

FROM : [REDACTED]

FAX NO. : [REDACTED]

Feb. 15 2008 11:08AM P1

[REDACTED]

Email: [REDACTED]

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VBLV-49-5  
FEB 15 2008  
P. 181  
YOSEMITE NATIONAL PARK

February 14, 2008

Subject: Proposed Vogelsang Backcountry Utilities Improvement Project

Yosemite National Park is a very special place to me because it is a spectacular National Park (one of the most beautiful places on earth) and it is close to the neighborhood where I live. Because Yosemite is a beloved and popular park, it has millions of visitors. The Park Service recognizes that Yosemite can be loved to death by too many visitors and overuse of the Park lands. Yosemite must be protected not only for us, but also for future generations to enjoy.

Following are my scoping comments on the subject project.

I believe the Vogelsang High Sierra Camps have outlived their time. It is time for the Yosemite backcountry to be restored to its natural condition. These camps should be removed. I believe the camps have had an adverse impact on the adjacent wilderness and too much impact on the environment within and surrounding these camps. Pack trains that supply the camps are pounding the trails and the horse manure and flies contribute to an unpleasant experience for hikers.

Since these camps are in wilderness, this proposed expansion and construction violate the intent of the 1984 Wilderness Act. I understand that such proposed improvement also violates the 1980 Yosemite General Management Plan as that plan prohibits any further development of facilities or services within potential wilderness additions. That includes Vogelsang.

As I understand that most of the stock use in the Yosemite backcountry results from the pack trains that supply the Vogelsang camps. The camps have also caused pollution that ends up in the meadows, soils and water in Yosemite National Park. I realize that you know Tuolumne Meadow is a very sensitive place that needs all the protection the Park Service can provide. It is now known from studies that the Tuolumne River is polluted with disease-causing bacteria. The most likely cause of the coliform pollution is the use of pack animals in the park.

The easiest and best solution is to remove the camps and restore the land to its original pristine condition, eligible for wilderness designation and protection. I believe wilderness protection is much more important than preserving an historic use.

Thank you for the opportunity to provide scoping comments.

Sincerely,

[REDACTED]

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CHRIS MODIN  
 <cmodin@pacbell.net>  
 02/15/2008 10:32 AM  
 PST

To: yose\_planning@nps.gov  
 cc:  
 Subject: yose comm Vogelsang scoping

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 VBCU-50-S  
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 P. 1084  
 YOSEMITE NATIONAL PARK



Sierra scoping comments Vogelsang sierra club.doc

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V BCU-50-5  
p. 2 of 4

Public Comment  
Vogelsang Backcountry Utilities Improvement Project  
Superintendent, Yosemite National Park  
Yosemite, CA. 95398  
P.O. Box 577

February 12, 2008

Dear Sir:

The following comments are submitted on behalf of the Sierra Club's Yosemite Committee. Hopefully they will be of value in protecting and improving the quality of Yosemite's backcountry wilderness.

Before considering upgrades and improvements at Vogelsang we need to first consider the impacts these changes would have on Yosemite's backcountry.

The drinking and waste water problems at the Vogelsang High Sierra Camp (HSC) will require considerable infrastructure upgrades and additions to resolve. The 2000 gallon rectangular concrete drinking water cistern is deteriorated and out of service and has been replaced by an inadequate temporary 300 gallon polyethylene tank. A new tank and filtration system of at least a 1000 gallon capacity will have to be constructed to allow sufficient retention time for the required chlorine treatment to be effective. It appears likely an additional building will be required to house the chlorine based chemicals (sodium hypochlorite) and solar powered pumps that administer chlorine to the water supply. The "hypo" attracts marmots and that will exacerbate an already serious and difficult problem with them at this high elevation site. A relatively safe and simple "off the shelf" water disinfection technology using chlorine gas could be substituted for the currently proposed chemical treatments that might obviate the "hypo" related marmot problem at Vogelsang. But in either case the question is whether an upgraded water supply and treatment facility is appropriate in a backcountry NP wilderness setting? Would the use of chlorine require ongoing monitoring and additional chemicals to treat effluents to insure chlorine is not entering and impacting aquatic resources in the surrounding wilderness?

Correcting the waste water problem will be even more difficult. Kitchen generated waste water is considered "black water" by regulating agencies and can no longer be allowed to be discharged on the sod surface of the existing leach field. The composition and design of the current leach field mound is not adequate to accommodate sub-surface disbursements required for black water wastes. Correcting this deficiency will require a major construction project including the use of pack stock and or helicopters to transfer the many tons of

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p. 384

additional suitable filtration substrates from yet unidentified off site sources for the existing leach field to accept and properly function with the required sub surface disbursements of black water waists.

A project of the scale required to upgrade the leach field combined with upgrades required for the water supply might be reason to suspend operations at Vogelsang indefinitely until the controversial issue of continued operations and level of services of all the HSC's is resolved.

Alternatives to consider:

1. It might be desirable to modify current infrastructure, removing non-functional composters, correcting unsightly visual impacts and reducing the numbers of guests and services to a level more appropriate in a NP backcountry wilderness. Packing in prepared meals and/or reducing and modifying meal selections to non black water generating selections would most appropriately address the existing black water waste problem without infrastructure expansion. This action combined with a requirement for all guests to use personal sleeping bags would reduce stock required to supply linens and other bedding to the Vogelsang HSC. Reducing stock use in the backcountry is an objective almost everyone agrees on. We could help meet this objective by eliminating bedding and other inappropriate levels of guest services that currently exist at Vogelsang and the other HSC in the Tuolumne River corridor. The elimination or reduction of stock use at Vogelsang would allow stock numbers and corral capacities to be reduced in Tuolumne Meadows where significant stock related impacts occur. These reductions could be factored into and be an important element in the current planning effort to reduce human activities impacting resources at Tuolumne Meadows.
2. The human waste problem could be addressed in one of two ways that might eliminate the need for replacement and upgrades of the existing and problematic composters at both Vogelsang and the nearby backpacker's camp. In the first, consider the adaptive management strategies successfully implemented by the Inyo National Forest at Trail Camp on the Mount Whitney Trail requiring individual responsibility for carrying out personal bio-wastes. It appears that strategy works well where the heavy use area is within a half day walk of a trail head. This adaptive management alternative is working very well at Mount Whitney. Could it work at Vogelsang too? A second solution might employ designing a small portable waist receptacle that would easily fit into standard pack stock containers. These receptacles would be designed to be easily inserted into and removed from a small marmot resistant cedar toilet structure. Properly fitted with sealable liners the units could be removed and transferred, on an as needed

VBCU - 50-5  
P-4074

basis, to stock returning to the trail head for appropriate disposal there. These small sealable containers would minimize personnel contact with wastes and would be far less problematic than dealing with hazardous bio-wastes in a poorly functional or failed composter.

3. Dispersing and reducing overnight use at the backpackers camp combined with a suspension of operations at the HSC might be adequate to resolve the bio-waste problem in the Vogelsang area. If these actions were taken would a replacement backpacker composter be needed in the Vogelsang area?

The Vogelsang back country "utilities improvement" project should emphasize a reduction in visitor services and existing infrastructure and avoid any "improvements" that maintains or increases the level of services currently impacting this NP back country setting. A more appropriate action might be a complete suspension of operations until the larger issue of continued operation of all HSC's is resolved by the NPS in a public review process. If this action is selected the existing non functional and dilapidated infrastructure impacting this wilderness setting must be removed.

Thanks for listening.

Joe Fontaine, Chair Sierra Club Yosemite Committee

VBCU-51-5



02/15/2008 10:45 AM  
PST

To: yose\_planning@nps.gov  
cc:  
Subject: Vogelsang scoping

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VBCU-51-5  
FEB 15 2008  
p. 1 of 4  
YOSEMITE NATIONAL PARK



Scoping comment [redacted] scoping vogelsang [redacted] doc

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p. 2034

Public Comment  
Vogelsang Backcountry Utilities Improvement Project  
Superintendent, Yosemite National Park  
Yosemite, CA. 95398  
P.O. Box 577

February 12, 2008

Dear Sir:

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A project of the scale required to upgrade the leach field combined with upgrades required for the water supply might be reason to suspend operations at Vogelsang indefinitely until the controversial issue of continued operations and level of services of all the HSC's is resolved.

