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February 4, 2010

Superintendent
Attn: Merced River Plan
P.O. Box 577
Yosemite, CA 95389

Dear Superintendent,

Wilderness Watch is providing these scoping comments on Yosemite's **Merced River Plan**. We're pleased that the NPS is moving forward with a new plan for this remarkable area. We sincerely hope that this effort will result in a plan that is worthy of the Park's extraordinary natural and scenic values, and that will protect and restore those values that have been lost from what may have seemed at the time to be appropriate developments and activities, but are now recognized as detracting from and harmful to Yosemite's wilderness and natural values.

Wilderness Watch is particularly concerned with those aspects of the plan that involve the *wild* segments of the Merced River and the Yosemite Wilderness. We recognize, however, that activities originating within the more developed areas of the Park can and do affect these areas. The plan needs to address the impacts on the Wilderness from these other activities.

Wilderness Watch believes the plan needs to give serious consideration to removing the High Sierra Camps and restoring the sites. The camps are incompatible with the Yosemite Wilderness. They significantly detract from the natural setting. The number of people, noise and structures coupled with the overly commercialized provision of goods and services exceed any reasonable interpretation of a wilderness setting. The amount of sewage, trash and other pollutants produced from such concentrated use impairs the area's natural conditions. The amount of pack stock needed to maintain the camps pulverizes the trails into dust and manure, and the use of helicopters to service the camps violates the Park Service's responsibility to preserve the wilderness character of the surrounding area.

The camps may have had their time and place, but like many other "historic" practices in the parks (bear feeding at garbage dumps, zoos, the "firefall" at Yosemite, etc.) it is time to implement a more enlightened ethic in the backcountry and Wilderness of Yosemite.

When establishing the Yosemite Wilderness, Congress recognized the incompatibility of these camps with the surrounding Wilderness. It recognized a number of resource concerns with the camps and delineated a process by which they could be removed and the areas designated as wilderness. The time has come to bring this direction to fruition. Should NPS decide to allow camps to remain at any of these locations, the camps should conform with all wilderness rules and policies including group size limits, leave-no-trace practices, temporary structures only, and no motorized (helicopter) use. The services provided should be consistent with a wilderness camp, not a frontcountry, or resort experience.

The camps are also incompatible with direction in the Wild and Scenic Rivers Act. A *wild river area* is defined as having “watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.” Webster’s defines *primitive* as “original, primeval.” These camps are neither primitive nor nonpolluting. Instead, they hearken to the expanding settlement and growing mechanization to which wilderness and wild rivers serve as an antidote.

Stock use is an appropriate use of the Yosemite Wilderness and the Merced River corridor. The use must be controlled, however, in a manner that preserves the wilderness character of the area and the experience of other wilderness visitors. NPS has long recognized the need to limit visitor use to protect that character. Stock are a wilderness-compatible means for allowing visitors to enjoy the wilderness, yet, all other things (ethics) being equal, each stock user has a disproportionately greater impact on the resource. That additional impact must be limited to only what is essential to enjoy a stock-supported trip. Group size should be limited to no more than 12 “heartbeats,” with a limit of no more than one packhorse or mule to three persons. This is more than adequate to haul necessary supplies, while at the same time keeping the impacts per visitor to a minimum. Given the additional impact that stock animals have on trails, water quality and campsites, it simply makes no sense and is unfair to other visitors to allow any individual to utilize more stock than is necessary. To prevent the introduction or spread of weeds stock should be must be sufficiently quarantined before entering the park and only pellitized, weed-seed-free feed should be allowed in the park.

Because the Park Service has already limited visitor use in many of these areas, and may have to further limit it to protect the river and surrounding area, we urge you to phase out all commercial developments in and near the Merced River corridor, and to phase-out commercial services in the wilderness. They are no longer necessary for the public to enjoy the area to the limit of the area’s capacity.

Thank you for this opportunity to provide comments. We look forward to continued involvement in the planning process.

Sincerely,

George Nickas
Executive Director