated Individual				
Received:	Nov,19,2012 09:15:39				
Correspondence Type:	Web Form				
Correspondence:					

As an avid hiker and one who is concerned for balance in the environment, I strongly favor Alternative #1 - current management practices.

I have taken 9 backcountry trips with Rock Creek Pack Station, and have found them to be extremely professional in all their practices regarding use of livestock, treatment of campsites, and courtesy to all they encounter on the trail. I am 61 years old and could not visit the backcountry if I couldn't count on them to transport heavy loads. My group of friends range in age from 60 to 74, and though we are in good health we couldn't carry heavy packs

anymore and therefore could not reach the deeper areas of the Sierra which are so beautiful and serene.

When hikers who are not part of our group encounter the pack mules, they frequently photograph them and are thrilled to see this reminder of the origins of travel in the backcountry. The fact that real cowboys still exist, and that this fairly primitive and low impact form of transportation is still used, is a reminder of a simpler day and is something the viewers share with their family and friends back home.

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.

It would make sense to allow experienced packers such as Rock Creek to move beyond the currently designated stock camps, because they could minimize damage by spreading out the use, as opposed to concentrating the use into smaller and smaller areas which would thereby become degraded by overuse.

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.

I also find it hard to understand why fires are not allowed in some areas, while there is abundant deadwood lying at our feet. Again, I think it makes abundantly more sense to spread out human use to minimize impacts to any single area, versus restricting areas so that those areas suffer damage through overuse. If professional packers file a plan for the specific areas they will travel to, they will take ultimate care to ensure that the areas are well-cared for. Also, after a long hike, it is so comforting to sit around a campfire and very difficult to be at higher elevations in the cold with no ability to build a fire.

I see the professional packers situation as analagous to the family farmer, who takes great care to ensure his own plot of land is maintained in a healthy fashion, as his and his family's livelihood depends on it. I have repeatedly witnessed the packers treating the wilderness with the same type of love and respect, and their knowledge and skills should be relied upon and taken into account as a valuable part of wilderness conservation. They care more about maintaining the backcountry than the casual visitor, since their way of life depends upon its sustainability.

Thank you very much for the ability to comment on the Wilderness Stewardship Plan. I sincerely hope my comments will be taken into consideration.

Correspondence ID:	88	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 10:14:51				
Correspondence Type:	Web Form				
Correspondence:					

I am a professional mountain guide of 25 plus years. I am one of the owners of Sierra Mountain Center, a CUA holder with SEKI. I am AMGA Alpine and Rock certified.

I embrace very high standards for my profession and encourage the Park to adpot the same, specifically when it comes to two requirements: techincal 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. 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.

Thank you for the opportunity to comment

Correspondence ID: 89 **Project:** 33225 **Document:** 49956
Outside Organization: High Sierra Packers Ass.
Received: Nov,19,2012 10:32:22
Correspondence Type: Web Form
Correspondence:

I believe that alter. 1 is the best one. Your current management is working fine . The park has already seen it's high's peak in backcountry use, in years past. You already have management tools in place to open and close areas as needed , for camping and stock use. My family has been packing in the Park since the early 1920' and we have seen some good things and some bad. With the current management plan things have always seemed to work out for the wilderness. Thank you for your time John E. Cunningham Owned High Sierra Pack Station

Correspondence ID: 90 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 10:59:57
Correspondence Type: Web Form
Correspondence:

Dear K. Taylor-Goodrich

I was astonished and horrified by your Preliminary Alternative for commercial stock in SEKI!!!! there are no limits or controls on stock!!!! Commercial stock have been trashing the trails and meadows legally and illegally for YEARS. Meadows that were healthy 35 years ago are now sand!!!! There is no real need for commercial stock for able bodied persons (except it IS difficult to hike on the extremely (and frequently illegally high (at least according to NFS regulations) granite steps that have mushroomed on most trails to offset the damage the stock do to the trails. You don't allow dogs in national Parks! Why would you allow sharp-hooved animals that were first introduced to North America a mere 200-300 years ago? Horse urine and fresh feces stink up the trails that would otherwise smell like fresh air/wildflowers etc.

Horse feces attract biting flies!!!!!!!! and, worst of all they trash meadows!!!! All of your alternatives allow for unlimited stock (thus my horror) animals and trips. did I forget to mention the dust raised by illegally long commercial pack trains? I have personally seen them on a trail from June Lake into Yosemite. You have even not done a "needs assessment".

you need do the "needs assessment" (for example NPS stock that supply trail crews don't need to munch meadows at the rate they do! Commercial trips don't "need to include more than 10 clients and 2 cowboys. The public AND OUR PLANET DESPARATELY "NEED" pristine wilderness. there is plenty of national forest for those healthy people that don't "feel" like walking. Please, at least limit stock to some "sacrifice" trails and lakes and preserve most of the parks. And limit regular use of commercial stock off the "sacrifice areas" to people over 60 and those with a doctor's order. Thank you for your consideration,

Correspondence ID: 91 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 11:06:30
Correspondence Type: Web Form
Correspondence:

I would like to comment on the proposals put forth. First I don't believe the proposals go far enough in many areas, and none of the proposals are acceptable in numerous ways.

Firstly, I don't believe campfires should be allowed in the national park back-county at any elevation. Self contained campstoves should be the only fire permitted. Desolation Wilderness has this requirement and there is less scarring from such a habit-though enforcement is weak, as there are still fire rings evident in many areas and

they last for many years.

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.

Making rules is great, but without enforcement your just wasting everyone's time.

I must say I was flabbergast the first time I came across a fence in the back-country and cattle grazing. In the wilderness? Seriously? That's why we have national forests I would have expected. So any grazing should not be allowed at all, period. I have to "pack it in, pack it out" Why is stock exempt?

You have this thing about zones. Are you going to post a multitude of signs in the back-country so people who are off trail and the like, know exactly what zone they are in and what the different rules are for each zone? How's that work out when doing your taxes-the multitude of rules. There should be two zones-one that is back-country, and one that is not. The back-country is required to be preserved for generations to come-that's the rules! There should be designated trails that all stock are required to use and stay on, and there should be a multitude of trails designated "foot travel only" where stock can be avoided completely by a hiker, without having to walk an additional multitude of miles from a trail-head wading through poop and fighting biting insects.

Studies show pack stock destroy wilderness. I see it when ever I hike. Post holes in fragile meadows-breeding ground for mosquitos, to the denuded rings around trees. This should be taken into account in any proposals put forth. Why should I drink water that is polluted by animal waste that is indiscriminately dropped wherever they chose?

All your proposals are lacking and should be scrapped. You need to have an honest discussion with your back-country rangers, and biologists. Your job is to preserve the wilderness, not sell it out to the highest bidder.

Correspondence ID:	92	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 11:07:03				
Correspondence Type:	Web Form				
Correspondence:					

I see a real need to allow stock (horses, mules) in the back country wilderness. Many visitors cannot endure the high altitude and rigors of hiking up steep trails, so allowing stock to carry supplies would mean these people (including the elderly and disabled) could enjoy the backcountry. Also, it's important that stock be allowed in a day early for acclimation and feeding.

Horses and mules have traveled these trails for decades. It's a part of the Park's history dating back to the silver mining days of the 1860s. Backpacking with stock is part of the "natural and historic objects" the National Park Service was formed in 1916 to protect.

Lastly, it would be helpful if the Park would open the Mineral King water system as soon as possible and close as late as possible for fire safety, and the public can use the Cold Springs campgrounds and the cabins.

Correspondence ID: 93 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 11:11:41
Correspondence Type: Web Form
Correspondence:

I have been coming up to Mineral King every year since 1933, and have participated in the protection of the environment with my parents in partnership with the Forest Service, and now, with my family, in cooperation with the Park Service.

Leave the historic cabins alone.

The cabin community has always been good stewards of the area for over 125 years, and will continue to care for the wilderness for future generations to enjoy.

Correspondence ID: 94 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 11:49:29
Correspondence Type: Web Form
Correspondence:

I have visited cabin owners at the Mineral King area for decades. As I have aged, I have developed arthritis and am no longer able to hike the steeper trails. I would like to access the wilderness by horseback. I understand horses, pack groups and pack stations are no longer being included as part of the Wilderness Stewardship Plan for Sequoia and Kings Canyon National Parks. I request that you reconsider. The horses provide access to this beautiful area that disabled people, without the aid of horseback travel, will be effectively eliminated from enjoying and participating in. This includes a wide range of people of ALL AGES - a partial listing includes those with physical disabilities, those with a variety of medical disabilities, those with moderate vision impairment, those with mild mental disabilities requiring a tour leader... Limiting access to wilderness when there is a reasonable, well established option of horse riding, seems like a plan to exclude, not to be inclusive. Numerous other national parks have trail access for horse riders. I will be counting on you to CONTINUE the long tradition of pack stations and access to horse riding that Mineral King area and Sequoia National Park have enjoyed for decades. Please don't let me down by taking away access to the wilderness.

Correspondence ID: 95, 96 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 13:16:57
Correspondence Type: Web Form
Correspondence:

I am 84 years old and have been travelling in the High Sierra on foot or by horse since 1967, although age is catching up with me. I would like to go on record as supporting Preliminary Draft Alternative #1. No additional restrictions on travel and camping. By the way, you should be commended on your selection of photos in the review summary. It brought back many fond memories, especially the high altitude camps.

Correspondence ID: 97 **Project:** 33225 **Document:** 49956
Outside Organization: Sierra Club Unaffiliated Individual
Received: Nov,19,2012 13:29:52
Correspondence Type: Web Form
Correspondence:
November 19, 2012

Dear Superintendent Taylor-Goodrich, Thank you for the opportunity to comment on the proposed alternatives under the Wilderness Act. I wrote to you last May about my concern over further limits on commercial stock access to the backcountry, since I am dependent on stock support to hike Sequoia and Kings Canyon's high country trails. I am now writing to express my support of the Alternative 1 options of continuing current management practices. Let me review the issues raised in my earlier letter, which continue to represent my reasons

for supporting Alternative 1. I am almost 70 years old and am not strong enough to carry a big backpack. However, I am fortunate enough to be able to carry a day pack and do day hiking. The Sierra Club calls the support I need, in order to have access to the High Sierra backcountry, "assisted trekking." Let me review my background in Sequoia and Kings Canyon, talk about the companions with whom I enjoy assisted trekking, explain why I believe that additional limitations on stock to support us is age discrimination, express my observations and appreciation of the care and quality of packer practices under the current rules and limitations, and try to convey to you my sense of urgency and anxiety over further limits that could have the effect of making commercial packer support no longer financially viable, thus denying me the opportunity to continue enjoying backcountry hiking. I have been camping, hiking and backpacking in Sequoia and Kings Canyon since age 11. The two longest and most thrilling backpacks I completed were the Piute Pass-Muir Pass-Bishop Pass semi-loop and the entire High Sierra Trail. I made these trips in the 1960's and carried a 45 pound backpack both times for the ten days of each trip. When I reached age 50, I was no longer strong enough to carry a backpack sufficient for a week or more in the backcountry. That was when I discovered the Sierra Club's mule-assisted High Sierra trips. The first one I went on was into the Evolution Valley/Evolution Lake country. For the past 20 years, I've spent almost every summer on one or two of these trips, either organized by the Sierra Club or privately organized. The people I've hiked with on these trips have been overwhelmingly like me in that they are former backpackers who are no longer strong enough to carry packs for a 50 or 60 mile backcountry trip. On three of the most recent trips, some members of the group rode stock while the rest of us walked. This is because each had too much deterioration in a joint to do the rugged hiking that the backcountry demands. Riding gave them backcountry access that they otherwise would not have had. If packers are either given too many constraints or denied the ability to support us, we will be no longer able to have access to the backcountry that we love and have supported not only through our taxes but through additional charitable contributions (I am myself a many-year member and contributor to the Sequoia Parks Foundation and Sequoia Natural History Association). We have seen packers obey increasingly stringent restrictions each year, created to protect the backcountry. We believe that these restrictions are effective and that further restrictions or eliminating stock completely from the backcountry represent unwarranted discrimination against the old and disabled who can only see the backcountry with stock assistance. In my observations and conversations with them, I am convinced that the packer station staff members have been meticulous in observing the current regulations and in leaving behind camps that have been returned to a wilderness state, the better to serve future users. The packer's provision of waste disposal facilities has assured cleanliness in the camps. By bringing bear-resistant panniers, they assure that anything we are carrying that could attract bears are properly stowed overnight. They also assure that there is room for backpackers in any permanent bear lockers where we camp. Based on what I have observed over the years, I believe that the packers have set a higher standard for backcountry care than have some backpackers. 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. When you approach age 70, you do not know how many years you will be able to continue. I have mild arthritis in my knee and lower spine and I'm a slow hiker. But the leaders of the trips I've been on will tell you that I keep on, I always make it to camp. Please don't deny me access to the backcountry simply because I'm 69 years old and no longer strong enough to carry a backpack! Thank you for your attention.

Correspondence ID:	98	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 13:41:51				
Correspondence Type:	Web Form				
Correspondence:					

Being in the back country of the Sierra nurtures my soul like religion does for others. I have been hiking there for 60 years, first backpacking, then with food drops and now with mules carrying most of our gear. For the last 20 years, without mule assistance I would not have been able to manage more than day hikes. As you know this does not access the back country. In stopping the use of mules two important groups, older people and the handicapped, will be cut off from a renewing source of wonder and joy. These groups, perhaps more than others, know the need to protect our mountains and the environment in general. Please continue with the rules for the present level of stock assistance. Your controls for access to the mountains are sufficient to limit excessive damage to trails and

camp sites

Thanks for soliciting public comment.

Correspondence ID: 99 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 14:23:44
Correspondence Type: Web Form
Correspondence:
To Sequoia and Kings Canyon National Park Officials,

I am writing to comment on the preliminary draft alternatives for the Wilderness Stewardship Plan. I will comment on each section to make it easier to follow:

1. 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.
2. Trials, Bridges, and Signs: I would think that trials 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.
3. Campfires, Food storage and Human waste: Campfires should only be able to be done in certain areas of the wilderness areas, due to fire danger and use of resources that are diminishing in the area. Food should be stored properly in a storage locker where there is one available or in bear proof canisters. But new storage lockers should not be put into the backcountry to replace ones that don't work anymore. Human waste should be buried underground while in wilderness areas.
4. Party Size: I think the current party sizes are within reason and should not be changed. From my understanding the party sizes are as follows: 25 people for day use and 15 people for overnight use. And each party is allowed 10 stock.
5. Camping: Campsites, Stock Camps, and Camp Night Limits: Campsites, in some areas, have historically been set because of the high volume of people that camp in the area. Bringing stock on your backcountry experience into the wilderness areas, there are some drawbacks. There are only certain places that the stock can graze, because of the availability of resources in different areas or the diminishing resources. Therefore, people need to be aware of this before going on a pack trip and bring hay or grain with them for the stock. Due to the heavy traffic in some areas, camping limits for night use need to happen. Then, everyone that wants to go to an area can.
6. Stock Use: Access and Travel; Camps; Party Size; and Grazing: Stock use should be fully accessible to all that want to use it (per to ADA accommodations). The use of stock in the wilderness areas is needed because it would make the backcountry/wilderness accessible for the disabled that couldn't go otherwise by hiking to the areas. The problem is that Sequoia and Kings Canyon National Parks only has one place that they allow individuals to rent horse for the day and for pack trips. But it is in Sequoia National Park. If someone wants to bring their stock up to the park, they would have to go out of that area. In Mineral King area, which historical had a pack station for all to use, individuals are not allowed to bring their stock up to the area and accumulate them overnight before going on a pack trip with their stock. Instead, they have to come up and go out the same day because there is not place available for the stock to be overnight. This is hard on the stock and could cause problems during the pack trip. (I

already discussed the other issues in the above other areas.)

7. Administrative Facilities: Ranger Stations and Crew Support Facilities: Administrative buildings, ranger stations, and crew facilities should be kept and no other buildings should be added that are permanent in wilderness areas. But when there is a need for reconstruction, it should only be done to its historical likeness.

8. Other Backcountry facilities: The other facilities should be looked at the same way as the above comments on number 7.

Thank you for taking the time to let us as the community that uses these areas be able to comment on the alternatives to your plan.

Correspondence ID:	100	Project:	33225	Document:	49956
Outside Organization:	Back Country Horsemen of America				
Received:	Nov,19,2012 14:44:25				
Correspondence Type:	Web Form				

Correspondence:

Regarding SEKI draft alternatives: BCHA is concerned that even though we were instrumental in the legal proceedings last spring regarding the permits and the HSHA lawsuit both BCHA and The Wilderness Society were not sent notice of this comment period in a timely manner for us to develop a proper response. We would like you to make sure that both BCHA and TWS are included in any further mailings and notifications on this and any other related topics. Back Country Horsemen of America Po Box 1367 Graham, WA 98338-1367 Mike McGlenn
Chairman BCHA mike@mikemcglenn.com

The Wilderness Society Paul Spitler paul_spitler@twso.org

BCHA supports and will thus not replicate, the comment letter dated 16 NOV 12 submitted by BCHC.

Mike McGlenn Chairman Back Country Horsemen of America 1992 Harmony Road Bellingham, WA 98226 360 739 2619 mike@mikemcglenn.com

Correspondence ID:	101	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 14:51:22				
Correspondence Type:	Web Form				

Correspondence:

Thank you for a chance to comment. As a frequent and lifetime user of the Sierra Nevada wilderness, I appreciate the need for a new, up-to-date wilderness plan.

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.

Pack-out waste kits should be required in high-traffic zones, but to require them throughout the Sierra would be an unnecessary restriction.

Food storage lockers are a necessity in the wilderness, and even the thought of removing existing ones is silly. The same goes for existing restroom facilities. While it's true that restrooms and food lockers are not part of the "pure" wilderness experience, the results of removing them would be detrimental to the current experience. Indeed, the

harmful effects of removing bathrooms and food storage lockers would be far from "pure".

The proposed trail-quota changes seems both unnecessary and impossible to implement given the current structure of the permit system.

Stock animals should be allowed in the Sierra, because their use can help provide a wilderness experience to people who otherwise could not enjoy the wilderness. 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.

Thank you for considering these comments.

Correspondence ID:	102	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 15:43:52				
Correspondence Type:	Web Form				

Correspondence:
1.PERMITS - Permits should be required for overnight use in the park only. It is a concern for the safety of visitors. No permits should required for day use.

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.

2.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.

3.CAMPFIRES - The park has now in place a system of campfire use in the back country. I do not think that prohibiting fires above 10,000 ft in certain areas and no fires in areas that need to be renovated will solve the problem of misuse (fire danger and diminishing of resources). I believe that most visitors do not have a basic knowledge of how to protect the environment from fires or the elevation requirements. Therefore, I suggest that the park prohibit campfires in all of the wilderness areas within the park.

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.

HUMAN WASTE - I am only addressing human waste management in the wilderness. There are some high use areas in the park that have become unmanageable. Back packers have not been packing out trash, including toilet paper, and not digging cat-holes deep enough. I recommend in these areas (Columbine Lake, Guitar Lake, Spring Lake) that Wag Bags be required. They could be given to people before they start their trips. This would seriously make for a more improved environment.

4.PARTY SIZE - The party size is adequate.

5.CAMPING - I believe that some areas need to have an established quota due to high use. This enhances the

visitors experience.

6.STOCK USE - There is a definite need for stock use in the wilderness areas. The use of stock will make it more accessible for people/visitors to get into the back country, for example the disabled and elderly. The park should make it more accommodating for stock use in the wilderness. stock has historically been used in the wilderness areas in the past. Also, there is a need to have areas for stock to use before going into the back country and over high passes. The animals need to become acclitized to the elevation and after a long trip the stock need to be rested and fed before returning to the valley. 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.

7.ADMINISTRATIVE FACILITIES - 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.

8.OTHER BACKCOUNTRY FACILITIES - These facilities should be evaluated individually. No new construction should be recommended.

Thank you for considering my commens.

Correspondence ID:	103, 144	Project:	33225	Document:	49956
Outside Organization:	The American Alpine Club Unaffiliated Individual				
Received:	Nov,19,2012 16:07:35				
Correspondence Type:	Web Form				
Correspondence:	November 19, 2012				

Dear Ms. Taylor-Goodrich:

RE: Comments to SEKI Preliminary Alternatives for Wilderness Stewardship Plan

The American Alpine Club (AAC) is pleased to supply comments on the Preliminary Alternatives proposed for the Sequoia-Kings Canyon (SEKI) Wilderness Stewardship Plan (WSP). We applaud SEKI's robust civic engagement process in an effort to co-create the most fruitful plan for this remarkable public resource. Our intention is to support park planners in meeting the stated goal of the WSP, which is to "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."

COMMENTS

We recognize that the WSP in its entirety is a highly complex undertaking with multiple stakeholders and diverse ecologies being affected. In alignment with our organizational mission, our comments are focused towards protecting and enhancing the history and experience of climbing and mountaineering for future generations visiting SEKI while protecting the natural and cultural resources within these two parks. The AAC generally supports the direction presented in ALTERNATIVE 3 as a balanced approach to meeting the WSP objectives of preserving wilderness character while providing opportunities for access and recreation.

TECHNICAL CLIMBING MANAGEMENT

From our attendance at the Bishop public meeting on October 25, we understand that this WSP will not contain alternatives for managing rock climbing and mountaineering specifically but that it may provide guidelines for its

management. 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.

CAMPS AND OTHER FACILITIES

Given that most of SEKI's climbing and mountaineering objectives are remote and require at least a full day of hiking to access, adequate opportunities for camping and overnight stays are critical to the public and research communities. 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.

SCIENCE IN WILDERNESS

Through our Climber Scientist Initiative, Research and Conservation Grants and partnerships with NGOs, the AAC empowers climbers to use their special skills to advance climate change knowledge and other needed science in alpine environments. We encourage SEKI to leverage the climbing community as volunteers for conducting surveys, observations and other data collection in difficult to access areas of the parks.

SUMMIT REGISTERS

Since 1902, the AAC has played the important role of preserving the history of climbing in America. We applaud SEKI for committing to inventorying summit registers and assessing maintenance needs. We offer our support in this process and would like to be considered a key partner to the park in ensuring the preservation of the 100+ year climbing history in SEKI.

COMMERCIAL SERVICES

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.

HUMAN WASTE

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.

In partnership with the NPS, the AAC has taken a leadership role in addressing this significant hazard by funding the Clean Mountain Can initiative on Denali, pack-out solutions in Grand Teton National Park and co-hosting the 2010 international conference, Exit Strategies. In September 2013, we are partnering with NPS to co-host Sustainable Summits: The International Mountain Conference on Environmental Practices. We hope you will join this cutting-edge symposium and consider integrating relevant practices and solutions into this plan. For more information on the Exit Strategies Conference and to join our Google Group on Managing Human Waste in the Wild, please visit <http://americanalpineclub.org/p/exit-strategies>. For more information on Sustainable Summits, please visit http://www.americanalpineclub.org/p/sustainable_summits. Through our Conservation and Research Grants and commitment to playing an ongoing role in advancing our responsibility to manage human waste in the wild, the AAC is poised to support park planners in planning and implementing sustainable solutions for SEKI.

In conclusion, we hope that these comments are helpful to this important process that will establish a framework for management of wilderness within SEKI. We wish to underscore the importance of adequate opportunities for camping and overnight stays to the climbing public as well as the need for a CMP and TMP to ensure sustainable climbing opportunities in SEKI. As the planning process progresses, we are committed to supplying greater detail on the points we have addressed in these comments. We thank you for recognizing the significance of these national parks to the climbing community as well as our deep commitment to preserving the history and future climbing experience in SEKI. If the American Alpine Club can be of any support to you in this process, please do not hesitate to contact me at 303-384-0110 extension 15 or lgoldberg@americanalpineclub.org.

Sincerely,

Leigh Goldberg Conservation & Advocacy Director The American Alpine Club

Cc: Phil Powers, Executive Director, The American Alpine Club Jeff Deikis, Western Regional Coordinator, The American Alpine Club Karen Zazzi, Sierra Nevada Section Chair, The American Alpine Club Ellen Lapham, Co-Director, Sustainable Summits Conference Scott Massey, Outreach and Advocacy Director, American Mountain Guides Association R.D. Pascoe, Policy Director, Access Fund

ABOUT THE AMERICAN ALPINE CLUB

The AAC provides knowledge and inspiration, conservation and advocacy, and logistical support for the climbing community. The AAC advocates for American climbers domestically and around the world; provides grants and volunteer opportunities to protect and conserve the places we climb; hosts local and national climbing festivals and events; publishes two of the world's most sought-after climbing annuals; cares for the world's leading climbing library; and manages the Grand Teton Climbers' Ranch, the New River Gorge Campground, and Hueco Rock Ranch as part of a larger lodging and campground network for climbers. As we submit these comments, our constituency is well over 1.5 million climbers in the United States. As the sole US representative to the international climbing community (International Mountaineering and Climbing Federation/UIAA (see endnote #2)), we also speak for millions of climbers worldwide who are directly affected by this planning process. Our membership has long been engaged in the stewardship and management of climbing in the many parks and forests throughout the state of CA, with a special emphasis in the Sierra Nevada. Each year, we bring climbers from around the world to the Sierra Nevada for our annual International Climbers Meet. For more information, please visit www.americanalpineclub.org.

ENDNOTES:

#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)

#2: <http://www.theuiaa.org>

Correspondence ID:	104	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 16:08:15				
Correspondence Type:	Web Form				
Correspondence:	Dear National Park Service,				

Who pays you guys to sit around the office and come up with such GARBAGE ?

1. You have an alternative that could require backpackers to pack out all of their own poop from all "zones" (a ridiculous notion that isn't necessary and you probably pulled out of nowhere just to create an appearance that you're considering a wide range of options) -- but there's no evidence in any form that such a measure is needed for any reason, and even worse, you don't propose to do ANYTHING about the tons of horse manure that pollute water, campsites, trails, etc. People bury their poop while horses let their manure fly right into the water !! Why not address that obvious issue? It is disgusting to see horses poop and pee right in the water we drink.

2. Your "zoning" scheme looks like it was dreamed up by somebody who hasn't spent much time in the field. You obviously have spent too much time in the office. It says you're considering to allow 30+ people per group in one zone (far too many, by the way, to even consider for any zone in any wilderness), and you'll allow fewer per group in other zones. How are folks supposed to know when they're passing from one zone to another? Are you going to pass out gigantic scaled maps of the entire park with every permit? post more signs in the wilderness at every zone boundary so the excessively large group knows when to turn around? expect that every permit writer in far-away places is going to know all your "zone" rules so visitors are properly informed about all such zone differences? RIDICULOUS !! Do you really expect the USFS permit issuers to know all these details about what's allowed in every zone so they can alert each group (ha ha ha, great joke, but get real !!). I got a wilderness permit this summer at the Lee Vining visitor center, and the permit issuer didn't know ANYTHING about the area we were going to visit, or the rules that applied there. Bottom line: You should drop this BOGUS zoning scheme entirely and start over with a framework that is actually practical. Just deal with the tough issues one-by-one without trying to over-complicate everything. You need a framework for each issue that is both easy to understand and enforce. For example, I'll help you out: Group size 10 people (max) on trails and 5 people off trails (DONE). Horses stay on designated, maintained trails, with no horse travel off designated, maintained trails (DONE). Remove all the food lockers (DONE). 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 (DONE). Why don't you have alternatives that deal with the issues simply and directly ??

3. PLEASE BAN ALL GRAZING OR AT THE VERY LEAST BAN ALL BELLS ON HORSES throughout the wilderness under ALL alternatives. My story: we were camping in an idyllic spot deep in the Sequoia Nat Park, more than a mile from the nearest trail, and right around sunset as we're watching nature's light show and enjoying

the silence, a packer rides up and turns his animals loose right in front of us, then rides away. Bells on three of the animals; we couldn't sleep. Finally, hours after dark we put some oats in a bag, attracted the belled animals, and taped the ringers to the side of each bell using duct tape. Sweet silence, sweet sleep, at last. In the a.m., angry packer kicking dirt in our camp and swearing "Somebody taped my gawd-dammed bells." We offered coffee and tried to engage him in our dilemma (tape the bells or lie awake all night), but he wanted a fight, not an explanation. He got very angry and even told us that he has a gun. (Scary.) A fist-fight almost ensues between him and David, our fullback, who was polite at first but lost patience after the packer started to yell and cuss (and mention his gun) and not listen at all. The packer finally realizes he's outnumbered (5-to-1) and he probably should just leave. It was very ugly; the violent encounter ruined our trip. It shouldn't have to ever happen this way. But we'd tape the bells again, because everyone deserves peace & quiet at night-time in order to sleep. ONLY YOU can prevent such conflicts, by banning grazing, or at least banning the "gawd-dammed" bells.

In closing I want to apologize for the personal jabs, but the materials you put out are just so deeply offensive to me that I felt you should know the truth: 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.

Thanks for listening

Correspondence ID:	105	Project:	33225	Document:	49956
Outside Organization:	Sierra Mountain Guides				
Received:	Nov,19,2012 16:24:41				
Correspondence Type:	Web Form				
Correspondence:	Ms. Taylor-Goodrich and the SEKI administration,				

Thank you for the opportunity to comment on the Wilderness Stewardship Plan Preliminary Draft Alternatives. It was a pleasure to meet you Karen, and some of your staff at the meeting in Bishop this Fall and thank you for the well orchestrated public presentation. These comments are both mine individually and on behalf of Sierra Mountain Guides, commercial permittee in the Park.

General Comments

The alternatives presented are all similar in that they all, with the exception of the No Action alternative, claim a directive to "protect wilderness character." There are 6 distinct alternatives along the full spectrum of what this could mean in accordance with the Wilderness Act, from accommodating increased use and allowing for expanded facilities to significantly reducing visitor access. The public has given input from scoping and other feedback mechanisms, but ultimately Park decision makers will have to face the task of making a final decision on the future relationship of SEKI to the public. I recognize the difficulty of this task, but this is not the first time a land agency has had to interpret the Wilderness Act of 1964.

Hundreds, if not thousands, of decisions have been made based on the interpretation of the Wilderness act in the aim of protecting character. How many of these decisions have included policy to significantly reduce visitor access- If any exist, how does the situation at SEKI compare- Increasing visitor restrictions are another way proposed to protect wilderness character. Do these restrictions alter the visitors experience of wilderness- If so, are they really protecting wilderness character- Do restrictions discourage people from desiring to visit the wilderness- If so, how many nationwide land agency decisions have interpreted the Wilderness Act to mean that protecting wilderness character is prohibiting or discouraging people from visiting wilderness- After all, does wilderness character even matter much if very few are able to experience it-

We recognize the fact that human passage leaves an impact on the land. It is a skill and ethic that not all user groups and individuals share to carefully practice minimum impact travel and camping technique. We believe this is why it is important to: a) Educate the public on the importance of wilderness and how to take care of it, and b) to allow people to experience it to their fullest capacity for enjoyment, in an ethical and responsible way.

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.

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.

The preferred Alternative is one that allows for current and increasing access and accommodates users, but at the same time enables them to be good wilderness stewards. Enabling means educating them effectively and then setting them up to succeed. We prefer the directives of both Alternatives 2 & 3 as the best balance of protection of wilderness character with public access and usability.

I question whether Alternatives 2 & 3 can be modified or combined in some way. A difference in party size allowances of + or - 3 people in wilderness does very little to affect wilderness impacts or experiences. This is an example of policy action with no significant result. 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. Keep the Pear Lake hut open in the winter. Why is limitation necessary there when it is already limited by the capacity of the hut- In the snowy season erosional and other environmental impacts are low, and use concentration issues are low. There should be no reason not to continue to have a way for people to experience this historically used hut accessible wilderness terrain in the winter.

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. 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.

Regarding human waste, I cannot understand how any preferred alternative would not heavily factor in this important wilderness impact. People poop. In high use areas, they poop in the same places. It is easy to do the math on how much poop can be expected in a given camp per season and it is easy to predict the degradation of this waste over time. This indicates whether catholes are a sufficient management method for a given high use area. It is important not to pretend an area is truly raw and untrammelled wilderness and recognize when human waste is a potential threat to wilderness character. One thing that is not a character of wilderness is the contamination of water sources and the public health issues that can arise from improper waste disposal. I do realize this is a nationwide problem that has not been adequately addressed in any wilderness areas, so I imagine

that SEKI is not prepared to be a pioneer in this regard. We use pack-out waste kits where required, recommended, and whenever practical and we feel this is currently the best method available for reducing human waste impact in higher use areas. However, this method has many serious limitations: 1. It takes commitment as well as training and comfort with the system to use it effectively. Most users do not have this level of commitment on their own, or the education to know, and putting human excrement into a bag is not an intuitive practice. I have not yet seen any good tutorials provided by the NPS on the subject. 2. Packing out human waste involves carrying a relatively heavy and foul smelling package. Often the weight of the waste is more than the weight of the food that created it, as it has a higher water content. Often people carry the waste on the outside of their pack so they don't contaminate their other important items inside the pack. This means that bags are sometimes ruptured or lost. The smell from a sun-heated waste bag is irrepressible. This significantly affects the experience of the user during every moment of carrying it. It also affects the experience of any other user on the trail. 3. Camping with bagged human waste is a challenge. The feces attracts wildlife, including bears, and increases the risk of a spread of pathogens into open water sources that affects all wilderness users. It is unsanitary to store human waste bags with food in bear canisters. This means that waste bags must be somehow stored securely but separately from food. This is an impractical scenario that can only be avoided by never requiring bear canisters where pack-out waste kits are also required, or vice versa. 4. Handling human waste is unsanitary and is a public health concern. It is suspected that most cases of giardia and other parasites contracted in the backcountry come from members of the group, not the water. It is difficult for people to maintain proper hygiene and sanitation when wilderness camping. This becomes even more critical when people are required to potentially manipulate their own feces, put it into a bag, and transport that bag. This experience is considered so unpleasant and against the character of the wilderness that many people refuse to do it. This leads to either conscientious objection to the rule or in some cases having to wait to go to the bathroom. In severe cases the latter can lead to increased risk of fecal impaction, a relatively common condition on longer trips that can produce an acute, life-threatening medical condition. 5. People commonly forget or opt to leave their bagged waste in wilderness locations. We have seen and carried abandoned waste bags many times in the Whitney Zone. The public also learns that rangers go and retrieve left bags. I have seen them commonly in such special locations in the Park as the summit of Mt. Whitney.

We may prefer Alternative 3 in many aspects but for the above reasons, we believe that high use areas should always be considered for adding other waste disposal options such as privies or vault toilets as need is indicated. Alternative 2 is the alternative that allows for more facilities for managing the challenges of human waste in Zones A,B,C, and therefore we prefer that part of Alternative 2. Precedent has been set in other National Parks to create and maintain such waste disposal facilities to manage overall impacts on wilderness character and public health. This is preferable to policy that restricts number of users to a level that can sustain the maximum amount of poop on the ground, with or without requirements to use pack-out waste kits.

Comments on Commercial Services Evaluation

Karen mentioned in our meeting in Bishop that we are breaking new ground in determining the extent that existing commercial services are necessary in the wilderness, so I would like to comment specifically on that point as it pertains to commercial outfitters and guides.

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.

What SEKI should also keep in mind is that guides and other professional outfitters are the greatest advocates and educators about wilderness stewardship in existence. Commercial outfitters and guide services have committed to partnership with the Park for mutual benefit. The public can easily see the economic benefits to commercial permittees, but they often do not realize the benefits to the Park and the wilderness: - Guides and outfitters

facilitate the wilderness experience for people without the physical or mental capacity, experience, skill, or training to manage risks and facilitate an enjoyable experience on their own. - Guides and outfitters live, work, and breathe the mountains. They hold preservation of the mountains and the wilderness experience as sacred and they share that every day with others. Education does not get more profound and powerful than through shared experience. - Guides and outfitters understand first-hand the importance of stewardship and leave no trace style ethics. They impart these ethics on all they work with and encounter in the wilderness. - Guides and outfitters provide critical feedback to land managers. We are eyes on the ground that assist the Park to monitor and adapt to improve land management in areas where rangers cannot often be positioned. - Guides and outfitters have the training and resources to respond in the event of an emergency. Lost and injured wilderness travelers have often been found and/or rescued with assistance from commercial operators. I have personally been an integral part of rescues in the Park including one where we used technical climbing equipment to bring a Park medic on to the flank of Starlight Peak where there was a critically injured climber lying on a ledge. Our satellite communications, technical expertise, and physical abilities were critical for affecting the rescue, which was successful in the end. I am certain that the consequences would have been much more severe had we not been in the area. - In the camp of the above accident victim was a basic climbing skills book. He was a beginner who was off route and beyond his abilities. Guides and outfitters provide services of education and training that make users less likely to have accidents or need rescue services in the future. This training makes them more safe, educated, and responsible lifetime backcountry users. - Guides and outfitters guide the public. These recreationists are stakeholders and users of the Park just as much as the unguided public. There should be no discrimination against them because they require the services of a qualified professional to experience the Park. - SEKI is rugged and remote terrain. There are inherent dangers of parts of the High Sierra that can only be reasonably managed by advanced users. Guides are experts that are required by many to responsibly and safely experience the wilderness. - SEKI contains highly sought and desirable terrain including the JMT and Mt. Whitney, as well as the many lesser-known but spectacular wilderness areas of the US. The greater the demand for recreational mountain opportunities in general, the greater the need for the same professional guiding services.

Commercial stock offers an important service to the public and to guided recreation. Their services of supporting guided hiking, backpacking, & climbing oriented trips that travel on foot is crucial to the range of activities that can be offered in the Park. Alternatives 2 & 3 are both acceptable as long as their terrain use is not overly restrictive so as to critically impact the usefulness of these services.

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.

Thank you for reading these comments and for all of your hard work and consideration.

Best regards, Howie Schwartz Sierra Mountain Guides

Correspondence ID:	106	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 17:22:54				
Correspondence Type:	Web Form				
Correspondence:	19 November 2012				

Dear SEKI Superintendent:

Thank you for the opportunity to submit comments on the proposed SEKI Wilderness Plan.