Alternatives to consider:

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P.4074

with wastes and would be far less problematic than dealing with hazardous bio-wastes in a poorly functional or failed composter.

The Vogelsang back country "utilities improvement" project should emphasize a reduction in visitor services and existing infrastructure and avoid any "improvements" that maintains or increases the level of services currently impacting this NP back country setting. A more appropriate action might be a complete suspension of operations until the larger issue of continued operation of all HSC's is resolved by the NPS in a public review process. If this action is selected the existing non functional and dilapidated infrastructure impacting this wilderness setting must be removed.

Thanks for listening.



, El Dorado Hills, CA 95762



02/15/2008 11:24 AM  
PST

To: YOSE\_planning@nps.gov  
cc:  
Subject: Scoping comments on proposed Vogelsang Backcountry Utilities Improvement Project

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VBCU-52-S  
FEB 19 2008  
P. 1072  
YOSEMITE NATIONAL PARK

Dear Superintendent,

I am writing to submit scoping comments on the proposed Vogelsang Backcountry Utilities Improvement Project.

It is my opinion that the proposed improvements to the Vogelsang HSC should not be made, and the camp should be closed and returned to a wild state, for the following reasons:

1. The activities of maintaining and running this camp have far exceeded reasonable impacts to the wilderness area compared to the value of access provided. The Yosemite back country is far from under utilized, it is over used. Continuing to provide this type of access in the face of the cost is inconsistent with the NPS goal of balancing access and preservation of the parks natural resources. 'Improving' the camp and continuing the service would be far out of balance, considering the impact. The fact the the underground spring that is the camp's water supply is now fouled by the camp's activities to the point of requiring filtration and disinfecting is evidence that this camp is destroying the very wilderness that it is providing access to, and is out of balance.

2. The California Wilderness Act of 1984 allowed the HSCs to remain until "... the continued operation of these facilities...results in an increased adverse impact on the adjacent wilderness environment (including increased adverse impact on the natural environment within the enclaves themselves)", at which point "...the operation of these facilities shall be promptly terminated, the facilities removed, the sites naturalized, and ... the areas promptly designated as wilderness."

This directive is unambiguous, and sets NPS responsibility clearly. If I understand correctly, this means it is effectively unlawful to continue otherwise at this juncture.

3. The large volume of stock traffic required to maintain the camp, and the significant additional traffic required to execute the proposed 'improvements' inflict an unacceptable amount of damage to the fragile high country - damage which park service signs point out take decades to recover from in the short, dry growing season of the high country. I have spent much time in the area, and seen this for myself - it is infuriating.

Please recognize that the time has come to turn our backs on the Vogelsang HSC, return the site to wilderness, and relieve the Tuolumne Meadows and surrounds of the pressure of supporting this service.

Sincerely,

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P-2022



Pacifica, CA 94044



"ILYSIA\_SHATTUCK"  
 <ILYSIA\_SHATTUCK@  
 patagonia.com>  
 02/15/2008 02:00 PM  
 PST

To: <YOSE\_planning@nps.gov>  
 cc:  
 Subject: Scoping Comments on proposed Vogelsang Backcountry Utilities  
 Improvement Project

**RECEIVED**  
 VBCU-53-S  
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 P-1072  
 YOSEMITE NATIONAL PARK

Please accept the attached scoping comments from Yvon Chouinard, Founder and Owner of Patagonia, Inc., on the proposed Vogelsang Backcountry Utilities Improvement Project.

