



April 19, 2013

Don Neubacher, Superintendent
Yosemite National Park
Attn: Merced River Plan
P.O. Box 577
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Superintendent Neubacher,

We appreciate the opportunity to provide comments on the National Park Service's Draft Environmental Impact Statement (DEIS) for the Merced River Comprehensive Management Plan. The mission of the Pacific Crest Trail Association (PCTA) is to protect, preserve and promote the Pacific Crest National Scenic Trail (PCNST) as an internationally significant resource for the enjoyment of hikers and equestrians, and for the value that wild and scenic lands provide to all people. As donors, volunteers and staff, we are dedicated to preserving and protecting this outstanding hiking and equestrian path.

In 1993 the PCTA signed a memorandum of understanding with the National Park Service, U.S. Forest Service and Bureau of Land Management. This agreement recognizes the PCTA as the federal government's major partner in the management and operation of the PCNST. A major partner in our efforts in protecting, preserving and maintaining the PCNST are the dedicated saddle and pack stock members of Backcountry Horsemen of California (BCHC). Equestrian organizations such as BCHC provide and invaluable service to the PCNST and countless other multi-use trails throughout the state. Not only do they conduct trail maintenance activities but they also provide valuable packing services to backcountry and Wilderness trail crews. Packers bring in tools, food, and gear for trail maintenance crews. Without this packer assistance, trail crews would be unable to bring in the necessary equipment to maintain remote sections of trail for significant lengths of time.

Use of saddle and pack stock is a historic use within Yosemite National Park, the Sierra Nevada, and throughout the Park's designated Wilderness areas. In sharp contrast to acknowledgment of this history of stock use, the DEIS states: "Recent empirical research on visitor experience in the Yosemite Wilderness has documented a visitor preference not to encounter stock parties and large campsites" (DEIS, p. L-16). The preference not to encounter stock parties is not shared by the PCTA, as it ignores the historic roots of stock use and the ongoing efforts of organizations like BCHC to promote, protect and maintain wilderness trails—often to great benefit to hikers and backpackers.

The PCTA is not aware of significant social conflicts that exist between hikers and stock users on trails in the Yosemite Wilderness. In cases where documented conflicts exist, we would expect to see the agencies undertake visitor education efforts prior to proposing regulations to restrict one user group or another.



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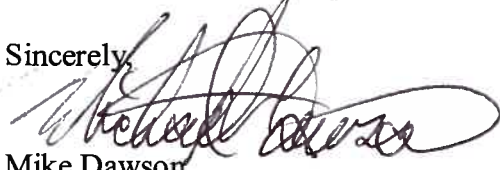
Education efforts could include the development of trailhead signage, notices on the Park website about shared trails with horses and mules, and brochures on what to expect when traveling on shared-use trails. Yet the DEIS provides no documentation on the magnitude or location of reported conflicts between other Wilderness visitors and horse and stock users. Nor does the DEIS propose mitigation measures such as visitor education about the historic and current role of stock use, both commercial and administrative, throughout Yosemite National Park.

We question whether a visitor's preference "not to encounter stock parties" in Wilderness should form a primary criterion for proposals to limit commercial stock use in the Merced River Plan DEIS. The DEIS states (p. 2.2-16) "commercially guided pack trips averaged only 48 stock-use nights, which represents less than 3% of all the guided pack trips that occurred in Yosemite Wilderness areas." Given the low level of stock use and the absence of measures in the DEIS to mitigate visitors' perceptions of conflict, we fail to see the necessary justification for proposed limits on commercial stock use based primarily upon visitor perceptions.

When designated by Congress as one of the first two National Scenic Trails through the National Trails System Act of 1968 the PCT was specifically called out to serve hikers and equestrians. This use, established by Congress, is an important part of the character of the Pacific Crest National Scenic Trail and hikers and equestrians have banded together to build, rebuild and maintain the Trail in volunteer organizations up and down the west coast. Last year alone more than 1,600 volunteers organized under PCTA's banner dedicated more than 88,000 hours of physical work to keep the PCT in excellent shape and to minimize impacts from use of the Trail. Our experience, that of our staff and volunteers, interacting with thousands of trail users annually stands in clear contrast to the "empirical evidence" referenced in the DEIS.

Thank you for this opportunity to provide input to the decision process regarding use and management of this iconic area including the portion of the Pacific Crest National Scenic Trail.

Sincerely,


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