My background: I have backpacked extensively throughout SEKI for the past 40 years (beginning in 1972). I have made repeated trips to Goddard Canyon, Ionian Basin, Darwin's Bench, Evolution Valley, Dusy Basin, Rock Creek, Guitar Lake, Mt. Whitney, as well as trips to Sixty Lakes Basin, Vidette Meadow, Bubbs Creek, Lake Italy,

Upper Basin, Kern River, Kaweah Basin, Gardiner Basin. All told, I have spent literally hundreds of nights in the SEKI backcountry, and want to see it preserved as wilderness, with signs of human, and especially stock, impacts reduced.

My comments on the proposed Wilderness Plan alternatives:

The alternatives do not reflect wilderness preservation : wilderness does not begin six miles into the wilderness from established trailheads, but rather at the wilderness boundary.

Group size for wilderness permits has been restricted for decades for foot travel, and should be less, not more for stock trips.

Stock use should be supplanted by lightweight gear, and should be discouraged from SEKI wilderness area. Stock has significant unacceptable impact on trails (pulverized dirt, flies, horse shit, trail congestion) and stock campsites are a blight on the wilderness.

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.

The alternatives appear to be arbitrary and capricious, and to presume that historic uses remain valid uses despite changes in usage, gear, and trail and campsite degradation.

The zone map suggests a system of highways through the wilderness: what is needed is less maintained trails, fewer established campsites, trails built to foot-travel rather than stock scale, and smaller rather than larger party size limits.

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.)

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.

Correspondence ID:	107	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 17:23:58				
Correspondence Type:	Web Form				
Correspondence:	Comments regarding the Preliminary Alternatives for Sequoia-Kings Canyon National Park's Wilderness Stewardship Plan:				

Since the 1970's I have been traveling in Sequoia National Park and since the age of three days I have lived in the High Sierra. Wilderness and the opportunity to spend time in the National Park Wildernesses along with those in the National Forests is as important to me as air, water and food.

My family has been involved in the packing industry since 1947. I was born in 1954 and my earliest recollections of conversations are those of the importance of saving land to be unspoiled and have wilderness character. Taking

care of the land and teaching others how to respect the land is a part of my nature.

As a packer, I assist those who want to travel in the remote areas of the Park. Most clients are hikers who need help in traveling the trails along the Sierra Divide at elevations between 10,000 to 13,000 ft. Without the historic use of horse and mule transport, all but the athletic elite will be excluded from the Park's Wilderness.

For fifty years I have been taking trips with horses and mules in the wilderness. Since the early 1970's I have promoted wise wilderness use with livestock to leave the least impact on the land. This was long before the leave no trace programs. I have been able to see what techniques work for handling livestock to best safeguard the Park.

The Park has done a good job of managing the wilderness. The preliminary stewardship plan offers a wide variety of alternatives. The best alternative would be Alternative #1. Current Management Practices meet the objectives of the Park.

Many of the suggested proposals in the preliminary plan are unacceptable. 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.

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?

The current plan deals with resource impact issues with site specific regulations and recommendations. It has worked and will work in the future.

The preliminary plan offers alternatives where stock travel will be further reduced. This is unacceptable. Wallace Creek, Woods Basin, Baxter Lakes, and other areas that are less traveled should remain open to both private and commercial stock. By allowing visitors to spread out you reduce the conflict between hikers and stock users.

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.

When I travel in the Park I want to be able to ride up to Wallace Lake, travel up to the Wright Lakes and visit places off the main trails. As I get older and have time after my working years....I want to be able to visit these remote areas. And, I want simple trail work...like removing trees and brush off the trails.

Cross country travel should be allowed. Making more restrictions takes away from the wilderness experience. Since 1986 you will find that there is less use on many of the trails. There is no reason to close access. Unfortunately, some in the public and the NPS feel if they don't do routine maintenance that people won't be able to use trails and that in the future they will be able to close them forever.

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. Perhaps the problem is that there is a lot of new use in the Park. Rather than eliminate the historical use by stock users...the plan should address reducing the overall number of visitors.

Trail maintenance reduces resource problems. Well maintained trails reduces water erosion which is the number one problem. The Plan should encourage spending more money for Park staff to maintain and improve trails.

Designating stock camps is a bad idea. The best way to have the least impact on the land is to encourage dispersal of livestock users. Good packers and stock users know how to find a good site. Park staff do not have the

experience, knowledge or ability to identify what are the best camps for stock users.

Many alternatives suggest complex remedies for numbers of animals grazing, how many people per group, etc. The current restrictions of 20 animals per group is too low. Adding additional restrictions to limit grazing to parties of six or counting people and stock are unnecessary. They won't work and will cause unintended consequences by putting all the use into certain locations.

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.

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.

The Park should allow camping in Dusy Basin with livestock. It is too difficult to ride from South Lake to LeConte. Perhaps if grazing were allowed in Dusy there would be less impact on camps. There are suitable campsites and if necessary...designate a few spots for those of us who use livestock.

Campfires are a necessary part of any wilderness experience. Where there is no wood restrictions are appropriate. The current levels of no fires above 10,000 ft in Kings Canyon is not needed. The level should be at 10,600 ft. By allowing fires in more areas there will be more dispersal of users.

The campfire elevational closure in Sequoia National Park needs to be raised. Allow those of us that want a fire to burn lodgepole pine. Yes, Foxtail Pine downed wood needs to be protected. The recent fire closure ruins the wilderness experience.

There needs to be a better way of managing campfire closures. In Wallace Canyon there is plenty of wood for fires if you go up canyon for two miles. Why have the closure at the jct of the PCT and Wallace Creek Trail? Every different area has different conditions. The plan should try to accomodate those of us who enjoy fires.

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.

The options proposed in Table 4. Preliminary Draft Alternatives by Key Topic - Party Size: People and Stock are too complicated. There should be conformity to the rest of the Sierra. Keep 15 people and 20 head of stock. Or, increase the party size and stock numbers. It is unnecessary to make so many new complicated zones and restrictions.

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.

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.

The preliminary plan does not mention how the Park is going to regulate commercial stock use. Any new restrictions should recognize historical use.

Correspondence ID:	108	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 17:39:19				
Correspondence Type:	Web Form				
Correspondence:	Dear Sir or Madam:				

I like your preliminary draft alternatives as presented. They are very well thought out and seem to help favor the environment as opposed to human use so as not to error on the side of overuse or damage beyond the point of no return. There are a few specific comments I am in favor of.

1) Permits and Quotas: I am in favor of both and see the best compromise in Alternative 4. Requiring permits for both overnights and day users are a good way to get numbers for human impact studies on particular areas even though many hikers and stock do not necessarily always keep their itinerary as given. It will give the park a general idea of where people may have impacted in order make any quota recommendations for the future.

2) Party Size - people and stock: Again, I like Alternative 4 where it limits party size to acceptable numbers in each of the zones. Since Zone D is the most fragile, I see that 8 max. people and 12 max combined stock (8 max. people/8 max. stock) is a very good recommendation. Though probably difficult to regulate, I feel stock should not be used for "luxury" items (ice chests, beach/lounge chairs, large electronic gadgets, etc.) that a backpacker wouldn't or couldn't take in to the wilderness. Stock should only be used to transport people who are disabled or where health might not permit one to hike in or those not in condition to do so. They should not have any more advantage (unless it's health-related) than the average backpacker. The rule should be they're backpackers on stock instead of on foot. Also, due to the increase of new species of plant introduced to the wilderness, stock should be watched for their defecation (which may contain seeds) in these areas and where grass is limited, pack in food supplements or alternatives for them.

3) Wilderness Ranger Stations: I like alternative 4 here, too. Keep some of the old, historic buildings and rather than put in new, permanent stations, tent tops that are temporary and can be relocated as the need arises or eliminated all together is the way to go. This gives the park the flexibility of monitoring the rangers and their contacts with the park visitors in those areas where the need is a higher priority and make adjustments.

One last thing I would like to add is the fact that since Roads End, Cedar Grove is a major starting point for many overnight hikes, there should be a walk-in backpacker camp in the area (just off the Copper Creek-Granite Basin trail, northwest of the backpacker parking lot would seem to be a favorable site. Even though this is a front country issue, it does determine a lot when starting a hike to the wilderness from here. First of all, it's a good place to get

acclimated before starting the hike. Also, it allows a party to camp here rather than in the campgrounds or the minimum 2 miles up the trail if arriving to the park in the afternoon or overnight. Also, it allows the party to get their permit easier and hike in earlier- depending on when the permit station is open. This prevents additional use of the vehicles (and more pollution) when hikers have to go back and forth from the campgrounds 5-6 miles to the west.

Keep up the great work in determining the future of our wilderness. It is important for us to keep it as pristine as possible so that future generations will see it much the same as it was before humans started impacting the area.

Thanks for letting me comment and giving my two cents worth.

Correspondence ID: 109 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 17:47:45
Correspondence Type: Web Form
Correspondence:
Dear National Park Service,

I am an avid hiker, backpacker, and equestrian.

I am writing to express my support for Alternative No. 1 (current practices).

Backpacking is not physically an option for everyone. And not everyone wants to endure the discomforts of ultralight camping in order to experience the wilderness. Last summer, for example, two different sets of friends wanted to take their young children on a wilderness camping adventure. Backpacking in all the food, clothing and camping equipment was not a viable option. So they hired commercial pack outfitters for their respective trips. Their young children had wonderful times on their respective trips. And when I asked each set of kids afterwards what was their favorite part of their camping trips, they all replied "the horses and mules!" They did also bemoan the "long and cold and dark nights" without campfires.

And hiking the John Muir Trail should not be limited only to the young, superfit and/or comfort-immune. People should be allowed to use the services of commercial pack outfitters to help support their trip.

In my 25+ years of experience accessing the wilderness at issue here, virtually no one has a more experienced and long-term view of appropriate use levels than commercial pack outfitters. They get to see the natural and manmade impacts week after week, season after season, and year after year. Someone hiking through on a once a season, or once every few years, or once-in-a-lifetime trip doesn't have the same depth or breadth of perspective.

Commercial pack outfitters understand that failing to be good stewards of the wilderness is not merely bad for their business. Failing to be a good steward of the wilderness also runs counter to packers' love of the outdoors, the same love of the outdoors that causes them to choose to be a packer, working outside, rather than earning better wages at a more stable, secure indoors job.

Commercial pack outfitters should be allowed to graze more than six stock in appropriate meadows, even at higher elevations.

Commercial pack outfitters should be allowed to free graze their stock, rather than tying them all to a picket line (which has more impact).

Commercial pack outfitters should be allowed to choose their own campsites, rather than being forced to

concentrate all their use on mandated campsite locations.

The system for counting people and livestock should not be changed, let alone made more complicated.

The current stock numbers (20 or 25) should be kept in place.

Thank you for the opportunity to weigh in on these important stewardship and access issues.

Correspondence ID: 110 **Project:** 33225 **Document:** 49956
Outside Organization: American Whitewater Unaffiliated Individual
Received: Nov,19,2012 18:22:30
Correspondence Type: Web Form
Correspondence:
November 19, 2011

Dear Superintendent Taylor-Goodrich,

American Whitewater appreciates having the opportunity to comment on the preliminary draft alternatives for the Sequoia-Kings Canyon Wilderness Stewardship Plan and Environmental Impact Statement ("WSP/EIS"). As we discussed at the public meeting on October 29th in Oakland, we look forward to working with you to ensure that non-motorized boating is recognized as a valued activity in the Wilderness Plan. American Whitewater submitted comments on August 20, 2011 during the scoping period for the WSP/EIS, and we attach them for reference and incorporate them into these comments.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 5,500 members and 100 locally-based affiliate clubs, and represent the conservation interests of whitewater enthusiasts across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. Founding principles of our organization include protection of the wilderness character of waterways and promotion of the recreational value of wilderness rivers.

A significant percentage of American Whitewater members reside in California and throughout the western U.S. and regularly take advantage of the opportunities for wilderness exploration that the Sequoia-Kings Canyon National Park and its related Wilderness Areas offer. The wilderness runs in Kings Canyon are considered to be some of the best in the world. As with the Granite Faces of Yosemite, these rivers have an international constituency that appreciates the challenge and beauty that the rivers in SEKI have to offer.

We understand that the preliminary draft alternatives are by no means comprehensive in describing the issues that will be in the Wilderness Plan. We note that non-motorized boating activities are absent from the tables, and similar to our 2011 comments, we write to highlight the importance of recognizing paddling values in the Final Wilderness Plan.

Whitewater paddling values are commonly recognized through National Park Service planning processes. We would like to highlight a few examples. The General Management Plan (GMP) for the Black Canyon of the Gunnison National Monument covers a remote and challenging whitewater river similar in many regards to the rivers of SEKI, and does a good job of describing and recognizing recreational values and use.[FN1] The GMP for Ross Lake National Recreation Area covers remote rivers, and states: "self-propelled and non-mechanized recreation will be encouraged throughout Ross Lake NRA." Olympic National Park also contains remote Wilderness rivers, and in the GMP the Park concluded that "within the frontcountry and wilderness zones, non-motorized/hand-powered boating including kayaking will continue to be an approved activity." [FN2]

Like Olympic National Park, SEKI proposes various zones within the Wilderness. We are not opposed to the

concept of zoning proposed by SEKI, so long as each zone is fully consistent with the Wilderness Act and supports low-impact wilderness-compliant recreation like paddling. We believe that such zones should help managers address place-based management issues, rather than act as an administrative layer of changing rules that Wilderness visitors must be aware of as they travel across the landscape and descend rivers. This recommendation is in keeping with standard concepts of Wilderness management that encourage freedom of thought and movement as individuals experience Wilderness.

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 < 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:

"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 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. Additionally, the rationale behind the closure supports an outdated belief about how other park visitors view paddlers on rivers. In a study recently completed for the Merced Wild and Scenic Management Plan in Yosemite National Park, the majority of Park users indicated that they not only support boating on the Merced River, but also support opening river segments that have historically been closed.[FN4]

Thank you for your consideration of our comments. We look forward to the Draft WSP/EIS.

Sincerely,

Dave Steindorf California Stewardship Director

Megan Hooker Associate Stewardship Director

Footnotes:

1. http://www.nps.gov/blca/parkmgmt/upload/CURE_BLCA_GMP.pdf 2. Final Olympic National Park General Management Plan EIS, Vol 2, page 68. See also Volume 1, page 72 for a discussion on paddling and Wilderness zoning.

3. Final Wilderness Boundary Map: As Designated by The 1884 California Wilderness Act (P.L 98-425); Map by NPS (TM), Nov 2, 2004.

4. Whittaker, Doug and Shelby, Bo. July 2012. Boats, Beaches, and River Banks: Visitor evaluations of recreation on the Merced River in Yosemite Valley. p. 43-44. Available at:

<http://www.nps.gov/yose/parkmgmt/upload/Recreation-study-full-report-July-2012.pdf>

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August 30, 2011

Superintendent Karen F. Taylor-Goodrich Sequoia and Kings Canyon National Parks Attn: Wilderness
Stewardship Plan 47050 Generals Highway Three Rivers, CA 93271

Re: Sequoia and Kings Canyon Wilderness Stewardship Plan and Environmental Impact Statement

Dear Superintendent Taylor-Goodrich,

American Whitewater appreciates having the opportunity to comment on the Sequoia and Kings Canyon Wilderness Stewardship Plan and Environmental Impact Statement ("WSP/EIS"), and we thank you for extending the deadline for comments. With over 800,000 acres of wilderness, we write to highlight the importance of human-powered boating opportunities on the rivers within the Parks and related Wilderness Areas. The Stewardship Plan and EIS provide management direction and important updates to management documents, including the 1986 Backcountry Management and California Wilderness Action of 1984, and current interagency policies regarding the preservation of Wilderness character within the Park.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 5,000 members and 100 locally-based affiliate clubs, and represent the conservation interests of tens of thousands of whitewater enthusiasts across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. Founding principles of our organization include protection of the wilderness character of waterways and promotion of the recreational value of wilderness rivers.

A significant percentage of American Whitewater members reside in California and throughout the western U.S. and regularly take advantage of the opportunities for wilderness exploration that the Sequoia-Kings Canyon National Park and its related Wilderness Areas offer. The Middle and South Fork Kings, Roaring River, and the Kaweah and its tributaries provide thrilling and technically challenging whitewater recreation opportunities for advanced boaters. And while these recreational opportunities are important, we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and incredible riparian forests, where natural successional processes dominate. For our members, the river systems and associated riparian zones represent defining landscape features of the Park that are highly valued by our membership and the general public.

Our members regularly enjoy a number of rivers within the Parks and their related Wilderness Areas. Unlike nearby rivers in the Sierra Nevadas, which are heavily impacted by hydropower operations, the rivers in the Parks offer unparalleled and unique opportunities for wilderness exploration. They allow for primitive and unconfined recreation, where individuals have freedom to explore, can practice self-sufficiency, and engage in a direct experience with the natural environment. The paddling experience on each one of these rivers offers a unique experience and opportunity for boaters to develop a strong connection with the Sequoia-Kings Parks and related Wilderness Area. The following includes some of the rivers that provide this experience.[FN1]

- Middle Fork Kings - This river is among the most highly respected and sought after runs of the trans Sierra kayaking trips. While the timespan that this river is boatable is short (during Spring runoff) and the hike in is challenging, paddlers come from around the country and the world to experience the stunning and sheer Kings Canyon, Tehipite Valley and granite Tehipite Dome. The most difficult part of this section is just outside the park boundary from Tehipite Valley to the confluence with the SF Kings. Typical trips down this section last 4 to 5 days. - South Fork Kings - Paddlers enjoy the headwaters of this river, but it has not become a widely popular run

due to the difficulty of hiking over the crest to the put-in. Those who do hike in find an easier route from the end of Cedar Grove Road, and enjoy the river to the confluence with Bubbs Creek. - Roaring River - This river has a series of impressive cascades and waterfalls, the last few of which have been boated. Boaters hauled their boats a very short way up the canyon. We also know of boaters who have planned to backpack boats into the upper reaches of Roaring River and then boat down into Cedar Grove. The flow window would be very narrow on the low end and only highly skilled and strong experts would have the confidence to attempt such a trip. - Clover Creek - Kayakers primarily boat this Creek near Wuksachi Lodge. They carry their boats about 1 mile upstream along the creek then paddle back down. There is a narrow boating window of a few days to a week or so when flows are optimum for this trip. The streambed is attractive to boaters for its granite slides, falls and potholes. - North Fork Kaweah - Kayakers often carry their boats upstream from Yucca Creek several miles then paddle back down over beautiful bedrock slides and drops. Boaters have also launched further upstream from the Cherry Flat/Tarbell Pocket area to boat on down to Yucca Creek. - Middle Fork Kaweah - Paddling from Hospital Rock picnic area down to Potwisha or further to the park boundary has been popular since it was first run by the pioneering team of Lars Holbeck and Chuck Stanley in 1984. This section is especially popular in the winter as flows begin to rise. Boaters have also taken to hiking further and further up trails to access the high sections of the Middle Fork. The trek is made infrequently as the river is difficult to access and the whitewater is only for experts. Those who make the trek enjoy the geology of the river valley - primarily granite with metamorphic sections. - Kaweah - This river offers a technical run with waterfalls, hydraulics and continuously challenging rapids for the advanced kayaker. The Kaweah and its tributaries are popular among boaters for wilderness exploration. Kayakers paddling the gateway section of the Main Kaweah previously accessed the river at the Gateway Bridge. Since access was lost at this location, paddlers now often launch after driving ~ mile into Sequoia National Park. - East Fork Kaweah - Boating on this river is only done by upper echelon expert boaters. While boating on this river is mostly outside the park, starting at Oak Grove Bridge, there are opportunities on the upper reaches within the park boundaries. - North Fork Kern - First run in 1981 by Royal Robins, the headwaters of the NF Kern is one of the easiest of the high elevation expedition boating trips. Getting to the put-in requires boaters to carry their equipment from Whitney Portal and over Muir Pass to the river. The Kern is unique in that it flows North to South while all other major Sierra rivers flow east to west.

Paddlers who have enjoyed the wilderness rivers of the Park for the past several decades have developed a deep appreciation for the unique resources these rivers provide. The wilderness setting and diversity of these rivers allows individuals to find solitude and explore areas of the park where one can find new adventures and rivers to explore.

We note, however, that there is a 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. This reach flows in part through the Sequoia-Kings Canyon Wilderness Area. American Whitewater respectfully requests that a fresh look be taken at this closure in the management and planning process and that lifting the ban be considered in the EIS as an alternative.

Rivers are natural trails that flow through the landscape, reflecting the unique character of the geology and natural beauty of the area. Floating down a river is likely the most ancient form of travel and exploration aside from walking. Paddling is human-powered, place-based, low-impact, quiet, non-consumptive, skill-based, and Wilderness-compliant. In fact, prohibiting the activity from a Wilderness area is inconsistent with the Wilderness Act.

Wilderness Areas are "devoted to the public purposes of recreational, scenic, scientific, educational, conservation and historical use"[FN2], and the Wilderness Act describes "wilderness" as an area that has "outstanding opportunities for ... a primitive and unconfined type of recreation."[FN3] Paddling is a form of recreation that is a core part of the Act, and the founders of the Wilderness concept, including Olaus Murie, Bob Marshall and Aldo Leopold wrote specifically of the unique perspective and adventure that paddling in Wilderness areas offer. Exploring the rivers in Sequoia-Kings National Park and their related Wilderness Areas by hand-powered craft affords visitors with a unique opportunity to experience park resources, enjoy the river and riparian landscape, and provides inspirational opportunities to experience wild rivers. We ask that you value this experience equally with

the experiences sought by other Park visitors. The core element of paddling is experiencing a place through interaction with moving water, going with the natural flow and experiencing the landscape from the river's perspective.

Paddling meets with the Park Service's 2006 Management Policy 6.4.3, which pertains to Wilderness and requires that "recreational uses of wilderness will be of a type and nature that ensures that its use and enjoyment (1) will leave it unimpaired for future use and enjoyment as wilderness, (2) provides for the protection of the area as wilderness, and (3) provides for the preservation of wilderness character."

Further, prohibiting recreation on the Wild and Scenic South Fork Kings River, both inside and outside of the designated Wilderness Area, is inconsistent with the Wild and Scenic Rivers Act. As a general rule, paddling is allowed and fully supported on the 200(+) Wild and Scenic Rivers throughout the country. The general basis for this policy is found within the Wild and Scenic Rivers Act (WSRA) itself, providing in relevant part:

"Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values."[FN4]

In many cases paddling is recognized as an ORV, or as an integral component of a more general "recreation" ORV. On these rivers, paddling is protected and enhanced under the first part of Section 1281. On Wild and Scenic Rivers where paddling is not specifically recognized as an ORV, agencies support paddling because paddling does not "substantially interfere" with public enjoyment of rivers. Far from substantially interfering, paddling itself is a powerful means for the public to use and enjoy Wild and Scenic Rivers. Paddling is protected and enhanced on these rivers under the second part of Section 1281. For these reasons the public is generally encouraged to enjoy Wild and Scenic Rivers in canoes, kayaks and rafts.

Concerns over safety hazards - including large woody debris - need not shape a ban on human-powered watercraft within the park. People who kayak, canoe and raft recognize that woody debris and other natural obstacles are an inherent part of every river and have no expectation that they be removed. We understand what the NPS General Management Policy 6.4.1 clearly outlines - that "park visitors need to accept wilderness on its own unique terms."

While paddlers are a relatively small segment of backcountry users in the Park, we recognize that all visitors have an impact on the environment. River exploration within the Park has similar impacts as hiking, backpacking, and backcountry fishing, although use of a trail is one way with the river serving as the return route. We support continued management of backcountry users, where hand-powered boating (including kayaking, rafting, pack-rafting) is recognized as a wilderness-compliant activity for all wilderness zones in the park. Our organization has a history of focusing our public education efforts on establishing a wilderness ethic for paddlers who explore wilderness rivers. We regularly publish articles in our journal to educate paddlers on safety issues that must be considered on wilderness trips and the importance of practicing Leave No Trace principles including the need to carry rather than drag boats.[FN5] We will continue to educate our members on this ethic in the future.

Thank you for the opportunity to provide comment on the Sequoia and Kings Canyon Wilderness Stewardship Plan and Environmental Impact Statement. We would like to remain on the mailing list for any future updates or opportunities for public input. Please do not hesitate to contact us if you have any questions regarding public use of rivers in the Park.

Sincerely, Dave Steindorf California Stewardship Director

Footnotes:

1. Descriptions and photos of these rivers can be found at our website www.americanwhitewater.org.

2. 16 U.S.C. ' 1133(b); emphasis added. 3. 16 U.S.C. ' 1131(c).

4. 16 U.S.C. ' 1281(a).

5. See Bousquin, J. 2005. Minimizing impact on California's upper Cherry Creek. American Whitewater Journal 46(3):50-53; and feature edition on Wilderness Paddling, American Whitewater Journal 46(5).

Correspondence ID:	111	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 20:09:33				
Correspondence Type:	Web Form				
Correspondence:	Karen Taylor-Goodrich, Superintendent Sequoia and Kings Canyon National Parks				

Re: Wilderness Stewardship Plan Preliminary Draft Alternatives

It is difficult to put into words my observations and opinions regarding the complex planning and management of our beautiful national parks. I have traveled through the Sierra Backcountry over many years and have seen many changes. I believe the NPS has done a good job in maintaining the parks, a job I'm sure that is not easy. My first trip was in 1945 when I was just a teenager. In those days we didn't have to worry about conflict with other park visitors and the many rules and regulations in place today. However, we did always follow the rules as they were and we always had a sense of responsibility to protect the environment. Back then I never would have believed there would someday be lawsuits brought against park management to keep tightening the restrictions on use of the parks, especially against the commercial packers. In my opinion, the commercial packers are the ones who are absolutely ESSENTIAL for the young people as well as the seniors to enable them to enjoy our wonderful parks and to educate them on the current rules and proper use of the wilderness.

My first trip into the backcountry in '45 was a spot trip using the services of Art Schober's Pack Outfit over Piute Pass and into Hutchinson Meadow where we camped and took hikes up French Canyon and also down to the San Joaquin River. After we packed out, we drove to Mammoth Lakes and backpacked over Duck Pass down into Cascade Valley. Backpacking back then to us meant toothbrush and comb in back pocket of jeans, wearing bathing suit under our clothes, and dividing the rest of what we needed such as food, tarp, etc. between all of us to carry. Believe me, we sure missed the horses and mules! A friend and I tried to revisit our campsite in Cascade Valley in 2001 with Mammoth Pack Outfit carrying our packs to Duck Lake. When we picked up our packs at Duck Lake we realized that IF we made it down into Cascade Valley, we would never get back up without the help of the packers. So we camped there at Duck Lake and flagged down one of the packers to pick up our packs in a few days when we hiked out. One of our favorite camps in the forties was over Bishop Pass into Le Conte Canyon at the junction of Palisade Creek and the Middle Fork of the Kings River using the Rainbow Pack Outfit to take us there. In later years we again tried backpacking to our old campsite. We did finally make it, but it took us several days in and several days out leaving just a couple of days to lunch at Grouse Meadow and then hike down to our old campsite which we discovered had been covered by an avalanche of rock from the snow pack pushing down from Palisade Creek taking out the wooden bridge there and spilling out over our camp.

In 1947, the first year Herb and Marge London operated the Rock Creek Pack Station, we packed in over Mono Pass to camp in the Fourth Recess. We had a marvelous trip! Marge London even rode in with a birthday cake for the "leader" of our party, a wonderful 66 year old lady, who had been traveling the Sierra since 1915 and who was my mentor and dear friend. She and I took a pack trip in 1951 with the Rainbow Pack Outfit into Le Conte Canyon and then backpacked out. We had the pleasure of having Norman Clyde carry our packs up the Dusy Switchbacks, one pack on each shoulder. He was an amazing man. Again we enjoyed riding in to camp and should have ridden out too. It took us a very long time even with the help on the switchbacks.

During the past 15 years I have been able to take some wonderful trips with Rock Creek Pack Station. I would

never have been able to see and feel the beauty of Evolution Valley, Northern Yosemite, Mono Creek and the Recesses, trail rides through the backcountry from Tuolumne Meadows to Taboose Pass and beyond without the services of Craig London's Rock Creek Pack Station and his crew. They have always been conscientious in the care of their camps and their stock and, as you can see, I have had the opportunity to observe and travel with them as well as with other pack outfits through the years. In the matter of grazing the stock, choosing campsites, etc., they have always exercised the greatest of care.

Alternative#1 is my choice and I hope the choice of the NPS. Current management practices and restrictions should not be expanded in such a way as to restrict further our ability to enjoy our parks including the comfort of a warm campfire and the use of horses and mules.

I greatly appreciate the opportunity to submit my comments to you regarding the Wilderness Stewardship Plan. Sincere thanks from me and from my children and grandchildren.

Correspondence ID:	112, 168	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov, 19, 2012 20:23:47				
Correspondence Type:	Web Form				
Correspondence:	Dear Ms. Taylor-Goodrich and your planning staff,				

This planning process is a once-in-a-lifetime opportunity for Park staff and the public to craft a vision for protecting Wilderness as wilderness, and not as a playground for thrill-seekers, nor as a commercial opportunity to cater to those simply seeking a convenient and comfortable vacation. Thank you for beginning the process of drafting a wilderness plan by providing Preliminary Alternatives. It is high time for the Park Service to publicly and comprehensively evaluate and prescribe direction for managing (and not managing) the wilderness of SEKI.

Unfortunately, the draft alternative you have disseminated are a huge disappointment for any lover of wild wilderness. Instead, it caters to base instincts of those who wish to wreckreate in wilderness and shows that the planning staff has little-to-no understanding of the science of managing wilderness as well as the vision of those that would like to see a bit of wild America stick around after we're gone. John Muir is turning in his grave.

That said, below I provide some suggestions for polishing this turd, pun intended. But first, a little about me and why I would bother to write to you in the hope that you will listen. I have been visiting the wilderness of the Sierra, including SEKI, since I was a child. This included being fortunate enough to climb Mt. Whitney at the age of 10. I backpack in the high Sierra to seek refuge from modern civilization, to challenge myself physically and mentally, and for spiritual renewal. Whenever I visit SEKI, I avoid places where I know it is crowded (e.g., the Kearsarge Lakes area, the Mt. Whitney area). In other words, my first criterion for where to go is figuring out where I am most likely to experience solitude. This seems bizarre given that designated Wilderness is supposed to provide outstanding opportunities for solitude. But sometimes it seems like the agencies manage wilderness for maximum use, rather than for optimal use, and that they do not manage Wilderness as Congress intended it to be managed.

My uncle was a wilderness ranger on the Inyo National Forest, and I was fortunate enough to accompany him on several tours and to help him with patrols, visitor contacts, and resource work. It was always amazing to me how much of his time and effort was spent cleaning and rehabbing campfire rings. Most of the time, the campfires were at elevations where burning wood is not a sustainable practice. He and I were always frustrated because that phenomenon was well-documented by Park Service and Forest Service scientists and rangers on the ground, yet the managers refused to do the right thing and close these areas to campfires. I hope that SEKI staff will take this opportunity to listen to its own scientists and rangers and do the right, and lawful, things to protect and preserve wilderness character by adopting appropriate elevational campfire closures before the wood is depleted by overuse.

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.

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.

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").

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.

As for polishing this turd:

- Most aspects of "management" are antithetical to wilderness. The wilderness itself is not what should be managed. Rather it is human use and encroachment on wilderness that must be managed. Limit use and impacts from humans, let wilderness take care of the rest. - The Park Service does not have the resources to implement complicated management schemes in the backcountry, and even if it did, the proposed zoning scheme is simply not workable. Just the fact that visitors would have to figure out the variance compliance requirements would eviscerate their wilderness experience before the even arrive. Keep it simple by limiting the number of visitors and especially those visitors that have the highest impact on the resource and opportunities for solitude (can you say large commercial stock groups!).

- 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. Congress could not have been more prescient in the preamble to the Wilderness Act when it acknowledged the threat of encroaching civilization. Since the Act was enacted in 1964, the threats of civilization and a growing human population to the natural world have only grown. The Park Service should use this planning opportunity to be just as far-sighted, innovative, reverential, and humble in its vision of the Wilderness of SEKI.

- Population growth argues for more zealous management of wilderness visitors and their activities, not less. Wilderness should be about getting away from the trappings of civilization. Relying on my own knowledge and skill to travel and be safe within the wilderness. Knowing that if we plan and act carefully future generations will have the same opportunity to escape civilization and experience the natural world in the way our ancestors did. Visiting wilderness should challenge us physically, spiritually, and intellectually. Wilderness and our Parks should not pamper us with food lockers in the backcountry. We should be required to carry and store our food in a manner

that is safe for ourselves and wildlife, not convenient for visitors and Park Service staff. - 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.

- 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?

- I am extremely disappointed by the proposed group-size limits in the alternatives. It is a huge step backwards for SEKI and even proposing these extreme numbers for groups in certain zones (up to 35 people in a group within wilderness!!) should cause you to lose sleep at night. I never travel in wilderness in a group larger than four people. Over years of experience, I have found that any group larger than four people, even when they are my friends and family, disrupts the solitude of the SEKI backcountry, too greatly impacts campsites and trails, and makes it unlikely to see wildlife. If I want to have an outdoor experience with larger groups, I do it outside of wilderness. Crossing the boundary from the frontcountry to wilderness should not be taken for granted, and visitors should not expect to behave and act the same as they do outside wilderness. Please propose scientifically-defensible group size limits that will be protective of the resource and solitude everywhere in the SEKI wilderness (no sacrifice zones ? they are illegal!!).

- 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. 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. 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!

- 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. 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. - Commercial services should only be permitted to the extent that they are legally permissible under the Wilderness Act. The Act restricts commercial use within Wilderness, unlike everywhere else in the country, only to the extent necessary. This means that commercial use should never be permitted simply for the comfort and convenience of visitors, nor simply because some visitors have the resources to pay others to make their trips easier. Any such use is antithetical to the spirit and letter of the Wilderness Act.

- Permitting commercial use for the comfort and convenience of visitors simply detracts from the experience of those that employ such use. Commercially-outfitted visitors do not learn about and experience wilderness on their own, they have whatever experience their outfitter prescribes for them. They do not learn to respect and revere the wilderness in the same way that a visitor who figures out how to do so on their own does.

- I have encountered many commercially-supported stock parties in the SEKI backcountry. They are consistently much larger than the backpacking parties I encounter. I have never seen a disabled or elderly person in a stock-supported party that could not otherwise visit the SEKI wildernesses. Every person I have ever met in the backcountry is able-bodied, if out of shape, and could experience and enjoy the Wilderness without stock support. 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 if necessary in the SEKI Wilderness.

- Just about every observable impact to the SEKI wilderness can be attributed to commercial stock use. The trails in SEKI where commercial stock do not go are generally in great shape with no signs of erosion or even maintenance, whereas every trail where stock is allowed have huge structures to construct the tread and are often 3-foot deep troughs with exposed tree roots and erosion into nearby water. I know from the published research of Dr. Derlet and others that commercial stock and associated grazing is responsible for polluting wilderness waters and making it unsafe to drink, whereas I can, and have for decades, freely drink from Wilderness streams and lakes where no stock ever visit. I have observed that locations where commercial stock parties camp are almost always sacrifice zones within the Wilderness of SEKI. The ground is bare of vegetation, tree roots are exposed from erosion, visitors flatten the ground for tent sites dig trenches around them, visitors cut stumps and drag logs and rocks from all over to make convenient seats, campfire rings are enormous and full of trash. I have observed that meadows and stream banks get trashed wherever stock are permitted to graze

- I have yet to see a backpacker eat grass or hoof-punch a meadow and stream bank incessantly. I hope that the Park Service will honestly disclose and evaluate the impacts from pack stock use and grazing in the SEKI Wildernesses, including impacts to trails, campsites, streams and lakes, and wilderness character. - The Park Service must go back to the drawing board, after completing a sound needs assessment, and place meaningful limits on the number of stock (both total and per-group), where they can go (only on trails constructed and maintained to withstand stock use), prohibit any grazing (feed is just too easy to pack and impacts to meadows from grazing non-native stock are too severe and unavoidable), require all stock to wear manure catchers (I know the Park Service has a number of staff assigned to mitigate the spread of weeds in SEKI- don't make their jobs harder, or even impossible, by the actions in your Plan), limit the number of animals per number of people served (so that visitors do not bring in unnecessary gear that is antithetical to experiencing wild wilderness), prohibit bells on stock (these have kept me up at night on more than one occasion).

- The Park should only and always use the minimum required and least intrusive management technique possible. Administrative convenience and cost should never be a factor in deciding to take administrative actions that impact wilderness character. For example, helicopters should rarely, if ever, be used, perhaps only for emergency situations involving human health and safety when no alternative is available. No permanent structures should not be built or maintained in wilderness. No fencing should be left in wilderness to facilitate stock use. No gear or supplies should ever be cached in wilderness.

- 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.

- 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).

- 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.

- Please, please, pretty-please consider and analyze designating certain trails as "foot-travel only." This is such a sensible proposal and needs to be analyzed seriously and honestly. Please.

- Finally, it is high time that the Park Service live by the same rules as the rest of us. No more grazing pack animals in the backcountry night-after-night for administrative convenience. No more helicopter flights to provide for easy resupplies and quick employee transport. Adhere to the Wilderness Act, don't pretend you are above it.

Thank you for this opportunity to provide comments on the Preliminary Alternatives. I look forward to you and your staff's continued dedication to this process, and to you taking a step back to define objectives compatible with the Wilderness Act and then crafting reasonable and realistic alternatives to meet those objectives.

Correspondence ID:	113	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 20:32:06				
Correspondence Type:	Web Form				
Correspondence:					

My first long hike in King's Canyon was in the summer of 1966. I have returned, often for week-long backpacks, almost every year since then. I just love the place.

