

HIGH SIERRA HIKERS ASSOCIATION

PO Box 8920, South Lake Tahoe, CA 96158

September 11, 2007

Yosemite Planning
National Park Service
P.O. Box 577
Yosemite, CA 95389-9905

SUBJECT: COMMENTS ON "TUOLUMNE PLANNING WORKBOOK"

Dear National Park Service:

The High Sierra Hikers Association (HSHA) is a nonprofit public-benefit organization that seeks to inform and educate its members, public agencies, and the general public about issues affecting hikers and the High Sierra. Many of the HSHA's members visit the Tuolumne River and Tuolumne Meadows areas for hiking, camping, backpacking, and other recreational pursuits. Following are our comments on your Tuolumne Planning Workbook. This letter also incorporates by reference our scoping comments dated September 6, 2006. Please place a copy of this letter in the project record for both the Tuolumne River Plan and the Tuolumne Meadows Plan.

We appreciate this opportunity to provide comments for your consideration, and hope that these comments will be seriously considered as you craft your alternatives and draft environmental impact statements (EISs) for each of the two plans.

General Comments

First and foremost, the Tuolumne Planning Workbook is a fraud. It gives the appearance of an open public planning process while burying and avoiding the real issues that need to be addressed in order to protect the Tuolumne River corridor and the Tuolumne Meadows area from documented problems, environmental degradation, and commercial exploitation.

Rather than producing expensive, colorful propaganda, the Park Service should embrace the opportunity afforded by these planning processes to address the real, tough issues at hand. The Park Service should craft plans that provide true long-term protection for these areas, as required by law, rather than putting on a dumb show in a disingenuous attempt to meet legal requirements for public participation.

Specific Comments

1. Yosemite National Park (YNP) has not to date provided any valid rationale to combine these two plans into one. The fact remains that YNP should first prepare a stand-alone plan for the Tuolumne River Wild & Scenic River corridor that provides the standards for

protection, carrying capacity limits, and clear guidance for managers regarding how the Tuolumne River corridor shall be protected according to the mandates of the Wild & Scenic Rivers Act. Then, a separate Tuolumne Meadows Plan should be deliberated and crafted to implement the direction contained in the Tuolumne River Plan. Combining the two plans into one would serve only to turn this logical sequence of events on its head. It confuses the issues, confuses the public, and confuses the Park Service's own planners and decision-makers. In attempting to combine these two plans into one, YNP is doing a great disservice to Yosemite National Park, to the Tuolumne River, to the reputation of the Park Service, and to the public that you are supposed to serve.

2. The Workbook presents several draft Outstandingly Remarkable Values for recreation. One of them states: "The rustic high-country lodging available along the Dana Fork, in Tuolumne Meadows, and above the Grand Canyon of the Tuolumne offers a distinctive type of recreation that is unique in the national park system." This Orwellian doublespeak appears to be a thinly veiled attempt to find that the High Sierra Camps (HSCs) provide Outstandingly Remarkable Values per the Wild & Scenic Rivers Act. Why don't you just come out and say it, so the public understands what you are up to? The HSHA objects in the strongest possible terms to even considering the lodging provided by the aged, ugly, and polluting HSCs as any kind of "outstandingly remarkable value." These elitist camps are nothing more than commercial tent villages catering to the comforts, convenience, and laziness of a very small minority of park visitors, at the expense of everyone else. Please refer to our scoping comments dated 9/6/06 for more background information about the HSCs.

3. The Workbook further presents several draft Outstandingly Remarkable Values for "historic values." One of them states: "Historic landscape features and structures associated with the High Sierra Camp Loop represent the development of a nationally distinctive kind of high-country touring." The HSHA objects also in the strongest possible terms to YNP's attempt to characterize the HSCs as having nationally distinctive and outstandingly remarkable historic value(s). The only two things that are "nationally distinctive" about the HSCs are: 1) the continued ability of the moneyed few to be pampered in a wilderness setting with little or no regard to the ongoing pollution that these camps produce, and 2) the depth to which YNP is stooping to facilitate the continued commercial exploitation of this grand national park. After Congress expressed serious concerns about the impacts of these camps, and requested monitoring reports, YNP has apparently done nothing to comply. And YNP has responded to pollution at the camps not by removing them, as requested by Congress, but by repeatedly approving band-aid developments and upgrades without public notice or NEPA compliance. The only honest way to proceed at this time is for planners at YNP to strike from their vocabulary any reference to the draft Outstandingly Remarkable Values that have been fabricated for the HSCs.

