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Superintendent
Yosemite National Park
Attn: Wilderness Stewardship Plan
P.O. Box 577
Yosemite, CA 95389

Dear Superintendent:

These are Wilderness Watch's comments on the second round of scoping for the update of the Yosemite Wilderness Stewardship Plan, the Preliminary Ideas and Concepts. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper administration of the National Wilderness Preservation System. We also refer you to our earlier scoping comments. These comments address the issues presented in the Preliminary Ideas and Concepts brochure as well as other issues.

Introduction

The Preliminary Ideas and Concepts brochure suggests that the key issues of the Wilderness Stewardship Plan are: 1) visitor use and capacity, 2) stock use, 3) trail management and 4) commercial services. It specifically asks for input on the first two. While these are all crucial, other issues--including those identified in the brochure--facilities in Wilderness, facilities in potential wilderness additions, and other infrastructure and activities—are of equal importance.

Even though stock use could be considered a subset of visitor use and capacity (except for administrative use), we address it separately. There are issues unique to each category and the National Park Service (NPS) has split them into separate categories.

We strongly urge the NPS to complete an environmental impact statement (EIS) for the new iteration of the wilderness plan. The current plan is admittedly failing, according to the NPS's own documents. The two main problems appear to be the plan is outdated and deficient in many aspects and the plan has not been implemented by the NPS. A full EIS would more completely analyze alternatives, which are sorely needed to current management.

Visitor Use and Capacity

The various concepts have some good ideas, but two overriding issues need to be addressed, regardless of what concept is followed. The first is carrying capacity and the second is groups size limits.

Carrying capacity has apparently been exceeded. The NPS information clearly shows increasing use of the Yosemite Wilderness. Ironically, the NPS has been actively advertising for more visitors without taking into account, if that advertising is indeed effective, the impacts of that action. This year has seen a lot of agency and corporate sponsorship of national park visitation campaigns, all done under an assumption that outdoor recreation is in decline. While this may serve a corporate agenda, it may not serve the best interests of the Yosemite Wilderness or the public.

When determining carrying capacity, impacts to the biophysical resource—including impacts to wildlife and vegetation from visitation—and impacts on social expectation—solitude and primitive and unconfined recreation—must be considered. There is considerable research that suggests current quotas in the Yosemite Wilderness are well in excess of any notions of carrying capacity or maintaining wilderness character.

The NPS apparently doesn't intend to revisit group-size limits. That is a big mistake as there is research demonstrating the limits are currently too high. Further, the measure of group size—number of stock and number of people—ought to be reconsidered. Ideas such as beating hearts or number of legs might be better measures. These are discussed in more detail in the stock use portion of the comment. Regardless, research shows group size limits of no more than 10 people on trails and no more than four to six off-trail are the maximum. Research should inform the alternatives.

The NPS materials recognize any analysis of visitor use and capacity needs to consider visitors who originate outside of Yosemite National Park. This would require a better way to deal with through hikers whose numbers have skyrocketed.

Alternatives should be considered to deal with heavily used camping sites. For example, rather than assigned or designated campsites at popular areas, perhaps those areas should be closed to camping, at least until those places recover. The zoning concepts offered by the NPS might be workable options.

Party size limits should also be applied to day use. The current number, 35 is well beyond anything reasonable.

Stock Use

According to both the NPS materials and research, stock use has an inordinate damaging impact on the Yosemite Wilderness. Commercial outfitters and concessionaires form the vast majority of stock use. Stock use is also the reason for retention of the camps that Congress intended be phased out and added to the Yosemite Wilderness. To date, the NPS has not effectively managed stock use.

There are alternatives that should be evaluated. For example, in the concept such as requiring all feed be packed in for stock merit serious consideration. The following are some other options to evaluate in the NPEA document.

Research shows that no more than nine head of stock per group size should be allowed. The current 25-head number is far too high.

Options for group-size limits such as number of legs per party or beating hearts should be considered. One head of stock does much more damage than one hiker.

Real reductions should be evaluated. At least one alternative should eliminate stock use, except for administrative use. Another option would be to allow administrative and private stock use.

Allowing stock only on areas or trails that can withstand such use should be an alternative that is considered.

Monitoring is particularly important for stock use. The NPS had had decades to monitor the grazing and other impacts of stock use on the Yosemite Wilderness. The draft plan should include the results of this monitoring (as well as other types of monitoring) for both the public and the agency decisionmakers.

Commercial Services/Nonconforming Structures and Uses (the Camps)/Potential Wilderness

The fact that 83% of the stock use in the Yosemite Wilderness is commercial is stunning. The popularity of the Yosemite Wilderness suggests that commercial services may not be necessary. Further, the impact of stock use suggests that commercial services are not proper in the Wilderness. At least one alternative should end commercial services in the Yosemite Wilderness.

The NPS errs in justifying continued operation of the camps, developed enclaves in the Wilderness, which seriously degrade the Wilderness. Congress did not order continuation of these camps. Rather, it left the agency the discretion to close and remove those camps, and expected such an action would eventually happen, especially if the camps caused more degradation to the Wilderness. The NPS has not used its authority to close camps, even when sewage systems failed and damaged the Wilderness.

Congress did order the NPS to prepare a report on the impact of these camps in 1984. That has yet to be done. Monitoring, also ordered by Congress, has been almost nonexistent.

As such, at least one alternative should immediately close the camps, rehabilitate the sites and have the potential wilderness designated as Wilderness. The agency can't abrogate its duty in this matter.

Other Wilderness Structures and Activities

Other nonconforming structures should be removed. This would include the structures (cables) on Half Dome and any agency structures that are not the minimum necessary for the administration of the Wilderness.

The draft plan should detail what structures currently exist and what practices the agency uses in current wilderness administration. For example, the NPS, unlike the Forest Service, routinely uses chainsaws in trail management. The NPS also uses helicopters as pack stock and has numerous structures. The NEPA document needs to evaluate if this is indeed necessary. The draft plan should reveal whether the NPS and routinely permits structures and motorized travel in Wilderness for researchers or others who are granted special privileges. All research should be conducted by means compatible with Wilderness (no mechanized/motorized use or structures or installations) and at least one alternative should require that this be done

Trail Management

Many of the concerns over trail management relate directly to too much use, especially stock use. Proper administration of visitor use may solve many trail issues.

The draft plan should have information about conditions on each trail, trail maintenance activities (including any nonconforming uses such as chainsaws), and an inventory of the trails. It should be remembered that human-built trails are structures and installations. The draft plan needs to explain whether each trail is indeed the minimum necessary. This information is essential in making decisions about trails.

Summary

In our scoping comments we noted:

The NPS properly expects visitors to experience wilderness “on its own terms” (NPS Management Policies 6.4.1). That concept goes beyond the absence of structures; it is the heart of our relationship to Wilderness. By yielding our uses and demands, we learn one of the most important lessons from Wilderness—the need for restraint. The ability to accept places as they are, and to let them be, is a primary lesson of Wilderness.

The NPS should also embrace this message in its management plan and in its stewardship and administration of Wilderness. Wilderness administrators should set the example for citizens and other wilderness visitors when it comes to restraint, self-reliance and the use of mechanized transport, motorized equipment and permanent structures.

Doing this would go a long way toward making the plan a workable document. Please keep us updated on this plan, including when there are additional opportunities for public input.

Sincerely,



Gary Macfarlane
Board Member