Among the alternatives presented here I usually favor alternative four. I am not in favor of reduced visitor access, but I think that the provisions in alternative four will not necessarily do that. One should not equate party size with access. On the specific topics:

1) Destination Quotas: I am very much in favor of these. While I do not particularly like meeting hoards of people on the trail, I really do not like to find all the campsites taken when I arrive at the lake.

4) Party Size with Stock: Here I like alternative four. A party of 35 with people and stock is just too big. It significantly diminishes the wilderness experience for everybody else.

6) Stock Use: Alternative 5 seems reasonable here. Zone D is no place for stock. Horses and mules need trails. Alternative 4 says that Amphitheater Lake might be closed to stock. That's nice. I was there the summer before last, and I cannot imagine how they would get in there!

Thank you for giving me the chance to comment.

Correspondence ID: 114 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 20:32:47
Correspondence Type: Web Form

Correspondence:

Thank you for the opportunity to comment on the proposed options. Over the past six years I have engaged Rock Creek Pack Station for three family trips into Kings Canyon and Sequoia National Parks. We have walked from Bishop Pass to Cottonwood Pass and climbed a number of mountains along the way. On all of these pack trips, my father, who was 80 years old on the first trip, join us and visited many of the places where he had hiked and camped back in the 1940s. He was able to make these trips only because he had the use of a mule to transport him between camps. When my father was young, he spent his junior high and high school summers in the High Sierra with rather large groups of people and even larger numbers of stock. I also spent my teen-age summers in the Sierra's in the mid-1970s, but with fewer people and much less stock. In the years between my first trips into SEKI and my most recent visits, the Park Service has implemented a management plan that has had a significant benefit on the wilderness experience. Trails have been improved and maintained to minimize the impact on the environment. Limits have been put on the number of people entering the park each day. Food storage requirements have been put in place to reduce the temptation for bears to seek out campers and packers provisions. Stock quantities and grazing have been managed to maintain the wilderness, yet allow enjoyment by both backpackers and pack animals. All these changes have improved the state of the environment, yet still allowed people of all ages and physical abilities to enjoy the wilderness. I have been impressed with the care and concern the Rock Creek employees have shown towards both the environment and their pack animals. Campsites were always left cleaner than when we arrived; trash left behind by previous campers was always picked up and carried out; guests were reminded to keep soap away from water resources; privies were established well away from streams and lakes; fires, where permitted, were kept within existing fire pits; pickets were established in safe areas and away from sources of water; and horse and mule dung was completely cleaned up and buried. I believe the Rock Creek employees are able to take much better care of a campsite than most backpackers due to the equipment they carry, their knowledge and love of the wilderness, and the realization that this is their livelihood. I believe the current wilderness management practices (Alternative 1) have provided an excellent system for both backpackers and stock packers to enjoy the beauty of the Sierra Nevada. SEKI is a National Park, which must be open for all to enjoy regardless of whether they choose to backpack or make a stock supported trip. Alternatives 4, 5 and 6 are too restrictive and unnecessary and will exclude many people from accessing the park. Alternative 3, while still allowing stock, places an undue burden and restriction on hikers supported by stock by requiring long distances between available camp sites. Closing Dusy Basin, Vidette, Sixty Lakes, Rae Lakes and others, would severely limit the use and enjoyment of the National Park by these individuals. Thank you for your efforts to preserve Kings Canyon and Sequoia National Parks and for the opportunity to comment on the Wilderness Stewardship Plan.

Correspondence ID: 115 **Project:** 33225 **Document:** 49956
Outside Organization: Rainbow Pack Outfitters
Received: Nov,19,2012 20:33:12
Correspondence Type: Web Form

Correspondence:

Comment on preliminary draft alternatives for the Sequoia and Kings Canyon National Parks Wilderness Stewardship Plan and Environmental Impact Statement (WSP/EIS) 11-19-12 From Greg Allen and Ruby Allen, Rainbow Pack Outfitters PO BOX 1791, Bishop, CA 93515 760-873-8877

Thank you for this opportunity to comment on the WSP/EIS, and thank you for your thoughtful organization/arrangement of issues to consider, and will try to respond in like kind. In regard to Permits, we support Alternative 1 and feel that the current permit system has worked. Day use permitting will only restrict Park visitation rather than encourage it. In regard to Quotas, we support Alternative 1, again feeling the current system is working. However it is not clear if more destination quotas will ultimately result in more red tape, as well as make trip planning even more difficult from a commercial stand point. If the Park feels it can increase certain

trailheads then it should do this in order for the public to adhere to the NPS motto: "Experience Your America". In regard to Trails/Bridges/Signs, we support Alternative 1 and feel current signage, and destination indicator signs are appropriate. Trails in class 2 and 3 to be maintained for safe stock use. In regard to Campfires we support Alternative 1. 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. In regard to Human Waste, we support Alternative 1. In regard to Party size for People, we support Alternative 1, and feel that visitor numbers can still increase while maintaining the current party size, by increasing trail head quotas. In regard to Party Size with Stock, we support Alternative 1, and feel that in Alt. 3-6; counting "heartbeats of both stock and people" discriminates against stock users, creates additional, unnecessary restrictions, limits the enjoy-ability of the Park, creates additional burdensome trip planning for commercial stock users and does not allow for equal access for the disabled, nor across the board. In regard to Backpacker Campsites: We support Alternative 1, feeling that designated camp sites will add another layer of bureaucracy, make trip planning more complex, lead to additional quotas at campsites and allow for possible conflict between users. 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. In regards to Night Limits for all Campers, we support Alternative 1. Additional night limits to the Dusy Basin area would greatly affect our business. Dusy Basin is a popular climbing and photography area, it requires most of a day to get in, and then another day to get out, making a 4 day trip more like a 2 day stay, making the 4 day night limit too restrictive on the enjoyment of the area. This restriction is possibly dangerous, as people may try to achieve their climbing goals in too short of a time frame, due to the night limit suggested. Many people require stock support to get into Dusy Basin, and they often use the large 10 gallon bear canisters. These are unwieldy and difficult to move, requiring further stock assistance to move them either down into Le Conte Canyon or back over Bishop Pass onto the Inyo Nat. Forest in order to comply with the 4 night limit. How many people would decide to go elsewhere with longer nights? In regards to Stock Use Access and Travel: We support Alternative 2, and although have rarely kept stock overnight in the Dusy Basin area, would like it as a continued option for both stock and client safety and well being. Support no grazing, use pellets or cubes, but support overnighiting as needed. In regard to Stock Use Camps we support Alternative 1. In regard to Stock Use/ Party Size we support Alternative 1. In regard to Stock Use: Grazing we support Alternative 2, and feel the current SUMMP works well and is well managed. There may be additional grazing areas that were previously closed that could be appropriate to reopen for grazing. This would allow for more dispersed use. 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. Alt. 5 the tie and feed only method increases the number of stock needed to supply a trip, with possible conflict of users if a stock camp is in use. Stock support facilities such as drift fences etc. should be maintained for both human and stock safety. In regard to Ranger Stations we support Alternative 2, request to not reduce commercial use in order to increase administrative use. Consider using commercial users as partners for communication, knowledge and collaborative purposes as well as visitor support. In regard to Other Facilities: We support Alternative 2 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. 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. We hope this traditional way of travel and transportation of goods for both work and pleasure will not be lost in this complex planning process. Thank you again for your work and this opportunity

Correspondence ID:	116	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 22:24:02				
Correspondence Type:	Web Form				
Correspondence:	Dear Superintendent Taylor-Goodrich:				

Thank you for the opportunity to comment on the preliminary draft alternatives for the Wilderness Stewardship

Plan and Environmental Impact Statement for Sequoia and Kings Canyon National Parks. We are writing in support of ALTERNATIVE 1 -- i.e., to maintain current management practices, particularly with regard to the continued limited and responsible use of pack animals. Only in this way will we, as older hikers be able to continue to enjoy the beauty of the national parks that stir our souls and have made us more conscientious and active protectors of wilderness and activists in the environmental movement. Without the use of pack animals, we will be denied equal access to the wilderness areas of these great parks.

We have loved the awesome beauty of Sequoia and Kings Canyon since we first went backpacking in the Sierra nearly 40 years ago. But, at ages 68 and 66, we can no longer backpack into the wilderness we love so much. Although we remain relatively fit, [REDACTED] compromised back and [REDACTED] cartilage-worn knees prevent us from backpacking. So it was with great joy four years ago that we discovered a way to go back into the wilderness ? by hiking with pack animals that carry our tent and other heavy equipment. We urge you to support our ability to continue doing so, in a way that preserves the wilderness environment.

A few points we'd like to make:

-- 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. For the past four summers, we have been part of a small mule-assisted hiking group, almost all of us in our 60s and 70s, who take week-long treks in the Eastern Sierra. All of us are avid lovers of the Sierra and former backpackers who can no longer shoulder heavy loads. Last year one of our party, who used to hike multiple days with a heavy pack but is now disabled, was able to access the wilderness by riding a horse, and her delight (and ours) in being able to once again be surrounded by the majestic beauty and awesomeness of these national parks inspired all of us.

-- The packers we've used have been extremely environmentally responsible - more so than many independent backpackers. The crew dug deep pits for a latrine and filled them in when we left camp, so that no trace was visible; we camped at a distance from water; we built no fires above 10,000 feet; we packed out all garbage; we kept to strict weight limits; the horses and mules were sequestered so as to ensure minimal disruption. By contrast, we've come across backpackers who have left toilet paper and other trash clearly visible, set up tents too close to water sources, and built fires in prohibited areas.

-- We also believe it would be counterproductive to reduce the quality of trails and signs, as some alternatives propose. Lack of clear signage is likely to lead to MORE use trails, undermining a larger amount of the land, as people try to find their way to their destinations. It could also lead to more people becoming lost, which -- beside the potential harm to human lives -- could lead to more search parties with further undermining of wilderness areas. We saw this phenomenon last summer, when we traveled near the spectacular Mitre Basin. Because there were no official trails, there were multiple use trails, far more trails than if official trails had been established, with more pristine areas consequently degraded. In addition, one of our party became temporary lost, which could have led to a disaster, if others of us had not fanned out (creating footsteps in more places) to find her.

Thank you for considering our concerns.

Correspondence ID:	117	Project:	33225	Document:	49956
Outside Organization:	Sierra Club Tehipite Chapter				
Received:	Nov,19,2012 23:08:30				
Correspondence Type:	Web Form				
Correspondence:					

My name is Robert Turner and I am a member of the Kings Canyon National Park Wilderness Conservation Committee of the Sierra Club Tehipite Chapter, which includes members in Fresno, Madera, Merced, and Mariposa Counties. We generally approve of the management practices detailed in Alternative 1, which represents the current administrative practices. The only other alternative we would consider supporting is Alternative 3, because of certain additional proposed changes, such as the conversion of present soft to hard-sided ranger

stations, or the disallowing of stock grazing in some fragile, high-use areas, such as Dusy Basin, where stock can alternatively drop off supplies and return over the pass or continue on to LeConte Canyon for grazing. However, Alternative 3 is replete with additional restrictions on users of the wilderness. We prefer a management program that continues to monitor visitor use, but attempts to control user impact not with additional user restrictions, but rather with education of wilderness visitors during the permitting process regarding the fragility of certain high-use, impacted areas on a given party's itinerary. In general we discourage the creeping increase in use restrictions, since part of the enjoyment of the wilderness lies in the sense of freedom that one encounters in leaving behind the trappings and constraints of civilization. This does not mean, however, that anything goes. 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. In line with this philosophy of protecting wilderness character while avoiding excessive user restrictions, we object to the application of destination quotas for hikers or private stock users. This method of control should be limited only to commercial stock parties. 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. We do not object to the continued use of the two established commercial facilities within the park wilderness, nor to the presence of commercial stock activities, as they provide access for those with limited ability to access the interior of the wilderness. However, parks policy ought not to favor commercial stock trips at the expense of non-commercial users, both hikers and those leading private stock trips. 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. Some additional development may be necessary in high-use areas to constrain and control visitor and stock use at established campgrounds. The use of natural materials to establish barriers to protect fragile ground is preferable to a proliferation of signs to restrict movement. 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. 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. Furthermore, the main automobile campgrounds are heavily smoky and thus unhealthy, especially for asthma sufferers. 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.

Correspondence ID:	118	Project:	33225	Document:	49956	Private:	Y
Outside Organization:	Unaffiliated Individual						
Received:	Nov,19,2012 00:00:00						
Correspondence Type:	Web Form						
Correspondence:							

Please withhold my personal identifiable information from public view. This includes my name, mailing address, and email address.

I am concerned that when SEKI perceives that there is too much human impact in some area, often close to trailheads, SEKI may reduce trailhead quota or maintain current low quota. This in effect limits the total number of people entering the wilderness, even for people that disperse far from trailheads, or even far from trails (cross country).

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.

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.

Before reducing quota for a given area, SEKI should present studies that show that human impact is too high in that area and seek feedback on how to address this issue.

SEKI should consider removing quotas for trailheads for which quotas rarely fill up. This would remove needless worry for visitors.

I am concerned that most alternatives call for reduced visitor access.

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

This document doesn't specify what issues are being addressed. Is there too much impact of visitors? Is visitor access too restricted? Are the issues universally present throughout SEKI? Or are they local, specific to some area or trailhead? It is possible that different approach is needed for different areas. A global change of policy, for example to reduce visitor access, may not be appropriate in all areas.

When there is too much impact due to people not following rules (entering without permits, camping, or setting up fires in wrong locations, leaving trash) consider better education and enforcement. Create a program for visitors to improve impacted areas. Visitors could show-off all the trash they picked up. Encourage visitors (perhaps after training) to dismantle illegal fire rings in way that leaves no trace that a fire ring was there. Ask them to take "before" and "after" pictures and document location. Encourage to report these actions so that SEKI can track that fire ring dismantling is done properly, and correct the program if needed. Encourage visitors to talk (in a friendly way) to other visitors that camp too close to water, etc.

The option of adding destination quotas, where the total number of visitors allowed at a particular location is limited, should be removed. This would limit too much the freedom of travel after entering the wilderness.

Limits on number of consecutive nights of stay at popular destinations are reasonable.

Toilets are much preferred to pack-out waste kit bags.

Again, please withhold my personal identifiable information from public view. This includes my name, mailing address, and email address.

Correspondence ID:	119, 158	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 23:12:51				
Correspondence Type:	Web Form				
Correspondence:					

I am commenting on the Preliminary Alternatives for the Sequoia-Kings Canyon Wilderness Stewardship Plan. Backpacking in the Sierra Nevada has been perhaps my most favorite pastime for the 20 years that I've lived in California. In the hiking season I often get to the Sierra three weekends out of a month. My most treasured trips have been to the backcountry of Sequoia-Kings Canyon.

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.

None of the current Preliminary Alternatives propose limiting stock use. I'd like to see new Alternatives that propose limits such as the number of outfitters and the number of stock trips or clients per year. I'd also like to see the Park Service propose a reduction in the number of animals and people allowed in a group traveling by stock. The new Alternatives should include concrete methods of measuring and enforcing these new limits. These limits could go a long way towards reducing the trail damage caused by excessive stock.

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.

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.

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.

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.

I'm opposed to the concept of zoning that is proposed in the Preliminary Alternatives. I believe this violates the Wilderness Act because some zones would be over-impacted.

Stock animals, especially horses, are an iconic element of the West. I emphasize that I do not propose the complete elimination of stock use in the Sequoia-Kings Canyon backcountry. There is a place for appropriately managed stock use by the Park Service, private parties, and responsible commercial outfitters. As we learn more about nature's processes, we've put in place rules in our National Parks to ensure that we preserve them for future generations. No longer as backpackers do we trench around tents to keep rain out, camp right next to water sources, enter the wilderness in large groups, cut down snags for firewood, or make fire rings wherever we want. Some sensible rules for stock use in Sequoia-Kings Canyon National Park are well overdue.

Correspondence ID:	120	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 23:13:03				
Correspondence Type:	Web Form				

Correspondence:
I have been hiking and backpacking in Sequoia and Kings Canyon National Parks for nearly 20 years, since the spring of 1994. I've enjoyed many nights in the backcountry of both Parks and the surrounding wilderness areas, both by myself and with friends. The following comments reflect that experience as a personal user of the wilderness rather than as a researcher, a commercial outfitter, or a resident.

My experiences in the wilderness, which has primarily been in the Zone B and Zone C corridors, have generally been positive and secluded, except in certain high-traffic areas such as Paradise Valley, Pear Lake, and Guitar Lake -- and even those have generally involved very little interaction with others (none negative). In short, I

consider my opportunities for solitude to have been good to excellent - I just rarely ran into others for more than a few minutes at a time, a few times a day. And these are the high-traffic corridors; my limited times in the Zone A areas have been basically no one but my party.

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; 3. 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.

Hence, my current preference is to do Alternative 1 and stick with the current regulatory regime in the absence of any data to the contrary -- more information is necessary to properly evaluate the advantages of the options (the negatives, at least of the more restrictive options, being that public access is extremely curtailed).

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.

My second concern is that 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.

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.

In the end, I must say that I think that limiting access to the Wilderness is counterproductive. The visitors I have met there have been generally well-behaved and tried to be good to the land; they were trying to follow John Muir's dictum:

"Climb the mountains and get their good tidings. Nature's peace will flow into you as sunshine flows into trees. The winds will blow their own freshness into you, and the storms their energy, while cares will drop off like autumn leaves." Reducing visitation to the Wilderness will just make it harder for people to hear those good tidings; and harder for them to drop their worldly cares and care instead about these splendid Parks.

Correspondence ID: 121 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 23:32:33
Correspondence Type: Web Form
Correspondence:

November 19, 2012

Re: Comments on Wilderness Stewardship Plan Alternatives

WILDERNESS USERS

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.

My wife and I are cavers. What is day use? Hard to tell if you don't carry a watch.

My wife is a long distance runner. I take long walks. The Rae Lakes loop is currently a day hike/run for her. Will it still be considered day use and under which Alternatives? How would non-stop hikes of 24 hours or more, without camping, fit into the Alternatives and permit systems?

My wife can get migraines from campfire smoke and a large number of individuals in the local area have respiratory issues. How will individuals with sensitivity to campfire smoke be affected under each Alternative? How will some of these individuals be able to enter farther into wilderness if they are blocked by being required to stay in areas that allow campfires?

Before the current wilderness permit system, it used to be possible to climb Mt. Brewer on a three-day weekend. Permit access now makes it difficult. How are mountaineers affected by this plan?

There are many other user groups. What are their needs? How is each user group affected by each Alternative? All of the currently proposed Alternatives are based on some varying level of resource protection. Maybe you should consider some Alternatives based on user group categories. Maybe a day use emphasis Alternative, a research alternative, an extended stay Alternative, and a travel with minimum impact Alternative, to name a few.

PERMITS

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.

ACCESSIBILITY

Access to the wilderness needs to be as unconstrained as possible. There needs to be a discussion when administrative actions, such as restricting campsite locations, create possible barriers to a user group. One example would be individuals with respiratory issues. Do the administrative restrictions allow them access to an environment free of campfire smoke within a reasonable distance? Does the permit system allow an individual wilderness entry without first having to stay in a front-country campground full of smoke?

STOCK USE

Use of weed free feed should be identified in at least one Alternative.

One solution to controlling grazing impacts would be to require any group with more than, say, four horses to show that they are carrying enough feed to support the additional stock for the length of the trip.

Correspondence ID:	122	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 23:36:42				
Correspondence Type:	Web Form				
Correspondence:					

In all plans stock use is still allowed at a level detrimental to all other users of SEKI. I support use of stock animals as deemed necessary by NPS for supply and operations, but wish we could substantially reduce recreational stock access. Every one of dozens of backcountry trips I have taken has been sullied by horse waste and by trash and other detrimental impacts at sites used by recreational packers. Require poop bags (as used in many urban areas), cleanup by pack groups, and limit access and use so that it better reflects the actual proportion of stock animal users to other users.

Unfortunately all of the proposed options seem to scale changes proportionally to the current lopsided favoring of stock use, so it is impossible to pick one (though if pushed I would lean toward 4 or 5).

Thank you for your consideration.

Correspondence ID:	123	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 23:40:03				
Correspondence Type:	Web Form				
Correspondence:					

I reviewed all of the documents at your website and there is one very important alternative missing: Requiring all stock animals to remain on designated trails that have been designed, constructed, and maintained to withstand the destructive forces of stock use. The "zoning" scheme presented at your site is incoherent, bounces all over the place, and considers various site-specific restrictions on stock in various places, but nowhere does it call for a simple, easy-to-understand, park-wide requirement that stock stay on designated, maintained trails. This has long been recommended by Leave No Trace advocates and scientists, and anyone who spends time in the parks' back-country can readily observe the enormous impact of stock on trails that are not regularly maintained. I do very much enjoy riding stock, but feel we stock users should all stay on designated and maintained trails. Venturing off maintained trails is what causes all the problems and gives stock users a bad name. If you cannot afford to adequately construct and regularly maintain a trail, it should be closed to stock. It should be that simple. Is it too much to ask for such an alternative?

Correspondence ID: 124 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 23:51:47
Correspondence Type: Web Form
Correspondence:

The following are my comments on the Preliminary Draft Alternatives for the Wilderness Management Plan.

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.

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.

The cost for wilderness permits should be low enough to ensure that access is truly open to all.

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.

Table 1 I support Alternative 3, which leaves the existing trailhead quotas and destination quotas in place, but allows for additional destination quotas as needed if an area is becoming too impacted and the wilderness experience and/or resources are being compromised. I do not support restricting wilderness usage further as outlined in Alt. 4 - 6. I especially do not want SEKI to require day use permits. This would be too costly for SEKI to administer (issuing so many additional permits) and too limiting and time-consuming for those who want to take a quick hike or short walk on the trails. Day hikers do not need to be regulated as backpackers do. Permits should only be required for overnight users. Usage around Mt. Whitney should be evaluated and the management of the area should be improved jointly by SEKI and the USFS. I do not support increasing trailhead or destination quotas as outlined in Alt. 2.

Table 2: I support the status quo in regard to trail classification and maintenance and do not think that the number of signs needs to be reduced. I do not feel that the current signs in any way detract from the wilderness experience, but instead help to direct and provide basic information for visitors. Existing Class 1 trails should not be made into Class 2 trails nor Class 2 trails into Class 3. Trail maintenance should, at a minimum, remove trees blocking the trails and prevent erosion. I do not support the construction of new trails.

I think that the current approach to trail signage in SEKI has been adequate and should be maintained as is. Signage does need to be added to all historical and cultural resources in the Wilderness Area in order to preserve and protect these resources. The signage should briefly explain the site and remind visitors not to damage it.

Table 3: I support leaving the campfire regulations as they currently are.

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.

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.

Table 4: 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.

Stock parties should still be allowed in wilderness areas in order to make the wilderness accessible to more individuals, but stock groups need to be managed wisely to protect wilderness experience and natural resources. In Zone A, I support having the maximum number each of people and stock set at 12 for day trips only. I feel that the total number, though, should be set at 24 to allow for all members of the party to ride since this would only be a day trip. For Zones B, C and D, I support the provisions under Alternative 5. 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.

Table 5: 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.

It is preferable not to designate particular campsites in wilderness areas. However, high use areas that are being adversely impacted, such as Guitar Lake, should have them. I do not support the construction of hardened campsites. I support Alternative 3 for Zones B, C, and D.

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.

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.

Table 6: I agree with Alternative 5 for Zones A, B, C, and D for Stock Use - Access and Travel. I support separating stock camps from backpacking camps. I agree with Alternative 3 for Zones B and C. Stock users should be required to camp in designated stock camps only. I support Alternative 4 for Zone D. For stock party size, I support Alternative 4's statement that applies to all zones. 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.

Table 7: 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. 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. 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.

In order to maintain the trail system, we need to give the trail crews adequate access and support to repair and work on the trails. Having base camps, where they can work from and store their food and their belongings makes sense. Requiring them to pick up and move to another location every few days does not, unless it makes sense based on the location of the trails that they need to work on. Reducing the number of storage lockers also does not make sense as they need to have adequate storage for their food. The reduction of two bear boxes at a site is not going to make a difference to the visitors' wilderness experience. I support keeping the existing crew camps, but not expanding the number of them.

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.

Table 8: SEKI should be supportive of and work in collaboration with non-profit organizations that support SEKI's goals. Unless the Redwood Canyon cabin is needed for SEKI rangers, it would be beneficial to allow the NGO to continue its cave research.

I support Alternative 1 for the Pear Lake ski hut. I don't feel that there has been any negative impact from its operation and it provides for a special winter experience for visitors.

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.

Correspondence ID:	125	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,20,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:					

16 November 2012

This letter is my comment on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan.

I have been an annual visitor to and user of present Wilderness areas of both SEKI and elsewhere in the High

Sierra for more than 75 years, as a hiker, backpacker, and client of commercial pack outfits. My use of these areas has been for either recreation, college teaching, or as a Research Geologist for the U.S. Geological Survey, 1967-1997.

I started hiking in the 1930s in what was to become Desolation and Yosemite Wilderness. My first visit to SEKI and its future Wilderness was as a backpacker in 1947, and I have returned to backpack in SEKI Wilderness most years since then, most recently in July, 2012. During the past 14 years, increasing frailty requires me to use pack stock to carry my pack on the first day of most trips.

But I am concerned that the Preliminary Alternatives do not address the need to reduce and restrict the use of pack stock in SEKI Wilderness, even though I am a user of pack stock.

Decades of my own experience and observations, plus the results of SEKI's own research show that pack stock are far more destructive of both the wilderness environment and wilderness values than is foot travel.

Stock numbers in our wilderness areas must be limited to about 10 maximum per group, they must not graze, and they should be restricted to a minimum number of arterial trails. There should be an extensive network of other trails on which stock are prohibited. And of course stock should never be allowed off-trail (except to access designated stock-campsites that are close to trails that are authorized for stock).

I also support the necessity of limiting permits (trailhead quotas) and access to protect wilderness values, but such limits should never favor pack outfits over others. 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.

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.

High Sierra wilderness areas are special and fragile. Those charged with protecting Sierran wilderness areas have an obligation to regulate uses to minimize damage to both the wilderness and the wilderness experience. 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.

You have an excellent and dedicated staff. You can do better than this inadequate Preliminary Alternatives product.

Correspondence ID:	126	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 00:00:00				
Correspondence Type:	Park Form				
Correspondence:					

I would like to see alt. 1 or 2 as this would keep or increase access to people as outlined in your plan. Keeping historic use such as hiking & stock use would be beneficial to many. Also I would like to see more done to keep meadows open and not encroached upon by trees.

Thank you

Correspondence ID: 127 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 00:00:00
Correspondence Type: Letter
Correspondence:

RE: Wilderness Stewardship Plan (WSP) for Sequoia and Kings Canyon National Parks.and John Krebs
Wilderness Areas.

"COMERSIAL USE"

THIS IS A NO/NO STARTER in the "John Krebs" Wilderness area., If you the Park do this in this Wilderness area what's the future to hold in the long run. To also commercializing the present Historical Cabin's, transferring the leases to commercial parties to :rent out, take fees to use, our what ever terms you all agree to. With the Park terminating the lease with the present Cabin owners as was planed in your last EIS?

There was a rider (16 USC 45f) in moving MK. from Forest Service to Park Service. Which denied any for profit commercial use in MK. Which I be live is the reason this last EIS was Canceled. with out doing the usual EIS reply of reason to cancel. To the public who commented / and filed as a public document record.

There most likely will be an amendment later on to change our cabin area to commercial use, if park can have Commercial use's in this specific wilderness area.

(16 USC 45f) and my comments to last EIS----"General Management Plan and Comprehensive River Management plan / Environmental Impact Statement) Volume 3: Comments and Responses on the Draft environmental Impact Statement."are at-----page's 265-9. [Are all on file and in this park document]

-- Hear are the Park words below' Note a clue on how these specific weasel words will be used, "'4(d) (5), and other law and policy sited hear?

"Potential Assessment Method for Commercial Services in Sequoia-Kings Canyon and John Krebs Wilderness Areas Sequoia and Kings Canyon National Parks propose to implement a multi-part assessment, or test, to determine whether specific commercial services should be allowed in the Sequoia-Kings Canyon and John Krebs wilderness areas. This proposed process reflects the requirements of the Wilderness Act, including '4(d) (5), and other law and policy. Considerations and questions that may be asked to formulate the END include: - 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? ? Does the commercial service provide for the specific needs of a particular activity, i.e. special skills, equipment, safety issues, introductory experiences, etc.? ? Does the commercial service maintain or improve the preservation of wilderness character? ? Does the commercial service meet the "necessary and appropriate" criteria of the NPS Concessions Management Improvement Act of 1998? ? Are the public purposes of wilderness (recreational, scenic, scientific, educational, conservation, and historical use) being realized without commercial services? ? What types and amounts of commercial services might be appropriate to realize the public purposes of wilderness? ? Should appropriate commercial services be managed differently in different management zones? ? Would the commercial service fit within site-specific visitor carrying capacities? If not, the service would likely not be allowed.

Minimum Requirement Analysis NPS Management Policies 2006 and DO: 41 (1999) require that the minimum requirement concept be applied to commercial services in wilderness. The END for SEKI will include an analysis of commercial services in the context of minimum requirement and minimum tool considerations.

Conclusion This preliminary introduction to the END process is to generate public comment on what commercial

services, if any, would be allowed, and to what level these services should be provided in the wilderness of Sequoia and Kings Canyon National Parks. The final management decision on the types and amounts of commercial services allowed in wilderness will be determined through a public process as part of the development of the WSP and its accompanying Environmental Impact Statement."

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

Correspondence ID:	128	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,16,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	11/09/12				

National Park Service,

I would like to comment on the Preliminary Alternatives for the SEKI Wilderness Stewardship plan. I have been backpacking in Sequoia and Kings Canyon National Parks since I was 14 years old (I am now 61 years old). I've had some of the best experiences of my life in these parks and would very much like to see them protected for future generations.

A major concern of mine has been the impact of commercial stock animals in the parks. The stock animals cause many problems that I have noticed over the years. They tear up the trails and make them hard to hike on and very unpleasant because they are so dusty, they cause swarms of flies, create animal waste on trails and in campsites, use noisy bells, require fences in some areas which are unsightly, and trample wet meadows . I have had to get off the trail in dangerous areas because of large pack animal groups, I have had piles of fresh horse manure and urine in the middle of my camp site, I have seen sensitive wet meadows trampled into mud by stock animals that should not be allowed in the area.

There is also the issue of luxury in the back country. I have backpacked several days into "wilderness" areas only to end up camping next to a group with folding tables, chairs, wine, and gourmet food all brought in by commercial stock. These were young people in good shape who should carry what they need themselves. If someone requires that type of luxury in the park they can stay in a lodge. In August 2011 in Sequoia at lower Soldier Lake there were two different groups that had their food and gear brought in by commercial pack animals which was completely unnecessary. One group of pack animals tore up the wet meadow that had a sign saying "no camping- sensitive area", and the other group of pack animals defecated and urinated in our campsite. Needless to say, my wife and I were not pleased. The people these pack animals were servicing were half our age and in good shape. The animals just allowed these people to arrive in their base camp nice and fresh without expending much energy.

Over the years I have seen piles of bottles and cans in camping areas in Sequoia and Kings Canyon, and I am sure that these piles of trash are from pack animal groups, and not from backpackers, as the items would be too heavy for a backpacker to carry. Some of these trash piles appear older in age, but I am sure the items were brought in by pack animals and should have been carried out by pack animals.

I feel that commercial pack animals should no longer be allowed in the parks, period. Times change and the impact of the pack animals is just too great. If they are allowed (for some reason) they should be restricted to certain trails and should be required to bring in their own food. NO Grazing should be allowed - high elevation vegetation is just too sensitive to allow pack animals to graze. Pack animal groups should be very small to reduce their impact - 4 animals and 4 people maximum. Pack animals should be reserved for only those with physical disabilities, and the items carried in by pack animals should be pure camping necessities and no luxury items. Commercial pack animals should be subject to a limited trailhead quota system because of the highly negative impact they have on

the park back country, because the trails are already crowded, and because backpackers have a quota system.

If the decision is to allow some pack animals into the park there needs to be a trail system for backpackers only so they can enjoy the wilderness without all the flies, manure, and deep dust on the trails. 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.

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.

As you can tell, I have very strong feeling regarding pack animals in the parks. Over my 46 years of backpacking I have seen a lot of abused trails, meadows, and campsites caused by pack animals. I have hiked on many trails that had a layer 6 inches deep with dust, with swarms of flies bothering me which were caused by pack animals. I always wondered why this could possibly be allowed- it just isn't right. The want of a few people to make money with pack animals should not be allowed to have such a huge impact on the environment and wilderness hikers. These parks need to be protected for future generations.

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.

Thank You,

Correspondence ID:	129	Project:	33225	Document:	49956
Outside Organization:	Black Park Pack Station Unaffiliated Individual				
Received:	Nov,09,2012 00:00:00				
Correspondence Type:	Park Form				

Correspondence:

Alternative 1- Specific problems: campfire elevation should be 10,000 consistant (lowering elevation just adds to fuel load in tree arena in case of wildfires). 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. Party size: should not be increased nor decreased, it is a good fair number for all. The fight to decrease party limits goes back to hikers association who typically hike alone or in twos. 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. Grazing: closing meadows to grazing as evident in Sand Meadow on the Hockett Plateau is counterproductive. You eventually lose the very area you are trying to protect as tree saplings overrun the grass and wildflowers and the meadow disappears.

Keep in mind when planning you are talking about an average 12 week period that any high country area is used. If you take the the time to look at the area (such as Hockett Plateau) there is very little change in numbers in the last 30 years. With limited use it receives and the evidence that stock use is not on the increase current quotas and number should be sufficient. 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.

Correspondence ID: 130 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,16,2012 00:00:00
Correspondence Type: Letter
Correspondence:
November 11, 2012

Dear Superintendent Taylor-Goodrich,

As an avid backpacker and hiker, I would like to comment on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan. 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.

I oppose the overly complicated "zoning" scheme proposed because it would sacrifice specific areas to high impact use. I oppose the preliminary group size limits which are much higher than recommended by research experts. I oppose the NPS proposal for three "trail classes" because it allows stock animals to use all trail classes and does not offer "foot travel only" trails for hikers.

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.

Thank you for your consideration

cc: High Sierra Hikers Association

Correspondence ID: 131 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,16,2012 00:00:00
Correspondence Type: Letter
Correspondence:
November 12, 1012

Subject : Comments on SEKI Wilderness Plan.

I'm 78 years old, love the Sierras, and am still able to walk far enough to be able to enjoy them. Unfortunately, the only way I can get into the true back country is to have a pack animal carry my gear.

I have followed the proposals of the High Sierra Hikers Association, and realize their proposals are a direct attack on anyone who owns stock, especially commercial packers. In today's jargon, their proposals are really discrimination against older people. I think they would like to put signs at the trailheads saying, "NOBODY OVER 60 ALLOWED".

Obviously if many of the proposals of this elite group of hikers (who are apparently allergic to horse manure and trail dust) were put into place, large numbers of seniors would find traveling in SEKI much more difficult and more expensive.

I could easily spend a paragraph or two commenting on the foolishness of the HSSA platform (what to do with

bear poop, everyone must hike in high-top shoes to keep the dust and manure off them, what rangers will be assigned to check the pack stock manure to insure there aer non non-native plant seeds, etc., etc.), but that would take several pages.

If the trails are taking a beating and there is an "overload" of human and animal body waste, the answer is to cut down the number of people allowed in the SEKI wilderness at one time...Even a child could figure that one out!! I understand this is difficult to implement because of political reasons, but the SEKI management is paid to make decisions like that. Yours truly,

Correspondence ID:	132	Project:	33225	Document:	49956
Outside Organization:	Sierra Mountain Center Business				
Received:	Nov,16,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Comments on SEKI WSP				

As a holder of a CUA with SEKI I am interested in the planning process as well as having a vested business interest.

As a recreationist and user of the Parks in my personal time I also have a personal interest. I am also a member of the American Mountain Guides Association and have been active since the 1990s in guide training and so have an interest in the credentials and requirements that the Park might ask of permit holders.

While the Park has undertaken an assessment of the "extent necessary" for commercial services I would like to point out the people that we as guides take into the mountains are members of the public. They are those who for a large variety of reasons choose the company and experience of a guide. Too often commercial is viewed by land managers as a necessary evil to be controlled as tightly as possible. In a public meeting I suggested that the NPS look to Parks Canada and their relation ship with guides.

Information can be found at; <http://www.interpretiveguides.org/main.php?p=606>

To quote their website "An interpretive guide build bridges between landscapes, people and history; reveals stories behind the scenery; and creates memorable and expiring experiences" As a guide I expect the NPS to ask a good job of me and expect to be asked to do my part to be educated in providing those memorable experiences. An opportunity exists for the NPS and CUA holders to work together to provide the highest quality experiences to the guided public.

Pack Stock. This will be one of the most controversial issues to be addressed. As a business we use the services of local pack stations to support trips. These trips are an important means of access to the Parks for a wide range of users and an integral part of the Sierra mountain experience. I know that there is a small vocal minority who actively seek to eliminate stock use in the mountains. 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. As grazing becomes more limited there needs to be alternatives that allow sustainable trips to continue. At present feed caching is not permitted. However if pack stack are going in with a small load it makes sense to use them to carry more. A trip to drop off feed over two days would reduce the number of stock taken on a five-day trip.

This also applies to NPS packing. Trail crews and research camps are a necessary part of NPS management. However trail camps do not need to be luxury and they often are. Do trail crews need cases of beer? Grazing will be a larger issue also. 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.

We currently take pack stock to Guitar Lake and any restrictions to stock access above Crabtree would severely impact the trips we run. Access above Guitar is not an issue. We currently use the Rock Creek Trail along Rock creek to Soldier Lake and Rock Creek Lake. A ban on use on this trail while not eliminating our use would have a negative impact on our guests experience and their desire to visit a different area by a different route, which makes for a better overall venture. The debate will center upon numbers and how allocations are made and the Preliminary Draft so far is mute on this.