Thank you,  
 Ilysia Shattuck

~~~~~  
 Ilysia Shattuck  
 Environmental Grants Manager  
 Patagonia, Inc.  
 259 W Santa Clara Street  
 Ventura, CA 93001  
 Phone: (805) 667-4730  
 Fax: (805) 643-2367  
 ilysia\_shattuck@patagonia.com



[www.patagonia.com/grants](http://www.patagonia.com/grants) Vogelsang HSC - Yosemite NP.doc

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VBCU-53-5  
p. 2 of 2

February 15, 2008

Superintendent, Yosemite National Park  
*Attn: Vogelsang Backcountry Utilities Improvement Project*  
P.O. Box 557  
Yosemite, CA 95389

Re: Scoping Comments on proposed Vogelsang Backcountry Utilities Improvement Project

Dear Superintendent,

As the founder and owner of Patagonia, Inc., a California based company, I am writing to urge the closure of the Vogelsang High Sierra Camp (HSC). Rather than pursue continued attempts at construction that will further desecrate this area, it should be naturalized and designated as wilderness.

The construction activities being proposed are in direct conflict with Yosemite's 1980 General Management Plan, which prohibits "any further development of facilities or services" within potential wilderness additions such as Vogelsang. Any construction work done would violate the Plan. Further, such activities are likely to harm the character of the surrounding Yosemite Wilderness. As one example, tons of construction materials and personnel would need to be transported through the wilderness, possibly via helicopters or pack animals.

Pack animals are a large concern, as stock use in the Yosemite backcountry, most of which results from incessant pack trains used to maintain and supply the HSCs, has been shown to pollute the waters of Yosemite. I urge the NPS to stop the pollution by ending the excessive use of stock animals by the Camps.

Should the NPS decide to further harm this area through maintaining the use of Vogelsang HSC, a full Environmental Impact Statement must be prepared for this project, as it is likely to result in substantial impacts to the environment of Yosemite.

In closing, Patagonia, Inc. is a company that designs and distributes clothing for active use in the outdoors. When we're not in the office, many of us head to places like Yosemite's backcountry to hike and climb, as do many of our customers. When we see these wild places being polluted, altered, or eroded, we are compelled to demand their protection. The time to return Vogelsang HSC to its natural state has come.

Sincerely,

Yvon Chouinard  
259 West Santa Clara Street  
Ventura, CA 93001

[Redacted]  
 Arlington, MA [Redacted]  
 Thursday, February 14, 2008  
 Fax [Redacted]

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 VBCU-54-S  
 FEB 15 2008  
 P. 1072  
 YOSEMITE NATIONAL PARK

Superintendent, Yosemite National Park  
 Attn: Vogelsang Backcountry Utilities Improvement Project  
 Fax 209 379 1294

I am writing to submit comments on the proposed Vogelsang Backcountry Utilities Improvement Project. I am a backpacker who visited Vogelsang on a day hike from Tuolumne Meadows with my Senior Scout troop in 1960. I can still see some of the country in my mind. I have not been there since, although over the years I have hiked through the Sierra from Yosemite to Sequoia. I have friends who have stayed at High Sierra Camps.

It is out of concern for the environment that steps were taken to cut the number of cars in Yosemite Valley. Now, out of the same concern, it is time to take steps to stop the overuse of certain areas in the back country. High Sierra Camps create a focused strain of use on a particular natural area and on the route that is used to support the camp. It is better for the wilderness for people to be spread out.

I am 64 and might be coming to the age where I would likely use a High Sierra Camp. Perhaps that makes me more aware that High Sierra Camps are no longer needed as they might have been when they were set up. There is now wonderful equipment, much lighter than when the HSC were set up that enables people to backpack into the wilderness. If a person needs or wants, they can plan trips with packers as they did three years ago when due to late snow the High Sierra Camps did not open. On the trail that year we met groups who planned trips with packers in lieu of going to High Sierra Camps. Without Vogelsang, people who want to will find a way to get into the back country. There are presently enough packers to handle this need and

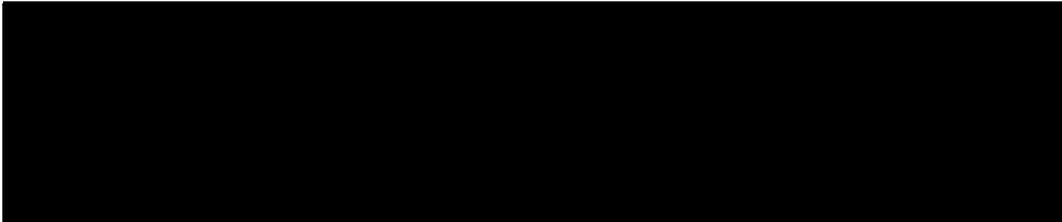
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p. 2072

therefore it should be understood that I am not advocating increased pack train use.

Let the vogelsang High Sierra Camp revert to true wilderness. The value of wilderness is more important than keeping an anachronism alive.

Sincerely,



*Handwritten mark*

Albuquerque NM

February 15, 2008

To: Superintendent, Yosemite National Park  
1 p by fax: 209 379 1294

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VBCU-55-S

FEB 15 2008

P-1871

Re: Vogelsang Backcountry Utilties Improvement Project YOSEMITE NATIONAL PARK

Greetings:

Many members of my family, living in California and elsewhere, have backpacked in the Sierras since 1963, and some or all of us return at least once every year to do so again. Our intense interest in what happens to these precious and delicate lands is of long standing.

I am writing to vehemently oppose any expansion of water and sewage treatment facilities at the Vogelsang or any other High Sierra Camp. Further, it is your clear duty under the law to eliminate all of the presently permitted abuses of these camps, which abuses have caused and each year renew the vile degradation of the surrounding land, surface water and water table, along with the approaching trails and their adjacent watersheds.

I have had the disgusting displeasure to walk through two of these excrescent camps in years past, traversing them as quickly as I could to reach places less defiled. Degradation and filth accost one on all sides. The air is laden with manure dust, flies and other exogenous insect vermin; there is no understory due to incessant trampling; the trail is a manure pit; the water taps are marked as poisonous. Folks dragged in on packstock may not notice what any hiker cannot miss: the evidence on all sides of a class of "stewardship" nothing short of contemptible.

Any permission you might grant to increase this reprehensible and misguided abuse of a rare and wonderful wilderness would be, as well you know, nothing but a foul and consciously evil contravention of the tattered remains of the "wilderness ethic" that is supposed to guide your Service's custody of these lands.

Please. If it costs you your job to do the right thing, what is that job worth if you do not? Do not "improve" the Vogelsang or any other High Sierra Camp. Begin to disimprove these camps and put them on the path to eventual closure.

Most sincerely,

[Redacted signature block]

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FEB 15 2008

P. 1087

YOSEMITE NATIONAL PARK

Superintendent, Yosemite Natl. Park

Subj: Vogelsang Backcountry Utilities Improvement Project  
Scoping Comments.

Dear Sirs:

I think Vogelsang is a very desirable and important destination for backcountry users (backpackers, hikers, riders, groups etc.).

Some in the extreme environmental movement no doubt would like to see Vogelsang "returned to nature" with little or no human use. Please keep in mind that humans, as part of the ecosystem, have "rights" too in the forests.

You can't win with some people. If public toilets are eliminated, how would human waste be handled? No doubt there would be complaints no matter what is done. It's more sanitary, in my opinion, to keep the public facilities open. Why couldn't 2 or 3 toilets be rotated, such that waste would decompose (with lime) between uses?

Please keep Vogelsang open, with few "restrictions" (regarding "quotas" etc). It's a beautiful place, and many value it, but I don't think it gets over-used (I haven't seen any use rates). When I was there one Sept., it was quiet, almost no people, and very beautiful. Please don't restrict its use!

Thank you, Sincerely,

[Redacted Signature]

Mariposa CA  
95338

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Mariposa, CA 95338

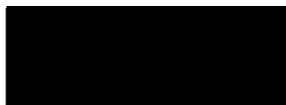
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LET US BARE TO N  
THINK, SPEAK AND  
John Adams, 1791  
POWER/STOCKTON  
USA FIRST CLASS FOREVER

*Superintendent, Yosemite Natl. Park  
Attn: Yosemite Backcountry Utilities Improvement  
Project  
P.O. Box 5774  
Yosemite CA  
95389*

95389+0000





02/15/2008 01:49 PM  
MST

To: <yose\_planning@nps.gov>  
cc:  
Subject: Vogelsang Public Scoping Comments

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VBCU-57-S  
FEB 15 2008

p. 10/1  
YOSEMITE NATIONAL PARK

Hello, YOSE

I am a YOSE wilderness lover and user, I backpack and hike in the wilderness every chance I get The Vogelsang High Sierra Camp proposal does not follow guidance for the wilderness site Many people are not aware that the site is supposed to return to wilderness mangement once it expands outside it's original scope and capabilities - which occurred a while ago. Vogelsang is essentially protected from new developements or "permanent" installations by YOSE's General Management Plan and Wilderness Management Plan. The proposed construction and developments would impair and change the surrounding wilderness and go against past regulations.

The 1984 CA Wilderness Act clearly states that there should be no further developement of the High Sierra Camps. Wilderness is supposed to be natural and these islands in YOSE's wilderness have grown beyond their means.

There should be no new installations: concrete, underground installations, etc..