4. The four "alternative concepts" presented in the Workbook are very much alike, and cannot provide the basis for the range of reasonable alternatives required by the National Environmental Policy Act (NEPA). For example, all four of the alternatives presented would retain all of the HSCs, and all four alternatives further claim that the fate of the HSCs would be determined during some future update to YNP's Wilderness Management Plan. This approach is both unacceptable and illegal. YNP has said for years, in fact for decades, that it would soon update its Wilderness Management Plan. That plan has been stalled for many years, and there is no assurance that it will be

updated any time soon, or ever. YNP cannot properly put off the key and highly controversial issues that are directly related to the health and values of the Tuolumne River corridor to some future planning process that may never occur. More important, the issue of the HSCs has been raised during scoping for these plans and is of high concern to a great number of people. NEPA requires that YNP consider a range of reasonable alternatives for protecting the Tuolumne River corridor, and this necessarily must include consideration of alternatives that would lessen and eliminate the many adverse effects of the HSCs on the Tuolumne River and Tuolumne Meadows. Eliminating the HSCs is clearly a reasonable alternative that must be fully evaluated and considered.

5. If YNP were to declare that the lodging, features, and/or structures provided by the HSCs provide “outstandingly remarkable values,” such a decision would likely pre-determine the outcome of any future planning process(es), such as the touted update of YNP’s Wilderness Management Plan. Planners working on the Wilderness Plan update (if it ever occurs) would simply say that the HSCs were found in the previous planning process(es) to provide “outstandingly remarkable values,” and the camps therefore shall be retained. With the shameful use of this deceptive language, YNP is creating a thinly disguised circular plan to retain the HSCs without admitting what it is doing, and without ever evaluating alternatives for their removal as required by NEPA. The Workbook is thus little more than a subterfuge crafted to justify YNP’s apparent desire to retain the HSCs at all cost. What is needed at this point is nothing less than an admission that mistakes have been made, and a promise to craft and evaluate a reasonable range of alternatives for protecting and managing the Tuolumne River corridor and the Tuolumne Meadows area as envisioned by the Wild & Scenic Rivers Act, the Park Service’s Organic Act, the Wilderness Act, and the NEPA. And those alternatives must necessarily include the elimination of the anachronistic, decrepit, ugly, elitist, polluting HSCs.

6. The draft alternatives and Management Prescriptions presented in the Workbook are insufficient, inasmuch as all of them would allow commercial packstock and horseback rides in all zones. None of the draft alternatives or prescriptions considers restricting or eliminating domestic stock animals, not even from fragile high-elevation areas, wetlands, riparian areas, or lake shores. How can such an approach possibly protect exceptional ecosystem and water quality values? As detailed in our scoping comments, studies have shown that surface waters in the Sierra Nevada, including the Tuolumne River, are polluted with bacteria and other pathogenic organisms, and that “pack animals are most likely the source of coliform pollution” (Derlet and Carlson 2006). Domestic horses and mules also harm wildlife, damage trails, spread noxious weeds, attract exotic cowbirds that parasitize the nests of native songbirds, and seriously degrade the recreation experience of numerous park visitors by polluting trails, campsites, riverbanks, and lake shores with dust, manure, urine, and flies. (Please refer to our scoping comments for more detailed discussions of these issues.) The draft EISs clearly need alternatives that consider strictly limiting (and even prohibiting, where necessary) domestic stock, especially commercial stock, to protect park resources, including the experience of park visitors who are adversely affected by the many significant impacts of stock use.

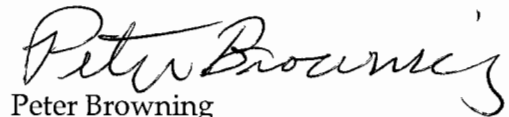
Summary and Conclusions

For the reasons summarized above, the Tuolumne Planning Workbook is fatally flawed and must not be allowed to serve as the basis for the development of alternatives to be included in the draft EISs for these two planning processes. YNP should first prepare an EIS for a

Tuolumne River Wild & Scenic River Management Plan that fully evaluates the removal of the Glen Aulin, Tuolumne, and Vogelsang High Sierra Camps, and that either eliminates or effectively limits and strictly controls the impacts of domestic stock animals. Then, a separate EIS should be prepared for the Tuolumne Meadows area that implements the direction contained in the river plan.

Thank you in advance for considering these comments. Please keep us informed of all opportunities for public involvement and comment.

Sincerely yours,

A handwritten signature in black ink, reading "Peter Browning". The signature is fluid and cursive, with the first name "Peter" and last name "Browning" clearly distinguishable.

Peter Browning
President, High Sierra Hikers Association