Permit process and group sizes. Any permit process needs to be easy and user friendly. There needs to be agreement on group sizes and policies on either sides of the Sierra Crest. The Inyo has established protocols and NPS needs to adapt to these or get the Inyo to adapt theirs. Inyo group size is 15. NPS and USFS need to be the same.

Wood fires Again agreement with surrounding agencies is needed. As a business we have a policy of no backcountry fires. The NPS needs to ask if burning wood is a long term viable strategy and if the risk of user created wildfires is worth the risk ' especially as climate changes drier conditions and increased vegetation die off occurs.

Campsites To avoid conflicts between user groups there is a need to designate separate campsites for stock and non-stock groups in popular areas. This would be primarily Zone B. However there also needs to be some flexibility and the camps can be designated, but not exclusive. If space is needed then accommodations should be made. Administrative use should not take away from recreational use. i.e A park group should not occupy a designated site for prolonged periods of time. Backcountry rangers should have discretion to allow groups to overlap. Experiences this year in the Rock Creek area has shown however that this is often a capricious decision. A group cannot suddenly change plans because the ranger would "prefer" that a campsite not be used. As a commercial operator we wish to cooperate with backcountry management, but backcountry management needs to cooperate with the CUA holder.

Guide Qualifications We have worked with NPS previously to give input for qualification for issuing CUAs for guiding in the Park and have also been involved with the American Mountain Guides Association since the inception of the guide certification process and support it. The Park does not seem to recognize technical climbing as a primary activity but it is so. Charlotte Dome for example is a popular technical rock climb in the Park. Qualification have not been yet addressed in the WSP but we suggest that the use of certification in the primary disciplines of rock climbing, ski and alpine be used for the granting of CUAs. The Park does not need to do the assessment of who is qualified and who is not but can rely upon an outside organization to do this. The Park has, to date, included a provision for "equivalent experience". While this is admirable it also leaves a lot of room for interpretation and then it becomes up to the authorizing officer to interpret. The AMGA is internationally recognized as the sole responsible party in the US for guide credentialing and after 25 years of training and credentialing guides it is no longer new and all guides have the opportunity to avail themselves of this training. Other credentials are not extensive enough for guiding in the complex terrain of SEKI.

I am sure that there are many other aspects of the WSP that could be commented upon but I'll try and limit it for now.

I look forward to being involved in the process and to a good relationship between CUA holders and the NPS.
Robert SP Parker Owner Sierra Mountain Center

Correspondence ID: 133 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,16,2012 00:00:00
Correspondence Type: Letter
Correspondence:

I have been an avid Sierra hiker since I was fifteen years old. For decades backpacking was the way I traveled through the wilderness, but as I got older I found I could no longer carry that weight so I began going on packer supported trips. With their help I've had the privilege of seeing (multiple times) Bighorn Plateau, Lake 12248' Just north of Forester Pass, Forester Pass, WallaceMales Lake, Rae Lakes, Shepherd Pass, Crabtree Pass, Big Pine Lakes, Sixty Lake/Milestone/ Miter/Center/busy Basin, Kearsarge Lakes, Lake Tulainyo (once only) and many other scenic areas. I treasure each trip I've been on and although I love the whole Sierra, my favorite is the southern part in Sequoia & Kings Canyon National Parks. Having access to Wallace Lake is very important to me. My life has been enriched every year by being able to hike so much of the backcountry on and off the John Muir Trail in these two parks and without packer support it would not have been possible.

I strongly believe maintaining the current status of stock/backcountry use would be the only way to make the wilderness available to an aging group who have a deep appreciation of the areas visited and who care about preservation.

The Rock Creek Pack Station is responsible with their stock, knowledgeable about Impact on the environment, cleaning up camp and taking better care than most backpackers. Grazing at higher elevation meadows should be allowed. I would not be able to hike the ten + miles to get from camp to camp.

The Sierra has always been a HUGE part of my life and at sixty nine years I am very thankful that I'm able to continue enjoying such a special place. Thank you for the opportunity to comment on the Wilderness Stewardship Plan.

Correspondence ID: 134 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 00:00:00
Correspondence Type: Letter
Correspondence:

This is a comment on the preliminary alternatives for SEKI's Wilderness Stewardship Plan. My suggestion is to mandate the use of llamas as pack stock. Modeled after green energy power production phase in over a ten year period the increased usage of llamas for backcountry stock use both commercial and Park Service.

The advantages of llamas are significant: 1) Native to high alpine environment. 2) Very low impact on trails 3) Very sure footed in rocky areas 4) Natural browsers, low consumers of feed 5) Low poop producers. Very little odor and low attractant for flies.

These are just some of the advantages. Combining the use of a low impact stock animal and discouraging the transport of mega camps that some stock outfits encourage would greatly alleviate the harmful affects of wilderness stock use.

Correspondence ID: 136 **Project:** 33225 **Document:** 49956
Outside Organization: The Garden Law Firm, P.C. Business
Received: Nov,20,2012 00:00:00
Correspondence Type: Letter
Correspondence:
VIA U.S. CERTIFIED MAIL Superintendent Karen F. Taylor-Goodrich Sequoia and Kings Canyon National
Parks Attn: Wilderness Stewardship Plan (WSP) 47050 Generals Highway Three Rivers, CA 93271-9700

Re: Comments on Preliminary Draft Alternatives for the Wilderness Stewardship Plan and Environmental Impact Statement

Dear Ms. Taylor-Goodrich:

I am writing as legal counsel to the High Sierra Unit of the Back Country Horsemen of California ("BCH HSU") in response to the National Park Service's ("NPS") request for comments on the preliminary draft alternatives for the Wilderness Stewardship Plan and Environmental Impact Statement for the Sequoia-Kings Canyon Wilderness and John Krebs Wilderness areas. BCH HSU very much appreciates the opportunity to comment on the preliminary draft alternatives and set out below are its specific comments.

A. Grazing

Of all the various restrictions proposed in the preliminary draft alternatives, restrictions on grazing can have one of the most dramatic impacts on the ability of stock users to access the areas within the Sequoia and Kings Canyon National Parks ("SEKI"). For that reason, we believe that any grazing restrictions should be very, very carefully evaluated and applied. Notably, the 1986 Stock Use and Meadow Management Plan ("SUMMP") imposed substantial grazing restrictions on stock use. Just three years later, Mitchel P. McClaran found vast improvements in the backcountry meadows noting that they are "generally in excellent condition." Past and Present Conditions of Backcountry Meadows in Sequoia and Kings Canyon National Parks (June 30, 1989). In addition to the beneficial impact of those restrictions themselves, stock use in the wilderness areas has dramatically decreased since those restrictions were put in place in 1986. Thus, given that there are improving conditions and decreasing use, it appears that there is no reasonable basis to impose even further restrictions on stock use through grazing restrictions.

The preliminary draft alternatives propose a variety of management prescriptions for grazing ranging from no grazing anywhere (Pre. Draft Alt. 5), no grazing above a to-be- determined elevation (Pre. Draft Alts. 3 and 4) to meadow closures based on site-specific conditions (Pre. Draft Alt. 6). 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.

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.

In stark contrast to the blanket and arguably arbitrary restrictions imposed by elevation- based grazing prohibitions in Preliminary Draft Alternatives 3 and 4, Preliminary Draft Alternatives 1, 2 and 6 propose site-specific grazing restrictions that would ensure resource protection, but avoid restrictions that are otherwise not merited. For that reason, BHC HSU agrees with this type of approach to the issue of grazing. It would allow for appropriate areas to be protected based on site-specific analysis but at the same time allow the freest use of SEKI as required by law.

B. Access and travel on trails

With regard to the issue of stock users' travel and access in the Wilderness areas at issue, BHC HSU is opposed to prohibiting any user from accessing any specific trail, except where prohibitions are necessary for purposes of public safety, such as on the John Muir Trail near the summit to Mt. Whitney. There are no "stock only" trails or areas, and there should be no "hiker only" trails or areas. Creating "hiker only" areas, such as are proposed in Preliminary Draft Alternatives 3, 4 and 5, would be in direct violation of the Congressional mandate that no user group should be given "exclusive privilege[s]" for access to any particular part of SEKI. 16 U.S.C. ' 45d. It should not be forgotten (but often is) that all of the recognized trails within these areas were created by stock users for stock users. Hikers were attracted to these trails because they created an easier way for them to access these areas. Ironically, hikers now seek to ban stock users from trails stock users' made and have been using long before hikers. Simply put, that is not fair.

On the issue of access and travel, BHC HSU supports Preliminary Draft Alternative 1, which would maintain the status quo. No reasonable bases have been set out that would support the restrictions set out in the other preliminary draft alternatives. For example, Preliminary Draft Alternative 2, while largely similar to Preliminary Draft Alternative 1, also proposes a 1/2 mile restriction on all off-trail travel by stock users, but no such restriction for hikers. There is no reasonable basis for this restriction on any user. In reality, off-trail activity is very limited and has the added benefit of dispersing use. All too often, the restrictions imposed result in further condensing use. This condensed use often and not surprisingly results in greater impacts. Those increased impacts are then cited to by anti-stock groups as justification for further restricting stock use. This clearly is a type of rigged-system with a predetermined outcome which simply is not fair.

As mentioned above, the remaining Preliminary Draft Alternatives 3, 4 and 5 all grant exclusive privileges to hikers in certain areas of SEKI. However, 16 U.S.C. ' 45d is very clear that this exclusive use is not allowed.

'45d. Exclusive privileges within park prohibited No exclusive privilege shall be granted within said park, or on or over the roads and trails therein, except upon ground leased for the erection of buildings or camps thereon.

This explicit rule was reiterated in the legislative history which shows that, while reasonable restrictions can be imposed on horseback riding and pack and stock activity, any restrictions must be shown to be "necessary" to protect park resources and wilderness values. House Report No. 110-694 (*4)(June 5, 2008)(110th Cong., 2nd Sess. 2008).

The use of pack and saddle stock is an appropriate and historically accepted recreational activity, as documented in the 2006 General Management Plan for the parks. The Secretary may authorize horseback riding in, or the entry of recreational or commercial saddle or pack stock into, an area designated as wilderness by this Act. The Committee intends that any decision made to authorize these activities shall be consistent with the statutory authority under which Sequoia and Kings Canyon National Parks were created, and the Wilderness Act, including section 4(d)(5) related to commercial services. Any authorization of these activities shall be subject to conditions and restrictions deemed necessary to protect park resources and wilderness values.

Restricting stock activity to please another user group is not "necessary to protect park resources and wilderness values," and therefore is not consistent with the explicit law or the Congressional intent. Based on the foregoing, it

is BHC HSU's position that the proposed restrictions in Preliminary Draft Alternatives 3, 4 and 5 regarding stock access and travel are not reasonable alternatives because they are prohibited by law.

C. Zones in general

BHC HSU opposes the use of geographic zones as a basis for determining "what would be allowed" in certain areas. Zones appear to be the antithesis to site-specific determinations and regulations. While zones could be used as a management tool to implement general policy goals and desired conditions, zones likely cannot be the basis for imposing specific restrictions on user activity without the restrictions being arbitrary. This conclusion is due to the fact that the restriction would apply in all parts of the zone. However, all parts of a zone are not the same and this would result in unjustified restrictions in parts of the zone. Thus, by their nature, imposing specific regulations by zone is likely to result in restrictions which do not allow the "freest use" of the resources, as is otherwise required by law.

D. Party size

BHC HSU supports a single party size limit which is consistent with the nearby National Forests. A single, uniform party size would eliminate the confusion and risk which currently exists when a party travels from a nearby federal forest or park into SEKI where the allowable party size is greater than allowed in SEKI. For example, the Sequoia National Forest currently has an allowable party size of 15 people and 25 stock, not to exceed a combined a total 40 of people and stock.

In addition and for the same reason, BHC HSU strongly opposes the use of different party sizes for different designated zones.

D. Stock camps

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. Moreover, the ability to enjoy a wilderness experience is severely limited when a visitor is mandated to use a particular location in the area for his or her camp. Also, all of the preliminary draft alternatives which implement mandatory stock camps would require use of those camps regardless of the size of the party. However, smaller parties have many options as to appropriate places to camp but these options would be eliminated because designated camps typically are selected only if they have the ability to handle larger groups. The one-size-fits-all nature of the rule is a further basis for disagreeing with it.

BHC HSU agrees with a policy that promotes recommended and strongly encouraged camps to be used by visitors, combined with clear rules on the location of any camp (i.e., at least 100 feet away from any water body). Given the dramatically decreasing stock activity in SEKI, BHC HSU does not believe that designated sites for parties with stock are necessary nor are they a necessary restriction on the freest use of the area.

E. Quotas and permits

BHC HSU does not oppose the use of trailhead quotas provided that they are set based on valid assessments of impacts. BHC HSU also does not oppose destination quotas provided that they are used solely for high use areas.

F. Conclusion

BHC HSU recognizes the conflicting policy directive which NPS has been given under the Wilderness Act and the demanding task the agency faces in simultaneously devoting the area to recreation while also protecting and preserving the area in its natural condition. As the courts have noted in rejecting a purist view of the Wilderness Act, "Congress did not mandate that the [agency] preserve the wilderness in a museum diorama, one that we might

observe only from a safe distance, behind a brass railing and a thick glass window." *Wilderness Watch, Inc. v. U.S. Fish and Wildlife Service*, 629 F.3d 1024, 1033 (9th Cir. 2010). Instead, Congress instructed that agencies should apply their judgment and discretion in establishing the proper management of these areas. *Id.*

Moreover, 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.

As counsel for the High Sierra Unit of the Back Country Horsemen of California, I thank you for the opportunity to submit these comments related to the Wilderness Stewardship Plan and Environmental Impact Statement for the Sequoia-Kings Canyon Wilderness and John Krebs Wilderness areas.

Very truly yours,

THE GARDEN LAW FIRM, P.C.

Kevin R. Garden

cc: High Sierra Unit of the Backcountry Horsemen of California

Correspondence ID:	138	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,20,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:					

Superintendent Traylor-Goodrich:

I am writing to comment on the Wilderness Stewardship Plan for SEKI. There are several components of the Preliminary Alternatives to which I, as a hiker and supporter of wilderness, object.

Specifically, the issues of stock and commercial outfits' use of the wilderness as proposed in the Preliminary Alternatives would continue the current over use and abuse of the wilderness by these entities.

As a hiker/backpacker I go to wilderness for the beauty, peace and solitude that can be found nowhere else. I understand that I must share the treasure that is the SEKI. However, sharing and being robbed of my wilderness experience by the noise, trail degradation, polluted water, flies and manure from unlimited commercial guiding and the attendant stock numbers is, frankly, unfair and untenable.

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. (This should be enforced for trail crews especially).

In addition, hiker-only trails should be established and preserved. The hiker- only trails should have access to

camping areas such as meadows and streams that are off-limits to stock. The great majority of hikers/backpackers I have met over decades of wilderness travel practice a wilderness ethic of "take only pictures, leave only footprints." suggest that this ethic is a far cry from that practiced by commercial and other equine-supported groups. Again, I will willingly share "my wilderness" on a one-for-one basis and only if all parties respect and preserve the nature of the wilderness experience.

Thank you for the opportunity to comment. I look forward to the outcome of this review.

Correspondence ID:	139	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,20,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:					

I am writing to express my concerns regarding the possible increase in stock use of the SEKI wilderness. I have just completed a through hike of the John Muir Trail (JMT), and I have seen firsthand the extensive damage caused by pack trains. Any increase in the number of pack animals in this sensitive wilderness would accelerate the destruction which I observed.

During my 16-day hike on the JMT I saw daily evidence of the damage that pack animals cause: eroded and destroyed trails; trails littered with horse feces; pristine meadows trampled under the crush of many thousand pound animals; remains of tin cans and garbage not removed by the pack parties. It is inconceivable that increases in pack traffic will somehow, magically, repair this fragile wilderness.

There are increasingly fewer wilderness areas where hikers can experience a pristine setting. I fear that the desire to increase pack traffic is a response to the increasingly sedentary nature of the populace who want a wilderness experience. Pack operators, seeking economies of scale, are encouraged to build larger operations and operate larger pack tours to capitalize on this growing (pun intended) segment of the population.

The result of more people on more pack animals will undoubtedly be the destruction of the very wilderness that we all wish to visit. We have seen this story before in many forms, from the over-fishing of the salmon runs to the destruction of important aquifers. Overuse, lack of planned management and a disregard for the health of the resource eventually dooms the resource to extinction.

I urge the NPS to first and foremost, Protect the Wilderness. Allow only carefully managed and monitored used, by both hikers and horses. Ensure that SEKI wilderness is a resource for generations, not the generation of resources.

With the deepest concern

Correspondence ID:	140	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,20,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Karen Taylor-Goodrich Wilderness Stewardship Wilderness Access and Campfires				

Thirty years of wilderness heaven- Lone Pine to Bridgeport. I'm seventy years young, and with the pack station help (Rock Creek) many more years of access to the Wilderness. Gathering around a camp fire at night is when we get to share. People and warm campfire so so important.

Access to Walker Lake very helpful. Backpackers do a good job picking up campsites and grazing areas. We are

older and cold - campfire so important.

11/17/12

Correspondence ID: 141 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,20,2012 00:00:00
Correspondence Type: Letter
Correspondence:

November 17, 2012 Dear Ms. Karen Taylor-Goodrich, Superintendent:

I am writing to comment on the Preliminary Alternatives for the Wilderness Stewardship Plan and provide suggestions to improve the condition of the SEKI wilderness and the experience for the many users of this wonderful park.

While I have been backpacking in Sequoia-Kings since the 70's, I am not entirely against the use of stock animals by other travelers. I just feel strongly that their use shouldn't damage the resource or take away from the experience of hikers like myself. Here are my suggestions:

- 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!

- I know when I take the main trails in the park, I'm sure to come across evidence of stock. I go off trail to get away from them. Please outlaw letting people take their stock animals anywhere they want and leave some places for hikers only!

- 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.

- Enough with the horse manure on the trail! Why can't you require the stock animals to wear those things and carry out the manure- I have to camp away from water sources but they do their business right next to creeks and lakes. Disgusting!

- How can SEKI propose 3 trail classes when none of these is for hikers only--- I am getting the strong impression that the NPS is operating our national parks for the benefit and profit of private companies, not the general public!

- 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. Please contact me, Ms. Taylor-Goodrich, if you would like my support in researching this policy change.

Thank you so much for taking the time to consider my comments.

Correspondence ID: 142 **Project:** 33225 **Document:** 49956
Outside Organization: UC Davis Medical Center University/Professional Society
Received: Nov,20,2012 00:00:00
Correspondence Type: Letter
Correspondence:

November 15, 2012

RE: SEKI PROPOSED WILDERNESS STEWARDSHIP PLAN

Dear Superintendent:

We are writing in regard to your preparation of wilderness plans to manage SEKI wilderness. This letter provides important information that should be considered by your planning staff and addressed by your plans, and we also respond here specifically to your published call for public comments.

We strongly disagree with the proposals for stock use in the wilderness, as they do not appropriately address the impact of stock on water quality.

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 downstream areas. Such impacts were recognized by Bob Harris, a USFS supervisor who largely eliminated livestock grazing in much of the Lake Tahoe basin.

Together we have a combined research experience in the High Sierra of more than 65 years. This has often been in collaboration with many researchers including those in the John Muir Institute of the Environment at UC Davis, and the Tahoe Research Group. We have published numerous scientific studies that show the negative impact of stock on water quality in the Sierra. In addition, other research groups have also shown negative impacts of stock on wilderness, both in the Sierra, and other roadless areas in the US.

A summary of some of these studies is provided below:

1. "Conform bacteria in Sierra Nevada wilderness lakes and streams: What is the impact of backpackers, pack animals and cattle?" Derlet RW, Carlson JR. *Journal of Wilderness and Environmental Medicine*. 17(1):15-20_2006. Analysis of 60 lakes/streams in the Sierra (including SEKI) showed that in stock use areas 80% of surface water had indicator bacteria above threshold, compared with 7% in wildlife areas. Conclusion: Pack animals significantly degrade water quality by increasing bacteria loads in surface waters.
2. "Surface Water Quality along the Central John Muir Trail in the Sierra Nevada Mountains: Coliforms and Algae." Carling Ursem, C. Scott Evans, Kemal Ali Ger, John R. Richards, and Robert W. Derlet. *High Altitude Medicine and Biology*. 10(4):349-355. 2009. 36 sites near the JMT between Yosemite and Kings Canyon were

studied on 3 separate occasions during the Summer. Suspended algae levels were higher in stock contaminated areas compared with backpack only areas. In addition, levels indicator bacteria were higher in stock use areas. Conclusion: Pack animals significantly degrade water quality by increasing- eutrophication and bacteria loads in surface waters.

3. "Do waterborne coliform bacteria increase in Sierra Nevada Mountain Wilderness area lakes and streams during drought periods?" Derlet RW, Richards JR, and Ger KA. *Journal of Wilderness and Environmental mental Medicine*. 2 (1):70. March 2010: The study found a 78% prevalence of indicator bacteria in stock areas, compared with 20% in areas trafficked only by wildlife or backpackers. Conclusion: During drought years, wilderness water coliform prevalence was significantly increased compared to non-drought years in those areas used by pack animals.

4. "Backpacking in Yosemite and Kings Canyon National Parks and Neighboring Wilderness Areas: How Safe Is the Water to Drink?" Derlet, RW. *Journal of Travel Medicine* 15(4):209,215. July/August 2008. This analysis of 72 lakes and streams in the High Sierra confirmed earlier work and demonstrated a 70% prevalence of indicator bacteria at stock use sites compared with none in wildlife sites. Conclusion: Pack animals significantly degrade water quality by increasing bacteria loads in surface waters.

5. "Risk Factors for Coliform bacteria in Sierra Nevada Mountain Wilderness Lakes and Streams." Derlet, RW, Carlson JR, Richards, JR. *International Journal of Wilderness*. 14(1):28-31. April 2008. Similar to items # 1, 2, 3, and 4 listed above, this study occurred during a different summer but yielded similar results: 56% of stock areas (66% in Yosemite) had high indicator bacteria levels compared with 18% of wildlife or backpack use areas. Conclusion: Areas used by stock are at significant risk for coliform pollution of lakes and streams.

6. "Risk Factors for Coliform Bacteria in Backcountry Lakes and Streams in the Sierra Nevada Mountains: A 5-Year Study." Derlet RW, Ger KA, Richards JR, and Carlson JR; *Journal of Wilderness and Environmental Medicine*. 19(2):82-90. June 2008. This major paper combined data from 5 years of High Sierra research. In all, 364 samples were analyzed and a multivariate analysis applied. Similar to individual years, prevalence of indicator bacteria above threshold was found to be 63% at stock use sites compared with 9% of wild sites. Conclusion: Areas used by stock are at significant risk for coliform pollution of lakes and streams, and most of the microbial contamination in areas used by stock can be attributed to stock animals. This detailed study establishes that stock animals are a source of significant water pollution in the Sierra Nevada, including at Yosemite National Park.

7. "Algae. in the Sierra Nevada Wilderness areas," Derlet RW and Ger KA. *Sierra Nature Notes*, Volume 9, February 2010. Based on our research studies, we discuss the problem algae in the Sierra and the potential for secretions of toxins harmful to humans and animals. The most important algae growth stimulant in Yosemite is stock manure, which is deposited or washed into streams and lakes. The high mass of nitrogen and phosphorus stimulate algal growth and provides and opportunity for non-native species to gain foothold.

8. "Wilderness area streams and lakes: Increased Periphyton and bacteria correlates with stock traffic in National Parks of the Sierra Nevada." 2012. In preparation. During the summer of 2010 an analysis of periphytic algae was undertaken at multiple lakes and streams in Yosemite and Sequoia-Kings Canyon national parks. Increased biomass of periphytic algae was found in stock use areas compared with wild areas not used by stock animals. In addition, algae were found support the growth of tremendous numbers of bacteria, as many as 2 million CFU per gm of algae.

9. Does Above Normal Precipitation Reduce the Impact of Mountain Cattle Grazing on Watershed Algae and Bacteria? Derlet, Richards and Goldman; *Water Qual Expo Health* 2012, 4:105-112. This study contains a sub-analysis on Horse-Mule impacts consistent with the above scientific studies.

10 - 18. National Park Service, Investigator's Annual Reports (IARs) for Principal Investigator Robert W. Derlet in SEKI: 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010 and 2011. It is our understanding that the Park Service

possesses, in these IARs and elsewhere in its own files, much of the data we have collected over the years, and this information should be made available to your planning team, Collectively these IARs show data described in some of the above publications.

Additional research by other investigators also provides data on the impacts of stock:

19-22. National Park Service IARs for Edward Atwill as PI. 2001, 2002, 2003, and 2004. These studies in the Tuolumne Meadows areas documented a very high mass of stock manure on popular trails and a high number of Giardia in the manure. Inspection of these trails demonstrates the close proximity to bodies of water and ease at which a rainstorm would carry manure into surface waters.

23. "Influence of Llamas, Horses, and Hikers on Soil Erosion from Established Recreation Trails in Western Montana, USA." Deluca TH, Patterson WA, Frcimund WA, and Cole DN. Environmental Management 22(2):255-262. 1998. :This Forest Service study documents increased erosion and sediment runoff from trails used by stock compared to those used by hikers.

In summary, considered as a whole, the body of evidence summarized above demonstrates that 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.

Further, as noted above, 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 have found a link between horse manure and water quality degradation. Further continuous research is indicated to explore the potential relationship between nutrient loading and algal growth and pathogens in SEKI. In addition, a related line of research should expand Atwill's research to determine the amount of manure per trail mile (which he's calculated on the Yosemite-Glen Aulin trail) then extrapolate to estimate the potential for nutrients and pathogens reaching open water within 200 feet of trails.

We are convinced that SEKI wilderness plan does not address the serious risk for invasive algae. This is not just an academic exercise. The Klamath River in Northern California has received years of excessive algae stimulating nutrients, and has now become prone to late summer algae blooms and large masses of periphyton. California Water Quality Board posted signs along the Klamath River warning persons not to drink or cook with the water, or eat certain parts of a fish catch and a whole run of salmon was lost to degraded water quality. Further, the evidence points to potentially critical effects leading to deterioration of SEKI's once pristine waters. Californians and visitors from around the world would be saddened to see this occur in the future to SEKI waters. Thank you for your understanding and consideration of our concerns. Please share this letter with your wilderness planning staff, We would welcome any further contact or communication on this important issue.

Kind regards, Robert W. Derlet, MD Professor Emeritus UC Davis

Charles R. Goldman, PhD Distinguished Professor of Limnology Emeritus Department of Environmental Science and Policy UC Davis

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Correspondence:
Karen F. Taylor-Goodrich, Superintendent Sequoia and Kings Canyon National Parks Attn: Wilderness
Stewardship Plan 47050 Generals Highway Three Rivers, CA 93271

Dear Superintendent Taylor-Goodrich,

This letter transmits comments of the High Sierra Hikers Association ("High Sierra") on your staff's "preliminary draft alternatives" for SEKI's Wilderness Stewardship Plan (WSP). These comments incorporate by reference our earlier letter on this subject, dated October 26, 2012, and our scoping comments dated August 31, 2011.

The Current Process is Unlawful and the Draft Alternatives Should be Withdrawn

While we appreciate in concept the opportunity for interested parties to review "preliminary draft alternatives" prior to issuance of a formal draft environmental impact statement (DEIS), it has become clear that your agency is acting in bad faith and that your current planning process is fundamentally and fatally flawed. We request, as an initial matter, that the "preliminary draft alternatives" be immediately withdrawn, and that 'prior to developing alternatives for the WSP' your agency first conduct a "needs assessment," via an open and transparent public review process, to determine whether and to what extent commercial stock services and administrative stock uses may be necessary in SEKI's wildernesses. Such an analysis is long overdue because the Sequoia-Kings Canyon Wilderness was designated nearly two decades ago, yet SEKI has never demonstrated any need for the many commercial stock services or administrative stock uses that it allows and conducts each year. Your staff simply assumes that unlimited and harmful commercial and administrative stock uses should be continued because such uses are deemed by park managers to be "traditional."

SEKI constantly attempts to justify and rationalize the unlimited use of stock animals by the deceptive employment of the words "tradition," "traditional," "historic," and "historical." Those words are not 'value-judgment' words. None of them has the meaning of "good" or "should continue." To employ them as if they had those meanings is a deliberate abuse of language, with the Intention to deceive and obfuscate, if SEKI has no stronger arguments than the use of those words, then it has no valid reasons at all to continue commercial or administrative stock uses.

In order to honestly evaluate the impacts of stock animals, you must first acknowledge that horses and mules are non-native, domestic animals and are invasive species that cause environmental pollution and physical damage. Horses are not native to the Sierra, to California, or to North America, They are European animals. There were no horses or mules in what is now California until the summer of 1769, when the Portola expedition explored northward along the coast and "discovered" San Francisco Bay in November of that year. Like any other non-native, invasive species, and like any other destructive practice (such as logging of the Big Trees, development in the Giant Forest, sheep grazing in park meadows, and feeding bears for public amusement, all of which are now ended) horses and mules do not belong in national parks simply because their use is deemed "traditional" by some white Americans.

As discussed in our letter of October 26, your staff finalized, circulated, and posted on the Internet a document titled "Final_Supplemental_and_Background_Information.pdf" which states, in part:

"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)

The above quote from the WSP's Final Supplemental Information document makes it plainly obvious that your "preliminary draft alternatives" were founded on the erroneous and unlawful assumption that "the GMP provides for continued commercial use under current NPS policies."

Your letter to me dated November 5, which attempts to spin this issue by characterizing the violation of the Court's order as an "oversight," is not only patronizing and unconvincing it fails to even acknowledge the simple fact that the "preliminary draft alternatives" were founded on portions of the GMP that have been vacated by the Court.

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."

This approach by your staff puts the cart before the horse by crafting alternatives before SEKI seriously considers the impacts of stock use or examines its current policies regarding stock use. And it limits the type and range of alternatives to be considered because your staff improperly assumed that all stock use would continue under current NPS policies. To proceed down the path of evaluating only these biased and unlawful "preliminary draft alternatives" would constitute further and continued bad faith.

A Fundamental Reassessment of Stock Use In SEKI's Wildernesses is Needed

The limited range of "preliminary draft" alternatives, and the failure of those alternatives to address numerous key issues raised in our scoping comments, leads us to question whether anyone at SEKI actually read and considered our detailed scoping comments dated August 31, 2011. We request that you and your staff read and carefully consider, our scoping comments, and the numerous exhibits attached thereto.

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.

SEKI's General Management Plan (GMP) lacks any detailed analysis of stock impacts, but it does acknowledge and list some of the impacts, including:

"...persistent hoof prints, streambank shearing, soil pedestals, erosion, and other soil impacts. Vegetation is directly affected through defoliation, trampling, and root shearing, and indirectly through changes in soil structure or nutrient status, shifts in species composition, and the potential introduction of exotic plant species. Meadow animal life is also affected through the removal of vegetative biomass (wildlife cover), crushed rodent burrows, and disturbance by grazing stock. Even when grazed meadows are healthy and productive, the removal of forage by stock diverts nutrients and energy from the natural system, depriving native herbivores and decomposers, and the predators that feed on them." (CM.P Vol. 2, p. 121)(2).

Other significant adverse impacts resulting from stock use which have to date been mostly ignored by SEKI staff include, but are not limited to; water contamination with bacteria and other pathogens resulting from the

uncontrolled discharge of stock manure; killing of threatened amphibians (e.g., mountain yellow legged frogs, Yosemite toads) by direct trampling and habitat destruction; displacement of endangered Sierra Nevada bighorn sheep from key forage areas (because bighorn sheep are frightened by stock parties and have been observed to leave key feeding areas when they encounter domestic stock); and pollution of trails & camp areas by the dust, flies, and manure that stock animals leave in their wake. 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.

Given the many significant adverse impacts resulting from stock use in SEKI's wildernesses, SEKI must do more than simply list the impacts and declare them "acceptable" because such uses are "traditional." The time has come to completely re-think how stock use is conducted, regulated, and monitored at SEKI, and (at minimum) adopt hard numeric limits, effective controls, and modern management practices to avoid further impairment of park values and wilderness character.

The Proposed Zoning Scheme Is Wrong-headed and Won't Work

The proposed zoning scheme is unnecessarily complicated, will never be well understood by park visitors, and would unlawfully allow for impairment of wilderness character in high-use or "sacrifice" zones (i.e., the "preliminary draft alternatives" propose excessively large group size limits and inappropriate installations in sacrifice zones). The proposed zoning scheme, put simply, is a sophomoric fad that will not stand the test of time. A much simpler approach (described below) would be far easier to understand, far easier to implement, and far easier to enforce.

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). Stock animals could be allowed on trails, but not off trails. There should be no difference in how structures and installations are treated in any "zones." Wilderness is wilderness, and there should be no degradation of wilderness character allowed, and no sacrifice areas. In sum, no amount of denial or rhetoric on NPS's part can change the fact that the high- use "zones" proposed in the "preliminary draft alternatives" would become de facto sacrifice areas.

High Sierra requests that the zoning scheme be abandoned immediately. It's a bad idea that will only cause problems and be viewed as a worse idea as time goes on.

A Range of Reasonable Alternatives is Needed

The "preliminary draft alternatives" do not present a range of reasonable alternatives for stock use. First, the WSP should consider an alternative for no stock use (at all) in SEKI's wildernesses (3). This is not a radical notion. SEKI's 1971 Master Plan called for phasing out all stock use in SEKI's sensitive higher elevations. And other countries with robust cowboy cultures, such as Australia, acknowledge the devastating impacts of domesticated stock on wildlands and do not allow recreational stock use in wilderness areas. 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.

Next, if NPS believes that some type and level of stock use is necessary for administrative purposes, an alternative should be evaluated that allows "No Stock Except for Essential Administrative Uses." (The essential administrative uses would need to be narrowly defined and strictly limited).

To be clear, High Sierra questions whether any stock use is truly necessary for administrative purposes in SEKI's wildernesses. Surely, the current use of government stock, staff time, and/or funds for boondoggles such as the so-

called "Squad Trips," "military trips," "Soararsis trips" 'and all other squandering of taxpayers' funds for leisure pack trips where little or no legitimate business is performed and documented' should be halted at once. Further, the practice of grazing NPS stock on park lands also should be halted, unless it can be demonstrated, in every case, that grazing is absolutely necessary.

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. If this WSP process accomplishes nothing else, it should require that NPS stock animals at minimum leave the mountains between supply trips. Government stock should not remain in the wilderness to graze and trample SEKI's fragile meadows, lakeshores, and wetlands unless the animals are absolutely needed to perform crucial work functions.

If NPS believes that there is a legitimate need for administrative stock use, it should define each such use, and limit its administrative stock use to the minimum necessary, in order to avoid 'preventable degradation of SEKI's park values and wilderness character. Anything less would render the WSP a hollow document.

A limited exception to the "No Stock" alternative could be considered to allow for front-country (i.e., non-wilderness) day rides. This would have dramatic impacts (i.e., trail damage, water pollution, create habitat for non-native parasitic cowbirds, etc.) that could be considered if the NPS is adamant that harmful front-country day rides must be continued.

Following these reasonable alternatives (i.e., No Stock, No Stock Except for Essential Administrative Uses, and No Stock Except for Essential Administrative Uses & Front-country Day Rides) a range of additional alternatives could be crafted that would allow for modest levels of stock use in SEKI's wildernesses. This could include non-commercial (i.e., "private") stock use (strictly limited to the extent proper, i.e., that which doesn't degrade park values or wilderness character), and commercial stock services (strictly limited to the extent necessary and proper).

As an initial matter, the WSP should evaluate two No Grazing alternatives park-wide, and wilderness-wide. SEKI's 1971 Master Plan stated, in part:

"Because of the damage resulting from livestock foraging for food and resultant trampling of soils, possible pollution of water, and conflict with foot travelers, use of livestock in the higher elevations for any purpose should be phased out as conditions permit...Livestock may be used in the lower elevations and around developed areas where It can be stabled and fed without open grazing on park lands." (Master Plan at p. 24)

High Sierra requested throughout the 10-year planning process for SEKI's General Management Plan (GMP) that NPS consider a park-wide No Grazing alternative. SEKI refused to consider such an alternative in its GMP process, saying repeatedly (to both High Sierra and to the Court) that the appropriate time and place for consideration of such an alternative would be in a subsequent stock use plan to be developed immediately following the GMP. That time is now.

Specifically, NPS argued (in *High Sierra v Dept of Interior et al.*) that a park-wide No Grazing alternative was "too detailed for treatment in a programmatic plan" such as its GMP, and promised the Court that "the WSP planning effort will evaluate these issues" (Enclosure 2). NPS repeatedly pledged that the concerns of High Sierra would be addressed in the WSP process (Enclosure 3). That time has come.

Regardless of "zone," additional alternatives should be considered for each of the following: No Grazing (park-wide); No Grazing (wilderness-wide); and No Grazing above 9,700 ft. elevation. For each such No Grazing alternative, limited exceptions should be considered for essential administrative uses and non-commercial (i.e., "private") use with no grazing allowed under any circumstances by commercial outfits in SEKI's sensitive higher elevations. Finally, an alternative should also be considered to prohibit grazing at a robust network of meadows

below 9,700 feet, so park visitors hiking along SEKI's trails may experience the entire range of meadow types without the myriad impacts caused by stock grazing and trampling.

To summarize, an outline for a range of reasonable alternatives for stock use is as follows:

1. No Stock (i.e., no stock use anywhere in SEKI): 1(a). No Stock Except for Essential Administrative Uses 1(b). No Stock Except for Essential Administrative Uses & Front-country Day Rides
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.)

If stock use is to be allowed in SEKI at all, it is essential that NPS fully evaluate and consider a range of "No Grazing" alternatives. Such alternatives are entirely reasonable. Many other national parks have banned grazing by domestic stock, yet their wilderness areas are still accessible and routinely visited by hikers and stock users alike. A park-wide or wilderness-wide "No Grazing" alternative would allow stock users ample access to SEKI's wildernesses without the substantial harm caused by livestock grazing.

