



August 30, 2011

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

Dear Superintendent Taylor-Goodrich:

Wilderness Watch is providing these scoping comments for consideration in developing the Sequoia-Kings Canyon (SEKI) Wilderness Stewardship Plan.

The SEKI Wilderness is one of the jewels in the National Wilderness Preservation System. We urge you to use this planning process to also make SEKI one of the jewels of wilderness stewardship. Below are what we view to be several key issues that should be addressed in the plan.

Motorized and mechanized use for administrative use

As you know, the Wilderness Act prohibits the use of motor vehicles, motorized equipment and aircraft except in those rare instances where such use is necessary to meet the minimum requirement for protecting the Wilderness. Put another way, the job of Wilderness protection could not be met but for the use of these motorized tools. Setting places aside where *growing mechanization* does not reach was one of the fundamental goals enumerated in the Wilderness Act.

Sadly, the use of helicopters, chainsaws and other motorized tools has become commonplace in SEKI Wilderness. Apparently, managers have deemed their use to be cheaper, more convenient, more familiar, or otherwise preferable to adhering to higher ideals (and legal requirements) of the Wilderness Act. Using helicopters to supply a trail crew or a wilderness ranger with food and other supplies are almost never necessary, and would be unheard of even in other large remote areas of the NWPS. Pack stock or backpack support is more than adequate and is indeed how such tasks are performed in Wildernesses throughout the System. Further, the use of helicopters to shuttle administrators or their supplies to and from Wilderness, to assist researchers or wildlife managers who should know how and be required to travel and work in Wilderness without such aid, or ferry fire monitors who can and should walk out of the mountains, is unnecessary and likely unlawful. Even if stock use or foot traffic squishes more plants than a helicopter might, those uses are compatible with Wilderness whereas motor vehicle use is anathema to it.

It is our understanding that SEKI has a helicopter assigned to it full time for administrative tasks. This is remarkable for a Park where 96 percent of the land base is administered as Wilderness, where aircraft is banned. Perhaps it's no wonder that SEKI wilderness managers have become reliant on aircraft use. But is also self-evident that the need for significant and fundamental change is in order.

We urge you to use this planning process to rethink and revise how Wilderness stewardship is engaged at SEKI and to set it on the path toward total elimination of aircraft use except in emergencies and other rare instances where access is essential and non-motorized means isn't feasible. If a project requires motorized access, in all likelihood the project itself is incompatible with Wilderness preservation.

It is long past time to take the chainsaws away from trail crews and rangers. Like aircraft, chainsaws represent the *growing mechanization* the Wilderness law sought to hold at bay. The wilderness stewardship plan should assess the current trail system, maintenance standards, trail crew operating procedures and other factors that have caused the Park to rely upon motorized use for routine administration, and revise those standards, practices and procedures so that the SEKI Wilderness can be protected and administered in accordance with both the spirit and letter of the Wilderness Act and the ideals it espouses.

Wildlife management represents another area where motorized incursions have become routine. Studying wildlife without the need to capture, handle, control, and collar them is not only safer and more humane for the animals, it adheres to the ideal of an untrammelled Wilderness, using the "minimum tool," and avoiding the use of motor vehicles and motorized equipment. The wilderness stewardship plan should establish standards and procedures that ensure wildlife managers and researchers are trained to work in wilderness conditions and to conduct their activities without motorized equipment. Non-invasive research techniques should be the norm. The SEKI Wilderness plan should be a leader in promoting and perfecting these non-invasive techniques.

Structures and installations for administrative or visitor use

As with motor vehicle use, the Wilderness Act prohibits all structures and installations unless they are necessary to meet the minimum requirement to protect Wilderness. The wilderness stewardship plan should address each structure (bridge or other trail structure, ranger cabin, food locker, sign, fence, campfire ring, etc.) to determine that it is both the minimum requirement and necessary for wilderness protection, and not for reasons such as administrative or visitor convenience.

Food lockers are an example of structures that are no longer necessary. Portable bear-proof canisters are now available for visitor use. They not only eliminate the need for permanent food locker structures, they enhance the self-reliance component of a wilderness experience for visitors. Moreover, food lockers tend to congregate use causing biophysical impacts and loss of solitude in the areas where lockers have been placed. The wilderness stewardship plan presents an excellent opportunity to reduce the administrative footprint in the Wilderness by requiring the removal of food lockers.

The plan should also consider closing the Bearpaw High Sierra Camp, and restoring the site to natural conditions. The Camp is not necessary for visitors to experience and recreate in wilderness. It merely exists for the commercial benefit of the camp operator and the comfort and convenience of their clients. The “pampering” the Camp advertises is not necessary for a wilderness experience, nor is the presence of a permanent resort-like camp compatible with the Wilderness setting. It is a relic of early 20th Century management no longer compatible with the area’s current status and future as Wilderness.

The wilderness stewardship plan should prohibit the placement of fixed anchors or other structures or installations for climbing unless they are administratively placed for resource protection. This is keeping with NPS policies state that wilderness visitors must accept wilderness on its own terms, and with the Wilderness Act’s prohibition on installations and structures. Just as other visitors such as hikers and stock users are prevented from creating their own trails, installing structures to convenience their use, or permanently altering the Wilderness resource, climbers must also abide by these fundamental rules.