After reading the guidelins and plans for the HSCs it seems pretty obvious the project should be mothballed for now (and eventually the camps should be taken out)!!!! The High Sierra Camps go against Wilderness regulations. YOSE Wilderness is an extremely special and unique place, we should maintain that. YOSE's wilderness character will be changed and degraded if we need to pour more concrete and create more installations. The solitude, quiet and natural beauty of YOSE wilderness is disrupted by the HSCs.

Regulations on which to base decisions:

California Wilderness Act of 1984 (CWA). The Act, signed by President Reagan, bestowed formal wilderness designation upon most of the Yosemite backcountry. It allowed the HSCs to remain, but Congress stated: "If and when it occurs that the continued operation of these facilities. . . results in an increased adverse impact on the adjacent wilderness environment (including increased adverse impact on the natural environment within the enclaves themselves), the operation of these facilities shall be promptly terminated, the facilities removed, the sites naturalized, and. . . the areas promptly designated as wilderness."

Yosemite's 1980 (GMP) states:

"Potential wilderness classification will prevent any further development of facilities or services; should existing developments be removed, there will be no reconstruction of facilities Wilderness classification will require the eventual elimination of all improvements that do not conform with wilderness activities Use of wilderness areas will be restricted to activities that are compatible with wilderness as cited in the Wilderness Recommendation for Yosemite."

Thanks,



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HSHA president  
 <president@highsierrahikers.org>  
 02/15/2008 07:17 PM  
 PST

To: YOSE\_planning@nps.gov, Michael\_Tollefson@nps.gov,  
 Jen\_Nersesian@nps.gov  
 cc: HSHAhike@aol.com, president@highsierrahikers.org  
 Subject: Scoping comments on Vogelsang Utilities Improvement Project

**RECEIVED**  
 VBCU-58-S  
 FEB 15 2008  
 P-18719  
 YOSEMITE NATIONAL PARK

\*\*\* via electronic mail \*\*\*

(attachments sent via US Mail)

February 15, 2008

Michael Tollefson, Superintendent  
 Yosemite National Park  
 P.O. Box 577  
 Yosemite, CA 95389

**SUBJECT: SCOPING COMMENTS ON PROPOSED "VOGELSANG BACKCOUNTRY UTILITIES IMPROVEMENT PROJECT"**

Dear Superintendent Tollefson,

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, and that also seeks to protect and restore the High Sierra for the benefit of present and future generations. This letter transmits our scoping comments on your staff's proposed "Vogelsang Backcountry Utilities Improvement project."

Many of the HSHA's members visit Yosemite National Park, including the area of the proposed project, for hiking, camping, backpacking, horse packing, and other recreational pursuits. The HSHA is very concerned about the ongoing (and increasing) adverse impacts to the environment and wilderness character of Yosemite National Park due to the existence and continued operation of the "High Sierra Camp" (HSC) at Vogelsang, and due to the proposed "improvements." In short, because of its many harmful effects, this camp should be closed at once. At minimum, if you should decide to proceed with this ill-conceived proposal, your staff must prepare an environmental impact statement (EIS) that evaluates all relevant issues including but not limited to those discussed in this letter.

**Background**

The Vogelsang HSC is an aged, ugly and polluting facility that has a significant negative impact on the environment of Yosemite and on the experience of countless park visitors. All the by-products of human occupancy are produced at the Vogelsang camp: sewage (human body wastes), "gray water" from showers, grease and detergent from kitchens. The wastewater and

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VBCU-58-S  
D. 2/19

sewage produced at this camp pollutes the meadows, soils, and waters of Yosemite National Park.

Congress specifically recognized this threat to Yosemite when it passed the California Wilderness Act of 1984. That Act, signed by President Reagan, bestowed formal wilderness designation upon much of the Yosemite backcountry. Congress allowed the HSC to temporarily remain, but stated:

“...If and when it occurs that the continued operation of these facilities...results in an increased adverse impact on the adjacent wilderness environment (including increased adverse impact on the natural environment within the enclaves themselves), the operation of these facilities shall be promptly terminated, the facilities removed, the sites naturalized, and in the procedure set forth by section 9 of the bill, the areas promptly designated as wilderness.”

The Vogelsang HSC is an anachronism --- an out-of-date holdover from the bad old days of the 1920s through the early 1960s, when more development and more commercialism were considered desirable and beneficial. One way to look at the HSCs today is this: If the NPS were to propose establishing an HSC in the Yosemite backcountry at the present time, the project would never get off the ground. It would violate the Wilderness Act, it would violate the California Wilderness Act, it would violate the Park Service's Organic Act, and it wouldn't have a ghost of a chance of surviving an honest NEPA process. That being so, why should not the Vogelsang HSC be abolished at this time?

Fifty years ago, no one talked about environmentalism. Now we have a federal agency, the EPA, and all and sundry declare themselves to be in favor of environmental protection. It is thus time for the National Park Service to catch up with the times (and pay attention to its Organic Act) by choosing preservation of park resources, scenery, wilderness character, and wild river values over the ongoing exploitation and impairment that are perpetuated by this ugly and polluting camp.

Furthermore, the trail from Tuolumne Meadows to the Vogelsang HSC, like all trails traversed by the HSC pack trains, is battered and polluted, featuring flies and stench and dust. One is not out of sight of manure for the entire seven miles. Significantly, a recent study by scientists from the University of California (U.C. Davis Medical School) has documented that the Tuolumne River is being polluted in this area, and concluded that: “*pack animals are most likely the source of coliform [bacteria] pollution*” (Derlet and Carlson 2006, copy attached). It is time for the NPS to pull its head out of the sand, and stop these polluting activities.

The Vogelsang HSC has a reported capacity of about 42 people. For the sake of those 42, dozens of people every day --- and during the course of an entire season, thousands --- are inconvenienced and offended by the disgusting condition of the trail and the pollution of surrounding park lands.

The House Committee Report prepared for the 1984 California Wilderness Act also stated:

VBCU-58-5  
P-30819

“ ...Because of the importance of continuing monitoring and assessment of this situation, immediately upon enactment of this bill into law, the Secretary of the Interior should document current baseline operational and environmental impact conditions of all of these facilities [HSC camps], and he should also, within one year of the date of enactment, report in writing to the relevant committee of the House and Senate, his findings and recommendations as to this matter. Annual assessments of this situation should thereafter be made by the Secretary to assure continued monitoring of conditions.”  
(House Committee Report No. 98-40)

The Park Service at Yosemite has apparently made no effort(s) whatsoever to prepare the baseline reports or the annual monitoring reports that Congress requested decades ago. Why? Because the NPS has always swept the impacts of this camp under the rug, and it continues to do so because the NPS has been hell-bent on keeping the camp open -- and it knows that any honest assessment would support our call to permanently close the camp. The time has come to stop the dishonesty, stop the cover-ups, stop the clandestine helicopter use, stop the “band aid” attempts to mitigate the harm, and close the camp.

Further, Yosemite’s 1980 General Management Plan (GMP), which preceded the CWA by four years, states:

“...Potential wilderness classification will prevent any further development of facilities or services; should existing developments be removed, there will be no reconstruction of facilities. Wilderness classification will require the eventual elimination of all improvements that do not conform with wilderness activities. Use of wilderness areas will be restricted to activities that are compatible with wilderness as cited in the Wilderness Recommendation for Yosemite.”

That sounds quite clear, doesn't it?

After Congress passed the 1984 CWA it became evident that the sewage disposal system at Vogelsang was failing, and the meadows and streams around the Vogelsang HSC were being threatened by wastewater from the camp. Instead of closing the camp, as required by law and by common sense, the Park Service in 1985 constructed a new “leach mound” system in an effort to contain the wastes (i.e., building a huge mound of soil, discharging the wastes into the pile, and simply hoping for the best). The project involved a great amount of explosives, soil and wetlands disturbance, and helicopter use. But the fix was short-lived. By 1990 it was obvious to the Yosemite administration and to the Curry Company (the operator of the camp) that the mound system was failing:

“After several seasons of continuing environmental concerns, NPS maintenance representatives have determined that the mound system for sewage disposal at the Vogelsang High Sierra Camp is inadequate to properly handle solid wastes generated by Camp guests and employees.” (Yosemite National Park Project Proposal Form, dated 1/16/91.)

