

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

8/30/11

Dear Sir or Madam:

I am writing to comment on the Wilderness Stewardship Plan.

Based on personal experience backpacking in the Sequoia & Kings Canyon National Parks over the last 40 years, it is clearly evident that impacts from commercial Pack Stock operators are seriously damaging the fragile alpine environment.

The gouging of thousands of hooves is seriously eroding the trails in many areas, which are a shared resource. This creates onerous safety and aesthetic problems for all users. In many places pack trains wander off the trail tread, particularly in wet or marshy areas leaving devastated terrain.

In meadows where stock are allowed to graze the impact is blatantly evident. I have seen hooves puncture the soil 6 to 10 inches. In damp conditions, meadows can be ruined in this way. I have also observed streamsides and lakeshores where the soils and vegetation have been trampled and eroded.

Pack animal waste polluting the water is a serious concern. Many times I have observed pack trains at stream crossings where numerous animals have defecated and urinated into the water, the very same source people are drinking from.

The campsites used by packers are most often seriously impacted. They are typically dusty, over used and have large messy fire rings. The surrounding area is usually over grazed and littered with manure. The trees near these campsites often show signs of limbs being sawed or chopped off for firewood.

The degradation of the high country by commercial pack stock use is of great concern to me. Where possible I now try to avoid visiting areas they tend to frequent.

It seems to me there are a number of inequities in the balance of regulations applied to commercial pack stock businesses as opposed to hikers. The fact that packers have guaranteed access while hikers are subject to strict quotas is basically unfair.

Based on the conditions alluded to above the Wilderness Stewardship Plan should fully address all impacts of commercial pack stock on natural resources, facilities,

including trails, campsites, effects on other users and to evaluate the cumulative impact of user numbers. The following are suggested regulations to be considered:

* There is considerable physical evidence that the overall numbers of pack stock must be reduced in the subject wilderness. Group size maximums of 25 head of stock and 15 people serves only to compound the above sited impacts and should be greatly reduced. I suggest a maximum of 6 people and 8 head of stock.

* Cross-country travel by pack stock should not be allowed. The impact of even one group of stock churning up the ground in sensitive high altitude areas can last for years or decades.

* A trail impact mitigation fee should be levied on pack stock users, the proceeds of which should be used strictly to restore damaged trails in the wilderness.

* An analysis should be made for implementing an elevation-based restriction on camping by stock groups. The high alpine environment is the most vulnerable to degradation by stock related impacts and should have strong protection. I recommend no stock camps above 9,000 feet.

* Campfires should be further restricted and prohibited in the higher elevations. Under no circumstances should commercial enterprises be allowed to transport firewood into restricted high elevation areas.

One of the biggest changes I have noticed in the last decade is the dramatic increase in jet airplane traffic over the Sierra both commercial and military. The noise pollution from these aircraft has moved beyond annoyance to a threat to the nature of this wilderness. The Park Service cannot ignore this pervasive annoyance. Some standard for noise must be adopted so that there will be a tool to reduce this inescapable impact.

Sincerely,

A handwritten signature in cursive script that reads "Jonathan Braun". The signature is written in dark ink and is positioned below the word "Sincerely,".

Jonathan Braun