Commercial services

We are pleased the plan will include a determination of the extent to which commercial services are necessary to realize the benefits of Wilderness. We feel that in the past *commercial demand* has driven decision-making with regard to the types and amount of services provided in Wilderness. The determination of what is necessary should include the following considerations:

- a. Professional commercial operators should be experts in minimum-impact camping and traveling techniques. Their camps and practices must exemplify minimum-impact use. They should be a model for other wilderness visitors to follow, nor an exception that would lead to wilderness denigration if other users mimic their practices.
- b. Commercial operators and their clients must be required to abide by the same rules that apply to other users. If campfires are prohibited in an area, there should be no exceptions for commercial users. Where quotas or other limits are in place, commercial clients should have to compete for permits via a single system that gives all users an equal opportunity to gain access. No one should be able to buy access if it means other citizens are excluded.
- c. There is almost no single action that will minimize impacts from visitor use as much as limiting the number of stock. As noted elsewhere, using stock is an appropriate and compatible wilderness use. But the impact of stock can’t be denied. Studies by David Cole at the Aldo Leopold Research Institute and others have shown stock impacts to be from 20 to 50 times greater than hiker impacts. Such studies usually don’t include the added impacts from spreading weeds or causing water pollution, or impacts to the experience of other users from manure, flies and urine along the trail.

- d. The easiest way to limit these negative impacts without limiting the ability of visitors to enjoy Wilderness on horseback is to limit group size and the number of stock used for packing. There is no reason that one pack animal can't haul all the gear needed for three or four people. Many so-called "luxury" items might make camping more enjoyable for some visitors, but they aren't *necessary* to enjoy a wilderness experience and they come with a cost (impacts) to Wilderness. Resupply trips should also be prohibited unless a group is on an extended outing of two weeks or more.
- e. The commercial services' analysis needs to take an equally hard look at non-stock supported commercial use. Here again, a marketing-driven demand is not the same as the limitations imposed by the *extent necessary* criteria in the Wilderness Act.

Stock use

As noted above, stock are an appropriate use of Wilderness, but require special consideration because of their impacts on wilderness character and the experience of other visitors. The plan should include measures that will prevent the introduction or spread of non-native plants. The measures should require animals be quarantined for an effective period of time before entering Wilderness, require palletized weed seed free feed, and prohibit camping with or grazing stock in areas where weeds are present. Stock use that damages native vegetation, creating sites where weeds can be established, should also be prohibited.

"Cowbells" placed on stock should be prohibited. There are many ways to keep track of animals without shattering the silence for other wilderness visitors. Cowbells broadcast ones presence for great distance—they are totally inappropriate in a place like the SEKI Wilderness.

Numerous studies in Wilderness in the High Sierra have shown that stock are degrading water quality. The wilderness stewardship plan should include measures that will protect water quality and prevent human-caused degradation.

Group size (all users)

The draft plan should present and analyze various group size limits. A limit of 12 people is common, while research shows smaller groups have much less impact on the land and on other users. The plan should assess the impacts for a group size limit of six, eight, and twelve.

Research suggests stock limits should be set at 8 or fewer animals to avoid unnecessary and unacceptable damage. This would accommodate a party of six people and two pack animals, enough to haul all of the groups' gear. If a stock supported group is larger than 6 people, some could walk or the group could take turns riding and walking. We believe it would still be necessary to limit the overall size to a "heartbeat" limit of 16 to lessen the impact of the group on biophysical resources and other visitors (10 people with six horses is in almost all cases a larger impact than 12 people). The draft plan should present and analyze various group size limits ranging from 8 to 12 stock. This would provide an

informative analysis to determine the impacts of such limits on the Wilderness and the vast majority of visitors.

Stewarding an Untrammeled Wilderness

Wilderness Act author, Howard Zahniser, historians and other noted Wilderness scholars have noted that the fundamental characteristic that sets the American concept of Wilderness apart is the emphasis on preserving an “untrammeled” or wild nature. As one of the largest Wildernesses in the Lower 48, and as part of the second largest contiguous block of Wilderness land, the SEKI Wilderness presents an extraordinary opportunity to manage an untrammeled Wilderness. There have been and currently are proposed a number of activities in SEKI that significantly compromise an untrammeled Wilderness including significant fire suppression and manager-ignited fire programs, a plan to poison 80 lakes and streams and most of their life-forms to remove fish the agency previously stocked, spraying herbicides to control unwanted plant species, and so forth. The wilderness stewardship plan should redirect SEKI’s wilderness management scheme toward one of restraint, where natural processes dictate the evolutionary path the SEKI Wilderness will follow. Where actions are taken that attempt to undo a human-caused impact, such as removing non-native plants or animals, mechanical measures that remove only the unwanted species should be employed rather than poisons that disrupt the entire ecosystem.

Zoning

The wilderness stewardship plan must not “zone” areas to create watered-down Wilderness that allows impairment of wilderness character or allows activities otherwise inconsistent with preserving Wilderness. We recognize there are different conditions within any given Wilderness and that managers might and often should choose to put in place practices to protect the most pristine areas in their wildest condition. But in no case should areas be “zoned” to allow conditions within any area to degrade. Congress “zoned” SEKI when it designated part of the area as Wilderness and part of it as non-wilderness. Everything that is Wilderness needs to be managed in accordance with the high standards of the Wilderness Act. It might be that because the vast majority of SEKI is designated Wilderness some uses or actions (visitor or administrative) incompatible with Wilderness cannot be provided in this national park. So be it. Those opportunities will exist elsewhere on the public domain.

Climate change

One of the scientific benefits of Wilderness is as a “control” to study how nature responds to dynamic natural processes without direct human interference. In an age of climate change, the value of Wilderness to provide a baseline to compare areas that are largely wild to those with active management will be greater than ever. The stewardship plan should incorporate a rigorous monitoring program and a non-interventionist stewardship approach to study how conditions within the SEKI Wilderness respond to a changing climate.

Thank you for considering our comments as you develop the draft wilderness stewardship plan. Wilderness Watch looks forward to being involved in the planning process and to reviewing the draft plan.

Sincerely,

George Nickas
Executive Director