At this point, as in 1985, the only intelligent action would have been to close the camp, naturalize the site, and designate it as wilderness. Nevertheless, in the summer of 1991, without asking for public comment, the Park Service once again ignored the law and constructed more new toilet facilities at Vogelsang HSC.

And now, because of "*public health and safety issues and utility deficiencies at the Vogelsang High Sierra Camp*" your staff is at it again -- proposing more band-aid cover-ups.

### **Impacts to Wilderness Character**

The operation of the Vogelsang HSC is resulting in substantial adverse impacts to the wilderness character of the surrounding Yosemite Wilderness. For example, in 2007, a woman with a history of memory loss was brought to the camp, and when she became lost, a massive search was undertaken, which resulted in countless helicopter flights. (See *The Sacramento Bee*, Wednesday August 8, 2007; copy attached). The NPS even used the search as an excuse to improperly fly non-search equipment and supplies to the Vogelsang HSC. All of this helicopter use (both search-related and non-search related) degrades the wilderness character of the Yosemite Wilderness. Your EIS must include an alternative to eliminate the camp, and that alternative (i.e., no continued helicopter use after the camp is removed) must be the baseline for evaluating the impacts of your other alternatives. That is, alternatives for retaining the camp are very likely to result in significant degradation of wilderness character due to helicopter use.

The HSC at Vogelsang is classified as "potential wilderness addition," which, by law, regulation and policy must be treated and managed essentially the same as wilderness. (See the California Wilderness Act of 1984, Section 9, and Yosemite's General Management Plan, quoted above.) However, despite the ongoing and increased impacts of the HSCs, and the clear direction from Congress, we are aware that the NPS has made ongoing efforts to hide the impacts of these facilities from Congress and the public, and has illegally continued to use nonconforming methods (i.e., helicopters) to maintain the HSCs and to construct new developments (i.e., sewage mounds, toilets, etc.) at the HSCs. Congress specifically directed that:

"Helicopter use for routine nonemergency purposes associated with visitor use is a questionable activity in national park system wilderness areas and should be eliminated within designated national park system wilderness." (House Committee Report No. 98-40, at p. 51)

In sum, this project requires an environmental impact statement (EIS) to evaluate and disclose the scope and nature of the substantial environmental impacts that would result from retaining and upgrading this camp. Significant impacts to the wilderness character include, but are not limited to: (1) impaired scenery; (2) degraded and offensive trails; (3) pollution of surface and ground waters by sewage and wastewater produced at the HSCs; (4) pollution of surface waters by manure (bacteria, etc.) produced by pack animals that service the camps; (5) harm to wildlife that come in contact with sewage (including pathogens and nutrients), kitchen/bath wastes, and human food sources; (6) harm to native songbirds due to proliferation of brown-headed cowbirds; and (7) noise and impairment of scenery due to helicopter use.

VBCU-58-5  
P. 5/8/19

## **Commercial Packstock Enterprises -- the Vogelsang packtrains**

The use of stock animals can be legitimate, appropriate, and even necessary for certain recreational and/or administrative purposes. We want to make clear that we do **not** advocate or suggest the complete elimination of recreational or administrative stock use from Yosemite National Park. Our primary concern is that the NPS must acknowledge and substantially reduce the many adverse impacts that are occurring due to the currently excessive and poorly controlled use of stock animals in the day-to-day operation of the Vogelsang HSC.

We are aware that commercial packstock activities and impacts have increased substantially in recent years in Yosemite. Your planning process should begin by producing a complete disclosure of the cumulative increases in stock use, facilities, and impacts that have occurred over the past few decades. Then, your plan should, at minimum, significantly reduce/control commercial stock use to avoid the identified cumulative impacts, and incorporate definitive limits to prevent future harmful increases in commercial stock enterprises.

## **Quotas and Permits for Commercial Stock Outfitters**

The Yosemite backcountry is so popular that quotas on its use have been implemented to prevent unacceptable impacts. We support the implementation of restrictions designed to protect park, wilderness, and wild & scenic river values. However, we remain concerned that commercial outfitters are allowed easy access when the general public is turned away due to use quotas.

A fundamental tenet of environmental science that must be acknowledged is that one horse (or mule) can produce *at least* as much impact as several people (see references below). Your EIS for this project should state clearly that: (1) Commercial stock use of Yosemite National Park is a privilege --- not a right, and (2) Commercial stock use shall not be given priority over private foot travel. Wherever rationing (i.e., a quota system) is necessary, commercial stock use, including animals used to service the HSC at Vogelsang, should be reduced to maximize the number of people allowed to enjoy the area.

In addition, all commercial outfitters (or their clients) should have to wait in line with the rest of the public to obtain wilderness reservations and permits. Commercial packstock enterprises should never be allowed to issue their own permits to conduct commercial operations in Yosemite National Park. (This is a ridiculous notion, and one that illustrates the unfair special treatment that commercial packers receive from land managers in some areas.)

## **Impacts to meadows, stream zones, wetlands, and lakeshores**

Numerous studies have documented adverse impacts to meadows caused by stock animals used for recreation (Cole 1977, Merkle 1963, Nagy and Scotter 1974, Neuman 1990 & 1991a-b, Strand 1972, Strand 1979a-c, Sumner and Leonard 1947, Weaver and Dale 1978).

Trampling and grazing by livestock are known to increase soil compaction and to contribute to

streambank erosion, sedimentation, widening and shallowing of channels, elevated stream temperatures, and physical destruction of vegetation (Behnke and Ralieggh 1978, Bohn and Buckhouse 1985, Kauffman and Krueger 1984, Kauffman et al. 1983, Siekert et al. 1985). Streambanks and lakeshores are particularly susceptible to trampling because of their high moisture content (Marlow and Pogacnik 1985). Unstable streambanks lead to accelerated erosion and elevated instream sediment loads (Duff 1979, Winegar 1977).

In sum, the impacts of recreational stock animals on meadows, streams, wetlands, and lakeshores are substantial, and need to be addressed in this planning process.

### Impacts due to invasive weeds

The role of herbivores in dispersing weeds is now well established. Seeds can be spread from one location to another by attachment to the bodies of animals (epizoochory) or by being ingested and later excreted (endozoochory). (See, for example, Fenner 1985, Hammit and Cole 1987, Harmon and Kiem 1934, Heady 1954, Janzen 1982, Ridley 1930.) Many native herbivores have been shown to be effective seed dispersers. In addition, domestic stock animals such as cattle, sheep, pigs, and horses have all been shown to pass viable seeds through their intestinal tracts. (See, for example, Harmon and Kiem 1934, Harper 1977, Heady 1954, Janzen 1981 and 1982, McCully 1951, Piggitt 1978, St John-Sweeting and Morris 1991, Welch 1985.) A detailed review of the scientific literature regarding the spread of weeds by domestic livestock (cattle, sheep, and horses) concluded:

“Recent research showing that livestock significantly increase invasions by nonindigenous plants in the western U.S. is persuasive. Similar results were found in all western states and for nearly every introduced species that has been studied. Although many of these studies would have benefited from both better replication and more recent research techniques, the pattern of evidence is overwhelming.” (Belsky and Gelbard 2000)

Numerous other reports document specifically that recreation livestock (i.e., horses, mules, etc.) can and do spread exotic weeds. (See Benninger 1989, Benninger-Truax et al. 1992, Campbell and Gibson 2001, Hammit and Cole 1987, Harmon and Kiem 1934, Janzen 1981 and 1982, Landsberg et al. 2001, Quinn et al. 2006, Weaver and Adams 1996.) For example, several reports show that horses can excrete viable seeds for many days or even *weeks* after ingestion. (See, for example, Janzen 1981, and St John-Sweeting and Morris 1991.) Hammit and Cole (1987) state that horse manure is a major source for exotic seeds in wilderness recreation areas. Campbell and Gibson (2001) found that “*seeds transported via horse dung can become established on trail systems,*” and that weed seeds found in horse manure had become established along trails used by horses, but not along trails that weren’t used by horses. Weaver and Adams (1996) documented “*substantial overlap in the weed species germinated from horse manure and the weeds present along trails used by horses.*” After reviewing all available scientific evidence, Landsberg et al. (2001) concluded that “*concerns about dispersal of weeds by horses are legitimate.*”

Invasive (i.e., weed) species have been specifically identified -- at the national level -- as one of

VBCU-58-5  
P. 7 of 19

the **four greatest threats** to our national forests:

See: <http://www.fs.fed.us/projects/four-threats/>

The spread of invasive weeds has also been identified by the Regional Forester as an urgent issue that needs to be addressed throughout California.

See: <http://www.fs.fed.us/r5/noxiousweeds/>

