

**Public Lands Committee  
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**VIA FACSIMILE & FIRST CLASS MAIL  
(559) 565-4202**

Superintendent Karen F. Taylor-Goodrich  
Sequoia and Kings Canyon National Parks  
Attention: Wilderness Stewardship Plan  
47050 General's Highway  
Three Rivers, CA 93271

Re: Wilderness Stewardship Plan

Dear Superintendent Taylor-Goodrich:

This correspondence amounts to the written comments by the Public Lands Committee of the High Sierra Unit of the Backcountry Horsemen of California on the proposed Wilderness Stewardship Plan (WSP).

Backcountry Horsemen of California (BCHC) evolved from a previous organization called the High Sierra Stock Users Association (HSSUA). The HSSUA was formed to articulate the interests and concerns of stock users in the Sierra Nevada Mountains and to deal with United States Forest Service and National Park Service officials on land management plans and user policy. The organization had its first meeting in 1981. Eventually, the HSSUA learned of the Back Country Horsemen of America and became affiliated with it and changed its name to the Backcountry Horsemen of California. HSSUA originated in Visalia, California and held its first meeting at the California Division of Forestry Office in Visalia.

At the time of being organized, the HSSUA was not aware that the 1971 Master Plan for Sequoia and Kings Canyon National Parks (SEKI) provided for the ultimate elimination of stock use. See attached letter from SEKI Superintendent John H. Davis dated October 18, 1985 addressed to Richard Cochran (Exhibit A).

After becoming formally organized, the HSSUA learned that SEKI was working on a pair of plans regarding stock use. In fact, we were informed that SEKI had been working on these plans for several years. On March 13, 1984 the Public Lands Committee of the HSSUA

received the Backcountry Management Plan (BMP) and the Stock Use and Meadow Management Plan (SUMMP) from SEKI, along with environmental assessments for the BMP and SUMMP. The four documents were lengthy and complex. More significantly, the transmittal letter that accompanied the four documents stated that SEKI required formal written responses by March 31, 1984.

The receipt by the HSSUA of the BMP and the SUMMP commenced a two year battle which ended in 1986.

The HSSUA did not know how to begin to comment on these complicated and complex plans. We sought an extension of time to comment on the plans but did not receive offers that provided HSSUA with sufficient time to review and digest and respond to the plans. Eventually, William Clark, then the Secretary of the Interior of the United States, granted us a one year period of time in which to comment on the plans. It was while the HSSUA was evaluating the plans that the HSSUA learned that the 1971 Park Master Plan called for the ultimate elimination of stock use.

Charles Morgan, a concerned and pivotal member of the HSSUA, performed a historical analysis of the plans and regulations that affected stock use in SEKI. Morgan also prepared overlays of the maps of the SEKI backcountry. In a presentation to William Penn Mott, then the Director of the National Park Service, Morgan explained to Mott that the proposed BMP and proposed SUMMP contained more closures and restrictions on pack and saddle stock use than all of the previous plans and regulations combined.

When the Backcountry Management Plan was eventually adopted and published in 1986 it contained, in Section 5.8 entitled Stock Use and Meadow Management, the following provision:

“Pack and saddle stock use of the backcountry of these parks is a long established historically and culturally significant and traditional use that will be continued with controls that will keep the effects of such use within acceptable limits.”

The Stock Use and Meadow Management Plan, when it was adopted and published in 1986, provided in the Introduction the following language:

“The use of pack and saddle stock is still recognized as a traditional, historically and culturally significant, and legitimate activity that will continue in the backcountry of Sequoia and Kings Canyon National Parks.”

There is a vocal and litigious organization named the High Sierra Hikers Association (HSHA) that has intimidated SEKI Management for many years. Consequently, out of fear of provoking more litigation by the HSHA, SEKI management has been looking over its proverbial shoulder as it deals with issues relating to stock use.

