

Marcus Taylor

August 24, 2011

Karen Taylor-Goodrich, Superintendent
Attn: Wilderness Stewardship Plan
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271

Dear Superintendent Taylor-Goodrich,

I'm writing to convey my comments on livestock packing practices in Sequoia Kings Canyon National Parks (SEKI) as part of the National Park Services' (NPS) scoping process of a new Wilderness Stewardship Plan. Currently the existing Stock Use Plan, which nearly thirty years old, allows unlimited commercial services in the SEKI wilderness, and they place no ceiling on the number of stock animals allowed to graze, trample, and pollute SEKI's fragile alpine meadows and lakeshores.

The existing plan fails miserably at protecting SEKI's magnificent and fragile wilderness from high-impact uses. The NPS has promised several times over the past twenty years to update these plans to place adequate limits and controls on stock use and commercial businesses—which continue to exploit SEKI for private gain—but the NPS has never delivered on its promises.

As a mountaineer with over 40 years of experience in SEKI, I'm hoping that my comments will serve to help the NPS to align it's current standards/practices in accordance with scientifically-based principles for wilderness protection in accordance with the 1964 Wilderness Act.

Specifically, the packstock operations within SEKI have over the last century resulted in contaminated ground and surface waters and eroded riparian stream banks that are trampled, denuded and polluted by manure, urine, odors, dust, and flies. These poor packstock management practices have contributed significantly to the sedimentation of spawning gravels, eliminating this habitat critical to sustaining ESA listed species.

No packstock grazing should be allowed anywhere within SEKI, or at the very minimum, grazing should be prohibited above 9,700 ft. elevation, as recommend many years ago by SEKI's own scientist. Stock users should be required to keep animals tied up when not in use and to supply packed-in weed free "feed" as is required by many other national parks. This would protect meadows, prevent animal from stomping through hiker's camps at night, preclude the need for annoying bells, reduce the pollution of campsites and water sources by animal wastes, decrease the spread of invasive weeds, and reduce conflicts with wildlife such as the endangered Sierra Nevada bighorn sheep.

A network of "foot-travel-only" trails should be established so that hikers who so desire may enjoy a wilderness experience free of the dust, flies, and manure that invariably litter and pollute trails used by stock animals. There is no valid reason why stock animals should be allowed to trample and pollute every single trail within SEKI.

All visitors to the SEKI wilderness should compete for wilderness permits on a level playing field. And where the general public is limited by trailhead quotas or other restrictions, commercial uses should be strictly limited or eliminated. It's simply not fair that the clients of high-impact commercial stock outfits are guaranteed access when private (non-outfitted) hikers are being turned away by trailhead quotas or other limits. Put simply, clients of the commercial outfits should not be allowed to "buy" access when others are being turned away. All users should compete for wilderness permits via a single system, and then only after obtaining a permit should visitors be allowed to employ commercial services as needed to facilitate their trip.

Commercial stock outfits (and/or their clients) should be required to pay fees sufficient to defray the Park Service's costs of repairing trail damage, monitoring stock impacts, controlling weeds, and enforcing regulations. Heavy use by commercial stock outfits pulverizes and destroys trails, and the NPS spends huge sums of taxpayers' money to fix trails, monitor meadows, track stock use, and control weeds. But the outfits pay paltry fees, usually only a couple hundred dollars per year, even as they rake in hefty profits. The commercial outfits get (literally) a free ride at the expense of taxpayers and park resources.

Stock animals should be required to stay on designated, maintained trails (i.e., no off-trail or "cross-country" travel by stock animals should be allowed). Scientists have repeatedly documented the many impacts of stock use, and recommended that stock animals be required to stay on designated trails.

In the face of these impacts, all packstock operations within SEKI should be upgraded to include tie downs in order to keep packstock out of the riparian corridor. In allotments where tie downs to protect the riparian corridor is deemed unfeasible or cost prohibitive I urge you to pursue a "No Grazing" policy to allow for these highly degraded systems to recover.

To minimize the size and impact of commercial groups, commercial packstock services should be strictly limited to serving only those persons who are truly unable to hike or carry a backpack, and commercial packing outfits should be prohibited from hauling unnecessary or excessive gear and/or luxury items. The NPS has long ignored the Wilderness Act's legal mandate to limit commercial services to the "extent necessary." While courts have ruled that items such as camp furniture, boats, radios, ice chests, excessive food/beverages, and other luxury items are unnecessary for the enjoyment of a wilderness experience (and often damaging to the experience of other wilderness visitors), SEKI continues to allow commercial outfits to cater to anyone and to haul anything that their clients may desire. In short, despite the law, SEKI currently places no limits on commercial services. It is high time the NPS starts following the laws that it is charged with enforcing.