Next, we would like to provide one specific example to illustrate the nature and extent of SEKI's extreme bias in favor of business-as-usual regarding stock use, the inadequacy of the current range of alternatives, and ultimately NPS's bad faith. Please consider the request made repeatedly in recent years by High Sierra (and hundreds of other citizens) that SEKI consider and adopt a park-wide "No Grazing" alternative. First, the NPS repeatedly represented to High Sierra (and to the Court, throughout the legal proceedings in *High Sierra v. Dep't of Interior*) that such alternatives would be evaluated, and SEKI would carefully address all of High Sierra's concerns and suggestions, in this WSP process. (See, for example, enclosures 2 and 3.) Yet no such park-wide "No Grazing" alternative is now included. Second, the reasons SEKI staff has given for its opposition to a No Grazing alternative are extremely simplistic and disingenuous. SEKI staff argues that too many stock animals would be needed to carry feed for the animals, ostensibly requiring more animals and resulting in greater impacts to trails and camp areas due to an increase in stock numbers. The problem with that simplistic assessment is that it fails to consider that many other national park successfully prohibit all grazing, and, more fundamentally, it assumes that stock use must be conducted.

SEKI staff refuses to consider that commercial and administrative stock trips (which comprise the vast majority of stock use at SEKI) could be conducted differently than they are done today. If commercial and administrative stock users relied more on "spot" and "dunnage" trips (whereby the stock animals leave the backcountry after dropping off the people and/or supplies, instead of remaining in the mountains), those persons who need stock support to access SEKI's wilderness could mostly gain access without any need for the stock animals to remain in the backcountry for more than one or two nights. Thus, if spot and dunnage were used instead of "traveling trips" or "full-service" trips (i.e., catered luxury trips, where the animals remain in the groups for its entire stay, complete with cooks, wranglers, and other pampering), both administrative and commercial stock use could be conducted with far less impact than exists today, and not so much feed would need to be carried as SEKI staff claims. Such an approach would require an honest re-thinking of the way things are done. A network of spot and dunnage

camps would need to be evaluated (and perhaps designated), in desirable locations, mostly within a day's distance from trailheads. The "preliminary draft alternatives" contain nothing of the sort, and assume simply that stock use patterns and practices must and will continue essentially as they exist today.

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 GMP/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.

The public is left to conclude that SEKI is not considering any upper limits on stock use, and that there will be no such limits. "Current levels" and "current policies" means "unlimited." High Sierra finds this unacceptable. As long as stock use remains unlimited at SEKI (i.e., no upper limits on the numbers of animals, overnight trips, day trips, commercial outfits, or commercial clients per year) this whole exercise is little more than a dumb show, a charade whereby NPS is going through the motions, pretending that it is evaluating options. But there is nothing proposed, nothing concrete to evaluate, and in fact no real "range" of alternatives at all. They are essentially all the same, because all of the alternatives allow unlimited stock use. This approach violates NEPA and the Wilderness Act, it is clearly an attempt to rationalize a pre-determined outcome (i.e., to continue unlimited stock use), and it demonstrates bad faith.

Other issues:

Alternatives for Commercial Stock Use: The "preliminary draft alternatives" do not even begin to lay out a range of reasonable alternatives for limiting and regulating commercial stock services. 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. This would provide reasonable wilderness access for all while avoiding the high impacts known to result from "all expense" trips or "traveling" trips (where the animals accompany the group for the entire duration of the trip). People can adequately access, experience, and enjoy the SEKI wilderness without the destructive power of horses and mules accompanying them for their entire visit.

Manure catchers: Horses and mules produce about 33 pounds of manure and 18 pounds of urine per- animal, per-day (Lawrence et al. 2003). This means that a single group of 20 stock animals on a one- week trip produces more than two tons of manure and more than 300 gallons of urine that are indiscriminately left behind in the wilderness to contaminate streams, lakes, and wetlands. All alternatives that allow for stock use in SEKI's wildernesses (whether administrative, private, or commercial) should require the use of manure catchers on all stock animals. The "preliminary draft alternatives" fail to address this important issue, which was clearly raised in our scoping comments dated August 31, 2011. Manure catchers are relatively inexpensive and readily available (see, for example, www.bunbag.com, and www.equisan.com.au). Anyone who has spent any time around stock animals in the backcountry knows that they often "relieve themselves" when crossing streams or when they are led to water for drinking. Instead of depositing their waste directly into the water sources from which we all drink, or along trails where the waste can be easily carried by runoff into streams and lakes, the waste could be bagged by manure catchers. For one-day trips, much or all of the manure could be packed out. For overnight trips, to avoid waste being deposited into waterways or left concentrated on trails and in camp areas, the manure catchers could be emptied by stock users away from water sources, trails, and camps.

SEKI Should Heed Its Own Advice: SEKI has made numerous comments to surrounding Forest Service units that it should itself heed. For example, SEKI's superintendent has told its neighbors that, at least where wilderness is

concerned, "ecological values should not be subservient to economic values," and that agencies charged with managing wilderness should ensure that "[no] double- standard exists for the benefit of a commercial entity." (See, e.g., Enclosure 4.) These should be founding principles for the WSP, and followed without exception.

Further, SEKI has supported the designation of specific campsites for stock users, and supported reducing access into SEKI's wildernesses from surrounding Forest Service areas such as Lamarck Col, Cottonwood Pass, New Army Pass, Taboose Pass, and Shepherd Pass (ibid). And SEKI also has supported having "all visitors compete equally" for wilderness permits to access the Mt. Whitney area (ibid), which means that ongoing corrupt practices, such as setting aside scores of priority permits for clients of the commercial Cottonwood Pack Station to access the Whitney area, should stop at once.

SEKI's top managers also have supported reductions in cross-country party size, commented on the need for agencies to control impacts from administrative pack stock use, and admonished its neighbors to limit excessive visitation & resource damage in the heavily impacted Mt. Whitney area. (See, for example, Enclosure 5.)

The WSP must specify concrete steps to ensure that SEKI implements its own advice, and SEKI must use its independent authority to Implement the above measures and restrictions where the Forest Service has failed to do so. The National Park Service is being hypocritical, disingenuous, arbitrary, and capricious by recommending management practices and regulatory strategies to its neighbors and then turning a blind eye when SEKI is continually affected by the Forest Service's failure to act.

Summary & Conclusion

For the reasons discussed above and in our letter of October 26, please withdraw the "preliminary draft alternatives," and, prior to developing alternatives for the WSP, first conduct a "needs assessment," via an open and transparent public review process, to determine whether and to what extent commercial stock services and administrative stock uses may be necessary in SEKI's wildernesses.

Please contact us at the letterhead address should you have any questions or desire clarification about any of these comments, our letter, of October 26, or our scoping comments dated August 31, 2011.

Sincerely yours,

Peter Browning, President High Sierra Hikers Association Enclosures (5): Enclosure 1: Final_Supplemental_and_Background_Information.pdg (from SEKI's website, Oct. 2012) Enclosure 2: Defendants' Reply in Support of Cross-Motion for Summary Judgment, 11/17/11 Enclosure 3: Transcript of Proceedings, High Sierra v Dep't of Interior et al., January 11, 2012 Enclosure 4: Letter from SEKI superintendent to Inyo National Forest, June 27, 2005 Enclosure 5: Summary of comments from SEKI superintendent to Inyo & Sierra national forests. In: "Summary of Early Attention Letters," Internal Working Draft, 1/3/01 (page 7)

References: Lawrence, L., J.R. Bicudo and E. Wheeler. 2003, In: Proceedings of the Ninth International Animal, Agricultural and Food. Processing Wastes Symposium, pp. 277-284.

FOOTNOTES: 1- The Remedy Order vacated all portions of the GMP that were related to commercial stock use in SEKI's wilderness areas. It is therefore unlawful and improper for SEKI to now (or at any time in the future) cite the GMP to justify or rationalize commercial stock use in SEKI's wildernesses. 2- The GMP also acknowledges that banning grazing would have "major, long-term benefits" to SEKI's environment (see GMP Vol. 2, p. 124). 3- High Sierra does not advocate for this (or any other) alternative at this time, but views a "no stock" alternative as a necessary baseline upon which to evaluate the impacts of alternatives that would allow for various types and levels of stock use.

Correspondence ID: 145 **Project:** 33225 **Document:** 49956
Outside Organization: Sierra Club Sierra Nevada Resilient Habitats Campaign Conservation/Preservation
Received: Nov,19,2012 00:00:00
Correspondence Type: Letter
Correspondence:

Dear Ms. Taylor-Goodrich,

The Sierra Club is pleased to submit these comments on the Sequoia Kings Canyon Wilderness Stewardship Plan, Preliminary Draft Alternatives. We also earlier submitted scoping comments that are still applicable.

Adaptive Management and climate change

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. Thus we do not support active manipulation within wilderness even if such manipulation is intended to benefit and might actually benefit wildlife species.

Human management intervention in designated wilderness must comply with the Wilderness Act of 1964. That Act mandates that human interference should be minimized while natural processes must be allowed to determine how designated wilderness responds to influences like climate change. There should be no human manipulation of natural processes inside of designated Wilderness. Wilderness should be used as a baseline to help us understand how natural processes control responses to outside influences. Human intervention via adaptive management can be used in comparable natural areas outside of wilderness to experiment in ways to deal with the negative influences of climate change. By comparing the response of natural processes inside of wilderness to similar areas outside of designated wilderness we can evaluate the results of human intervention using adaptive management. In this way designated wilderness can be used as a base line to evaluate the results of human intervention in natural areas. In order for this process to be successful careful monitoring of adaptive management outside of wilderness and the result of natural processes management inside of wilderness will be essential. Adequate funding for monitoring must be assured for this process to succeed.

Natural fire is an important natural process that should be used to manage wilderness. In the past all fires have been suppressed on our public lands. We support the more recent use of unimpeded natural fire by the National Park Service in wilderness management. In wilderness, naturally ignited wildfires should be allowed to continue naturally and should be suppressed only under exceptional circumstances. Monitoring of all fires is necessary both during and after the event. The use of prescribed fire to manipulate wilderness is seldom necessary and should be rarely used. If it is felt that prescribed fire might be beneficial it should be used in similar areas outside of designated wilderness for evaluation.

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.

We support a strict interpretation of the minimum tool requirement and oppose the use of helicopters and chainsaws except when absolutely necessary.

Visitor Use and Impacts

Adaptive management should be used to evaluate human use inside of wilderness in order to find solutions to negative results of visitation. Controlling party size, establishing quotas at trailheads, trail standards, food storage,

etc are appropriate techniques to minimize and control the results of human use. Natural processes should be the dominant influence on the wilderness resource. Careful monitoring, adequately funded, will be necessary to evaluate the success of methods to manage human use of wilderness.

We see no reason to reduce the overall number of visitors to the wilderness as use has not shown any increase. We recognize that visitor use must be restricted by quotas and camping restrictions in certain areas where necessary. We support the use of bear canisters rather than bear lockers.

We fully support the implementation of a Wilderness Education Strategy. Education becomes increasingly important as new visitors may have relied heavily on electronic information and may not have the requisite skills and knowledge about how to act in wilderness. A well educated group, versed in "leave no trace" skills, will leave less impact on the landscape; larger group sizes for knowledgeable groups with education credential could be considered.

Zoning:

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.

We understand that no non-wilderness-appropriate activities will be allowed in even those zones closer to the edges of the wilderness or those that get heavier visitor use. We do not imply that non-wilderness, appropriate activities would be permitted. Rather, the "lesser" or more heavily used zones could see greater degradation over time. And, while the zones may start out just being an administrative convenience to connect different sites with similar amount of use, over time there could too easily be a tendency to allow incrementally greater degradation anywhere in that "zone".

While it is intended that no wilderness-inappropriate actions would occur, we repeat that the possibilities for increasing degradation are alarming. For example, in the Preliminary Draft Alternatives, the statement that "what would be allowed and the desired conditions within each zone may change." Desired condition should be wilderness-specific, and not zone specific.

It is also stated that, "in addition to zoning, the NPS could develop regulations/restrictions specific to particular areas and/or trail segments." Exactly. Our point is that such site-specific regulations are likely to be needed and to be imposed anyhow. They are a practical necessity, and therefore broad, general zones are simply not needed as an overlay. Any management regulations or restrictions that wilderness managers need to conduct, implement, or impose can be done simply and logically by site, area or trail specific actions. Why bother with "zones" and their ominous implications?

Obviously, areas near access points, edges of wilderness, trail, campsites, popular scenic features will get heavier use. Each of these can be separately documented and assigned for restrictions or whatever management controls are deemed necessary in the area or trail specific way that is mentioned. That is simply practical and differs from a sweeping division into zone classifications.

In practice, today, management of heavy-use areas is mainly done on a site specific way. This can and should continue. If, as we have been told, managers find the zoning overlay to be a management convenience in guiding and giving direction to management for specific sites, then we might compromise by acceding to a continued use of zones administratively only for management convenience.

But, for the public, it is not a useful or helpful designation. It gives the impression of allowing more impacts in certain areas and it adds an unacceptable overlay of confusion into public understanding of which places are managed how. It even makes reading a wilderness stewardship plan unnecessarily obtuse and tiresome, and gives the impression of administrative obfuscation. In the present preliminary alternatives, it is difficult to grasp intent in any general way, since alternative actions are laid out, unhelpfully and confusingly, in terms of zones.

If in practice the agency admits a higher impact for a specific camping site, for example, ok. But with zoning such impacts have a tendency to spread -- by granting similar such additional impacts to a sweeping zone surrounding this specific site or these specific sites.

Wilderness with no zones at all is the ideal to work toward.

Wilderness Fees

Sierra Club opposed imposition of user fees for wilderness visits. Sequoia Kings Canyon has recently imposed a "wilderness camping fee" for overnight wilderness permits. Sierra Club generally opposes the relatively new fees structures, (starting in 1996 with fee demo, and presently under authority of FLREA, Federal Lands Recreation Enhancement Act). We support fees for developed non-wilderness sites like campgrounds, marinas, which are customary. We also do not oppose National Park System unit entry fees which also are long standing. But a fee on top of that to go into wilderness -- no. A fee to enter wilderness overnight gives a total wrong message about wilderness and the freedom of the hills. We strongly oppose such fees.

An advance "reservation" fee for popular wildernesses, such as the Sierra, is justified to assure one's permit ahead of time; this is not a "wilderness" fee per se; free permits should be available for people who just come in to pick them up without advance reservation. It is still that way in Yosemite, as it should be.

Charging a fee for a visit to wilderness could also border on the illegal. Charging a fee commercializes such visits and puts the whole concept of wilderness into a commercial category that comes dangerously close to the gray area of the Act's prohibition of commercial uses in wilderness. Agency staffers say that, since no one is "making any money" off these fees, that the agency uses the moneys just to support its wilderness stewardship work, it is not commercial. However, that argument misses the point. Charging a fee for a wilderness visits commercializes the entire experience for the visitor. Wilderness is land that is FREE of developments -- and fee structures are a type of development. A fee turns the visitor to a customer paying for a service.

A fee for visiting wilderness is the most onerous kind of public land fee imaginable. Specific isolated high-use areas like the Mt Whitney trail are acceptable exceptions.

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.

Party Size including packers

Sierra Club supports the commercial packing industry and wants it to continue. Some Sierra Club trips utilize the services of packers, and individual members may hire packers on their own when they go into wilderness. However, over time the agency has been too lenient as a whole with the packers, and some reins need to be put on ability of packers to write their own permits, pretty much granting them unlimited access, and on party size. We support a gradual reduction, over the next ten years, so that after that transition period, a packer party will have no or hardly any more participants including all people as well as all horses as the maximum number allowed to a party on foot. Due to expectations of their customers, it won't be reasonable for packers to reduce their party size

all at once. To do so to the levels called for even after a transition period, most packers would have to reduce the allowable dunnage of their customers, and it is hoped this would eliminate many non- wilderness items, such as large coolers, large stoves and barbeques, and most chairs, possibly except for the handicapped. This would enhance the wilderness experience of their customers as well as of visitors who meet their party en route.

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.

How will the NPS deal with the court order to do a needs assessment about the amount of both private and commercial stock in SEKI wilderness? The Wilderness Stewardship Plan should identify a process to determine criteria for unacceptable impacts from stock and to establish a process for conducting a needs assessment for both private and commercial stock use.

Campfires:

The use of camp fires should be closely monitored and controlled. Sierra Club supports the present elevational limits to campfires and potentially other restrictions on campfires, including not allowing them at all where firewood is scarce. 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. Green trees should never be cut; only down wood, no live wood, should be used for campfires. We support lower elevations for campfire closures than currently used if needed to prevent the loss of residual dead wood.

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." Doing so may not denude the scarce wood at those higher elevations, but it gives the wrong message to other campers in the vicinity. If a backpacker sees the light of a packer fire in an area above the elevation limit, there is a tendency to say ? Ah, evidently fires are ok here ? let's scrounge some wood and have one too." For those clients of packers to whom a campfire is an essential camp experience, let them camp below the elevational limits, in forested areas where there is plenty of down wood.

Thank you for providing an extra step of "Preliminary Alternatives" and for the opportunity to comment on these.

s/ Joe Fontaine, Co-Chair Sierra Club Sierra Nevada Resilient Habitats Campaign

Correspondence ID:	146	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 00:00:00				
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Correspondence:					

Hello!

This letter contains my comments on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan.

I have enjoyed backpacking in the High Sierras several times including the Sequoia and Kings Canyon National Parks.

My two main concerns regarding the plan are related to horseback riding.

Please stop avoiding the main issue of unlimited stock trips, commercial outfitters and commercial clients use of

horses on all trails. Please rewrite the Preliminary Alternatives to include meaningful and measureable limits of total stock use per year.

When I am backpacking in the High Sierras, the main distraction is related to fresh or powdered horse dung on trails. I do not appreciate either the odor or breathing the dust of powdered horse dung. Also, sometimes the trail is hard to walk on when some rocks are dislodged by the excess weight of the horse's hooves.

The most reasonable way to alleviate this problem is for you to include a requirement for use of manure catchers. All Stock users should be required to use manure catchers during all uses of trails. The NPS should immediately abandon the zoning scheme and adopt a wilderness plan that preserves SEKI's entire wilderness including the areas around trailheads. All stock animals should be required to stay on designated trails including trails to designated stock camps.

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.

Please have the NPS conduct a needs assessment prior to proposing alternatives in order to determine whether and the extent to which commercial stock use is necessary in the SEKI wilderness.

NPS should reduce the maximum party size by considering recommendations of research scientists.

Correspondence ID:	148	Project:	33225	Document:	49956
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Introduction

My comments are based on over 40 years of wilderness experience as a backcountry ranger, ski guide and outdoor instructor. I have spent more than 20 cumulative years living, hiking and skiing in the Sierra. In addition, I am editor of Sierra Nature Notes, which publishes research papers for a popular audience on science studies being conducted in wilderness. I still live and work in the Sierra. These comments are submitted as a member of the public and do not in any way represent opinions or policy of the National Park Service nor were they written on government time.

Summary 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.

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. The document and proposed alternatives assume a problem where none is defined or may not exist. The reality is, when compared to current use patterns, the actual effects may not be all that significant. To present the Alternatives as you now have them may skew people's perceptions of their true impact and so effect their understanding and comments.

I have three major criticisms of the Draft Alternatives as written. I will summarize here and provide details further on.

1. The zone approach presented in the WSP makes understanding of proposed policy alternatives a confusing

mess. Zones are useful for visualizing use patterns and modeling dispersal from trailheads. However, this document is needlessly complicated by, for instance, different group sizes for both stock and people according to zones.

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. In addition, there must be a maximum number of stock that can leave a trailhead per day, just as there's a maximum number of people per day. The same with length of stay. The CFR already has regulations for length of stay within the parks. There is absolutely no evidence or projected use pattern that show this to be a problem that needs to be micromanaged by different lengths of stay per zone.

2. Organizing and potentially limiting wilderness visitation, group size by zones is both unworkable and places an unnecessary and confusing burden on park visitors. It marks a major departure for both the practical side of managing wilderness use as well as a major change in how visitors might relate to wilderness. A person should, within reason, be able to travel wherever they want and stay as long as they like. This is the long-established Freedom of the Hills that is at the core of the wilderness experience. Nothing in current or projected future use patterns suggest any need to change this.

Using zones to establish grazing policy makes no sense whatsoever. That's an ecological consideration and so must be decided on the individual requirements of meadows and the watersheds they are in. In addition, Alternatives proposed for stock travel in Zone D actually increases social and ecological impacts significantly beyond current policy.

3. 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.

Merely limiting grazing of meadows, as the current alternatives seem to emphasize, is not sufficient. To allow visitors a full range of a true wilderness experience when travelling in wilderness, they absolutely must have the opportunity to experience large meadows absent ANY grazing by stock. In addition, the park service must carry out its mandate under the wilderness act to afford complete protection to at least some meadows, allowing them to reach their full ecological potential heretofore denied by over a century of stock grazing.

3. The zones proposed are, apparently, created relative to their current use levels - a factor that is a result of their geography (close to a trailhead) and social variables of visitation (popular trail corridor). Tables 4 and 6 say that stock numbers and grazing will be managed to, among other reasons, protect resources - an ecological constraint. The Alternatives for those tables, though, seem to propose stock use levels based on the socially-defined zones rather than the ecological and aesthetic effects of grazing on specific areas - meadows and watersheds. The WSP cannot use a socially derived zonal plan to regulate what the document clearly says should be based on resource protection.

For instance, while several of the Alternatives propose a possible elevational limit to grazing, that is only a small part of the resource protection variables that must be considered as a direct result of the impacts of stock grazing. Such impacts and potential impacts are not reflected in a zone approach to management. Management must be based on ecological and aesthetic considerations - local and general - and not on these socially-derived zones.

Visiting wilderness on a stock supported trip is unquestionably an acceptable wilderness use. Grazing, though, is not. The alternatives do not make this distinction clear or provide explicit choices in separating the two distinct activities. Grazing, then, must be managed independent of zones. That does not mean that stock users need be regulated much differently in their access and group size by zone - a social consideration - but that the animals

supporting their trip cannot graze more or less based on those zones.

Detailed Comments Zones

The zone approach necessitates a needlessly cluttered and very difficult to understand document and should be completely abandoned for the WSP. I understand that this document is, necessarily, general in presentation. Nonetheless, I don't see how it can realistically be enforced or, philosophically, implemented within the spirit of the Wilderness Act and historical attitudes towards backcountry use.

Wilderness is about freedom. Any management system that limits or further intrudes on that freedom is inherently antithetical to the very spirit of wilderness. Absent obvious and quantifiable ecological or social impacts from overuse, there is no need to micro-manage wilderness travel as proposed by the zone plan introduced with these alternatives. I have been a backcountry ranger for over 40 years and can authoritatively say that impacts are not even close to those where such micro-management is necessary.

Practical Considerations

Setting party size, for instance, based on what zone the group is travelling in requires that the permit issuer know what zones a group is going through and the party size allowed for each. In my experience, this is unworkable. There is no way a USFS permit issuer in Lone Pine or Bishop is going to know the location of Martha Lake or Lake 10,212 and tell the party that their group size exceeds what's allowed there, then take the time while the visitor tries to come up with alternative routes. The question should only be: "does your route leave the trail - is it cross country in places-" This means one maximum party size for all trails and one size for any cross-country travel. To do more requires greater knowledge and time, needlessly complicating the permit workflow. Both are almost impossible given the size of the permit issuer's area of responsibility and the length of lines on an August day.

The same is true of regulating stock use by zones. Overall policy should just be guided by whether the stock is on a trail or off a trail. Current policy prohibits off-trail stock use, with only a few exceptions. The WSP alternatives would seem to allow such use in Zone D (which is almost entirely off-trail) in Alternatives 2, 3, 4 and 6. This is a major new ecological and social impact that must not be allowed under any circumstances. It reverses over 40 years of stock policy where stock use was only allowed on trails and included a few abandoned trails. At a minimum, the current policy should continue: absolutely no stock use beyond 1/4 mile of a trail and then only to go to an established camp or for grazing, where allowed. Any other stock use in Zone D is an unacceptable ecological and social impact and a clear increase of social and ecological impacts over present policy.

The policy guidelines that have been in place since the 1986 stock plan have worked well, protected fragile off-trail areas, are easy to understand and should be continued. There is no evidence that current or projected future stock use patterns require any more than site-specific restrictions if conditions indicate a need.

Protect Specific Iconic Meadows Manage Grazing According to Ecological and Aesthetic Criteria, Not Zones

Meadows are the heart and soul of the Sierra. Along with granite peaks, the huge meadows that occur along rivers in canyon bottoms are iconic. Their unique riparian ecosystems are vital to both the ecology of watersheds and the aesthetic experience of wilderness travelers. With only one exception, in all of Sequoia and Kings Canyon National Parks, every major meadow on a popular trail corridor is subject to grazing. A person hiking the John Muir Trail has only one opportunity in over 100 miles of travel to experience a large meadow free of grazing impacts - Vidette Meadow. This is unacceptable and a glaring failure of the Park Service to truly provide for the enjoyment of visitors and leave park areas in as unimpaired condition as possible.

Managing meadows and watershed-level meadow ecologies cannot be done according to the zones proposed. Those zones are based almost entirely on social criteria - where use has, historically, been concentrated or not.

They are not in any way based on the ecological relationships or requirements of individual meadows or the watersheds they are a part of. The draft says that, if allowed, grazing will be "managed to protect ecological functions...". It appears, though, that such management will be based on, among other criteria, the zones the grazing takes place in. That's a contradiction. Grazing must be entirely managed on ecological and scenic criteria, regardless of the zone the grazing takes place in or the previous history of grazing in individual meadows or watersheds.

Although the USE of stock is, unquestionably, "a primitive type of recreation appropriate to fulfill the recreational purpose of wilderness..." the stock supporting the people have absolutely no intrinsic right to graze Sierra meadows. Stock and meadow management has, bizarrely, morphed into recognizing the animals as a user group equal to people. Stock numbers are looked at independent of the number of people they carry into the wilderness. Their associated grazing has become almost a fundamental right of those animals. Furthermore, while it appears that although daily trailhead quotas for people will be maintained, there is no indication that similar quotas for stock will be implemented. There is a definite double standard that has existed for decades - and which seems to be perpetuated by this document - in how stock and human impacts are evaluated and regulated when traveling in the Sequoia Kings wilderness. 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.

The essential question when stock is regulated - whether for grazing or party size - is: Are the ecological, aesthetic and social impacts of stock justified by the number of people they support on any given trip- This core question has never been addressed and the draft alternatives do not do so.

In LeConte Canyon this year, I witnessed a meadow that was made aesthetically offensive and ecologically impaired for about three weeks following a stay of 6 animals for three nights. The grasses were trampled, soil churned up, two new 10' X 3' roll pits eroded through meadow sod, stream banks collapsed by hoofs and the entire area smelled strongly of horse urine and manure. Those 6 animals supported a multi-day trip of only two visitors. Two park visitors essentially wrecked the wilderness experience of anyone who wanted to camp at that campsite and meadow for the rest of the season. It was perfectly acceptable under current regulations and meadow management criteria. That is not in any way acceptable and the Draft Alternatives of the WSP must establish clear rules to both mitigate and prohibit such impacts.

Stock can be allowed only to the extent they further wilderness values by allowing human visitors to experience wilderness. This must be made clear in the Topic summary and the Alternatives so derived. The Alternatives must also clearly require carrying feed to mitigate and eliminate many of the unacceptable impacts of grazing. Stock use can and should continue to be allowed to further the wilderness experience of visitors choosing to travel with animals, however grazing must be severely limited to protect a meadow's ecology and increase the range of a wilderness visitor's experience.

Aesthetic and Ecological Considerations: Protecting Meadows

Iconic Sierra meadows are endangered. Each one is slowly disappearing from encroachment of Lodgepole pine around their margins. Most of the major meadows in, for instance, Evolution Valley will be reduced by over 20% in the next two decades (I've measured this by GPS and area calculations). The reasons for the lodgepole encroachment are not completely clear. Climate change is certainly a factor, but it could well be accelerated or exacerbated as a result of grazing or other human activity. This threat makes total protection for at least some of these meadows imperative.

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. In fact, from an ecological standpoint, it

makes absolutely no sense. Though it can be said that higher elevations are more fragile than lower ones, overall, impact and elevation are not closely related. Serious stock impacts occur throughout all elevation zones.

As such, the grazing section of Table 6, Alternatives 2, 3, 4 and 5 must explicitly require that criteria will be established such that an increasing number of the large canyon-bottom meadow per drainage will be completely closed and protected from grazing to preserve and protect their ecological and aesthetic integrity. The long-term goal would be rehabilitating them to as pristine a state as possible.

Historically, meadow management has been focused almost entirely on establishing limits for stock use nights in specific meadows. Establishing those limits have been based on several criteria: long term ecological impacts, e.g. whether the meadow is likely to show changes in species composition over years; and short term ecological impacts, e.g. whether an unacceptable amount of biomass (aka grass) is being removed from the meadow such that it can't recover to some arbitrary level that season. No serious consideration is given to either aesthetics or the effects of grazing on any part of meadow ecology other than removal of grass by grazing. No serious consideration is given to meadows as a vital riparian habitat, as nesting area to waterfowl and land-nesting birds; to the small mammals and insects that make up the fragile ecology of these meadows. By looking primarily at "biomass" removal (an inherently ugly and insulting term for the rich and beautiful ecological diversity of a meadow...) the National Park Service ends up with a sustained yield policy no different from the US Forest Service or the Bureau of Land Management.

Aesthetics - the sights, sounds and smell of a meadow - are inseparable from the wilderness experience and enjoyment of a meadow. Yet aesthetics and the potential effects of grazing on visitor enjoyment of a meadow play absolutely no part in meadow management and little explicit part in the draft alternatives.

Stock routinely create "roll pits" in fragile meadows. While not optimal or encouraged, these pits are not a violation of any current regulations or policies. There is no Sierra meadow free of roll pits. Such pits take decades to recover to their vegetated condition, if they do at all. In addition, a party supported by even a small group of stock will leave the immediate area around their camp an incredibly unpleasant experience for weeks or months after their visit. Manure and urine in and around camps make them smell like a pasture; the grasses for hundreds of yards surrounding a camp is trampled, pawed and chewed up; stream banks near where stock go to water are sheared off; and stock often urinates and defecates directly into and near open water. Regulations are in place - and strictly enforced - stopping human visitors from causing even 1/100 of these types of impacts, yet it is perfectly within regulations for stock to do it. This glaringly hypocritical double standard cannot continue to exist and equivalent standards for stock and people must be reflected in the WSP alternatives.

The draft alternatives say that grazing and party size of stock will be managed to protect resources. Yet it allows a 1:1 exchange of people and stock to make up a maximum on total party size. Although a maximum of each (people and stock) is set and can't be exceeded, the implication is that subtracting one person can be substituted by an animal, which is an absurd proposition. An animal has, at minimum, ten times the ecological impact of a human - and some experts put that impact at 50 times. Nowhere is there a hint on how these relative numbers are arrived at or a clear set of criteria established for changing those numbers, based on actual ecological and aesthetic benchmarks. Stock and people are not equivalent and there must be no management policy that makes them so or implies that they are the same.

Standards

Three standards, then, must be explicitly stated throughout the final alternatives:

1. Independent of where a possible elevational limit is set for grazing, specific iconic meadows will be chosen for their ecological and aesthetic values and closed permanently to grazing. For Alternative 2, this could be one meadow per canyon; for Alternative 3 this could be 2 meadows; and 3 meadows for Alternative 4 and all meadows for Alternative 5. In Alternative 2 and,3, camping in closed meadows with stock would still be allowed in

designated stock camps (to preserve the aesthetic integrity of both camps and meadow) but they'd have to bring their own feed.

2. It is not enough to merely list "scenic" as a quality to determine a management criteria. Aesthetic considerations must be clearly defined and integral - fully equal to biomass removal (did I mention how ugly a term that is--) - to how meadows are evaluated for stock use nights. Such an evaluation will establish criteria to look at the meadow, the streams and surrounding campsites. Criteria will include how an area looks - how close does it resemble a meadow undisturbed by stock or human use; how it smells; and how it sounds - are the grasses tall enough such that one can hear the susurrations as they are moved by the breeze- The latter won't happen if the grasses are trampled or eaten by stock.

Additional ecological considerations beyond mere biomass removal must be established and made in both the alternatives and, eventually, accompanying supporting narrative. Short term impairment should be fundamental to a true evaluation of a meadow. It is not enough if, after several stock parties have grazed a meadow that recovery the following season is sufficient to find no impairment to the ecology of a meadow. A meadow's total ecological integrity much be considered - what is the effect of grazing for small mammals such as marmots and belding's ground squirrel; what are the potential effects on nesting habitat of birds, both aquatic and those on dry ground; what are the effects of manure on meadows and the potential runoff of pathogens, nitrates, phosphorous etc. into streams- Not a single one of these criteria currently guides stock use numbers.

To truly protect and preserve wilderness character, values and maintain a meadow's ecological integrity, grazing must be shown NOT to impair these values in any way.

As is done for people, total daily limits must be established for stock. Such limits should be based on the ecological impacts (grazing and stock camps) and social impacts of the animals. Although it's a potential hardship on commercial operators, they must not be allowed to trade unused days to go over the daily quotas.

We are not the Bureau of Land Management or US Forest Service. Preservation should be the primary goal of all management, not what is effectively a "sustained yield" policy of current grazing practices. Stock can and should continue to be allowed, but carrying feed needs to be widely implemented to protect meadows. If meadow management is truly to be about meadows, then in actual practice it has to be more than range management, which is all it currently is.

All the meadows in Evolution Valley were grazed this summer, and they all looked it. Yet Franklin Meadow apparently was not, and in October it was a place of knee high grasses, ripe and open panicles drifting on the moving air, luminous-bronze in the backlight. It was a very different place and a very different emotional experience of a mountain meadow, and entirely consistent with what one might rightly expect of national park backcountry. It was a garden. I sometimes wonder whether range management concepts are any more applicable to our business than timber management concepts. The difference between a grazed meadow and a logged forest may only be one of scale. Backcountry Ranger Randy Morgenson, 1989

3. The zone system is not workable either practically or philosophically. As presented in the WSP draft, it's a confusing mess. It should be abandoned as a management tool and a more simplified approach adopted. All criteria must be independent of what zone the destination, camping or grazing is in. Use levels should be established entirely according to the ecological and aesthetic needs and criteria of the individual meadows and watersheds they are in.

Correspondence ID: 149 **Project:** 33225 **Document:** 49956
Outside Organization: Alpine Urology Business
Received: Nov,19,2012 00:00:00
Correspondence Type: Letter
Correspondence:
11/14/12

Dear Ms. T-G: in re Jan. 2013 Hearing

My wife and I hiked with our son every year from 1994 to 2005 in or around your parks without using animal transport. On one occasion our son was nearly trampled to death by mules off halter in an immense pack train that cut across a switch back running down hill where we had stashed ourselves to avoid them on the trail. This was the Rock Creek gang. We also saw immense collections of people in high meadows with attendant animals. We were early members of the High Sierra Hikers Association.

So, size of parties and length of stay of the animals should be limited. 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. Moreover, the unlimited number of wilderness passes for parties of 7 and below should continue because of the rigidity of Park Service issuance. This rigidity means that only the retired and students can get in reliably. Those of us who still work and pay considerable federal taxes may have to change a day or two very close to the departure date. The Park service cannot accommodate such changes. The packer's flexibility may be the only way we can save our vacation which we deserve as taxpayers. So no daily limit for small parties doing an in and out horse drop of packs.

'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.

These rules should pertain to the entire wilderness area and not be limited by zones.

I don't think manure catchers are practical. It seems to me that is good fertilizer. I do think packers could use modern lightweight equipment to reduce the numbe of animals.

Sincerely, Anthony H Horan, D.D.

Correspondence ID: 150 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 00:00:00
Correspondence Type: Letter
Correspondence:
November 16, 2012

To the Wilderness Planning Staff and the Wilderness Rangers

Before retiring, I worked for 13 years in wilderness management on the Sierra NF. Our High Sierra Station had between 15 to 25 head of stock used throughout the season for backcountry work. Before that I worked on the Inyo NF where a large portion of my job was managing the wilderness permit and reservation system for the White Mountain Ranger Station. Having worked with Forest Service stock, and previously owned a horse, I thoroughly understand how stock can impact the land but I am not opposed to stock use in Wilderness. But I am concerned

about unregulated and unmanaged stock use. Managing commercial stock use in Wilderness is an important issue needing to be addressed and not "swept under the rug".

The Park Service and the Forest Service do a decent job of managing hiker use to limit physical damages to the resources and reduce crowding. SEKI does a much better job of managing the mountain meadows than the Forest Service. Unfortunately, The Park Service has done little to inventory actual pack station use, travel routes and campsite use. There are several areas showing unacceptable damage by pack stock as the result of agency reluctance to manage pack station stock numbers, travel patterns and length of stay. And I admit that packers are not the easiest permittee group to manage and they can throw tantrums and get hostile when asked to conform to use and rule changes. But it is our job, to quote Andrea Mead Lawrence, to be the adults in the room and enact and enforce reasonable use restrictions to protect the wilderness resources.

Another issue is agency pack stock use. It is important for us to "practice what we preach". At High Sierra Area we rarely camped in the same spot for more than two nights. If we did, the electric fence containing the horses was moved every day. All manure was raked up, etc. The goal was to be able to return the following year and not see signs of our previous visit. 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.

I strongly urge the Park to conduct a thorough inventory of pack station use; travel and camp patterns then develop reasonable guidelines to reduce stock damage and crowding on trails and camp areas. Proposed stock group size is too large. There can be policy exceptions for unusual circumstances. Remember, this is Wilderness, not a front country youth camp jamboree. Large groups make a lot of noise, spoiling the solitude and peace other wilderness travelers expect. There are areas in the park too fragile to handle stock use and these should be closed; Wilderness rangers know these precious places and can easily outline the areas to management. For instance, to my knowledge Darwin Bench is closed to stock; yet I have seen evidence in the past of stock use there; if pack stations had to have their itinerary approved by the Park in advance of the trip, the packer would have been informed the area was off limits.