When SEKI attempted to make its party size limits commensurate with the surrounding national forests and parks, the HSHA sued. SEKI and the surrounding national forests and national parks wanted to make the party size limits uniform so that parties, whether hikers or stock users, could travel from one national forest or national park to another without fear of being cited for having more stock or more people than allowed. The HSHA recognized a flaw in the procedure followed by SEKI to increase its party size limits to match those of the surrounding

parks and forests and sued. The HSHA prevailed. SEKI had failed to follow all of the appropriate steps to make its party size limits the same as the surrounding forest and parks.

The HSHA is presently engaged in litigation with SEKI over the General Management Plan that SEKI adopted in 2007. This litigation is currently pending in United States District Court in San Francisco. The HSHA picks forums for their litigation favorable to their position. San Francisco is the most liberal city in the United States. Right now the US District Court in San Francisco is deciding whether or not to allow the administrative record, which SEKI prepared and submitted to the Court, to be augmented by documents favorable to the position of the HSHA. One such document is a letter, obviously from a backpacker, who wrote a letter to SEKI complaining that the stock party in a nearby camp had a two burner stove and a table in their camp.

Recent litigation by the HSHA includes litigation against Sierra National Forest over its management of commercial packer concession contracts. This litigation and the consequent results of it threaten the existence of the commercial pack stations that service the public in the central Sierra Nevada Mountains.

The focus of the HSHA litigation against SEKI and its General Management Plan is over stock use and allegedly about commercial stock use. However, a reading of the actual complaint filed by the HSHA causes the reader to conclude that it is really an action filed against all stock use. Some of the language in the actual complaint (lawsuit) is interesting in that it periodically refers to the alleged utterly devastating effects of stock use in Sequoia and Kings Canyon National Parks. That unsupported claim is aimed at a trial judge and his or her law clerks sitting in San Francisco.

The reality about stock use is that it has declined dramatically over the last 50 and more years. The exact cause of this dramatic decline is unknown. However, the numerous restrictions placed on pack and saddle stock use by the BMP and the SUMMP have not helped. Attached as Exhibit "B" is a document entitled Stock Use Nights in Sequoia and Kings Canyon National Parks – 1990 through 2010. This document was obtained by a member of the Backcountry Horsemen of California at the scoping session for this Wilderness Stewardship Plan in Visalia, California from SEKI staff. Exhibit "B" dramatically demonstrates the steady decline in stock use in SEKI. SEKI management should be focused on maintaining and encouraging this historical and traditional use rather than placing more and further restrictions and limitations on it.

Mitchel P. McClaran is a well respected college professor that has contracted with SEKI over many years to perform studies and analysis of the backcountry meadows in Sequoia and Kings Canyon National Parks. McClaran authored a 411 page report dated June 30, 1989 entitled "Past and Present Conditions of Backcountry Meadows in Sequoia and Kings Canyon National Parks". In the executive summary of said report McClaran states, in part, as follows:

"Compared to past conditions, as indicated by old photographs and historical reports, the backcountry meadows are generally in excellent condition".

At the time of performing his services and preparing the previously described report McClaran was an Assistant Professor in the School of Renewable Natural Resources at the University of Arizona.

Aldo Leopold is considered to be one of the foremost proponents of creating wilderness areas. While on a pack trip in the headwaters of the Pecos River in 1913, Leopold shared with his companion, District Ranger Elliott Barker, an incredible dream. He propounded a belief that our

nation should set aside large tracts of land that would remain forever wild. These tracts would serve as “anchor points so society would always have a touchstone to the past.” Leopold believed that “Public wilderness areas are, first of all, a means of perpetuating, in sport form, the more virile and primitive skills in pioneering travel and subsistence.” Two examples “are as American as a Hickory Tree; they have been copied elsewhere, but they were developed to their full perfection only on this continent. One of these is canoe travel and the other is travel by pack-train.”

Harvey Broome, an attorney and one of the eight organizers of the Wilderness Society, is recognized to be one of the three co-writers of the Wilderness Act along with Howard Zahniser, and George Marshall (brother of Robert Marshall). His book “Faces of the Wilderness” gives accounts of numerous Wilderness Society trips in the decade before passage of the Wilderness Act. Most of these trips were supported by pack and saddle stock. It is inconceivable to think that the framers of the Wilderness Act did not recognize the propriety and symbolism of the pack-train when they drafted the original bill. (This information provided by Dennis Dailey, Wilderness Resource Consultant).