Current direction requires Forest Service units neighboring Yosemite to address these issues. For example, specific Standards and Guidelines applicable to neighboring Forest Service lands include:

42. Encourage use of certified weed free hay and straw. Cooperate with other agencies and the public in developing a certification program for weed free hay and straw. Phase in the program as certified weed free hay and straw becomes available. **This standard and guideline applies to pack and saddle stock used by the public, livestock permittees, outfitter guide permittees, and local, State, and Federal agencies.**

43. Include weed prevention measures, as necessary, when amending or re-issuing permits (**including, but not limited to, livestock grazing, special uses, and pack stock operator permits**).

See:

<http://www.fs.fed.us/r5/snfpa/final-seis/rod/appendix-a/standards-guidelines/forest-wide.html>

As outlined above, scientists have (in the past five to seven years) documented “overwhelming” evidence that domestic livestock (including horses, mules, etc.) can and do spread harmful weeds. This relatively new issue has never been adequately evaluated by the NPS at Yosemite. Therefore, your EIS must address the issues of weeds and plant pathogens that may be spread by domestic stock animals used to service the Vogelsang HSC.

This would include, at minimum, a range of reasonable alternatives for mitigating the potential for spread of weeds and plant pathogens, such as: (1) prohibiting all grazing by domestic stock (to minimize the free-roaming of stock animals and dispersion of seeds across the landscape via epizoochory and endozoochory); (2) requiring stock users to feed their animals weed-free forage for at least several days before entering the park (in order for stock animals to excrete viable weed seeds before entering Yosemite); (3) cleaning stock coats and hooves before entering the park (to minimize the potential for epizoochory); and (4) prohibiting open grazing and requiring the use of weed-free feed at all times within the park.

### **Water quality impacts of stock animals**

Stock urine and manure contribute to eutrophication of streams and lakes (Stanley et al. 1979). Such impacts are a significant concern in the oligotrophic aquatic environments of Yosemite

VBCU-58-5  
p. 8 of 19

National Park. For example, a recent publication by the National Academy of Sciences documents that nutrients from livestock wastes can cause deformities in amphibians. See Johnson et al. 2007 "Aquatic Eutrophication Promotes Pathogenic Infection in Amphibians":

<http://www.colorado.edu/eeb/facultysites/pieter/documents/Johnson%20et%20al.%202007.pdf>

Livestock manure can also pollute water with harmful bacteria and other organisms such as *Giardia* and *Cryptosporidium*, which are pathogenic to humans and other animals. (See, for example, Derlet and Carlson 2002 and 2006).

Some stock users continue to claim that the strains of *Giardia* and *Campylobacter* spread by domestic livestock are not infective to humans. This is wishful thinking, and is counter to the available scientific evidence. For example, their argument that humans cannot contract *Giardia* from stock animals hinges on a single inconclusive study conducted on domestic cats. The cross-transmission of enteric pathogens from stock animals is certainly not fully understood. However, there is an increasing body of evidence showing that pathogenic bacteria, protozoa such as *Giardia* and *Cryptosporidium*, and other harmful pathogens can be spread from stock animals to humans (Bemrick 1968, Blaser et al. 1984, Buret et al. 1990, Capon et al. 1989, Davies and Hibler 1979, Derlet and Carlson 2002, Derlet and Carlson 2006, Faubert 1988, Isaac-Renton 1993, Kasprzak and Pawlowski 1989, Kirkpatrick and Skand 1985, Kirkpatrick 1989, LeChevallier et al. 1991, Manahan 1970, Manser and Dalziel 1985, Meyer 1988, Rosquist 1984, Saeed et al. 1993, Stranden et al. 1990, Suk 1983, Suk et al. 1986, Taylor et al. 1983, Upcroft and Upcroft 1994, Weniger et al. 1983, Xiao et al. 1993).

Specifically, Derlet and Carlson (2002) found pathogenic organisms in 15 of 81 manure samples collected from pack animals along the John Muir Trail. This documents that about twenty percent of the manure piles in the Sierra contain potentially pathogenic organisms (i.e., organisms that may cause disease in humans). Pack animal manure collected in the Tuolumne River/Meadows areas contained pathogenic bacteria as well as *Giardia*. Derlet and Carlson (2006) also found pathogenic bacteria in surface waters of the Tuolumne River watershed, and concluded that **"pack animals are most likely the source of coliform [bacteria] pollution."** The pack animals used to operate the Vogelsang HSC are likely a significant cause of this pollution.

Your EIS must evaluate and disclose the effects of domestic animal wastes on the environment, and any plan to retain the Vogelsang HSC should include elements to minimize the amount of animal waste that reaches water courses. For example, stock users should be required to use other management tools (i.e., use of portable electric fencing when watering stock, diapers on pack and saddle stock animals, etc.) to prevent pollution of surface waters by livestock manure. (See enclosed report "Horses in Diapers Help Mexico's Beach Cleanup." This report documents the feasibility of requiring diapers on stock animals to prevent the spread of diseases found in horse manure. Horse diapers are commercially available and have been accepted around the world. See, for example: <http://www.equisan.com.au/>

In addition, your environmental document must acknowledge not only the State of California's specific water quality standards, but also the state/federal anti-degradation requirements. See the

VBCU-58-5  
P. 9/19

*Water Quality Control Plan for the Central Valley Region*, the State Water Resource Control Board's Resolution No. 68-16 ("Statement of Policy with Respect to Maintaining High Quality Waters in California"), and 40 CFR Sec 131.12.)

Significantly, the waters of Yosemite National Park are high quality waters that are eligible for designation as Outstanding National Resource Waters. The federal and State anti-degradation requirements clearly apply. Specifically, the National Park Service must comply with the California State Water Board's Resolution No. 68-16, which requires that existing high quality waters be fully protected, unless very specific formal findings are made. In this case, neither the Central Valley Regional Water Quality Control Board, the California State Water Resources Control Board, nor the U.S. Environmental Protection Agency has ever made the overriding findings necessary to allow degradation of water quality from the High Sierra Camps or the commercial stock enterprises that service them. Because the degradation and pollution of water resulting from both the High Sierra Camps and the commercial pack & saddle stock enterprises are *controllable*, that degradation and pollution must be fully prevented (unless the findings required by Res. 68-16 are formally made). These violations of state and federal water quality laws must be stopped.

### **Impacts of brown-headed cowbirds**

The operation of livestock pack stations, stables, and corrals (i.e., stock holding areas) is contributing to the demise of songbird populations in the Sierra Nevada by creating artificial habitat for the parasitic brown-headed cowbird. Cowbirds are obligate brood parasites that can significantly impact native passerine species. One study in the northern Sierra found that up to 78 percent of warbler nests are parasitized by cowbirds, resulting in significant decreases in the reproductive success of those species (Airola 1986). Elsewhere in the Sierra, individual female cowbirds have been reported to lay an average of 30 eggs per season (Fleischer et al. 1987). These high rates of parasitism and fecundity by cowbirds indicate that significant local impacts occur wherever cowbird populations are present. Habitat modifications, pack stations, corrals, and the presence of livestock throughout the Sierra may contribute significantly to regional declines in songbird populations (Graber 1996). A detailed literature review on cowbird impacts is enclosed and incorporated by reference. The impacts of holding facilities for stock animals that supply the Vogelsang HSC must be evaluated. Your EIS should clearly disclose the environmental consequences of, and alternatives to, the continued use of stock animals by the HSC. For example, your EIS should consider, at minimum, the removal of pack stations and stables from national park lands, and a reduction in stock use to the minimum amount that is necessary.

### **Trail damage by stock animals**

When compared to hikers, stock parties cause substantially greater impacts to trails (Dale and Weaver 1974, Frissell 1973, Kuss et al. 1986, Laing 1961, McQuaid-Cook 1978, Trottier and Scotter 1975, Weaver and Dale 1978, Weaver et al. 1979, Whitson 1974, Whittaker 1978, Wilson and Seney 1994).

VBCV-58-5  
p. 10 of 19

Whitson (1974) provides a good discussion of how horse impact differs from hiker impact. Dale and Weaver (1974) observed that trails used by horses were deeper than trails used by hikers only. Trottier and Scotter (1975) documented deterioration of trails used by large horse parties. Weaver and Dale (1978) found that horses caused significantly greater trail damage than hikers. Whittaker (1978) concluded that horses significantly increased the potential for severe erosion by churning soil into dust or mud. Weaver et al. (1979) found that horses caused more trail wear than both hikers and motorcycles. After reviewing the available literature, Kuss et al. (1986) concluded that: "*Pack stock and horse travel is considerably more damaging to trails than hiking.*" Recent research (Wilson and Seney 1994) has confirmed these earlier studies, concluding that "*horses produced significantly larger quantities of sediment compared to hikers, off-road bicycles, and motorcycles.*"