I wish your staff the best in the Wilderness management planning process. Above all, listen and heed the advice and recommendations of your Wilderness rangers.

Correspondence ID:	152	Project:	33225	Document:	49956
Outside Organization:	National Forest Recreation Association Non-Governmental				
Received:	Nov,19,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	November 19, 2012				

Dear Ms. Taylor-Goodrich:

The National Forest Recreation Association (NFRA) appreciates the opportunity to provide comments on the preliminary draft alternatives for the Wilderness Stewardship Plan and Environmental Impact Statement for the Sequoia-Kings Canyon Wilderness and John Krebs Wilderness areas.

Wilderness Zoning:

It is our view that zoning creates more boundaries, more regulations, more inability to move freely within the wilderness, a reduced sense of a true 'wilderness experience' and more exclusions of certain uses, particularly stock use. Zoning has proven to be seriously problematic in the John Muir and Ansel Adams Wilderness Areas not only for Agency managers to administer, but for the public as well. In contrast, the Golden Trout Wilderness does not

have zones, which results in a higher level of a true 'wilderness' experience. The resource itself tends to separate users by way of difficult and steep terrain, altitude, trail-less areas, and distance from trailheads. The complexity of costs managing the different standards and regulations in the zones does not correlate to better or improved resource conditions. Zoning only proves to make travel in the wilderness more difficult and restrictive.

Permitting/Quotas:

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. For example 'interpretive and education programs could be enhanced instead of instituting more quotas.

Many of the areas SEKI proposes to initiate day use quotas were recent additions to the Wilderness System. If reducing use and making it more difficult to access the area is going to be the result, it makes the case for keeping areas out of the designated wilderness system so that Americans and international visitors can hike and enjoy our public lands.

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.

Trails/Bridges and Related Trail Structures:

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.

Campfires:

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.

Food Storage:

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.

Human Waste Management:

NFRA supports the use of privies, vault toilets and restrooms. In other wilderness areas where these facilities exist, there is much less human waste scattered randomly around. Instead, the waste is centralized and is managed appropriately. It is far less intrusive on the overall environment to have centralized locations for toilet needs.

Party Size ' People:

NFRA believes that allowing visitors into the wilderness will help to generate interest in these lands for the future. As the restrictions and regulations increase, and the public is virtually locked out, there will be little support for funding and protection in the future. The party size should be no less than 20 people per group ' all areas. Having different limits in different parts of the wilderness will only serve to discourage people from taking a wilderness trip, and most certainly will keep groups away. SEKI should adopt the group and party size from the Sequoia National Forest to help with consistency for the groups traveling to and from the neighboring area.

Party Size ' Stock Groups:

Stock use has declined significantly over the past 50 years. Impacts to campsites and trails has more recently been the result of hiking use. Thus, it is not reasonable to reduce the stock use group size, since greater use comes from hikers. 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.

Campsites ' Backpacker:

NFRA does not support zoning, thus does not support 'no camping' areas. None of the legislation designating these areas included any language that indicated areas would be closed to use (camping).

Campsites ' Stock Use:

NFRA does not support zoning, thus does not support 'no camping' areas. None of the legislation designating these areas included any language that indicated areas would be closed to use (camping). 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. '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.

Night Limits:

'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. That is an

outdated concept that is not pertinent with today's users.

Stock:

As mentioned, NFRA does not support zoning, so none of the options for stock use managed by zone are reasonable. 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.

Because of the significant history of stock use in the Parks' wilderness areas, any change to a facility, trail, campsite or other relevant aspect that would curtail or negatively impact stock use should be thoroughly reviewed and analyzed under the National Historic Preservation Act.

Grazing:

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. 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. Alternative 5 - the tie and feed only method increases the number of stock needed to supply a trip, with possible conflict of users if a stock camp is in use. Stock support facilities such as drift fences etc. should be maintained for both human and stock safety.

Commercial Services:

See Attachment A for the statement of support, and explanation of the necessity of commercial packing in the affected wilderness areas. 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.

If you have any questions, or need additional information regarding this response, please contact me at the address below. Thank you very much.

Sincerely,

Marilyn Reese, Executive Director National Forest Recreation Association

Enclosure

Correspondence ID: 153 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,19,2012 00:00:00
Correspondence Type: Letter
Correspondence:
To Whom It May Concern,

I find myself very concerned by the influence by a very rich minority of back packers who send mailings constantly and who hire lawyers to keep stock out of the back country.

My experience began in the mid 1940's when I packed into Hilton Lakes by horse + mule for about 15 years in a row. Those 10 lakes were always kept spotless. There were cabins and a lodge and out houses. In those days backpackers didn't really exist much.

Fast forward to the early 1970's when I rented horses from Rock Creek Pack Station to show my family Hilton Lakes. We came across a Forest Ranger at the Lakes and he was filling bags with rubbish left by backpackers and was not happy with their inability to carry out their rubbish.

Now fast forward to early 1990's where I worked in the office for Rock Creek Pack Station. They always clean up any camp and help with trails and do their best to keep the back country pristine.

Now fast forward to 2012. The only way I can now go into the back country is by horse as I am somewhat physically disabled. If you ban horses, mules, campfires from the back country only young-able bodied people will be able to experience a back country which we all should be able to access.

I would hope you would not limit accessibility to the wonders of the Sierras to satisfy the few who have organized against pack stations. It seems to me the mule + horse excrement is more natural than human excrement.

Pack stations clean up after trips - back packers don't do that. Please leave things as they are or many will never have the opportunity to enjoy what they should be able to enjoy.

Correspondence ID: 154 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,23,2012 00:00:00
Correspondence Type: Letter
Correspondence:

Dear Ms. Taylor-Goodrich,

Thank you for allowing us the opportunity to comment on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan. The Sequoia and Kings Canyon National Park as well as the surrounding areas are of unparalleled natural beauty that is unique and should be preserved at every opportunity. My family has made several camping trips to the area starting when my children were at a very young age and I always emphasized to them how important it is to protect these natural resources. This is why I am opposed to having any commercial stock tromping through these sensitive areas. The NPS should conduct a Needs Assessment before even suggesting Preliminary Alternatives. The PA completely ignores the real issues at hand and allows for unlimited stock use to continue. 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. 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. The trail classes should include foot travel only classifications that do not permit stock use. The stock animals should be required to be fitted with manure catchers. It's amazing that as a backpacker I am required to pack out waste yet stock animals are allowed to defecate pretty much everywhere. What do these policies do to the quality of the watershed in the areas? Have you ever hiked on a trail after a several parties (or even just one group) of stock animals has passed through? Please consider the impact of these policies and how they affect the land.

Correspondence ID: 155 **Project:** 33225 **Document:** 49956
Outside Organization: Wilderness Watch Conservation/Preservation
Received: Nov,26,2012 00:00:00
Correspondence Type: Letter
Correspondence:

Karen Taylor-Goodrich, Superintendent Attn: Wilderness Stewardship Plan Sequoia and Kings Canyon National Parks 47050 Generals Highway Three Rivers, CA 93271

Dear Superintendent Taylor-Goodrich,

The following are comments by Wilderness Watch on the Preliminary Alternatives for the Wilderness Stewardship Plan for Sequoia Kings Canyon (SEKI) National Parks. Wilderness Watch is a national nonprofit wilderness conservation organization focused on the protection of Wildernesses within the National Wilderness Preservation System. As someone who has backpacked in the SEKI Wilderness, I can personally attest to the spectacular nature of SEKI's Wilderness, and the need to protect it. Our organization has also had extensive involvement with the management and stewardship of other High Sierra Wildernesses, and the use of commercial pack stock in them.

The following are Wilderness Watch's comments:

1. 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.
2. The Preliminary Alternatives completely side-step the real issues. Essentially all of the alternatives would allow unlimited stock use to continue in SEKI's Wilderness. There are not now any limits on the total number of stock animals, stock trips, commercial outfitters, or commercial clients allowed per year, and no such limits are proposed in any of the alternatives. Even 30-some years ago, when I backpacked in SEKI's Wilderness, the stock use was way too extensive, and I remember hiking through and breathing in clouds of pulverized horse manure
3. The "zoning" scheme proposed by SEKI is extremely complicated, and would never be well-understood by park visitors. This would cause endless compliance and enforcement problems. Even worse, it would create "sacrifice areas" where high impacts would be allowed (and abetted) by the NPS. (For example, NPS proposes that groups of up to 35 people could be allowed in "Zone A," which includes trail corridors within six miles of trailheads.) The proposed zoning scheme should be abandoned immediately, and instead the NPS must adopt a WSP that protects ALL of SEKI's Wilderness. The Wilderness Act does not permit NPS to preserve wilderness character only in some "zones," while other "zones" are allowed to degrade.
4. The proposed zoning scheme side-steps the issue of stock animals traveling off maintained trails. Scientists have long recommended that stock animals be required to stay on designated, maintained trails at all times. The NPS should require all stock animals to remain on designated trails that are adequately designed, constructed, and maintained to withstand use by stock animals (i.e., there should be no stock travel on unmaintained trails, and no "off-trail" or "cross-country" travel by stock at all, regardless of zone). The only exception for stock to leave designated, maintained trails should be for no more than 1/4-mile to reach an approved, designated stock camp.

This would allow reasonable access for stock users while protecting wilderness.

5. The Preliminary Alternatives also side-step the crucial issue of ongoing excessive "administrative" grazing by NPS stock. 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.

6. 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. In Minnesota's Boundary Waters Canoe Area Wilderness, for example, the group size limit is set at no more than 9 people per party.

7. SEKI's proposal for a system of three "trail classes" is fundamentally flawed because it allows stock animals to use all trail classes. This fails to acknowledge the substantial impacts of stock animals on trails (erosion, high maintenance & repair costs, etc.) and the effects that such impacts have on the experience of hikers (i.e., dust, numerous rocks kicked loose by animals, etc.). At least one additional "trail class" is needed: "Foot Travel Only," to provide at least some trails closed to stock animals, so that hikers may enjoy walking on trails without the dust, flies, loose rocks and manure that pollute trails used by stock animals. (Occasional administrative stock use could be allowed on "foot travel only" trails, when necessary for trail maintenance and/or search-and-rescue.)

8. The Preliminary Alternatives fail to address many other key issues. For example, the NPS should consider alternatives requiring "manure catchers" on all stock animals to keep animal manure off trails and out of surface waters (see, for example, www.bunbag.com). (Ironically, the NPS is considering alternatives that would require backpackers to pack out their own feces from some or all of SEKI's wilderness zones using "pack-out waste kits," but NPS ignores animal wastes, which are routinely deposited on trails, in campsites, in wetlands, and directly into the lakes and streams from which we all drink) All stock owners should be required to attach manure catchers to their animals. and (at minimum) dump the manure away from trails, campsites, and watercourses.

9. The NPS should also consider alternatives requiring that: 1) all stock animals be inspected before entering the parks to ensure that they are not importing invasive weed seeds on their coats or hooves; 2) prohibiting bells on stock animals (bells shatter the natural quiet and disturb the sleep of wilderness visitors); and 3) requiring stock users to utilize compact, lightweight equipment to reduce the number of animals needed to transport their gear.

Thank you for this opportunity to comment, and please keep Wilderness Watch on your contact list as you develop the Wilderness Stewardship Plan for SEKI.

Sincerely,

Kevin Proescholdt Conservation Director

Correspondence ID:	156	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,27,2012 00:00:00				
Correspondence Type:	E-mail				
Correspondence:	Karen,				

Beautiful mountain meadows. Clean running streams. Great views. All contaminated with horse shit, flies, & dangerously torn up trails.

Please keep stock animals off the trails used by hikers.

Correspondence ID: 157 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,23,2012 00:00:00
Correspondence Type: Letter
Correspondence:
November 18, 2012

Dear Superintendent Taylor-Goodrich,

I am writing this letter to comment on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan. I have taken many trips to the Sierra including many to areas that will be covered by this plan. I have read over the alternatives proposed and have the following comments.

Any alternative under consideration should reduce number of stock and further restrict any access off a trail. To propose opening up more areas to stock or increasing quotas for stock users in any plan is irresponsible. Stock continue to have a huge negative impact on the wilderness areas they traverse and on the trails that take them there. The meadow trampling, fouled streams, and dusty, urine and manure strewn trails would solve themselves if stock was disallowed in more areas. Maintenance crews would have less work to do--an individual hiker doesn't begin to compare to one stock animal. If stock are going to continue to be allowed into an area, their quotas need to be reduced which might cause stock users to pack in less and lighter equipment which would further reduce their impact.

The zoning scheme proposed by this Plan seems flawed, protecting some areas while allowing other areas to be overused. I am also concerned that stock concessions could unduly influence this designation. These business are well-known by the NPS and I imagine their wants and needs are, also. I would hope the NPS administration would continue to honor the experiences of those whom they may never interact with except via letters like these.

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. 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.

Thank you for taking into consideration my comments.

Correspondence ID: 159 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,29,2012 00:00:00
Correspondence Type: E-mail
Correspondence:

Dear Superintendent Taylor-Goodrich:

I am writing to comment on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan (WSP). I have hiked the Sequoia and Kings Canyon National Parks backcountry for nearly 40 years. My first Sierra backpacking trip was a 3- day trip up the Silliman Creek drainage as a 13-year old Boy Scout. I still vividly recall climbing Mt.Silliman, catching my first glimpse of the Great Western Divide and higher peaks to the east, and realizing that there was an incredible world of wilderness in front of me that would take a lifetime to fully explore. To put it mildly, I was hooked.

I've done my best to fulfill the dream of covering every inch of the Sierra wilderness, walking more than a thousand miles in SEKI alone, and visiting the most remote and beautiful portions of these parks, from the sublime meadows of the Chagoopa Plateau and Evolution Valley, to the rugged and awe inspiring Enchanted Gorge. I have seen hundreds of bright, sunny days, with aspen trees flickering in the wind and columbines dancing along the streambanks. I've spent countless nights where the Milky Way seemed to flow through the sky like a river, and I have slept on the edge of a precipice watching the moon rise over the Sierra crest in full eclipse. I have lain in the middle of the night hunkered in a bivy sack while being pounded by hailstones, and waded knee deep through icy waters for a half mile through Funston Meadow one June day when it was flooded by snow melt from the surrounding peaks. I have stood atop the saddle between Wanda and Davis lakes on a day so completely still that my ears rang from the silence and our voices seemed swallowed up by the stillness. I have awoken after a freak early September storm under a blanket of nearly two feet of snow in the Ionian Basin and made a mad dash to the top of Mt Goddard to witness the entire Sierra high country, from the Minarets to the Kaweahs, dressed completely in its white winter robes. These mountains are where my spirit---and the spirit of thousands of other visitors---is renewed each year, and preserving this incredible wilderness environment is of enormous importance to me.

Over the decades, I have witnessed many changes in wilderness management practices, both positive and negative. Consequently, I looked forward to the release of the draft WSP alternatives, hoping to see some signs that the Park Service would truly embrace the intent of the Wilderness Act and provide a framework for honestly examining the practices and policies that have guided management of these parks for the past several decades. For although there is still a great deal of beauty in the backcountry of these parks, there have been disturbing trends both in the direction management has taken and the failure of the Park Service to seriously address the most serious issues threatening the parks, such as the excessive use of recreational and administrative packstock in SEKI wilderness.

Sadly, after reviewing the draft alternative summary, I am left with a deep feeling of disappointment. With all due respect, the draft alternatives and other supplementary materials are bland, sterile, and visionless. 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. I do not mean to be disrespectful, but it as if the process of drafting these alternatives was outsourced to a bunch of guys in India (or perhaps Denver is more accurate?) who have nothing more than a set of maps and the existing set of park rules in front of them. Thus armed, they have succeeded in developing a framework that, while it may seem logical to them on paper, is entirely impractical. I truly have to wonder if any of the authors actually have spent any significant time in SEKI's backcountry.

Below are some specific aspects of the draft WSP alternatives that I find particularly troubling.

(1) 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.

(2) The proposed zoning scheme is deeply flawed and should be greatly simplified or abandoned altogether. The scheme creates an unnecessarily complicated management framework that directly violates the spirit and intent of the Wilderness Act.

The fundamental premise presented in the draft is that wilderness will be divided into management zones that

represent different levels of resource protection. The very definition of Wilderness provided in the Wilderness Act defines wilderness as "an areas where the earth and its community of life are untrammelled by man... retaining its primeval character and influence...protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation...(4) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition, and (4) may also contain ecological, geological, and other features of scientific, educational, scenic, or historical value. These high standards apply to all parts of the wilderness, not just a subset of "management zones" within wilderness.

The draft WSP purports to meet these high standards stating in the section on "General Zones," that "zoning would not result in managing the wilderness resources below those standards, but higher standards could be applied." But in the very next breath, it states that, for example, Zone B is going to have "high use corridors, and developed administrative areas such as ranger stations and food storage lockers." Food storage lockers (or composting toilets such as have been built along Bubbs Creek), are not consistent with a wilderness where the "imprint of man's work is substantially unnoticeable." Do you really think the authors of the Wilderness Act imagined backcountry toilets as part of the Wilderness Experience?

In essence, the zoning prescribes managing some areas of wilderness (primarily zones A and B) as sacrifice areas where the impacts of humans will be severe and a far cry from the substantially unnoticeable requirement of the Wilderness Act.

The parks would be far better served with a very simple two-tier management structure: areas without trails, and areas with trails. The guiding principles for alternative development should be as follows. In trail-less areas, a person should be able to experience wilderness in much the same condition as the earliest visitors to these parks, with no signs, no human structures, no bear boxes, no fire rings, no horses, and no crowds of people. In trail corridors, the trail itself should be the only permanent human fixture, other than a few essential signs (only at trail junctions) and structures (e.g., existing bridges) that are critical for visitor safety. There should be no toilets, no bear boxes, no drift fences for stock, or any of the other intrusions that the Park Service has allowed to proliferate in the wilderness in recent decades.

(3) The Draft Alternatives continue to ignore the fundamental truth regarding the relative impacts caused by hikers compared with stock users. There is overwhelming scientific evidence that the impacts of recreational livestock on trails, meadows, campsites, water quality, and wildlife are orders of magnitude greater than those caused by people traveling on foot. Seemingly oblivious to this fact, 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. Moreover, it would be a completely unenforceable regulation, unless you wish to have your backcountry rangers conducting Gestapo-style searches for our "waste kits."

The mere suggestion of this as a possible policy is rendered even more ridiculous by the fact that the draft alternatives completely ignore the fact that every horse and mule out on the trail deposits roughly 30 lbs of fecal waste each and every day and does so indiscriminately. Whereas people at least have the ability to bury their wastes far from water sources, horse and mules make a regular habit of urinating and defecating near water sources. Not long ago, while I was hiking up the Copper Creek trail out of Cedar Grove, I stopped at a tributary crossing to pump some water. While I sat there, a pack train of 7-8 horses and mules arrived at the crossing. The packer stopped, allowing each of the animals, in turn, to drink from the creek. Four or five of these animals proceeded to urinate directly into the stream while they drank. Several others that remained on the bank each proceeded to crap directly on the trail, just a few feet from the water. (Needless to say, I looked at my canteen of

freshly pumped water with a considerable amount of suspicion!) If the Park Service is so concerned about contamination of water by animal wastes, why does it focus all of its energy on humans when they are trivial contributors relative to stock?

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 (ie., bear boxes; see comment 6 below) that are creating the human waste problems by concentrating use. Any other schemes should be stricken from all alternatives.

(4) The draft WSP fails to consider a reasonable range of alternatives regarding recreational stock use. The draft WSP starts with the assumption that stock use is "a primitive type of recreation appropriate to fulfill the recreational purposes of the Wilderness Act." Yet there is nothing in the Wilderness Act that says this is true. Horses and mules are not native to the Sierra Nevada and they should be treated as the alien intruders that they are. The Park Service has no problem prohibiting dogs in the backcountry, and has even gone so far as to suggest poisoning high mountain lakes to rid them of nonnative fishes. Why the double standard with stock? They are nonnative animals that cause substantial harm to meadows and vegetation; they pollute the water with bacteria and other harmful pathogens; they disturb the behavior and habitat of natural wildlife such as bighorn sheep; and they necessitate nonconforming structures such as drift fences, not to mention that they greatly impair the enjoyment of the vast majority of wilderness users who travel on foot.

Consequently, it is entirely reasonable to evaluate alternatives that prohibit all stock use in the SEKI backcountry. 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.

(5) The draft WSP alternatives fails to address the significant impacts of administrative stock use on the SEKI backcountry. Twice in the last five years I have observed egregious examples where administrative stock use has thoroughly trashed the backcountry environment. In 2009, I did a late season hike from South Lake over Bishop Pass and down to Tehipite Valley. This was a trip that I had wanted to do for many years, in part because I had been told that the region from Simpson Meadow to Tehipite was quite pristine and received very little use. When we arrived at Simpson Meadow --- after hiking 24 miles --- we were shocked to find that Simpson Meadow was completely trashed. The meadow had been mowed by stock to short stubble. Manure piles were everywhere, even along the river's edge where we went looking for a place to pump water. Deep hoofprints pock-marked the damp portions of the meadow. And the logical campsite, beneath a pair of majestic cottonwood trees, was so pulverized, dusty, and rank with horse crap, that we simply could not stand to be there. We were so distressed by the scene, we hiked another mile in the failing daylight just to distance ourselves from this tragic scene. I later learned from a ranger that an NPS trailcrew had spent much of the summer staging at Simpson Meadow and that the stock had been "pastured" there for the entire time. It was shocking to learn that the Park Service would allow such rampant damage to occur under their watch. I witnessed an equally depressing scene in the upper Kern Canyon.

Correspondence ID:	160	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,23,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:					

Dear Karen:

This letter is concerning the Preliminary Draft Alternatives for Seki's Wilderness Stewardship Plan. Why are the "Preliminary Alternatives" so premature? I beg for a "needs assessment"! The impacts of stock animals killed my

wilderness experience in SEKI this summer. One day I had 31 horses pass me in one group! I only wish the decision makers would get out and hike the trails to see the impact. Then make decisions.

enclosed: 4 pics worth 100 words 1) 6th dead horse in wilderness 2) trampled meadow 3) human waste from Pack Outfit in meadow 4) horse trail

Correspondence ID:	161	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,25,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Dear Superintendent Taylor- Goodrich,				

Re: Wilderness Stewardship Plan - Preliminary Alternatives

The bone of a wilderness experience in Sequoia and King Canyon NPS is the presence and use by stock. I have hiked and climbed in these Parks many times. The degradation of trails, campsites and grazed areas was distressing and distasteful.

To maintain the qualities these Parks were designated to preserve all stock use should be banned save for emergency and necessary to maintained use. Save that, the trails used by stock should be separate from those on foot. In addition the size of parties should be limited sufficiently to maintain wilderness values. These preservations are not reflected in any of the preliminary alternatives I am told, nor is there any assessment given to justify stock use. This s unacceptable and does not reflect the desired experience of all users except clients, perhaps, of commercial packers. National Parks do not exist for the purpose of companies to make profits.

The Sequoia and King Canyon NP have provided one with unique and enjoyable experiences.

Please provide alternative to the stewardship plan that make those available in the future.

Correspondence ID:	162	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,27,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	November 25, 2012				

Dear Superintendent Taylor-Goodrich,

As a frequent visitor to the High Sierra, and to Sequoia and Kings Canyon National Parks, I would like to comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan. I backpack and dayhike annually in the above areas, and have been doing so for almost thirty years, and I have become increasingly concerned about the consequences of the heavy stock use I encounter on my visits.

I understand that you have the opportunity to create a new plan that can reverse the damaging developments arising from the overuse of pack animals and I strongly encourage you to take measures to fully preserve the wilderness character of the backcountry. Such preservation is incompatible with the establishment of zones sacrificed to overuse and excessive crowding, or to the development of facilities to accommodate particularly large groups. All areas need greater protection, not less, from filth, trail damage, pollution of water sources by stock, and the ravages of grazing.

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.

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.

As a backpacker, I have always appreciated and accepted the permit/quota system as a means of preventing overuse and minimizing the impact we have on the wilderness. When viewing the trails strewn with manure and overturned rocks or breathing the dust kicked up by a pack train, I have been very aware that these restrictions are badly misdirected due to the disproportionate impact of even a small amount of livestock in relation to a great many hikers. It is time to reduce and restrict the most damaging uses to which the wilderness is subjected. Please take this rare opportunity to reduce the impact of stock use and to insist that commercial operations take responsibility for repairing the damage resulting from whatever stock use continues to be permitted.

Thank you for your consideration of these requests.

Correspondence ID:	163	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,24,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:					

Dear Ms. Taylor-Goodrich:

I have hiked and backpacked in Sequoia and Kings Canyon National Parks since I was a child in California and I would like to respond to the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan. I am concerned that the alternatives do not include any restrictions on stock use in the parks because stock have a destructive impact on the fragile alpine environment and detract from the wilderness experience of hikers and backpackers. When stock are allowed, they should be required to stay on trails that are designed to withstand their impacts, and they should be required to wear "manure catchers", especially if backpackers may be required to pack out their own 'manure.'

The proposed alternatives also create a zoning scheme that seems to sacrifice some areas and threatens their wilderness character, neglect to include a class of trails for "Foot Travel Only," and permit group size limits that are too high.

Please consider these changes to the proposed SEKI's Wilderness Stewardship Plan so that the wilderness character of these magnificent parks can be preserved for hikers in the future.

Correspondence ID: 164 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,21,2012 00:00:00
Correspondence Type: Letter
Correspondence:
Nov. 19, 2012

Dear Superintendent Goodrich,

I am writing in regards to the alternatives being discussed for Sequoia and Kings Canyon Stewardship Plan. These two wilderness areas mean so much to me. I am an avid backpacker who has spent considerable time in the back-country and for many years sent letters of concern about issues and conditions which I believe need attention.

My foremost concern and complaint is the unregulated use of packstock. There needs to be limits and they need to be enforced. Packstock and subsequent "camps" which are set up for these groups, ruin the wilderness experience. I have asked and proposed that there be limits on total number of animals, trips, outfitters and clients but my requests have been ignored.

The mixed use trails are in terrible condition. They are eroded, dusty, full of manure and in general poor condition. There seems to be more concern over human waste and pollution versus animal waste and the contamination it poses. I have seen the breakdown of meadows due to NPS stock (as well as outfitters) being allowed to graze while servicing trail crews.

I regularly see outfitters leading packstock outside or off of designated trails and cutting across switchbacks, tearing up grass, native plants, dirt and rocks, which leads to severe erosion.

*The proposed "zoning" system is flawed. It is the responsibility of NPS to preserve the character of all wilderness. *Unlimited stock use needs to end. Group sizes need to be much lower. *Hikers deserve trails that are off limits to pack stock. *Packstock should not be allowed to defecate on trails, graze or be "stalked out" in meadows, wear bells or enter the park with invasive plant seeds.

I look forward to knowing that you are considering those of us who have been presenting our concerns for years with no consideration or changes to policy by the NPS. This is my wilderness too and I want it kept that way.

Correspondence ID: 166 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,23,2012 00:00:00
Correspondence Type: Letter
Correspondence:

Dear Ms. Taylor-Goodrich:

I am writing to comment on the Preliminary Alternatives for the Wilderness Stewardship Plan under development at this time. I have entered one or both of these parks annually for the past 30 years as a backpacker, with a vested interest in preserving these wild and beautiful areas for generations to come.

I am appalled by several proposals put forth in these alternatives, essentially because they fail to provide adequate protection for wilderness resources. I list several concerns below:

1. 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.

2. 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. It is outrageous that this blatant pollution is allowed to go on year after year, with barely any mention ever made in official NPS documents. Ignoring this obvious issue does not eradicate it, and it can only get worse without enforcement of new restrictions on stock use. Now is the time.

3. The proposed zoning scheme is not only complicated, it sets up areas of wilderness where overuse is not only condoned, but planned and expected. Parties of up to 35 people and 20 stock?! Yikes!! The waste and trampling problems will be huge and completely unjustified, not to mention the potential for excessive noise and rowdiness. We don't need any complicated scheme that will be difficult to enforce and result in trashing the wilderness areas around trailheads. Please, please abandon this idea at once and renew your commitment to the preservation of all SEKI wilderness, not just the more remote areas. Go with group size limits recommended by studies previously conducted by NPS scientists, which are much lower. Silence and solitude are two of our most precious wilderness resources, and are ever in shorter supply in our country; let's hold on to them.

4. 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.

In a nutshell, the only areas where I do not have to worry about water pollution are the higher elevations, where stock are not taken, but mountaineers still go; I can draw my water from lakes and streams with no worries, and no need for stringent purification, and I continue to do so. Let's face the obvious lesson here.

I very much appreciate your consideration of my views and I thank you for the opportunity to present them.

Correspondence ID:	167	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,27,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:					

Gentlemen:

It has recently come to my attention your plans for increasing the stock usage in our parks. I feel this is a grievous error, and terribly wrong judgment on your part.

Recent experience in the high country has convinced me that over usage is degrading the wilderness at an increasing rate; too many people with too little sense of their impact on the wilderness now seasonally populate this precious high country. And for each person that walks into the high country, the negative impact is increased many-fold when they are transported and supported by commercial stock operations.

Although you may have conflicting goals for the public's utilization of the wilderness, the prime goal, superseding all others, should be to preserve the wilderness character for as long as possible. Usage of our wilderness by stock animals markedly accelerates the wilderness degradation. Just when all efforts should be to decrease the use of

stock animals in the high country, with an eventual goal of their elimination, you seem to be enabling further usage by stock animals in your "Preliminary Alternatives" of the Wilderness Stewardship Plan.

Let me enumerate the reasons why stock animals should not be in our high country wilderness areas:

1. They were never there before they were brought there by man. Wild horses in the west never climbed up to our sub -alpine areas; ditto for all hooved animals. It is a distinct contradiction to the term "wilderness" to bring these animals into the High Sierras.
2. Allowed to graze, they destroy alpine meadows. Confined by fences to destruction of limited areas, you are greeted by fences, hardly a "wilderness experience".
3. Their excrement brings flies and befouls the trails and meadows. I was recently at a US Forest trail in Colorado, and I was provided with a plastic bag to pack out my own excrement. (I have heard that you are thinking about this for SEKI) Why don't you do the same for pack animals, collecting it and removing their feces.
4. Stock animals are much more destructive of trails than are humans, for obvious reasons. Any plan that allows them to freely use any trails just hastens the degradation of the trails. More money has to be spent maintaining the stock usable trails than is spent on trails for foot traffic only, yet the number of people transported and supported in the High Sierras by stock traffic is a distinct minority.

It is very sad to see commercial, for profit use of national parks, increasing the rate of destruction of trails and meadows. This is the time when we should be working to slow park degradation from all sources. Increasing park usage by the public just worsens this problem. And usage of our parks by stock animals increases park degradation and increases maintenance cost disproportionately.

Please work to allow my grandchildren to have the same wilderness experience that I enjoyed.

Correspondence ID:	169	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,19,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:					

I'm commenting on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan out of respect for students and their future. SEKI's wilderness is special and important because it belongs to all people and is part of an increasingly rare and valuable wilderness areas. This is because businesses are sometimes allowed to abuse these public places for private profit. Over time, these areas suffer immensely and everyone else loses including our kids and their kids.

Steel tipped hooves with hundreds of pounds of pressure are like shovels and are particularly damaging with unauthorized off trail use. People with stock animals can't help but damage nature. A few pack trains of animals can have the impact of a few hundred backpackers who don't leave urine soaked manure piles on the trail and in sensitive wetlands. It even seems these folks don't care about nature. So is nature important? Yes, if you care about kids. And their kids. Those who really care about education understand nature is more than important. It is crucial for physical and mental health and an important part of gaining a complete education. You can tell it is valuable because these private companies abuse it for their own profit. Politicians care about companies and money. Leaders care about people and families.

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. 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.

My students and I often study exotic invasive plant species whose documented introduction was by stock animals. There's no place for bells on animals in nature. It is difficult to explain to the kids why these animals can leave manure right on the trail while we carefully walk so far away and pack out waste. Some of my students have gotten physically ill noting stock animals defecate right into lakes and streams just like where we filtered drinking water. We've seen manure catch bags being used in some parks, and wondered why not here.

Even my students understand how rare real leadership is. They know that's what's needed, and that's what they and their kids deserve.

Correspondence ID:	171	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,26,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:					

Ms. Taylor-Goodrich:

I am writing to comment on the preliminary draft alternatives for a Wilderness Steward Plan for Sequoia and Kings Canyons National Parks. I realize that my comments are arriving a bit later than you had hoped but trust that you will nonetheless consider them.

I have visited many national parks and wilderness areas but have not seen a zoning system like that proposed. Four zones, each subject to a multitude of rules, would be too complex for most users to understand, especially for parties travelling through multiple zone types. A simpler zoning system would be better, for example: (a) no stock and no camping, (b) no stock but camping is allowed, and (c) both stock and camping are allowed. It may also useful to designate zones for areas that tend to be overused (e.g. near popular lakes) so as to limit the number of persons camping there or to specify the periods when stock are allowed (e.g., to delay stock use until the soil has firmed up after spring melt). Such zoning would be easy to characterize and could be understood by most users.

Also, the proposed zoning system indicates intent to allow heavy use of some areas. For example, off- trail stock access would be allowed in some areas. I feel strongly that stock animals ' especially horses and mules -- should not be allowed off-trail anywhere in the wilderness because they cause a lot of damage due to their great weight, especially in fragile areas such as in wet meadows, along streams, and anywhere that soils have been softened by rain or snow melt. More generally, usage rules should be designed to minimize degradation and protect the user experience over the entire wilderness.

The proposed rules allow party sizes of up to 20 head of stock with 25 persons. That's too large a party to be considering, for reasons of resource impact and of impairment of the wilderness experience for persons in other parties. I think the upper limits should be 8-12 persons together with an equal or lesser number of stock animals.

Moreover, since stock usage increases impact to the wilderness, usage limits should favor parties traveling without stock. The wilderness experience is intended for people, not for stock animals, and so reducing stock usage should increase allowable usage by people, for a given level of impact.

Finally, none of the trail classes presently excludes stock animals. Your Class 1 trails should be designated for people only. Such trails are not engineered to withstand stock use. Moreover, day hikers and backpackers should be afforded some trails where they will not encounter stock parties and their attendant commotion, delays, dust,

and manure.

Thank you very much for considering my comments.

Correspondence ID:	172	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,20,2012 00:00:00				
Correspondence Type:	E-mail				
Correspondence:					

Dear Superintendent Taylor-Goodrich,

I am a long time hiker and camper in Sequoia Kings Canyon - nearly every year. My first back country trip was in 1994. My most recent was this past summer which was my first trip with my sixteen year old son. As much as I have appreciated the wilderness of the Park in the past, visiting it with my son really made me understand how unique and special real wilderness is. His generation is bombarded daily by modern "civilization" with iphones, web sites, cars, planes, advertising, etc. The wilderness environment is ever more important as a respite from all the "conveniences".

This makes a WSP that fully preserves wilderness character of the park critical. The proposed "zoning" scheme, for example would undermine the wilderness by permitting large groups and developments to nibble away at the wilderness. Sequia Kings Canyon is such a very small area of actual wilderness - allowing development "zones" will compromise a little more. While it is presented as a small area, it under values the percentage of remaining wilderness. Once compromised by the impact of large stock groups and structures, the wilderness environment ceases to exist. Please abandon the zoning idea and provide full protection for ALL portions of SEKI's wilderness.

I have seen the impacts of stock animals at SEKI. Stock animals degrade the wilderness. No new developments should be constructed to facilitate stock use. We should be reducing the current levels and impacts of stock use, NOT increasing it.

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.

Commercial stock use should be limited to those persons or groups who truly need it. Because of the competition for limited wilderness permits, and because numerous hikers are turned away due to trailhead quotas, it would be possible for many more people to visit SEKI's wilderness if the available spaces weren't taken up by so many unnecessary commercial pack trips (i.e., where able-bodied persons ride horses and bring excessive numbers of stock animals loaded with unnecessary luxuries). Reducing unnecessary commercial stock services could both reduce ongoing harm to SEKI's wilderness and allow more people to enjoy a limited and rationed resource.

I oppose the idea of NPS using "trail classes" that were developed by the U.S. Forest Service. The USFS's trail classes allow stock animals on all trails, with no trail class that prohibits stock use. THIS IS OUTRAGEOUS. SEKI should adopt a trail class for "foot travel only" trails, so that hikers may enjoy at least some trails without the dust, loose rocks, flies, and manure that pollute trails used by stock animals. Foot-travel-only trails would clearly not need to be constructed or maintained to the standards used by the USFS. This would save a lot of money in addition to providing a few places for hikers to enjoy a stock-free hiking experience.

Stock animals should be required to remain on trails that are designated, designed, constructed and maintained to withstand the erosive forces of stock animals. Absolutely 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. The NPS needs to reform its own stock program. Currently, animals that re-supply trail crews remain in the wilderness between trips, to graze and trample SEKI's sensitive meadows, lakeshores, and wetlands. It should be the other way around: Your stock animals should be stabled outside the wilderness between supply trips.

Please also: 1) require manure catchers on all stock animals (see, for example, bunbag.com) to keep manure off trails and out of streams, lakes, and campsites; 2) prohibit bells on stock animals, which shatter the natural quiet, and disrupt the sleep of wilderness visitors; and 3) remove all fences from SEKI's wilderness. Fences are the complete antithesis of wilderness. Encountering a fence in the back country completely undermines the wilderness experience.

The Sierra Kings Canyon National Park is a special and precious place. The wilderness nature of the Park provides a glimpse into what the whole of our nation - and planet - once was like before settlers, before stock animals, before fences. Please respect and preserve this for us and our future generations. Reduce stock animal activities - increase true wilderness experience.

