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SEQUOIA AND KINGS CANYON NP

August 17, 2011

Ms. Karen Taylor-Goodrich Superintendent Sequoia and Kings Canyon National parks 47050 Generals Highway Three Rivers, CA 93271

Attn: Wilderness Stewardship Plan

Dear Ms. Taylor-Goodrich,

This letter provides my comments on the proposed Sequoia and Kings Canyon (SEKI) Wilderness Stewardship Plan. I am pleased, but also somewhat concerned, to hear that the SEKI Wilderness Plan is moving forward. I'm pleased because a strong, new plan is vital; concerned, because of my fear that once again commercial packer interests will dominate the result to the detriment of the SEKI wilderness and those of us who enjoy its peace, solitude and environmental integrity. What is particularly vexing is that the science is clear, the research by both the Park Service and outside experts unanimous, and yet somehow those elements are pushed aside and the same old heavy-impact commercial use wins again. Let's make sure that doesn't happen this time.

Packers play a part and have a place in the wilderness, but not unlimited right to use and abuse this precious, very fragile, environment.

Here are my specific recommendations:

- 1. Low Impact Rules Should Apply to All. Many times I have defended the quota system and strict regulation of access for light-footed hikers, only to see the heaviest impact users of all waltz in with no restrictions. This is unfair and completely counter-productive to a healthy wilderness environment. Quotas and access rules should be based on real impact, with rules for all that bear some resemblance to the extent of that impact. Packers shouldn't have pre-guarantees for permits.
- 2. Specific Measures to Reduce Impact Should Be Spelled Out for Packstock. Limit the number of animals per train, and the number of trains, and the load they can carry.
- 3. **Limit the Geography**. "Multiple Use" doesn't mean that those who inflict the most damage should be able to go and inflict that anywhere and everywhere. Let's have some hiker-only areas, both trails and even entire basins. Stock shouldn't be able to just wander anywhere for grazing or to get to a particular spot more quickly.
- 4. **Fair Fees For Heavy Users**. To the extent you do allow packer use, let them pay fees that are in proportion to the impact they make. We all know the primary cause of those miles long dusty troughs we call trails that always happen to be lined up with pack stations! Remedial trail work

- for damage caused by all those heavy hooves, weed abatement, and other recovery work should be borne primarily by the people who profited from and caused the harm.
- 5. Why are we still allowing grazing in Wilderness Areas? With millions of acres available for taxpayer-subsidized private grazing, why can't we set aside some areas—such as our wilderness areas—where we can enjoy nature without having to share it with our bovine pals? At a bare minimum, as your own scientist's say, there should be no grazing above 9,700 feet.

Thanks in advance for your consideration of these suggestions, and for your hard work in bringing this plan to completion. I look forward to seeing a fair and equitable document, based on science, fact, and respect for this precious, ever-diminishing jewel called SEKI Wilderness.

Sincerely,

Francis Toldi