According to Dennis Dailey, the pack string in modern wilderness remains as a commemoration of the pioneering of America, of mountain men, the forms of travel and way of life he experienced during the expansion era of our history. Every time a Back Country Horseman throws a load on his horse and mule and rides into America’s wilderness, he is living Aldo Leopold’s dream, in helping to “preserve a ...traditional, historic and folk culture that [is] a living expression of our American heritage.”

At the present time SEKI management is presiding over a historical use (pack and saddle stock use) that is threatened with extinction because SEKI management and the National Park Service are afraid to stand up to the HSHA and their litigation team at the law firm of Morrison and Forester.

Pack and saddle stock use pre-dates the formation of both Sequoia and Kings Canyon National Parks. First stock use by Euro-Americans was in the late 1850’s. In 1861 horse use and trail building took place in Log Meadow. In 1890 Sequoia National Park was formed and the 4<sup>th</sup> United States Calvary conducted its first administrative patrols in 1891. In 1902, a contract was awarded for commercial transportation with horses and mules (wagons, pack-trains, etc.). Moreover, stock use was the primary means of access into Sequoia and Kings Canyon National Parks into the early 20<sup>th</sup> century. There is a hollow Giant Sequoia tree in the Grant Grove part of Kings Canyon National Parks where the Calvary stabled its horses. African American Buffalo Soldiers participated in patrolling the parks as part of the United States Calvary.

Sequoia and Kings Canyon National Parks are “out of balance” in their dual mandate to preserve and protect the environment and to provide for public use and enjoyment of the two parks. There is at present only one commercial pack station operating in SEKI. This station is located in Cedar Grove. We are informed and believe that the Cedar Grove Pack Station is operating on a year to year permit. This pack station is literally on life support. In the recent past SEKI has closed down an ice skating rink as well as a ski area. The pack station located at Wolverton has been closed for the alleged reason that the area was needed for a parking lot for visitors to use to enjoy and view the General Sherman Tree. The pack station located in Mineral King was also owned by the operator of the Wolverton Pack Station and he was unable to operate just the one station. In the recent past SEKI has caused the closure of two of the three remaining pack stations located within the boundaries of the two parks. Further, the HSHA has submitted formal written comments to SEKI on SEKI’s Mineral King Management

Plan requesting SEKI to demolish and remove the structures which comprise the Mineral King Pack Station.

BCHC as well as BCHA focus a great deal of attention on education programs that teach our members how to be gentle with the back country areas that we love and treasure. Significant effort is devoted to "Leave No Trace" and "Gentle Use" education. All of the states that comprise the BCHA participate in these education programs and even train members to educate the public and our fellow members about "Leave No Trace" and "Gentle Use" concepts and practices.

BCHC and BCHA not only educate our members about low impact use but we also contribute significant amounts of labor and materials to maintain trails and campsites on the Federal lands that we use for recreation purposes. In 2010 the BCHA membership contributed \$7,500,000.00 worth of services to our Federal lands and of this \$7,500,000.00, \$4,124,566.64 was contributed by the BCHC. Meanwhile, the HSHA squanders the resources of our Federal land management agencies by pursuing litigation to accomplish their selfish goals.

De Facto Stock Free Zones are a concern of ours. We are concerned that SEKI is creating De Facto Stock Free Zones in a clandestine way to placate the HSHA and the back packer community. SEKI needs to confront the challenge posed to it by the HSHA and the back packer community through education and educate other user groups that stock use is a historic and traditional use that will be continued.

As regards any proposed modifications to it, the SUMMP provides in Appendix III as follows:

"Significant modifications will be made available for review by interested public before being implemented."

This same language or similar language should be placed in the Wilderness Stewardship Plan.