Correspondence ID:	175	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,24,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	20 Nov 2012				

Karen Taylor-Goodrich, Superintendent Attn: Wilderness Stewardship Plan

Dear Planners, Beginning in my fifties I have backpacked the Sierra crest including SEKI for over 30 years., so I care deeply about assuring the best possible wilderness experience for today's and future backpackers.

The plan provides for limiting, rationing permits for hiker access to the backcountry to reduce the human impact. Comparative limitations on stock use are not clear, but should be more restrictive than hiker limits because stock use per anima causes more damage to trails and wilderness quality than hikers.

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.

Walking through stock manure on trails is unpleasant and unnatural so "manure catchers" should be required for all stock. Bells should also be prohibited since they are not a natural part of the wilderness.

Group size should be less than 35. Probably 20 maximum.

Thank you for considering my recommendations.

Correspondence ID:	177	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,20,2012 00:00:00				
Correspondence Type:	E-mail				
Correspondence:	Superintendent Taylor-Goodrich				

Please include these comments on the WSP DRAFT in the record.

I backpack in the Sierra often and completed the JMT this year. Many years ago my 12 year old brother was lost in

Tehipite Valley and the forest service gained my respect as they searched for him. (unsuccessfully as he was never found) So I write this with respect for your work.

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. Please develop an alternative that

- progressively reduces stock usage in the entire area. - requires stock users to use weed free feed - If stock is necessary, and it sometimes is for handicapped use or for access by FS personnel, provide a trail class distinct from trails used by foot traffic - Remove all fences inside the wilderness for any reason - require manure catchers on stock. If people can't crap in the streams, why do you allow stock to- - Stock has to stay on trails - no cross country - No stock stabling inside the wilderness except at trail heads for stock "class" trails

I appreciate your good work. Please place my comments in the record.

Correspondence ID:	178	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,20,2012 00:00:00				
Correspondence Type:	E-mail				
Correspondence:					

Dear Superintendent Taylor-Goodrich,

I am writing to comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan (WSP). I request that these comments be considered and included in the record for your WSP.

I am very familiar with the SEKI area having written several books on the Sierra Nevada, and various wilderness areas in California. 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.

Stock use on wilderness trails is somewhat analogous to ORV use on other public lands. As with ORVS, stock use has a disproportionate impact on other public lands users and wildlife. Studies of ORVs found that few ORV users were bothered by meeting hikers, but most hikers preferred not to meet ORVs. It is the same with horses use and hikers. The manure from stock, the impacts to trails (muddy pools), the dust in dry season, and the effect of large oversized camps enabled by stock use is not appropriate in the SEKI wildlands. If this were the middle of the Canadian wilds or some of the more remote parts of Wyoming or Montana, maybe horse travel would be acceptable, but given the huge demand for wildlands experiences in California, and the mandate of the Park Service to maintain to the greatest degree possible wildlands characteristics, I believe horse use is inappropriate.

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.

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.

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.

Thank you for considering my comments.

Correspondence ID:	183, 184	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,21,2012 00:00:00				
Correspondence Type:	E-mail				
Correspondence:	Dear Superintendent Taylor-Goodrich,				

I am writing to comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan (WSP). I request that these comments be considered and included in the record for your WSP.

I urge you to craft a WSP that fully preserves wilderness character. I am very concerned that the proposed "zoning" scheme would allow degradation of certain "zones" by allowing excessively large groups and inappropriate developments. Please abandon the zoning idea and provide full protection for ALL portions of SEKI's wilderness.

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.

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.

Commercial stock use should be limited to those persons or groups who truly need it. Because of the keen competition for limited wilderness permits, and because numerous hikers are turned away due to trailhead quotas, it would be possible for many more people to visit SEKI's wilderness if the available spaces weren't taken up by so many unnecessary commercial pack trips (i.e., where able-bodied persons ride horses and bring excessive numbers of stock animals loaded with unnecessary luxuries). Reducing unnecessary commercial stock services could both reduce ongoing harm to SEKI's wilderness and allow more people to enjoy a limited and rationed resource.

I oppose the idea of NPS using "trail classes" that were developed by the U.S. Forest Service. The USFS's trail classes allow stock animals on all trails, with no trail class that prohibits stock use. SEKI should consider and adopt a trail class for "foot travel only" trails, so that hikers may enjoy at least some trails without the dust, loose rocks, flies, and manure that pollute trails used by stock animals. Foot-travel-only trails would clearly not need to be constructed or maintained to the standards used by the USFS. This would save a lot of money in addition to providing a few places for hikers to enjoy a stock-free hiking experience.

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.

The NPS needs to reform its own stock program. Currently, animals that re-supply trail crews remain in the wilderness between trips, to graze and trample SEKI's sensitive meadows, lakeshores, and wetlands. It should be the other way around: Your stock animals should be stabled outside the wilderness between supply trips.

Please also: 1) require manure catchers on all stock animals (see, for example, bunbag.com) to keep manure off trails and out of streams, lakes, and campsites; 2) prohibit bells on stock animals, which shatter the natural quiet, and disrupt the sleep of wilderness visitors; and 3) remove all fences from SEKI's wilderness. The wire fences installed throughout SEKI's wilderness for the convenience of stock users detract from the untrammelled scenery and are a hassle for visitors to cross. Stock users should be responsible for their own animals, without the need for fences.

Thank you for considering my comments.

Correspondence ID:	185	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,26,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	November 21, 2012				

Dear Superintendent:

This letter is written concerning the Preliminary Alternatives for Sequoia and Kings Canyon National Parks (SEKI) Wilderness Stewardship Plan.

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.

It appears to me that initially all of the alternatives allow unlimited stock use to continue in SEKI's wilderness. It is proposed that there will be no limits on the total number of stock animals, stock trips, commercial outfitters, or commercial clients allowed per year and no such limits are proposed in any of the alternatives.

As an avid climber/hiker and with great love for the wilderness experience, I am asking that the National Park Service withdraw these alternatives and re-circulate new alternatives that include measurable and enforceable limits on stock use.

Further, I would ask that the National Park Service immediately abandon the new proposed zoning scheme. The National Park Service must adopt a Wilderness Stewardship Plan that fully preserves the wilderness character of all of SEKI's wilderness. The Wilderness Act does not permit the National Park Service to preserve wilderness character only in some zones, while others are allowed to degrade.

The National Park Service should require all stock animals to remain on designated trails that are adequately designed, constructed and maintained to withstand use by stock animals. There should be no stock travel on unmaintained trails, and no "off trail" or "cross country" travel by stock at all, regardless of zone. The only exception for stock to leave designated, maintained trails should be for no more than 1/4 mile to reach an approved, designated stock camp. This would allow reasonable access for stock users while protecting wilderness. Currently, SEKI owns numerous stock animals that are allowed to graze and trample the park's fragile meadows all summer long. National Park Service packers periodically haul fresh food to trail crews, but then leave the animals to graze in the wilderness until it is time to exit the mountains to fetch another load of supplies. It should be the opposite. National Park Service stock should leave the mountains between re-supply trips and not be allowed to graze the park's fragile meadows all summer long.

SEKI's proposal for a system of three trail classes is fundamentally flawed. It allows stock animals to use all trail

classes. There are substantial impacts of stock animals on trails (erosion, high maintenance and repair costs, etc.) and the effects these impacts have on the experience of hikers. I would think at least one additional trail class is necessary for foot travel only. This would provide at least some trails closed to stock animals, so that hikers might enjoy walking on trails without the dust, flies, loose rocks and manure that pollute trails used by stock animals. Of course, administrative stock use could be allowed on foot travel only trails when necessary for trail maintenance or search and rescue.

The National Park Service should also consider alternatives requiring manure catchers on all stock animals to keep animal manure off trails and out of surface waters. All stock owners should be required to attach manure catchers to their animals and dump the manure away from trails, campsites and watercourses. Animal waste is routinely deposited on trails, in campsites, in wetlands, and directly into the lakes and streams from which we all drink.

Further, the National Park Service should consider requiring all stock animals be inspected before entering the parks to ensure they are not importing invasive weed seeds on their coats or hooves. Bells on stock should be prohibited, as bells shatter the natural quiet and disturb the sleep of wilderness visitors. Last, stock users should be required to utilize compact, lightweight equipment to reduce the number of animals needed to transport their gear.

Thank you for your consideration of these issues to maintain and preserve the integrity and character of our Sequoia and Kings Canyon National Parks.

Correspondence ID:	187	Project:	33225	Document:	49956
Outside Organization:	Sierra National Forest Federal Government				
Received:	Dec,18,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Karen F. Taylor Goodrich Superintendent Sequoia and Kings Canyon National Parks Attn: Wilderness Stewardship Plan Preliminary Draft Alternatives 47050 Generals Highway Three Rivers, CA 93271-9700				

Dear Superintendent Goodrich,

Thank you for the opportunity to comment on the Sequoia and Kings Canyon National Park's Wilderness Stewardship Plan proposed alternatives. The Sierra National Forest appreciates being a Cooperating Agency and working with the Park Service on this project. The presentations made to the Forest and the tribal communities have been very useful.

Please find attached the Forest's comments on the proposed alternatives. If you have any questions about these comments, please feel free to contact Judi Tapia, Environmental Coordinator, at jetapia@fs.fed.us or (559) 297-0706 extension 4938.

Sincerely,

John D. Exline Acting Forest Supervisor

Enclosures

cc: Micki Didier, Robbin Ekman, Deborah L McDougald

November 20, 2012

Comments on SEKI's Draft WSP (Wilderness Stewardship Plan)

Micki Didier

Facilities: "Really" Take a step back, re-read the Wilderness Act Public Law 88-577 (U.S.C. 1131-11360 88th Congress, Second Session September 3, 1964 Section 2: (a)"in order 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...

(c) ...undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation...

The question of necessity vs. convenience for each individual structure needs to be evaluated. Is it really a necessity for the rangers to have a building (a permanent one at that) to do their job out in the wilderness, or can they backpack and move around? The term "for Administrative Purposes" gets used all too much as an excuse or for convenience. We managers and wilderness advocates need to, more than anyone else, make a bigger effort to lead by example and be the ones to be proactive in convincing the users 'public the best practices to leave the minimal amount of impact. I think that looking to remove as many of these facilities as we can which would greatly improve the wilderness character of many areas and push us wilderness rangers to practice what we preach. Building new facilities should definitely be prohibited. It's curious to read that all of the Alternatives supports retaining facilities in the wilderness and even converting some less permanent structures into more permanent structures! Although it's nice to "take care" of the employees in the field, it is possible for rangers to patrol and live in wilderness without housing. Stock support is already happening, and there is no lack in finding employees who like to live out of their backpacks.

There may be times and a place where crews may need to stay in one place for extended periods, but can it really be justified to have permanent structures and camps? Is it possible to move camps to different places to allow the area to recover? Rotations. Also, all the rules that apply to the public should be followed by the agency's personnel and partners

Get away from the Administrative leeways and really stress LNT camps, use and such.

Bear storage lockers: again permanent re-evaluate. Portable bear canisters are certainly doable and even for temporary crews. (is it really convenience?)

Trails: Trails are in wilderness. Seems to be fitting that the "Wilderness Stewardship Plan" should be inclusive of such a document, because of the huge impacts and connections it has in wilderness. Trails are an impact or a tool in wilderness and the management go hand in hand and shouldn't be managed separately. The trail crews that work in wilderness, should also be held to the same standards as any wilderness ranger and visitor. Trails are usually where visitors are encountered and has huge educational opportunities.

Comments of Draft Alternatives to SEKI Wilderness Stewardship Plan

Debbie McDougald Wilderness Special Uses Permit Administrator Sierra National Forest

Zones and Permitting Zones

Alternatives 1 and 2 require overnight visitors to obtain wilderness permits while Alts 2, 3 and 4 would also require day use visitors to require permits

Comment- Requiring permits for day use is cumbersome and unnecessary for most areas. Visitors might be tempted to portray themselves as a certain type of user, even though not accurate, to be able to get around full quotas if the quotas were split out. Restrictions on day use would also be considered a restriction to a visitor's right to "unconfined recreation " Wilderness Act sec 2(c)

Comment ' Establishing trailhead quotas for Tehipite Valley is unnecessary as the Sierra National Forest already has a trailhead quota in place. To have a site specific quota is not a function of a trailhead quota, it is a destination quota.

Comment- Destination quotas are an effective management tool to help improve the wilderness character and solitude of popular areas yet this is a difficult concept to regulate on a large level.

Trails, Bridges and Signs

Comment- Hell For Sure Pass just had over \$100,000 worth of maintenance/construction on it in the last 10 years, how can it possibly be considered a Class 1 trail? (Alt 1)

Comment- Class 1 Trails should not be newly established! (Alts 2 and 3). Essentially they are user trails which may have some designed features for resource protection and they have probably never been "constructed" to any kind of a standard.

Comment- All trails in Zone B should be maintained to Class 3 and the more popular trails in Zone C should also be maintained to Class 3. Zone C trails should for the most part all be Class 2 and the majority of Zone D should be Class 1.

Campfires, Food Storage and Human Waste

Comment- What is the rationale or science behind lowering the elevation that campfires are allowed as you go south? Forested areas generally are more dominant at higher elevations as you move south thus firewood should be more available at lower elevations.

Comment- What is the rationale or science behind the no campfires in wilderness? (Alt 5)

Comment- Removal of already in place bear lockers is not necessary (Alts 3, 4 and 5). If they weren't needed, why were they put there in the first place? The impact of already in place lockers to wilderness character (man made structures) is by far, less than the impact would be to the bears in those areas (they certainly have not gone away!) should "easily" available food sources come back. Also, the impact to wilderness character and solitude from the helicopters needed to remove these lockers is also much more profound than leaving them in place even though it would be a one time occurrence.

Comment- Requiring pack out waste kits for all users will not ever be possible to achieve for all users (Alt 5) and very difficult in some high use areas (Alt 4) due to the number of through hikers on the PCT. The only reason it appears to work on Mt. Whitney (Alt 2) is

because of the dedication and number of rangers assigned to this fairly confined use corridor. Also most visitors on Whitney are only in this zone for 1-3 days. It would seem difficult at best to require visitors on longer trips to use these kits and pack them out with them.

Party size: People and Stock

Comment-Party size of larger than 15 is inappropriate for most areas with the exception of Zone A. The impact to wilderness character and opportunities for solitude override a larger group size. Smaller group size would be ideal as a recommendation for Zone D however, this is moving toward destination management, and would be a difficult concept to enforce.

Comment- All of the different combinations would be far too difficult to keep track of for traveling parties and could lead to a tracking nightmare. Combinations are just not a good idea since stock parties are often traveling separately from each other (riders in one group and pack stock separated by miles or hours from the riders). Tracking this from tally sheets would not serve to protect the resource and tracking it from the field would be a nightmare.

Comment- Alt 6 is supposed to be the most unconstrained wilderness experience yet it has a total far less than the current allowed maximum. Is this alternative making the assumption that current numbers (or management)are not protecting wilderness character?

Comment-Designating campsites along the length of the PCT (Alt 2) would be almost impossible to enforce without the presence of wilderness rangers on a daily basis. Also, this would lead to impairment of solitude and unconstrained recreation in some very remote sections of the wilderness.

Comment-Construction of hardened campsites (Alt 2)should not be necessary as in high use areas these sites have already been hardened by constant use. Construction and the associated personnel would only serve to impact the area to an even greater degree.

Comment-Requiring stock parties to only stay in designated campsites on a broad scale(Zone C-Alts 3,4 and 5) will lead to potential conflicts between user groups.

Comment-Recommending stock groups stay in designated camps is the ideal alternative as this would help protect the resource (assuming these camps were designated after approval from resource specialists)without necessarily setting up user group conflicts that requirements might.

Comment-With there already being a max stock size limit of 8 in Zone D under Alt 4 is the differentiating of party sizes into medium and large under the same Alternative and same zone really needed to separate out whether designated stock camps would be required or recommended?

Comment-Camping night limits on a broad scale (Alts 2-5)would be difficult to enforce and would represent a more constrained wilderness experience than the Wilderness Act had in mind.

Comment- Where is the science to show there is a difference in impact between a 14, 10, 7

or 4 night stay at any campsite?

Comment- Why would there be a need to have less nights in Zone C than B since they are both essentially limited to narrow trail corridors?

Comment- Areas should only be closed to stock if there are already documented resource concerns that are directly related to stock in these areas. Zones without adequate, safe routes for travel for stock are already limited to stock because of this.

Grazing

Comment-While Alt 3 appears to be the most reasonable from a resource standpoint, some incorporation of the 1986 Plan should be included(i.e. rest/rotation of key meadows on major trail corridors). Also, a strict elevational closure(Alts 3,4, and 5) from north to south ignores the fact that vegetation types do not remain constant at set elevations as you travel further south. Meadows at 7000 feet in the north end of the park will receive a higher snowpack and be wet later in the season than meadows in the southern reaches of the park at the same elevation. It is more important to consider topography, aspect, elevation and species composition of grazing areas to determine suitability.

Administrative Facilities

Comment-While manmade structures are generally not considered acceptable in wilderness neither are the impacts from the hundreds of visitors on the trail corridors where the permanent structures are already located. However, there seems to be no logic supporting the conversion of tent type structures to solid sided buildings other than comfort of the rangers based there. Removal of such structures would be likely to increase helicopter useage, if even on the short term, which would be a greater impact to wilderness character than a structure that has existed in the same location for a number of years.

Comment-If administrative pastures are already in place then they should be maintained but they should be monitored and utilized only to the extent that public accessed grazing in the same area is.

Comment-Established crew camps should be continued at existing levels. No new sites should be built. Since these sites already exist and are hardened due to annual use by larger groups of people camping for long periods of time they should also be considered as appropriate for public use stock camps when not occupied by trail crews. Structures outside of those already there (bear boxes, storage caches of tools, etc) should not be permitted to be constructed if even on an annual basis other than latrines. Decreasing the number of bear boxes would only increase the need for more re-supplies and thus an increase in stock and/or helicopter use. Fires should only be allowed if this is an allowed practice for the public in this area. Re-hab of user trails in and out of camp and to latrine locations should be performed at the end of each administrative use period.

Comment- Project camps should be no different than the established crew camps.

Other Comments Outside of the scope of the listed alternatives-

Nowhere in the alternatives are use of chainsaws and helicopters addressed even though these are clearly exceptions to the intent of the Wilderness Act with respect to the use of

motorized equipment and landing of aircraft and as such, should be banned unless a Minimum Tool Decision deems the use of such equipment necessary.

Where in the Wilderness Stewardship plan will policy regarding wildfires be discussed. Will this discussion include a discussion about minimum tool requirements (helicopters, chainsaws, etc)?

Nowhere in the alternatives is there mention of commercial use and allowable limits of such. It is stated in your Commercial Services Evaluation for the Wilderness Stewardship Plan (D0:41) that allocations between commercial and non-commercial uses will be subject to public comment so when will this be addressed? And how will such comments be incorporated? Will this subject generate a second set of alternatives?

Comments on SEKI WSP Draft Alternatives by Key topic Greg Dusic Lead Wilderness Ranger Sierra National Forest

Topic: Permitting/Quotas

Quotas are essential in providing opportunities for solitude, reducing resource impacts and maintaining Wilderness character. The current trailhead quota system is marginally effective at providing such opportunities because of recreation use patterns in the Sierra. Certain areas end up "pooling" visitors from various trailheads under different quotas creating use inconsistent with management objectives. Several options could be considered to rectify this situation. Through-hiker permits and quotas need to be addressed as the popularity of the JMT, PCT, and Sierra High Route increase. Not all of these quotas are determined by SEKI although all of the through-hikers mentioned pass through SEKI. Interagency cooperation would be needed to deal with these issues. Destination Quotas could be considered for areas where trailhead quotas are not adequately working. A combination of alternatives three and four would be ideal. Trailhead quotas would be reduced for certain high use trailheads but no day use permits would be required and destination quotas would be considered. Quotas for day use should only be implemented if there is an area with a specific resource, safety, or Wilderness character concerns.

Topic: Trails Bridges and signs

Alternative one would be preferred. SEKI's trails in general are in good condition and there is no need to raise the standards of trail maintenance. If anything, some of the more remote trails could be downgraded to provide for more of a Wilderness experience and decrease the work load on trail crews.

Topic: Signs

In order to provide more consistency between agencies and improve Wilderness Character, the following is recommended:

1) Trail signs with directional markers are present without mileage 2) Interpretive signs are not authorized 3) Destination and Pass signs are not present 4) Regulatory and resource protection signing minimal 5) Route markers are not present 6) Material of routed wood versus metal for traditional look

Other than the trails themselves, signs are the most frequent "human improvement" in Wilderness. Because of this, signage should be minimal in order to complement the trail

system in an unobtrusive manor.

Topic: Campfires

Alternative three is a simple compromise that is easy to understand. Campfires should be allowed where there is ample firewood to allow for natural processes as well as campfires. Heavy use areas should be monitored to ensure that recreational use is not impacting natural processes. Campfire closure areas should be made easy for the public to understand and rangers to enforce. Topic: Food Storage

Alternative four is where Sierra Nevada Wilderness should be headed. There are so few areas where proper counter-balancing is available. As a Wilderness ranger in the Sierra Nevada, I have yet to see a proper counterbalance by a visitor. Bear canisters are becoming lighter weight and easier to use and availability of rentals is becoming more readily available. At this point there is no excuse for improperly storing food and bear canisters are the only real way of accomplishing this. Permanent food storage lockers are not appropriate in Wilderness and should be removed. I understand that the first night of a trip in some locations is difficult for backpackers to have enough room in one bear canister. Perhaps the rentals could include the larger dimension canisters and the smallest dimension canisters in order to ensure that all food is properly stored on the first night. Wilderness character should not be compromised in order to make Wilderness convenient for visitors.

Topic: Human Waste Management

Alternative three is perhaps the most realistic although it is not really ideal. Structures in Wilderness should be extremely limited and only to the extent necessary for resource protection. Restrooms and vault toilets are completely inappropriate in Wilderness and Privies should only be used where there are serious issues with human waste. Toilets are not something that visitors should expect to find in Wilderness. Every visitor should be taught how and where to dig a cathole. If there are issues with too many people using the privies or not digging proper catholes, the issue should be controlled through education, enforcement and potentially destination quotas. The Mt. Whitney Zone should require the use of pack-out waste kits due to the lack of mineral soil and high visitor use of the area.

Topic: Party Size ' People and Stock

Alternative four would provide better opportunities for solitude, fewer impacts associated with large groups and create a better Wilderness experience for all involved. Consideration should be given to closing certain areas of Zone D to stock use.

Topic: Backpacker and Stock Campsites

Alternative four is recommended. Designated campsites should only be designated when there are site specific resource concerns. Reducing trailhead quotas or creating destination management should be considered instead of designating campsites if an area has issues with visitor use and impacts. Designated campsites should be exemplary campsites to help visitors understand what they should look for when finding their own sites. To follow Leave No Traces principles, campsites should be located 200 feet from all water sources and trails. Unfortunately, if the NPS requires people to camp in specific sites, the NPS holds responsibility for ensuring those sites are reasonably safe. This degrades Wilderness

character by removing "hazard trees" and opportunities for unconfined recreation.

Topic: Night limits for all campers

Alternative four is a straightforward solution although no alternative addresses interagency travel. How many nights go toward the stay limits when visitors cross boundaries between Forest Service and Park Service land and then re-enter without leaving Wilderness? Because permits are trailhead specific, a visitor could stay 20 nights in SEKI, cross into the John Muir Wilderness for 20 nights, cross into Yosemite and then end up back in SEKI for another 20 nights on the same trip. This does happen (although not often yet) and could make it difficult to get an accurate count on stay limits and to determine trailhead quota effectiveness. Stay limits can also be difficult to enforce without constant ranger presence in all areas. The stay limits of shorter duration (i.e. 2 nights) are a step toward destination management without being able to enforce as easily.

Topic: Stock Use

Alternative three would provide for the traditional use of stock while managing their use effectively. Group size limits are addressed under "Party Size" and alternative four is preferred in this regard. The issue with this alternative is designated stock camps. Stock camps can be identified and recommended but I would advise against designated campsites in general.

Topic: Stock Use ' Grazing

Alternative one is preferred. SEKI does an excellent job of determining meadow suitability and utilization and should continue with current management practices.

Topic: Ranger Stations etc.

Alternative five minimizes the use of ranger stations which would improve Wilderness Character. Ranger Stations should be seen as historic structures (if they are) and maintained as such if possible. The construction of new cabins should be discontinued as it negatively impacts Wilderness in a number of ways. Structures should be minimal and historic in nature. The helicopter delivery of cabin materials degrades Wilderness Character. If cabins are in a state of disrepair and are not historic in nature, removal should be considered. If it is deemed necessary for a ranger to remain in the Wilderness at a specific location for the duration of the summer, temporary tent cabins would be preferred.

Topic: Established Crew Camps

Alternative six is preferred. If crosscut saws were used to clear trails, backpacking would become an option for trail crews. By traveling light, crews would be able to cover more ground and be resupplied where possible by stock support. In general, basecamps for trail clearing do not make sense because the farther out from the basecamp you clear, the more you hike before you start work and the earlier you have to return to reach camp. Crosscut saws are the preferred tool for Wilderness trail clearing for the following reasons:

1) Promotes traditional tool use and education within agency and among visitors 2) Reduces sound quality issues within Wilderness 3) Reduces pollution from internal combustion engine and oil leaks 4) Conforms with Wilderness by using non-motorized equipment 5) Allows crews to backpack self-supported for up to 9 days at a time thus

reducing impacts related to basecamps and continuous pack support.

Rock work crews would be more stationary but should still not require permanent infrastructure in camp. Instead of permanent food storage lockers, bear-resistant panniers should be used and removed every year. The permanent food storage lockers are inconsistent with Wilderness and should be removed.

Topic: Project-related crew camps

Helicopter landing areas should not be set up for established or project-related crew camps. Landing zones should be recognized nearby in case of emergency, but helicopter resupplies should be very limited or eliminated. Camps being returned to pre-project conditions should be emphasized in the field.

Topic: Transitory Crew Camps

This type of camp should be the standard for trail crews at least during trail clearing. Leave No Trace Principles should be stressed by a training early in the season.

Topic: Redwood Canyon Cabin and Cache

Without knowing the full history and the MOU, alternative three seems appropriate.
Topic: Pear Lake

Alternatives four or five are preferred. Full Wilderness designation of the area would be ideal.

Topic: Bearpaw

Alternative four is preferred. It would be good to preserve the historic structures for future generations, but based on its location, full Wilderness designation should be considered.

General Comments:

Managing Wilderness is obviously a delicate balance. Too little or too much regulation and management can make an area less wild. From trail crew camps to ranger cabins it is important to make sure that the steps taken to preserve Wilderness don't in fact have a negative effect on Wilderness character. I have mentioned the use of destination management in a few comments and wanted to clarify that this should be used as a last resort. When destination management and designated campsites become the norm, the further we are from providing opportunities for unconfined recreation and a true sense of wildness. The emphasis for Wilderness preservation should be in education. Regulation and enforcement can only go so far, while education and outreach can have a lasting and exponential effect.

Topics that should be considered in future draft alternatives: 1) Wilderness Character Monitoring 2) Search and Rescue 3) Minimum Tool Assessments (crosscut vs. chainsaw, helicopter use, etc.) 4) Wilderness Regulations 5) Through hiker impacts/education/permits

Correspondence ID: 188 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Dec,12,2012 00:00:00
Correspondence Type: Letter
Correspondence: November 19, 2012

Karen Taylor-Goodrich, Superintendent Attn: Wilderness Stewardship Plan Sequoia and Kings Canyon National Parks 47050 Generals Highway Three Rivers, CA 93271

Dear Superintendent Taylor-Goodrich,

Thank you for this opportunity to comment on the Preliminary Draft Alternatives for SEKI's Wilderness Stewardship Plan. I request that you consider these comments and that you include my letter in the record for this project.

I lived and worked at SEKI for several years throughout the 1980s-90s. During that time, I worked in SEKI's wilderness as a trailhead ranger, in which I carried out weeklong backcountry patrols, wrote wilderness permits, and contacted countless park visitors. I have also, before and since that time, visited SEKI's wilderness on numerous backpacking trips, in search of SEKI's exceptional solitude and quietude, which I cherish.

One of my primary concerns is the "zoning" scheme proposed by your staff. "Zoning" of SEKI's wilderness would unnecessarily complicate the issues. It would not be well-understood by park visitors. And it would be impossible to effectively implement or enforce. Having different rules (such as different group size limits) for different "zones" within SEKI's wilderness would be impossible to effectively communicate, because wilderness permits are issued by scores of offices surrounding SEKI, most of which are staffed by people unfamiliar with SEKI's backcountry. I encourage you to abandon entirely the zoning scheme, and provide adequate protection for all parts of SEKI's wilderness, not just protection for some "zones." This zoning idea appears to me as a means to shirk your responsibility of wilderness protection, as it would allow over-use and degradation of "sacrifice areas."

I am concerned that the Preliminary Alternatives seem to side-step the real issues. For example, essentially all of the alternatives would allow unlimited stock use to continue in SEKI's wilderness. I ask that you withdraw these alternatives, and conduct a "needs assessment" for commercial stock use (in a transparent public process), and then recirculate new alternatives that include measurable and enforceable ceilings on all stock use (commercial, administrative, and private).

In regards to commercial stock use, please limit the use of commercial stock services to those persons who truly need it, and require that commercial outfits use compact, lightweight equipment (and leave the luxuries at home) to reduce the number of animals needed.

SEKI should not blindly "cut-and-paste" trail class definitions from the U.S. Forest Service. Please think about this issue instead of mindlessly copying the flawed scheme used by the Forest Service. Your staff's proposal for a system of three USFS "trail classes" fails to acknowledge the substantial impacts of stock animals on trails (erosion, high maintenance & repair costs, manure/urine, etc.) and the effects that such impacts have on the experience of foot travelers (i.e., dust, numerous rocks kicked loose by animals,

manure, flies, etc.). At least one additional "trail class" is needed: "Foot Travel Only," to provide at least some trails closed to stock animals, so that hikers may enjoy walking on trails without the dust, flies, loose rocks and manure that often pollute trails used by stock animals. (Occasional administrative stock use could be allowed on the designated "foot travel only" trails, when necessary for trail maintenance and/or search-and-rescue.)

All stock animals should be required to stay on maintained trails; they should not be allowed off-trail. None of the Preliminary Alternatives considers such a common-sense approach to limiting the sometimes severe impacts of stock animals.

I am concerned that the Preliminary Alternatives seem to avoid the crucial issue of how the NPS manages its own stock animals. My most recent observations indicate that SEKI continues to allow its own stock to graze in the backcountry even when the animals are not working. NPS stock should depart from the mountains between re-supply trips, not graze the park's fragile meadows all summer long.

Essentially all of the group size limits listed in the Preliminary Alternatives exceed the sizes which have been recommended by scientists. Your plan should fully evaluate and consider smaller group size limits, as recommended by research scientists. Visitors may not realize it, but they're likely to have a better, more profound wilderness experience if they travel in smaller groups.

I urge you also to consider alternatives that prevent the spread of invasive weeds by stock animals, such as prohibiting all grazing, requiring certified weed-free feed, and inspecting animals for weed seeds before they enter the parks.

Please also prohibit bells on stock animals, which are very noisy and disruptive of wilderness quietude. Stock users should be required to manage their animals without the use of noisy bells.

Thank you for considering my views.

Correspondence ID:	189	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,16,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Karen F. Taylor-Goodrich, Superintendent Sequoia and Kings Canyon National Parks Attn: Wilderness Stewardship Plan 47050 Generals Highway Three Rivers, CA 93271				

Dear Superintendent Taylor-Goodrich,

I am writing to comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan (WSP). Please consider my comments and include them in the record for your WSP.

I have been an avid backpacker in many wilderness regions including Sequoia and Kings Canyon National Parks. I urge that preservation of wilderness be a top priority in your draft alternatives. The proposed "zoning" scheme would allow degradation of the park environment by encouraging large groups and developments which promote stock use. Please abandon the zoning idea and provide full protection for ALL portions of SEKI's wilderness.

Allowing grazing by stock animals in wilderness areas leads to further degradation and does not meet the 1971 Master Plan to phase out all grazing in Sequoia and Kings Canyon National Parks. I firmly believe that some trails should be designated "foot travel only" trails, so hikers can enjoy them without the attendant dust, flies, manure, loose rock, and invasive plant species which stock use creates.

Commercial stock use should be limited to those persons or groups who truly need it, such as the elderly or handicapped. Because of the keen competition for limited wilderness permits, numerous hikers are turned away due to trailhead quotas. It would be possible for many more people to visit SEKI's wilderness if the available spaces weren't taken up by so many unnecessary commercial pack trips (i.e., where able-bodied persons ride horses and bring excessive numbers of stock animals loaded with unnecessary luxuries, such as a 10 foot long, fully stocked bar of alcoholic beverages). We have personally observed this!

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.

Currently, animals that re-supply trail crews remain in the wilderness between trips, to graze and trample SEKI's sensitive meadows, lakeshores, and wetlands. It should be the other way around: All stock animals should be stabled outside the wilderness between supply trips.

Other requirements which should be made mandatory are: manure catchers on all stock animals; removal of all fences from SEKI's wilderness.

Thank you for considering my comments.

Correspondence ID:	190	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,28,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Superintendent Sequoia and Kings Canyon National Parks Attn: Wilderness Stewardship Plan 47050 Generals Highway Three Rivers, CA 93271				

11/28/12

Dear Sir or Madam,

I am writing to comment on the Preliminary Draft Alternatives for the Wilderness Stewardship Plan (WSP).

My over riding concern is that the WSP provide the highest level of wilderness preservation for Sequoia and Kings Canyon National Park. I have been backpacking in the Park and through out the Sierra for nearly 50 years. I am deeply concerned about the impacts to the alpine environment by commercial stock businesses.

To site just one example: In Miter Basin, a destination I chose thinking that since there is no trail I would avoid pack stock, there was in fact evidence of considerable cross-country visitation by stock. Hooves had rutted the high elevation, fragile, damp meadows in upper

Rock Creek. I found a large "packers camp" at 11' 200 feet where they had been illegally sawing branches and having fires.

The proposed "Zones" that are the basis of the plan are in my opinion unworkable due to their complexity. I believe that if this approach is adopted it will lead to "grey areas" in the field and will be very difficult and expensive to implement and enforce. I strongly recommend that the Park Service rethink its approach to managing the Parks wilderness.

The following are comments on some important issues relevant to the proposed plan:

* There is overwhelming evidence that the overall numbers of pack stock must be reduced in the subject wilderness.

* Group size maximums proposed are excessive and unsustainable. I suggest a maximum of 6 people and 8 head of stock.

* Cross-country travel by pack stock should not be allowed. The impact of even one group of stock in sensitive high altitude areas can last for years or decades. * A system of trails should be preserved for hikers only. There are many trails in the wilderness that cannot sustain the impacts of stock.

* A trail impact mitigation fee should be levied on pack stock users, the proceeds of which should be used to restore damaged trails in the wilderness.

* An analysis should be made for implementing an elevation-based restriction on camping by stock groups. The high alpine environment is the most vulnerable to degradation by stock related impacts and should have strong protection. I recommend no stock camps above 9,000 feet.

* Campfires should be further restricted and prohibited in the higher elevations. Under no circumstances should commercial enterprises be allowed to transport firewood into restricted high elevation areas.

Thank you for the opportunity to comment on the proposed Wilderness Plan.

Correspondence ID:	191	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,28,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	To Karen Taylor-Goodrich,				

I am commenting on the Preliminary Alternatives for SEKI Wilderness Stewardship Plan.

I am a backpacker and a horse Rider. I do not advocate removal of all stock from the wilderness. I do advocate reduction in numbers.

Being a rider I know what damage shod hooves can do. All stock should always remain on designated trails. Other trails should be for hikers only so they don't have to slog through dust manuer and flies

The number of stock should be reduced there is no "Wilderness Experience" when 20+

animals pass hikers stirring up dust etc.

No zoning for high use areas. The Wilderness area needs to remain a solid unit governed by one set of rules or the concept of wilderness becomes void.

Thanks for your time. Relax and enjoy the wilderness you protect.

Correspondence ID:	192	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,28,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	November 28, 2012 Karen F. Taylor-Goodrich, Superintendent Sequoia and Kings Canyon National Parks Attn: Wilderness Stewardship Plan 47050 Generals Highway Three Rivers, CA 93271				

Ref: SEKI Wilderness Stewardship Plan

Dear Superintendant Taylor-Goodrich:

I backpack in various parts of the High Sierra every summer, and have done so every year since 1964, usually in small family groups.

During these five decades, very so many of these trails and campsites have been slowly but inexorably damaged, degraded, and made filthy by packtrain animals. A sharp reduction in this traffic is desperately needed and long overdue.

I gather that you have it in your power to reduce the use of stock in the wilderness as you construct a new Stewardship Plan for Sequoia/Kings Canyon. I urge you initiate phased reductions of pack animal traffic on the trails of the High Sierra, with the goal of their eventual elimination.

It would be unfair to pack operators to suddenly restrict their livelihoods, but you can gradually reduce the number of permits, and especially you can reduce the size of pack trains allowed. This should raise the price of such portage to the point where visitors might think twice about bringing some of the idiotic camp furniture I have seen hauled into the back country.

Please, please also reduce the number of different places to which pack animals may go! These operations are extending into more and more remote locations, where delicate flora are devastated during the first such visit.

I recall that from the earliest days, Parks personnel spoke of planned reductions in pack animal traffic. Somehow these have never been accomplished. Reductions in such abuse are long, long overdue and I urge you to implement them in the execution of the new Wilderness Stewardship Plan.

Horses, donkeys, mules, llamas, please! Get them out of the wilderness.

