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August 4, 2010

Superintendent
Yosemite National Park
Attn: Half Dome Trail Stewardship Plan
PO Box 577
Yosemite, CA 95389

Dear Superintendent:

Wilderness Watch is providing these comments for the scoping phase of the **Half Dome cable system** environmental analysis.

Wilderness Watch appreciates the National Park Service's decision to address the issues created by the cable system including the incompatibility of the cable system structure and its maintenance within a designated Wilderness, crowding and the lack of outstanding opportunities for solitude along the entire hiking route, and biophysical resource degradation along the route.

The Wilderness Act prohibits structures and installations within Wilderness unless such structures are necessary to meet minimum requirements to preserve the area as wilderness. The Half Dome cable system is not necessary to preserve the area as Wilderness. Indeed, the existence of the cable system is causing substantial damage to the area's wilderness character, including its natural conditions, undeveloped condition, and its outstanding opportunities for solitude. Because the cable system conflicts with the prohibition on structures and installations, we urge the NPS to include in the EA, and to ultimately adopt in the decision, an alternative that removes the cable system from the Wilderness. The removal should be accomplished using non-motorized and non-mechanized tools and transport.

Removing the cables alone may not be enough to resolve other resource and solitude concerns. Therefore, we also urge the NPS to determine the appropriate level of use that will preserve the area's wilderness character, including outstanding opportunities for solitude. The baseline for making this determination might be the level of use that was occurring when Congress designated the Yosemite Wilderness, since that's the date upon which the legal mandate to preserve the area's wilderness character became paramount for this area. It may be, however, that that amount of use was too high and that lower levels need to be set to protect biophysical resources or visitor experience values.

We recognize that the cable system has been in place for many years, long before the Yosemite Wilderness was designated. But like many traditional activities or uses, the system is no longer compatible with broader public goals

for the area. As a federal judge found in overturning a plan to replace historical trailside shelters in the Olympic Wilderness:

“Once the Olympic Wilderness was designated, a different perspective on the land is required. Regarding the Olympic Wilderness, that perspective means ‘land retaining its primitive character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions.’”
Olympic Park Associates v. Mainella. 2005

That “different perspective” is also reflected in Park Service policy, where visitors are encouraged to accept Wilderness on it’s own unique terms, without artificial aids or assistance.

In summary, Wilderness Watch urges NPS to include and adopt an alternative that removes the cables and establishes visitor use limits at a level that preserves the area’s wilderness character, including its experiential and biophysical values. We also urge NPS to use this opportunity to educate visitors about why the cable system conflicts with wilderness policy and values, and the need for both visitors and managers to practice restraint in order to preserve an enduring resource of Wilderness.

Thank you for the opportunity to provide these scoping comments on the Half Dome cables plan. We look forward to continued involvement in this process.

Sincerely,

George Nickas
Executive Director