To mitigate these impacts of stock use, your EIS should at minimum limit stock groups to ten or fewer animals per party (as suggested by Cole 1989 & 1990).

### **Aesthetic effects (adverse impacts on visitors' experience)**

We are also very concerned about the many aesthetic impacts that result from stock use, such as the dust, manure, urine, and flies that severely pollute the trail leading to the Vogelsang HSC (see Absher 1979, Cole 1990, Stankey 1973, Watson et al. 1993) and the many public comments in the record. The experience of park visitors will continue to be substantially harmed until the numerous pack trains that travel to-and-from the Vogelsang HSC are substantially reduced or stopped.

Group size limits. The NPS at Yosemite has in the past taken the irresponsible, unsupportable (and illegal) position that limits on group size will only be adjusted in conjunction with surrounding land units. This ignores the mandate of the Wilderness Act and the Wild and Scenic Rivers Act to preserve wilderness and wild & scenic river values regardless of how other surrounding areas might be managed (or mismanaged). The fact that officials in the central and southern Sierra agreed (in a 1991 back-room deal) on a "consistent" number for maximum group sizes is no excuse to ignore the mandates of the Wilderness Act, the Wild and Scenic Rivers Act, and the Park Service's Organic Act. This is especially true since the 15-year-old decision to allow 25 stock animals per group throughout the central/southern Sierra was adopted without following any NEPA process, and was implemented over the strong objections of hundreds of citizens and scores of conservation groups.

Further, the current group size limits have been shown to significantly and adversely affect park resources and values. In order to adequately protect Yosemite's environment and wild & scenic river values, the group size limits must at minimum be revised downward.

Number of stock animals per group. Scientists have recommended that thresholds in group size that result in unacceptable impacts "*...would certainly differ between backpackers and parties with stock*" (Cole 1989). Lower limits are necessary for stock parties, since they cause greater social *and* ecological impacts. Yosemite National Park must acknowledge the available research findings and conclusions, and regulate hikers and stock users according to their varying degrees

VBCU-58-5  
p. 11/9/19

of impact. The current group size regulations in effect for Yosemite's backcountry -- which employ the same limits for hikers and stock users -- were arbitrarily adopted for "ease of management." This scheme does not comply with either the Wilderness Act, the Wild and Scenic Rivers Act, or the Park Service's own Organic Act or wilderness management policies.

Recent research has shed light on the effects of large stock groups on the experience of wilderness users. Watson et al. (1993) documented that the average hiker in the central/southern Sierra is unacceptably affected by encountering stock groups with more than *nine* animals. Even stock users themselves are negatively affected by encounters with large groups: The average *stock user* in the central/southern Sierra is unacceptably affected by encountering groups with over *fifteen* animals (Watson et al. 1993, Table 29 & Table 10). Thus it is very clear that *twenty-five* animals in a group will degrade the character of the Yosemite Wilderness for the majority of visitors. The Park Service must take action to prevent impairment of these areas by lowering the group size limit for stock parties.

We propose that groups traveling to the Vogelsang HSC (including the commercial supply packtrains) be limited to no more than nine head of stock per party (*see* Cole 1989 & 1990, Watson et al. 1993), and that **all** off-trail travel by stock be strictly prohibited.

### **Summary and Conclusions**

As discussed above, the Vogelsang High Sierra Camp and the commercial packstock enterprises used to support it are having significant, adverse impacts on the environment and wilderness character of Yosemite. The proposed project would **not** stop the ongoing harm and pollution; it would serve only to perpetuate that harm and pollution, and to delay the inevitable closure of this ugly, polluting, elitist, and exploitive facility. The Vogelsang HSC should be closed without wasting any more taxpayers' money on further studies or band-aid improvements. If you are unable or unwilling to close the camp, at minimum an EIS must be prepared that fully evaluates and discloses all impacts, and adopts effective limits and controls on permissible activities, including commercial packstock enterprises. A formal finding from the California Water Boards would also be needed in order to comply with the State's antidegradation policy.

Thank you for considering the above comments. Please contact me at if you have any questions about this letter. Please also send full paper copies of all environmental and decision documents for our review.

Sincerely yours,

***Peter Browning***

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**Enclosures (5):** (1) "Coliform Bacteria in Sierra Nevada Wilderness Lakes and Streams : What Is the Impact of Backpackers, Pack Animals, and Cattle?" by Derlet and Carlson (2006); (2) "The Brown-headed Cowbird in the Sierra Nevada: Impacts on Native Songbirds and Possible Mitigation Measures," by B.C. Spence; (3) "Horses in Diapers Help Mexico's Beach Cleanup," by Reuters, August 2003; (4) "Aquatic Eutrophication Promotes Pathogenic Infection in Amphibians" by P.T.J. Johnson 2007; and (5) "Yosemite Hiker Search Ends," Sacramento Bee, August 8, 2007

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VBCU-58-S  
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02/15/2008 08:19 PM  
PST

To: YOSE\_planning@nps.gov

cc:

Subject: Scoping Comments for Vogelsang Backcountry Utilities Project

RECEIVED  
VBCU-59-S  
FEB 15 2008

p. 1 of 1

YOSEMITE NATIONAL PARK

Dear NPS at Yosemite,

THE VOGELSANG HIGH SIERRA CAMP IS AN EYESORE, A DUMP, A COMMERCIAL EXPLOITATION. LAST TIME I WAS THERE, MARMOTS HAD GOTTEN INTO THE WASTEWATER, CONSUMED IT BECAUSE THEY SMELLED FOOD, AND WERE GAGGING ON THE LYE AND SOAP FROM THE KITCHEN. THE TRAIL LEADING TO VOGELSANG IS A STINKING MANURE PILE. I WON'T EVEN HIKE THERE ANYMORE. PLEASE WAKE UP FROM YOUR DELUSION THAT YOU CAN ADEQUATELY TREAT WASTEWATER WITH PRIMITIVE DISPOSAL SYSTEMS IN AN ALPINE ENVIRONMENT. IT IS NOT GOING TO WORK. PLEASE STOP MESSING AROUND, AND JUST CLOSE THE CAMP. PERIOD. WE ARE NOT FOOLED. PLEASE STOP FOOLING YOURSELVES. PLEASE STOP BEING SO PATHETIC !!!!!

Thank you for considering my comments. Please do the right thing for Yosemite. Close the camp.



SLT, CA 96158

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To: <Yose\_Planning@nps.gov>  
 cc:  
 Subject: Vogelsang scoping comments

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**YOSEMITE NATIONAL PARK**

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Vogelsang is a very special area. It is very beautiful and, at 10,300 feet, very sensitive to overuse.

Of course the park must address public health and safety issues at the Vogelsang High Sierra Camp (VHSC) and the Backpacker's Camp while these facilities persist. I would ask that, in planning to address the deficiencies, you conscientiously follow the guidance and spirit of the law provided in the 1964 Wilderness Act, the 1984 California Wilderness Act, the 1984 House Report on the 1984 CA Act interpreting the CA Wilderness Act, and the 1989 Yosemite Wilderness Management Plan.

These documents make clear that the continued operation of the High Sierra Camps should not result in any increased adverse impact on the adjacent wilderness environment compared with 1984 facilities and operations. The 1984 Report, in particular, indicates that, in seeking solutions to management issues, carrying capacity limits should be applied and tied to the limits of the ability of the resource to absorb sustained use without unacceptable degradation.

Other issues that become apparent in reviewing some of the above guidance include the following:

1. Is there monitoring at the VHSC to allow for evaluating whether proposed or anticipated actions would increase adverse impacts within the Potential Wilderness Addition (PWA) or adjacent wilderness? (The 1984 Congressional Report directed baseline evaluation by 1985 and regular assessments to provide for such evaluations.)
2. In complying with state and NPS regulations for the water supply and wastewater systems, it remains incumbent on the park to avoid increased adverse impacts, including to wilderness experience, on the adjacent wilderness environment and PWA in which the VHSC is located. Therefore, operations should not add facilities, nor add power generation that will create visual impacts or noise (e.g., generator) while adding filtration and disinfection to the water supply and repairing or replacing the water storage tank.
3. Repairing or replacing the water storage tank should not create a visual impairment of the Wilderness setting.
4. Switching to chlorination and a spray field may be inappropriate at this high-elevation site. Chlorine is a biocide, and the coarse soils, cold temperatures, and low organic matter content probably provide a meager ability for the soils to filter and/or tolerate chlorine. Chlorine kills soil organisms that are the basis for healthy soils and support of plant life in any setting; the shallow soils around Vogelsang may make them especially vulnerable to even low chemical concentrations.
5. The camp's water supply sourcing should ensure diversions do not deplete water resources normally available for local plant and animal life.

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Additional issues that occur to me include:

