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

January 19, 2016

Dear Superintendent:

These are Wilderness Watch's comments on the scoping letter for the update of the Yosemite Wilderness Stewardship Plan. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper administration of the National Wilderness Preservation System. The amazing geography and qualities of this Wilderness are world-renowned. However, there are serious problems and challenges facing the Wilderness. In addition to this comment letter, we refer you to our comments on the Merced River Wild and Scenic River Management Plan (April 18, 2013) and our comments on Half Dome (March 15, 2012).

Wilderness and Wilderness Character

The 1964 Wilderness Act governs the stewardship of the wilderness system. This visionary law defines Wilderness in part as "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain." Untrammelled means unmanipulated or unconfined, where humans do not dominate or impose human will on the landscape. Wilderness designation brings a special protection for Wildernesses and forbids the federal land management agencies like the Park Service from manipulating or dominating the Wilderness. Rather, federal agencies are required by the Wilderness Act to preserve the wilderness character of Wildernesses, in essence to protect their wildness. This mandate is reflected in the epigram written by the drafter of the Wilderness Act, Howard Zahniser of the Wilderness Society, who wrote, "*With regard to areas of wilderness, we should be guardians not gardeners.*"

This fundamental tenet of wilderness stewardship was reiterated in a program review initiated by the four federal agencies and conducted by the Pinchot Institute for Conservation in 2001. The purposes of the study were to examine the federal agencies' wilderness programs and the critical management issues facing Wilderness. One of the eight "fundamental principles" for stewardship emphasized the need to preserve the wildness in Wilderness. As the Pinchot report stated, "Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness....Since wild is a fundamental characteristic of wilderness that is not attainable elsewhere, if there is a choice between emphasizing naturalness and wildness, stewards should err on the side of wildness."

Wilderness is as much a process as place. It is “untrammled by man” (wild or unconfined) with “primeval character and influence.” These relate directly to a process that is devoid of conscious industrial human manipulation.

With this in mind, the four issues raised in the scoping letter—visitor use and capacity, stock use, trail management, and commercial services—are important to address. In many respects, they are the same issue—that of overuse and over allocation. The scoping letter appears to tacitly acknowledge as much.

The scoping letter points out, “The Wilderness Act requires that the National Park Service evaluate the need for commercial services within wilderness (i.e. guided hiking, climbing, and stock use). This project will determine an appropriate amount of commercial services in wilderness.” Additionally, the Act requires commercial services to be proper for Wilderness. We hope the agency intends its evaluation of what is necessary and proper for commercial services (i.e. guided hiking, climbing, and stock use) respects the intent of the Wilderness Act to limit commercial services to what is truly necessary and proper. Unfortunately, the appendices associated with the Merced River Management Plan (Appendix L in particular) are a great deviation from this requirement. We hope and expect the agency’s intent is to correct past mistakes by doing a new analysis.

Other issues that should be evaluated include the proliferation of nonconforming structures and uses in Wilderness (for example, the use of helicopters and other motorized equipment) and resolution of the potential wilderness—intended to be temporary—by the removal of nonconforming structures and uses in the potential wilderness and the designation of those areas.

Alternatives

All alternatives should ensure that the wilderness character and wildness of the Wilderness is maintained and even improved. Improvement of wilderness character would rarely, if ever, be from active restoration activities. Rather, such improvement would come from two main areas. The first is careful stewardship and administration of recreation and other allowable uses. That way, for example, it may be possible to eliminate designated campsites, at least in some areas, which often have nonconforming structures associated with them. The scoping letter recognizes the importance of visitor use and capacity so various methods of managing and reducing such use need to be evaluated. The second would be an agency management paradigm that recognizes the necessary restraint in administering wilderness and minimizes the impact from any nonconforming uses.

An alternatives or alternatives that live up to the intent of the Wilderness Act should be developed. Key elements to all alternatives should include:

- a strong wilderness character monitoring program. This must include monitoring of agency-authorized use of motorized equipment, which should be extremely rare to nonexistent;

- allowing natural processes to define the character of the wildernesses;

prohibit the use of motorized equipment and permanent structures for wildlife, cultural resource, or scientific purposes;

requiring all public uses of wilderness listed in section 4(b) of the Wilderness Act be conducted in a manner consistent with wilderness preservation. For example, this means no motorized use and no installations or structures;

ensuring that any outfitting and guiding (commercial services), if and where allowed, be both necessary and proper for wilderness;

ensuring that in the rare instance where exceptions to generally prohibited uses are necessary for management¹, that those exceptions be for the singular purpose of preservation of wilderness and that they be the minimum necessary (see Wilderness Act section 4(c));

reviewing policies about party size, numbers of stock, and backcountry allocations to ensure those policies meet the intent of the Wilderness Act.

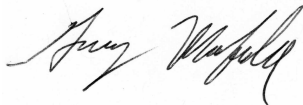
Administration

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.

Please keep us updated on this plan, including when there are additional opportunities for public input.

Sincerely,



Gary Macfarlane
Board Member

¹ For example, the routine use of helicopters and chainsaws by the NPS is inconsistent with section 4(c) of the Wilderness Act. Further, it has a corroding impact on the way wilderness administrators understand and view Wilderness.