Correspondence ID: 193 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,29,2012 00:00:00
Correspondence Type: Letter
Correspondence: Dear Karen Taylor-Goodrich, Superintendant

I am commenting on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan. I have backpacked in this area for many years - since 1975 and I have witnessed what stock grazing has impact on the Trails and meadows + streams. I believe the NPS should conduct a needs assessment to determine whether & extend to which commercial stock use may be necessary in SEKI's wilderness. I disagree with unlimited stock use. No limits are not proposed in any of the Preliminary Alternatives. I have seen stock dirty the streams + rivers, trample the fragile meadows and dig up the trails for hikers. I was in the Rae Lakes + Sixty Lake Basin this summer + witnessed this. I believe there should be limits of amount of stock. The zoning scheme proposed by SEKI is very complicated & difficult to comply with + enforce. Please abandon the proposed zoning scheme + adopt a WSP that preserves wilderness character of all of SEKI's Wilderness (i.e. zone A allows up to 35 people). All stock animals should be required by NPS to remain on designated trails only - no cross country travel. I applaud how you limited stock in 60 Lake Basin. There should be no grazing of stock animals allowed. NPS stock should leave mountains between resupply trips, not graze the fragile meadows all summer.

SEKI's proposal for a system of 3 "trail classes" is flawed because it allows stock to use all trail classes. At least 1 additional trail class is needed "Foot Travel Only" to provide at least some trails closed to stock animals.

The Preliminary Alternatives fail to address other issues - NPS should consider alternatives requiring "manure catchers" on all stock animals to keep manure out of surface waters + trails.

NPS should require stock users to utilize compact lightweight equipment to reduce # of animals needed to transport gear.

Correspondence ID: 194 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,12,2012 00:00:00
Correspondence Type: Letter
Correspondence: Karen Taylor-Goodrich, Superintendent Attn: Wilderness Stewardship Plan Preliminary Draft Alternatives Sequoia and Kings Canyon National Parks 47050 Generals Highway Three Rivers, CA 93271-9700

Dear Ms Taylor- Goodrich:

I believe that Alternative #1 of the Preliminary Draft, Current Management Practices, is the best choice for the Sequoia and Kings Canyon Wilderness Stewardship Plan.

Our family began camping in the Sequoia and Kings Canyon National Parks in the 1970's. By using commercial outfitters and pack stock we were able to enjoy the wilderness experience with our children and over a period of 25 to 30 years we were frequent visitors. I was so impressed with the back country skills of Rock Creek Pack Station that when I retired at age 60 I asked the owner, Craig London, for a job and was accepted as a packer

and wrangler and worked summers for 5 years. Because of my experiences I can tell you that the professional outfitters are your best stewards of the wilderness. They want their customers to enjoy their camping experience as if they were the first to use that campsite that summer even though the outfitter might have had customers in that same site just a week before. Therefore we were diligent in practicing Leave no Trace principals every day and at every campsite.

For these reasons I urge you not to limit campfires above 10,000 ft or to restrict grazing in the upper elevation meadows, or close access to areas like Wallace Lake, Upper Crabtree Meadow or Dusy Basin. The present restrictions on stock size of 20 or 25 has already kept damage to a minimum and free grazing is the best way to protect the upper meadows.

You don't see older or very young backpackers very far beyond the trailheads. Stock travel is essential to the young and people my age to carry my food and supplies so that we, too, can have that wilderness experience. A campfire at night for warmth and ambiance a must. Letting experienced packers pick the proper campsite is to be preferred, free grazing for the animals and access to remote areas are what we want and need. Don't restrict the Parks any more than they are.

Correspondence ID:	195	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,12,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Karen Taylor Goodrich, Superintendent Sequoia and Kings Canyon N.P.s				

Dear Karen,

For the protection of the ecology in SEKI's Wilderness stock animals should be required to stay on designated maintained trails at all times. The proposed zoning plan does NOT address this important issue.

Stock animals should be limited to using only stock trails not foot traffic trails.

Group sizes of pack stock should be 10 people and 10 stock.

Put a limit on pack stock usage in SEKI. Pack stock damage the trails and pollute water sources by increasing the pathogens. As a long time wilderness user, I cannot really enjoy walking s SEKI's trails and touching the water anymore. I am afraid of the bacterias and other contaminates brought about by animal pack stock.

Pack animals should be checked for foreign and non native species in their coats.

Packers and their stock should follow the same regulations for people on foot! Waste products away from water sources!

No grazing please!

Correspondence ID: 196 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,14,2012 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mrs. Goodrich,

Relative to the increasing regulations to "protecting the wilderness character" - if you want to do that, why not just kick us all out...hikers, bikers, birders, clubs, mules, horses, llamas, dogs, etc. fishermen, photographers, etc

The point being that those of use who do love the wilderness other than on T.V. or at the visitor center are going to be in the wilderness doing the above activities.

1) We watn and need to have a small campfire. Those of us who are older, experienced, educated, lifelong outdoorsment (I'm a 71 year old woman) know how to leave little trace. No trace is pretty impossible.

2) Why limit our use of less traveled areas like Wallace Lake -- it's good to spread us out.

3) always using the same campsite is contraproductive.

4) there is no difference in grazing high or low meadows except usually more water/grass @ high elevations - esp with the drier weather trends

5) Picket lines can be counter productive - too much damage - spread um out!

I have fished, hunted, canoed, hiked, rode, photographed, bird watched the Sierras from South to North for over 60+ years! I know the country well. My whole family inc husband were Forest Service. We also ranched in Honey Lake Valley for years.

I can't carry a 40 lb pack anymore for fear of a back "blowout". So, I've packe with muiles for 16-18 yrs. If you want to help the wilderness limit some dogs, large hiking groups too!

The Pacific Crest and John Muir trails are heavily trod by hikers - crowds of people - and they leave toilet paper galore, open feces dumps, etc - the professional packers are much more fastidious!!

Park Service folks do a darn good job, in my opinion, but the reality is that we all do want to use and enjoy our beloved wild country. We have already lost enough camping time in our established gov. campgrounds since they were handed to the private, profit geared outfits. They close most of our loved places early in the season (when the crowds go, the colors are beautiful, and the fishing is best) because they don't make enough money!! This is a disgrace.

Like many people, esp my age (and I can ride 8 hours a day!) I feel I really no longer have a country - I have a government. I mean that sincerely and with a sad heart. Its not "we the people of the United States" its "The US Gov". Think about it.

Im glad Ive only a decade left where I can still cowgirl up (although we have an 80 +84 yr

pair that still do). I hate to think I might live long enough to see we wilderness mule packers (yes - I have a professional certificate) pushed out our our Sierras.

Its people like me (for 65 yrs) who have picked up the garbage, cans, butts, dog crap, etc of others - happily - but the TONS by now - because I am a steward of my country, Ive walked around little Crater lake every year since age 10 and cleaned it up!! Ive never not buried my campfire, spread my manure etc, and Ive spent hours hand grazing!!

Dont punish us for loving and using our Sierras. Some of us have done it for generations! This idea of pretending its a "real wilderness i.e. no people there is silly. If you are serious - close Yosemite + Yellowstone to vehicles, G.G.'s, stores, snowmobiles! Dont cater to the R.V. Rec. Industry and slap mule/horse packers down. Remember how nice lakes were before "personal watercraft"?

What Im saying is that a lot of regulations avoid impacting snowmobiles, quads, jet skis, etc due to lobbyists access to congressional pockets. No mule ever had a hoof in a pocket.

This idea of wilderness "Character" is not very realistic unless you limit hikers. One might see one other mule outfit "out there" - but hundreds of hikers. And thats ok too, I dont pretend its a true wilderness when its so well trailed, pathed, and traveled - its still MAGNIFICENT.

I don't really know what you mean by "natural and cultural resources within wilderness"? Most hikers use stereos, headphones, gas stoves, radios, cell phones, navigators, etc - esp the Sierra Club.

In any event mule packing is more part of the cultural (?) experience than given credit for.

Think about this. What is the purpose of the park? What are the expected activities? How can you call a "wilderness" a place where you allow so many people, and have so many trails, regulations?

Why did the gov allow the commercial utilization, (privitization essentially,) of so many campgrounds)

Re: more restrictions 1) reduce day use 2) keep the signs! 3) keep 10,000 fire level 4) 12 people with stock OK 5) why separate back packers + packers!! Can we all get along? 6) Dont ban high use areas - thats another step to out us 7) Dont ban high level grazing.

I hope this honest, heartfelt opinion helps you all really think about the use of our land. We cant live here and not have some impact.

Correspondence ID:	197	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,14,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	To Whom it May Concern,				

I am continually amazed by the Public Agencies entrusted with stewardship of Public Lands love affair with mules/stock. I live next to Inyo Nat'l Forest that trumpets their love of mules. I have been backpacking in the Sierras for 50 some years, I don't like mule's damage to trails or the backcountry. I don't appreciate mule fecal material (and flies) on

the trail. It seems that the Agencies think of mule deposits as something other than fecal material. I am aware of the study (U.C. Davis) that says Giardia is being maintained in the backcountry by stock. Stock also introduce invasive species. Public Agencies spend big dollars, out of their limited budgets, maintaining trails so that commercial outfitters can use the trails for their profits.

I frequently backpack by myself. The idea of meeting a group of 35 people and 20 head of stock is horrifying. I know foot travel parties are limited to 15 head of people that seems large to find camp space.

Correspondence ID: 198 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,16,2012 00:00:00
Correspondence Type: Letter
Correspondence: Dear Ms. Taylor-Goodrich,

I prefer Alternative 5 with the following changes:

- 1) stock use: camps - Zone B restrictions should be adopted -would identify and designate stock camps -stock users would be required to camp in designated stock camps only
- 2) Redwood Canyon cabin and cache - adopt Alternative 4 plan
- 3) Pear Lake - adopt Alternative 4 plan
- 4) Bearpaw Meadow High Sierra Camp - adopt Alternative 4 plan

My second choice is Alternative 4.

Correspondence ID: 199 **Project:** 33225 **Document:** 49956
Outside Organization: Unaffiliated Individual
Received: Nov,29,2012 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Superintendent Taylor-Goodrich,

I am writing to comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan (WSP). I request that these comments be considered and included in the record for your WSP.

Our whole family has backpacked in the High Sierra since 1975. Our annual 10-14 day trips have been instrumental in helping us get a better perspective on our busy lives, and setting priorities for both my husband and I, as well as for our three children and often their friends who accompanied us. Pristine nature brings solace to cluttered minds, clarity of thought and purpose.

We try, whenever possible, to get away from the dusty and dirty trails used by stock animals in order to experience the wilderness as it's meant to be; unspoiled, clean and pristine. This is becoming more and more difficult as stock animals use trails that should be the sole use of hikers. We urge you to do everything in your power to make sure that the WSP fully preserves the wilderness character of both the Sequoia and the Kings Canyon National Parks.

We are very concerned about the proposed "zoning" scheme that would only result in further degradation of the SEKI wilderness. Absolutely no new developments should be built to facilitate stock use. Please focus instead on reducing or, even better, eliminating stock use to heal the damage already done to the SEKI wilderness.

The SEKI wilderness should be open to more people on foot, NOT stock animals that often carry in unnecessary luxuries for a few. Reducing or eliminating stock animals, thus allowing to increase the trailhead quotas, would allow more people to enjoy the limited resources of this area.

We of course strongly oppose the idea, put forth by the U.S. Forest Service, that would allow stock animals the use of ALL trails. The interest of a few commercial outfits should not come before the interest of the greater public. These are after all PUBLIC lands, and the public's interest should come before any commercial outfit that profits just a few.

Thank you for taking the time to read and consider our comments.

Correspondence ID:	200	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,28,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Dear Superintendent Taylor-Goodrich,				

I am writing to comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan (WSP). I request that these comments be considered and included in the record for your WSP.

I am a frequent visitor to Sequoia and Kings Canyon Parks both for backpacking in the summer and cross-country skiing in the winter. In reviewing your Preliminary Alternatives I am concerned because all of your alternatives would allow essentially unlimited use of the wilderness by outfitters and commercial grazing stock. This concerns me because I have seen major damage to trails and the landscape from stock just this past summer on a trip into the Blue Canyon area. The trails which we hike in and out on were very dusty and degraded by large numbers of stock animals making for very unpleasant travel.

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.

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.

I understand that for people who have disabilities, horses and commercial outfitters are the only way in which to visit the wilderness. However commercial use can be limited and still allow these people to access the area without destroying it for the rest of us. The creation of separate trails for stock use and foot travel would also help to alleviate the conflict.

Commercial 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. Manure catchers also would alleviate the impacts of outfitters horses.

The NPS also needs to reform its own stock program. Currently, animals that re-supply trail crews remain in the wilderness between trips, to graze and trample SEKI's sensitive areas. Your stock animals should be stabled outside the wilderness between supply trips.

Thank you for considering my comments.

Correspondence ID:	201	Project:	33225	Document:	49956
Outside Organization:	Unaffiliated Individual				
Received:	Nov,28,2012 00:00:00				
Correspondence Type:	Letter				
Correspondence:	Karen F. Taylor-Goodrich, Superintendent Sequoia and Kings Canyon National Parks Attn: Wilderness Stewardship Plan 47050 Generals Highway Three Rivers, CA 93271				

Dear Superintendent Taylor-Goodrich,

Our comments on the Preliminary Draft Alternatives for the Sequoia-Kings Canyon Wilderness follow. We ask that you consider these comments that provide protection for this spectacular wilderness and a better wild experience.

All of the wilderness should be provided the best protection possible. Therefore "zones" which allow heavier and damaging use are not a good management tool. I urge you to do away with consideration of zones as described in the draft. All wilderness deserves equal protection.

We believe it is totally inappropriate to allow stock on all trails. Some trails should be for hikers only. When we travel in wilderness, we certainly appreciate trail not impacted by stock use. Stock create dusty trails, manure, and flies abound. That does not provide a good wilderness experience for hikers. Trails for hikers only would be easier to build and maintain. This should be considered in this time of low government funding.

Stock animals should be allowed only on trails that are designated, designed, constructed and maintained to withstand the use of stock and not allowed off-trail. The preliminary draft alternatives fail to present any such alternative.

No stock animals should remain in the wilderness between trips, as they graze and trample SEKI's sensitive meadows, lakeshores, and wetlands. NPS stock animals and all stock should be stabled outside the wilderness between supply trips.

How about requiring manure catchers on all stock animals (see, for example, bunbag.com) to keep manure off trails and out of streams, lakes, and campsites? Fences do not belong in the wilderness. Please remove them.

Thank you for considering our comments.

FORM LETTERS

The following letters were marked by the database system as potential form letters due to a percentage of duplicate information contained within the letters.

Author Information

Organization Type:	I - Unaffiliated Individual
Status: Reviewed	Correspondence ID: 151, 186
Date Sent:	Date Received: 11/19/2012
Number of Signatures: 1	Form Letter: Yes (Master) Seven Matches
Contains Request(s): No	Type: Letter
Notes:	

Correspondence Text

Karen F. Taylor-Goodrich, Superintendent
Sequoia and Kings Canyon National Parks
Attn: Wilderness Stewardship Plan
47050 Generals Highway
Three Rivers, CA 93271

Dear Superintendent Taylor-Goodrich,

I am writing to comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan (WSP). Please consider these comments and include them in the record for your WSP.

I am very concerned about maintaining and preserving the wilderness character of the Sequoia and Kings Canyon National Parks (SEKI). When constructing your WSP consider the adverse impact stock has on the land ' commercial trips, horse travel, and grazing operations.

I have seen firsthand the negative effects of these practices, and it is with interest that I note that SEKI's 1971 Master Plan called for phasing out all grazing operations, something that other parks have done long ago.

Further, here are some suggestions that other groups have made that I will second: 1) require manure catchers on all stock animals to keep manure off trails and out of streams, lakes, and campsites; 2) prohibit bells on stock animals, which shatter the natural quiet, and disrupt the sleep of wilderness visitors; and 3) 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. Stock users should be responsible for their own animals, without the need for fences.

Thank you for considering my comments. Let's try for some fair and balanced policy making, without the past favoritism that has perhaps been shown to commercial pack and stock operations.

Author Information

Organization Type:	I - Unaffiliated Individual
Status: Reviewed	Correspondence ID: 165
Date Sent:	Date Received: 11/23/2012
Number of Signatures: 1	Form Letter: Yes (Master)
Contains Request(s): Yes	Type: E-mail
Notes:	

Correspondence Text

Sequoia and Kings Canyon National Parks Attn: Wilderness Stewardship Plan
47050 Generals Highway
Three Rivers, CA 93271

Dear Superintendent Taylor-Goodrich,

I am email you to officially comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan (WSP). These comments need to be considered and included in the record for your WSP.

I encourage you to improve the WSP to fully preserve and to work to restore wilderness character in SEKI and immediate access corridors in the surrounding National Forests. I seems clear to me that the proposed "zoning" scheme would allow degradation of certain "zones" by allowing unnecessarily large groups and inappropriate developments. Please abandon the zoning idea and provide full protection for ALL portions of SEKI's wilderness and access corridors.

As I have experienced the impacts of stock on my wilderness experience, I know 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 and eliminating stock in sections of the parks where hikers can enjoy a stock-free experience.

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.

Commercial stock use should be limited to those persons or groups who truly need it. Because of the keen competition for limited wilderness permits, and because numerous hikers are turned away due to trailhead quotas, it would be possible for many more people to visit SEKI's wilderness if the available spaces weren't taken up by so many unnecessary commercial pack trips with able-bodied persons ride horses and bring excessive numbers of stock animals loaded with unnecessary luxuries). Reducing unnecessary commercial stock services could both reduce ongoing harm to SEKI's wilderness and allow more people to enjoy a limited and rationed resource.

I oppose the idea of NPS using "trail classes" that were developed by the U.S. Forest Service. The USFS's trail classes allow stock animals on all trails, with no trail class that prohibits stock use. SEKI should consider and adopt a trail class for "foot travel only" trails, so that hikers may enjoy at least some trails without the dust, loose rocks, flies, and manure that pollute trails used by stock animals. Foot-travel-only trails would clearly not need to be constructed or maintained to the standards used by the USFS. This would save a lot of money in addition to providing a few places for hikers to enjoy a stock-free hiking experience. Also, alternate "foot travel only" trails paralleling existing stock capable trails should be added to the SEKI access corridors as these trails are some of the most over used by stock.

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.

The NPS needs to reform its own stock program. Currently, animals that re-supply trail crews remain in the wilderness between trips, to graze and trample SEKI's sensitive meadows, lakeshores, and wetlands. It should be the other way around: Your stock animals should be stabled outside the wilderness between supply trips.

In addition it seems to me that some additional issues need to be addressed:

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.

Prohibit bells on stock animals, which shatter the natural quiet, and disrupt the sleep of wilderness visitors. Stock woke me up last summer. Also, the wire fences installed throughout SEKI's wilderness for the convenience of stock users detract from the untrammelled 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.

Take steps to Keep Stock Out of Established Camp Sites Last September I did a short trip to scout a lower-stock-impacted route into northern Kings Canyon NP. I hiked from Florence Lake to a Thompson Lake just below 10,000' on an unmaintained trail. There was one decent camp site there with wet, fresh stock manure all around the fire pit rendering it unusable. Later the cows came roaming through the camp unfettered. I'll never go there again until the stock are removed.

Beyond Protection of Meadows and Streams, Restoration needs to be a priority
Anyone who has been in the NP backcountry, and seen pristine meadows like the one's I saw last summer, knows that the front country meadows are severely degraded. All these meadows should be restored to pristine states including restoring the biotic diversity of grasses, flowers, and small animals if possible. Allowing heavy stock into meadows certainly isn't supportive of this kind of restoration. Enforcement needs to be addressed

With NPS budget cuts and reduced ranger numbers, what good are regulations unless there is an enforcement plan. I found manure from several stock within feet of the trail and a 9,800' camp site up Goddard Canyon in northern Kings Canyon NP last summer, a significant reduction in the wilderness experience. I also found manure and deep tracks in meadows above 10,000' on a cross-country route to Martha Lake.

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.

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.

Human Porter Options should be investigated.

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.

Thank you for considering and including my comments in your WSP development process.

Please confirm receipt and addition of the comments to your planning process by emailing me at the email address below.

Author Information

Organization Type: I - Unaffiliated Individual
Status: Reviewed Correspondence ID: 170
Date Sent: Date Received: 11/19/2012
Number of Signatures: 1 Form Letter: Yes ([Master](#))
Contains Request(s): Yes Type: Letter
Notes:

Correspondence Text

Karen F. Taylor-Goodrich, Superintendent
Sequoia and Kings Canyon National Parks
Attn: Wilderness Stewardship Plan
47050 Generals Highway
Three Rivers, CA 93271

Dear Superintendent Taylor-Goodrich,

I am writing to comment on the Preliminary Draft Alternatives for your Wilderness Stewardship Plan (WSP). I request that these comments be considered and included in the record for your WSP.

I urge you to craft a WSP that fully preserves wilderness character. I am very concerned that the proposed "zoning" scheme would allow degradation of certain "zones" by allowing excessively large groups and inappropriate developments. Please abandon the zoning idea and provide full protection for ALL portions of SEKI's wilderness.

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.

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.

Commercial stock use should be limited to those persons or groups who truly need it. Because of the keen competition for limited wilderness permits, and because numerous hikers are turned away due to trailhead quotas, it would be possible for many more people to visit SEKI's wilderness if the available spaces weren't taken up by so many unnecessary commercial pack trips (i.e., where able-bodied persons ride horses and bring excessive numbers of stock animals loaded with unnecessary luxuries). Reducing unnecessary commercial stock services could both reduce ongoing harm to SEKI's wilderness and allow more people to enjoy a limited and rationed resource.

I oppose the idea of NPS using "trail classes" that were developed by the U.S. Forest Service. The USFS's trail classes allow stock animals on all trails, with no trail class that prohibits stock use. SEKI should consider and adopt a trail class for "foot travel only" trails, so that hikers may enjoy at least some trails without the dust, loose rocks, flies, and manure that pollute trails used by stock animals. Foottravel-only trails would clearly not need to be constructed or maintained to the standards used by the USFS. This would save a lot of money in addition to providing a few places for hikers to enjoy a stock-free hiking experience.

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The NPS needs to reform its own stock program. Currently, animals that re-supply trail crews remain in the

wilderness between trips, to graze and trample SEKI's sensitive meadows, lakeshores, and wetlands. It should be the other way around: Your stock animals should be stabled outside the wilderness between supply trips.

Please also: 1) require manure catchers on all stock animals (see, for example, bunbag.com) to keep manure off trails and out of streams, lakes, and campsites; 2) prohibit bells on stock animals, which shatter the natural quiet, and disrupt the sleep of wilderness visitors; and 3) remove all fences from SEKI's wilderness. The wire fences installed throughout SEKI's wilderness for the convenience of stock users detract from the untrammelled scenery and are a hassle for visitors to cross. Stock users should be responsible for their own animals, without the need for fences.

Thank you for considering my comments.

Author Information

Organization Type:	I - Unaffiliated Individual
Status: Reviewed	Correspondence ID: 173
Date Sent: 11/20/2012	Date Received: 11/20/2012
Number of Signatures: 1	Form Letter: Yes (Master)
Contains Request(s): Yes	Type: E-mail

Notes:

Correspondence Text

Karen Taylor-Goodrich, Superintendent
Sequoia & Kings Canyon National Parks
Attn: Wilderness Stewardship Plan
47050 Generals Highway
Three Rivers, CA 93271

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Thank you for considering my comments.

Author Information

Organization Type:	I - Unaffiliated Individual
Status: Reviewed	Correspondence ID: 174, 179
Date Sent:	Date Received: 11/20/2012
Number of Signatures: 1	Form Letter: Yes (Master)
Contains Request(s): Yes	Type: Letter
Notes:	

Correspondence Text

Karen F. Taylor-Goodrich, Superintendent
Sequoia and Kings Canyon National Parks
Attn: Wilderness Stewardship Plan
47050 Generals Highway
Three Rivers, CA 93271

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Thank you for considering my comments.

Author Information

Organization Type:	I - Unaffiliated Individual
Status: Reviewed	Correspondence ID: 176
Date Sent: 11/20/2012	Date Received: 11/20/2012
Number of Signatures: 1	Form Letter: Yes (Master)
Contains Request(s): Yes	Type: Letter
Notes:	

Correspondence Text

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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.

On a trip this summer around Rae lakes loop, a dozen horses ran through our camp at mid-night. They had broken out of their drift fence in Castle domes and were running out to the trailhead. This is not my idea of wilderness!

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.

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Author Information

Organization Type:	I - Unaffiliated Individual
Status: Reviewed	Correspondence ID: 180, 181
Date Sent: 11/21/2012	Date Received: 11/21/2012
Number of Signatures: 1	Form Letter: Yes (Master)
Contains Request(s): Yes	Type: E-mail
Notes:	

Correspondence Text

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Thank you for considering my comments.

Author Information

Organization Type:	I - Unaffiliated Individual
Status: Reviewed	Park Correspondence ID: 182
Date Sent: 11/21/2012	Date Received: 11/21/2012
Number of Signatures: 1	Form Letter: Yes (Master) (one match)
Contains Request(s): Yes	Type: E-mail
Notes:	

Correspondence Text

November 19, 2012

Dear Superintendent Taylor-Goodrich:

I am writing to comment on the Preliminary Alternatives for SEKI's Wilderness Stewardship Plan (WSP). I have hiked the Sequoia and Kings Canyon National Parks backcountry for nearly 40 years. My first Sierra backpacking trip was a 3-day trip up the Silliman Creek drainage as a 13-year old Boy Scout. I still vividly recall climbing Mt. Silliman, catching my first glimpse of the Great Western Divide and higher peaks to the east, and realizing that there was an incredible world of wilderness in front of me that would take a lifetime to fully explore. To put it mildly, I was hooked.

I've done my best to fulfill the dream of covering every inch of the Sierra wilderness, walking more than a thousand miles in SEKI alone, and visiting the most remote and beautiful portions of these parks, from the sublime meadows of the Chagoopa Plateau and Evolution Valley, to the rugged and awe inspiring Enchanted Gorge. I have seen hundreds of bright, sunny days, with aspen trees flickering in the wind and columbines dancing along the streambanks. I've spent countless nights where the Milky Way seemed to flow through the sky like a river, and I have slept on the edge of a precipice watching the moon rise over the Sierra crest in full eclipse. I have lain in the middle of the night hunkered in a bivy sack while being pounded by hailstones, and waded knee deep through icy waters for a half mile through Funston Meadow one June day when it was flooded by snowmelt from the surrounding peaks. I have stood atop the saddle between Wanda and Davis lakes on a day so completely still that my ears rang from the silence and our voices seemed swallowed up by the stillness. I have awoken after a freak early September storm under a blanket of nearly two feet of snow in the Ionian Basin and made a mad dash to the top of Mt Goddard to witness the entire Sierra high country, from the Minarets to the Kaweahs, dressed completely in its white winter robes. These mountains are where my spirit--and the spirit of thousands of other visitors'is renewed each year, and preserving this incredible wilderness environment is of enormous importance to me.

Over the decades, I have witnessed many changes in wilderness management practices, both positive and negative. Consequently, I looked forward to the release of the draft WSP alternatives, hoping to see some signs that the Park Service would truly embrace the intent of the Wilderness Act and provide a framework for honestly examining the practices and policies that have guided management of these parks for the past several decades. For although there is still a great deal of beauty in the backcountry of these parks, there have been disturbing trends both in the direction management has taken and the failure of the Park Service to seriously address the most serious issues threatening the parks, such as the excessive use of recreational and administrative packstock in SEKI wilderness.

Sadly, after reviewing the draft alternative summary, I am left with a deep feeling of disappointment. With all due respect, the draft alternatives and other supplementary materials are bland, sterile, and visionless. 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. I do not mean to be disrespectful, but it is as if the process of drafting these alternatives was outsourced to a bunch of guys in India (or perhaps Denver is more accurate?) who have nothing but a set of maps and the existing set of park rules in front of them. Thus armed, they have succeeded in developing a framework that, while it may seem IDical to them on paper, is entirely impractical. I truly have to wonder if any of the authors actually have spent any significant time in SEKI's backcountry. Below are some specific aspects of the draft WSP alternatives that I find particularly troubling.

(1) 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.

(2) The proposed zoning scheme is deeply flawed and should be greatly simplified or abandoned altogether. The scheme creates an unnecessarily complicated management framework that directly violates the spirit and intent of the Wilderness Act.

The fundamental premise presented in the draft is that wilderness will be divided into management zones that represent different levels of resource protection. The very definition of Wilderness provided in the Wilderness Act defines wilderness as "an areas where the earth and its community of life are untrammelled by man... retaining its primeval character and influence... protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation... (4) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition, and (4) may also contain ecoIDical, geoIDical, and other features of scientific, educational, scenic, or historical value. These high standards apply to all parts of the wilderness, not just a subset of "management zones" within wilderness.

The draft WSP purports to meet these high standards stating in the section on "General Zones," that "zoning would not result in managing the wilderness resources below those standards, but higher standards could be applied." But in the very next breath, it states that, for example, Zone B is going to have "high use corridors, and developed administrative areas such as ranger stations and food storage lockers." Food storage lockers (or composting toilets such as have been built along Bubbs Creek), are not consistent with a wilderness where the "imprint of man's work is substantially unnoticeable." Do you really think the authors of the Wilderness Act imagined backcountry toilets as part of the Wilderness Experience?

In essence, the zoning prescribes managing some areas of wilderness (primarily zones A and B) as sacrifice areas where the impacts of humans will be severe and a far cry from the substantially unnoticeable requirement of the Wilderness Act.

The parks would be far better served with a very simple two-tier management structure: areas without trails, and areas with trails. The guiding principles for alternative development should be as follows. In trail-less areas, a person should be able to experience wilderness in much the same condition as the earliest visitors to these parks, with no signs, no human structures, no bear boxes, no fire rings, no horses, and no crowds of people. In trail corridors, the trail itself should be the only permanent human fixture, other than a few essential signs (only at trail junctions) and structures (e.g., existing bridges) that are critical for visitor safety. There should be no toilets, no bear boxes, no drift fences for stock, or any of the other intrusions that the Park Service has allowed to proliferate in the wilderness in recent decades.

(3) The Draft Alternatives continue to ignore the fundamental truth regarding the relative impacts caused by hikers compared with stock users. There is overwhelming scientific evidence that the impacts of recreational livestock on

trails, meadows, campsites, water quality, and wildlife are orders of magnitude greater than those caused by people traveling on foot. Seemingly oblivious to this fact, 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. Moreover, it would be a completely unenforceable regulation, unless you wish to have your backcountry rangers conducting Gestapo-style searches for our "waste kits."

The mere suggestion of this as a possible policy is rendered even more ridiculous by the fact that the draft alternatives completely ignore the fact that every horse and mule out on the trail deposits roughly 30 lbs of fecal waste each and every day and does so indiscriminately. Whereas people at least have the ability to bury their wastes far from water sources, horse and mules make a regular habit of urinating and defecating near water sources. Not long ago, while I was hiking up the Copper Creek trail out of Cedar Grove, I stopped at a tributary crossing to pump some water. While I sat there, a pack train of 7-8 horses and mules arrived at the crossing. The packer stopped, allowing each of the animals, in turn, to drink from the creek. Four or five of these animals proceeded to urinate directly into the stream while they drank. Several others that remained on the bank each proceeded to crap directly on the trail, just a few feet from the water. (Needless to say, I looked at my canteen of freshly pumped water with a considerable amount of suspicion!) If the Park Service is so concerned about contamination of water by animal wastes, why does it focus all of its energy on humans when they are trivial contributors relative to stock?

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 (i.e., bear boxes; see comment 6 below) that are creating the human waste problems by concentrating use. Any other schemes should be stricken from all alternatives.

(4) The draft WSP fails to consider a reasonable range of alternatives regarding recreational stock use. The draft WSP starts with the assumption that stock use is "a primitive type of recreation appropriate to fulfill the recreational purposes of the Wilderness Act." Yet there is nothing in the Wilderness Act that says this is true. Horses and mules are not native to the Sierra Nevada and they should be treated as the alien intruders that they are. The Park Service has no problem prohibiting dogs in the backcountry, and has even gone so far as to suggest poisoning high mountain lakes to rid them of nonnative fishes. Why the double standard with stock? They are nonnative animals that cause substantial harm to meadows and vegetation; they pollute the water with bacteria and other harmful pathogens; they disturb the behavior and habitat of natural wildlife such as bighorn sheep; and they necessitate nonconforming structures such as drift fences, not to mention that they greatly impair the enjoyment of the vast majority of wilderness users who travel on foot. Consequently, it is entirely reasonable to evaluate alternatives that prohibit all stock use in the SEKI backcountry. 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.

(5) The draft WSP alternatives fails to address the significant impacts of administrative stock use on the SEKI backcountry. Twice in the last five years I have observed egregious examples where administrative stock use has thoroughly trashed the backcountry environment. In 2009, I did a late season hike from South Lake over Bishop Pass and down to Tehipite Valley. This was a trip that I had wanted to do for many years, in part because I had been told that the region from Simpson Meadow to Tehipite was quite pristine and received very little use. When we arrived at Simpson Meadow --- after hiking 24 miles -- we were shocked to find that Simpson Meadow was completely thrashed. The meadow had been mowed by stock to short stubble. Manure piles were everywhere, even along the river's edge where we went looking for a place to pump water. Deep hoofprints pock-marked the damp portions of the meadow. And the IDical campsite, beneath a pair of majestic cottonwood trees, was so pulverized, dusty, and rank with horse crap, that we simply could not stand to be there. We were so distressed by the scene, we

hiked another mile in the failing daylight just to distance ourselves from this tragic scene. I later learned from a ranger that an NPS trailcrew had spent much of the summer staging at Simpson Meadow and that the stock had been "pastured" there for the entire time. It was shocking to learn that the Park Service would allow such rampant damage to occur under their watch. I witnessed an equally depressing scene in the upper Kern Canyon in summer of 2008. Clearly, the Park Service is abusing its discretion when it allows its horses and mules to graze all summer long, despite the fact that they are only needed for a small fraction of the total trail work. All WSP alternatives should specify that use of administrative stock will be limited to the absolute minimum extent necessary to perform essential functions. Those essential functions should be clearly defined. If administrative stock are not being used for such functions, they should be removed from the wilderness and pastured in the frontcountry. It is unconscionable to treat the most remote and beautiful meadows of SEKI as nothing more than pastures simply because it is convenient.

(6) 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. It is deeply puzzling to me that this possibility seems to have escaped the notice of the authors of the draft alternatives. Clearly, if any of the authors are backpackers, they are of the "weekend variety."

It is disconcerting is that there is not a single alternative that actually proposes the most common sense solution. That is, all overnight backcountry users should be required to carry a bear canister (no matter where they are in the backcountry), and any food or toiletries that do not fit into the canister must be stored using counter-balance methods. Period. By proposing zone-specific rules, you are making this way more complicated than it needs to be.

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.

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). So much for the "excellent opportunities for solitude" promised by the Wilderness Act. Even worse, the concentration of human use results in concentration of human wastes to the point that virtually every rock in the vicinity of these storage lockers has a pile human feces under it. Regrettably, the Park Service's response has been to compound its self-created problem by adding yet another intrusion to the wilderness: backcountry toilets! These abominations further degrade the wilderness environment and the experience of visitors. Get rid of the storage lockers, and visitors will distribute themselves in space.

(7) The preliminary stock group size limits for certain alternatives are ridiculously high and should be dropped from consideration. Given that the NPS has for more than two decades restricted use through trailhead quotas throughout the parks, it is unconscionable to even consider group size limits greater than the current limits of 15 people and 20 head of stock (which are already excessive). Group size limits should go nowhere but down.

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 IDic 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.

Finally, under no circumstances should any of the alternatives allow for cross-country travel by recreational livestock. Again, horses and mules are alien species in the Sierra that cause great damage to the environment. It takes but a handful of stock animals passing through an area to create a trail of use that is slow to heal. If stock are allowed at all, they should be restricted to hardened trails constructed to handle such uses.

(8) Grazing by stock should be prohibited in more than one alternative. I am deeply frustrated by the fact that the Park Service takes such a casual approach to the issue of recreational livestock grazing in SEKI, offering only a single alternative that would prohibit grazing in the backcountry. Many National Parks in the mountainous West have banned all livestock grazing, while still allowing some recreational use by packstock. It is time for SEKI to move into the 21st century with the rest of these parks. Grazing of alien animals has no place in these precious national park wilderness areas'areas that should be afforded the greatest protection of any land designation in the country. It is the height of hypocrisy that the Park Service admonishes visitors not to pick even a single wildflower and yet will allow a herd of 20 horses and mules to rampage freely through a meadow, grazing and trampling all vegetation in its path. It is time to end this damaging practice once and for all.

(9) Stock should be prohibited from all non-core trails in the parks. The proposed zoning and trail class scheme does not afford appropriate protection to areas where trails of use exist but have never been constructed or maintained to stock standards. Examples of this are the trails of use that lead into the Wright Lakes, Wallace Lakes, and Milestone basins. In these areas (and others), stock should be allowed no more than Y. mile from primary trail (i.e. John Muir Trail in the case of Wright and Wallace lakes, and the Kern River trail for Milestone Basin). Any stock user that is capable of riding in to these destinations can easily dayhike from the main trail into these basins if they so desire.

(10) 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. The draft WSP seeks to rationalize that stock use is somehow necessary to "fulfill the recreational purpose of wilderness within Sequoia and Kings Canyon National Parks." Yet if numerical limits are already being placed on general public (both hikers and stock users) in order to protect the wilderness environment and the wilderness experience, then that "recreational purpose" has already been filled to capacity. It is entirely ilIDical to continue to allow commercial stock services---which cause disproportionate damage to backcountry resources--to continue when the general public is being turned away.

In summary, I strongly urge you to take a step back and simplify your approach. The current draft alternatives are far too complicated as they stand, and none of them would serve the wilderness or the interests of the vast majority of wilderness users--those who travel on foot---very well. Most importantly, please put someone on this planning team that understands what wilderness means to the using public, and that can provide a vision of the future that is something other than repeating (and rationalizing) the mistakes of the past. Somewhere, John Muir must surely be spinning in his grave.

Thank you for considering my views.