SEKI's limit on the number of stock animals per group should be reduced from the current 20 animals/party to 10 or fewer animals/group. Because parties using stock are known to cause more than ten times the impact of foot travelers, stock users should be required to minimize the number of animals, and to leave unnecessary and luxury items at home. This can be effectively accomplished in part via smaller group size limits. Large groups are also known to have substantial adverse effects on the experience of other wilderness visitors.

Bells should be prohibited and all fences should be removed. "Cowbells" placed on stock animals shatter the natural quiet and make sleep difficult for many backcountry campers. Fences ruin the scenery, giving the SEKI wilderness the look and feel of someone's private ranch. The many "drift fences" that currently exist throughout the SEKI backcountry were constructed primarily for the convenience of stock users. Hikers (the vast majority of users) and wildlife are substantially inconvenienced (and injured) by clumsy gates and rusty wire, for the sole benefit of a small handful of stock users. Some stock users and NPS personnel claim that the fences are needed for "resource protection." This is a ruse. Other methods (such as tie & feed, hobbles, and/or portable solar-electric fences) can be used to restrain animals, and stock users should be responsible for their own animals rather than the NPS constructing ugly, permanent fences across the landscape.

The NPS in SEKI should require strict prevention measures to minimize the introduction and spread of invasive weeds. It is a well documented fact that stock animals are responsible for introducing and spreading invasive weeds, both from viable seeds in their manure, and from seeds imported on their hooves and coats. SEKI has for many years been quietly using chemical herbicides to control weed outbreaks—even deep in the SEKI backcountry, but it has given little more than lip service to prevention measures.

The NPS in SEKI should:

- 1) prohibit open grazing of park lands and *require* the use of weed-free feed by all stock users;
- 2) require that all animals be provided weed-free feed for at least two weeks before entering the parks (to allow time for the animals to excrete weed seeds before entering the parks); and
- 3) require all stock animal hooves & coats to be thoroughly cleaned before entering the parks (and require that all animals be inspected by qualified rangers to ensure that this is done. Stock users should be charged a fee to pay for the inspections). Without a robust and mandatory weed prevention program, SEKI will be increasingly stuck in a reactionary mode, relying on expensive, intrusive, and chemical-intensive weed control efforts that often fail.

All stock animals should be required to wear "manure catchers" (i.e., diapers) to reduce water contamination from livestock manure. Manure catchers are now widely available, and manure should be either packed out or disposed far from surface water sources. This has been a standard practice the Grand Canyon for over 20 years.

The commercial Bearpaw "High Sierra Camp" should be closed, removed, and the site restored. This ugly and polluting commercial enterprise, located deep in the SEKI wilderness, exists solely to pamper its clients with soft beds, hot showers, flush toilets, and fancy chef-prepared meals. Weekly mule trains are needed to continually supply the camp with fresh food, beverages, linens, and other luxury items. Congress directed the Park Service in 1984 to monitor and annually report on impacts caused by the camp, but the NPS has *never* done so. Congress also authorized the NPS to remove the camp, and authorized the Secretary of Interior to formally designate the camp, and the area surrounding the camp, as wilderness once the camp is removed. (Currently, the camp and surrounding area are formally classified as a "potential wilderness addition.") Tell SEKI that the Bearpaw camp is elitist, ugly, and polluting. If people want soft beds, fine dining, hot showers, flush toilets, and other comforts, they can and should stay in town (i.e., Lodgepole or Grant Grove). It is an affront to the SEKI wilderness to allow a commercial enterprise to provide luxury accommodations deep in the wilderness.

The former commercial pack station buildings at Mineral King should be removed, and not be replaced. The long-defunct commercial pack station at Mineral King is an eyesore that should be removed, and the site naturalized. The NPS should not relocate or reopen the pack station, as some commercial and pro-stock interests are now advocating. The areas accessed via Mineral King Valley are too high in elevation, too wet, and too fragile to support commercial packstock activities without causing substantial harm to natural resources and the experience of park visitors. And, if any for-profit commercial enterprise wants to operate "day rides" to squeeze money out of tourists, they should open a stables on private lands, not within SEKI.

The NPS needs to undertake a scientifically based monitoring program for assessing and redressing negative impacts from packstock grazing to both ground and surface waters, as well as the associated riparian corridors to avoid future degradation of these critical upstream tributaries.

I appreciate your time, and look forward to hearing your decisions on the scoping process for the Wilderness Stewardship Plan in the SEKI.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'M. Taylor', with a stylized, cursive script.

Marcus Taylor, P.E.