6. The issue of human waste associated with the backpacker's camp. I believe the campground has been open during the time the associated composting toilet has been closed, and there is now abundant, unburied human waste in all directions from the closed toilet. This is the result of the offer of a toilet now removed and inappropriate concentration of backpackers at a high-elevation area that cannot easily support the concentration. The campground should not be open while the toilet is closed. Even with the toilet, there is undoubtedly high input of nitrogen in the campground area, leading to polluting nutrient runoff during rain and snowmelt and degrading visitor experience.

The 1984 Congressional Report states that "user dispersion, alternate camping practices, limitation, and other approaches should be considered as alternatives, and instituted." This statement was related to helicopter use, but applies to the Vogelsang backpacker campground as well. Concentrating use to the extent found at the High Sierra Camp backpacker campground is not managing the area "as much as possible as wilderness" (Wilderness Management Plan 1989).

7. The restoration of social trails is laudable and should use very local seed and plant stock for revegetation as the park has been doing in other areas for some time. It should also repair soil structure to the extent practicable in social trails rather than just revegetate, again as the restoration program has done in the past.

[REDACTED]  
El Portal, CA 95318  
[REDACTED]

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VBCO-61-5

FEB 15 2008

P. 1031

YOSEMITE NATIONAL PARK

February 10, 2008

Mike Tollefson, Superintendent-Yosemite National Park:

This letter is in response to the proposed Vogelsang Backcountry Utilities Improvement Project.

I have visited the Yosemite backcountry for the past 30 years and have noticed during that time the impact of stock use and use of the High Sierra Camps has increased through the years.

In the earlier times I stayed at the tent-cabins, then became a backpacker camper. In the later years I noticed an increase in the number of humans using more and more pack animals. The trails were becoming filled with more and more dung and eroding even more so, let alone the amount of dust I inhaled!

Although facilities were improved at Vogelsang through the years, the water supply was being polluted more and more. I remember the day I hiked up to Vogelsang, being stopped by a Park Ranger and told to wait while some blasting was taking place where they were doing some upgrading for the water supply. Later they installed toilets that were meant to be used with compost - then the marmots invaded the structures and it was an ongoing battle.

I have written comments on the General Management Plan since the 80's. The GMP stated that no further development of facilities or services in the wilderness, - that's were Vogelsang is - shall take place.

If the proposed plan at Vogelsang is approved, the impact of the construction activities would harm the character of this beautiful wilderness area.

An Environmental Impact Statement will be needed before doing such a proposed project, which will show the huge impacts to the Yosemite wilderness areas.

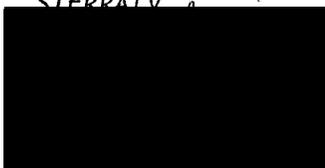
Finally, stock use should be cut back to pack in supplies and to transport humans to all the other High Sierra Camps as well. The idea of the HSC's were to give the people a wilderness feeling; that has disappeared! It is now "over-used" and over populated, especially by stock.

I pray that DNC doesn't get its way and ask to turn the HSC's into the "CAMP" they have in Sequoia with every eminety for guests!

Vogelsang High Sierra Camp, especially, should be entirely closed and the area designated as wilderness!

P.S. Merced HSC gives one a feeling we're still in Yosemite Valley - it is not a camp that gives one a feeling of being away from all the people in the Valley. It is also "over used" and the stock trails make one feel you are in the middle of a stock camp.

SIERRA



Lincoln, CA 95648-



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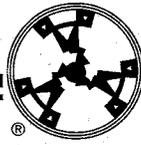
"LET US DARE TO ASK  
THINK, SPEAK, WRITE."  
John Adams, 1776  
USA 41

SACRAMENTO CA 957  
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MIKE TOLLEFSON, Superintendent  
Yosemite National Park  
ATTN: Vogelsang Backcountry Utilities  
Improvement Project  
POST OFFICE BOX 577  
YOSEMITE, CA 95389

532940577





RECEIVED

W-000-695  
FEB 15 2008

February 13, 2008  
Yosemite National Park

Dear Mr. Jollefson,

I am writing in support of the Inclusive Project, specifically that involving Vogelsong HSC. For more than 50 years, Yosemite has been a destination for my husband and me and our children. I think we have participated in every kind of accommodation in the Park in every season of the year, including the HSC loop hike under the expert guiding of Ranger Dick Gwert. We recently were at the Ahwahnee for five nights for X-country skiing and introduced ourselves to you at dinner.

Each part of the Yosemite experience is unique and valuable. We appreciate your efforts in maintaining it for future generations. My grandchildren are just appearing.

Sincerely,

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Wed 2/13/08

Fort Worth, Texas 76140

Superintendent, Yosemite National Park  
Attn: Vogelsang Backcountry Utilities Improvement Project  
P.O. Box 577  
Yosemite, CA 95389  
yose\_planning@nps.gov

RECEIVED

FEB 15 2008

YOSEMITE NATIONAL PARK

Superintendent:

I am writing to submit scoping comments on the proposed Vogelsang Backcountry Utilities Improvement Project. You have stated, "Scoping is an opportunity early in the planning process for the public to suggest issues to be considered in the proposed project. Ideas and concerns from the public help to identify the range of issues that should be addressed in this planning effort."

I support responsible use of our national parks and backcountry. When I lived in the area, I visited them weekly during the summer and monthly or so during the winter. Now that I live further, I visit only once or twice in a summer, though for longer periods, such as a recent three-week trip climbing many of the high peaks in the High Sierra. I have over-night back-packed in the Yosemite backcountry numerous times, and have seen each of the High Sierra Camps (HSCs).

My belief is that the full impact of the improvements has not been weighed, including the actual project difficulty and the use of stock or other means to transport the equipment and materials to the HSC.

I feel your scoping should clearly identify new items as upgrades, and those which are driven by new laws. It appears to me that additional laws are the impetus for aspects of the project. My impression is that this is a clear indication that the HSC should be abandoned because the facility requires more and more "improvements." I am also opposed to the additional developments such as the water source disinfectant system, which appear to be simply in response to laws and regulations which have been created in such a way that they do not account for the most appropriate response for a back country HSC.

I feel your scoping should more realistically weigh the true difficulty in accomplishing the tasks in your proposed options. For example, the current wastewater system was not accomplished to specification when built just a few years ago in several regards, and this indicates that the difficulty in accomplishing the proposed improvement project.

I feel you should consider in your scoping the closure of Vogelsang HSC; its level of imprint on the environment out-weighs the benefit derived from it.

As time, use, and laws have changed, so too should our practices. High-altitude areas have been closed to fires and firewood-gathering. I think it is time that Vogelsang HSC be closed.

I am glad for the area's designation as a potential wilderness addition, and hope that full wilderness designation will be soon implemented.

Sincerely,

[Redacted signature]

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LET US READ,  
THINK, SPEAK, WRITE.  
John Adams  
power



Superintendent

Yosemite National Park

Area: Vegetation and Impoverment Proj.

P.O. Box 577

Yosemite CA 95389

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Whittier, California 90601  
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YOSEMITE NATIONAL PARK

Superintendent, Yosemite National Park  
Attn: Vogelsang Backcountry Utilities Improvement Project  
P.O. Box 577  
Yosemite, CA 95389

Dear Sirs:

It is time for you to make the tough but correct decision to close the Vogelsang High Sierra Camp and remediate the site. It should be added to the designated Wilderness area. Although it has been in use since 1923, it is time to cease operations there.

It certainly appears the scope of work necessary to insure compliance with the myriad requirements and regulations for continued operation of the Camp would be highly disruptive to the surrounding Wilderness. Therefore, the last disruption in this area should be for this dismantling and remediation of the Vogelsang High Sierra Camp site.

In years past, I have found the Rafferty Creek trail to be fouled by the stock traffic necessary to the "normal" operation of the Camp. As with "fire falls", sheep grazing, and hydraulic mining, it is time to close the book on this part of Yosemite history. Your successors and the general public will greatly benefit from such an action.

Thank you for the consideration of my comments and I remain,

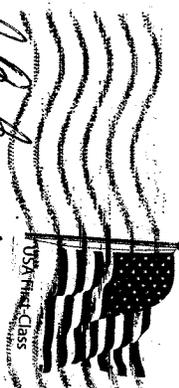
Sincerely yours,

[Redacted Signature]

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*Superintendent, Yosemite National Park  
Attn: Loggery Building, Yosemite Utilities Department Project  
P.O. Box 5777  
Yosemite, CA  
95389*

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