We have the following recommendations:

1. Provide for the continued use of pack and saddle stock in both the front country and wilderness areas of SEKI at the traditional use levels using 1954 as the base level.
2. Change grazing restrictions on all trail systems to facilitate shorter travel distances. The maximum distance between allowable camping and grazing areas should be no greater than 7 miles, with camping limits of no less than 2 nights per area. This provides opportunities for visitors to travel with both young and old members of their group and aids in the mission of the parks to facilitate and enhance visitor experiences.
3. Party and group size limits should be no less than 15 people and 25 head of stock.
4. Increase private and commercial stock use. It is clear that the parks' capacity to handle more stock use is far greater than current use levels. It is therefore our contention and our recommendation that private and commercial stock use be increased and use areas expanded (trails, corrals, overnight facilities, hitch rails, bear boxes, etc.).

5. Reestablish the commercial pack station operations in Wolverton and Mineral King. Establish facilities that can provide services for day rides and overnight trips. Include facilities and services for persons with disabilities. Include overnight corrals and facilities for private stock users. Include camping sites for stock users for both short term (1night) and longer term (14 nights). Continue to allow commercial pack stations to enter from surrounding national forests.
6. Allow commercial pack stations to issue wilderness permits to stock parties.
7. Do not make any provisions that separates user groups.
8. Supplying backcountry and wilderness administrative functions should be done primarily using pack and saddle stock. The use of helicopters should be limited to emergency situations including evacuations, rescues, and initial attack on fires.

The High Sierra Unit of the BCHC as well as the Sequoia Unit have contributed significant efforts to eradicate an exotic species, velvet grass, which became established in a tiny portion of SEKI. This exotic specie is believed to have been imported from the adjacent Sequoia National Forest. For several years now, BCHC members have packed in gear and supplies to the volunteers who are now on the verge of eradicating this exotic specie.

### **The Need for Commercial Pack and Saddle Stock Services in Sequoia-Kings Canyon Wilderness Areas**

**The Wilderness Act:**  
**American People and Commercial Services**  
**Public Law 88-577 ~ September 3, 1964**

- **“To establish a National Wilderness Preservation System for the permanent good of the whole people, and for other purposes.”**
- **“For this purpose there is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as ‘wilderness areas’, and these shall be administered for the use and enjoyment of the American people...”**
- **“Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”**
- **“Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.”**

**PUBLIC NEED**

The 1964 Wilderness Act clearly provides for the inclusion of commercial services for recreation and other purposes. The Act states:

“Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.”

The *purposes* that are referred to are also specified in the Wilderness Act:

“Except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”

Commercial packing services have a long and important history in Sequoia and Kings Canyon National Parks.

### ***I. The Wilderness Act of 1964 and Outfitter Services***

The basis of the requirement for determining 'need' is derived from the Wilderness Act specifically Section 4(c) which reads "Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas."

A review of the Congressional Record (leading up to passage of the 1964 Wilderness Act), subsequent legislation, and related literature provides solid guidance and direction for enabling the managing agency to allow for the continuation of commercial outfitting and guiding as a legitimate use.

This is consistent with the information provided when the High Sierra Packers Association inquired of Congress in 1959, as to the intent of the proposed wilderness bill as it related to commercial packing. In response to the inquiry, Congressman George Miller requested an interpretation from the Committee on Interior and Insular Affairs and provided the Association with the following information: "**I am advised by the staff of the Senate Committee on Interior and Insular Affairs that, in the hearing on the Senate legislation and in discussions thus far, it has been understood that this language would not be intended to prevent the continuation of the commercial operation of pack stock into the wilderness.** (emphasis added) The indication was that the detailed regulation of the use of pack stock for travel into the wilderness would be subject to the administration of the various agencies administering the lands such as ... In other words, it would not be expected that the enactment of S.1123 or a similar measure would necessarily cause any change in this respect."

Many of our country's leaders from President Theodore Roosevelt to Senator Frank Church spoke fondly and often of their outfitted experiences. There can be no doubt from reading the Congressional Record that outfitting and guiding was intended as an accepted use of wilderness.

Congress's intent of preserving for the future, without eliminating uses established at the time of passage, has been the subject of considerable debate between prominent legislators and the administering agencies, and has resulted in specific language and interpretation in subsequent wilderness legislation.

Senator Frank Church (floor manager in the Senate when the wilderness bill was passed by the Senate in 1961 and 1963), in an address at the University of Idaho, made the statement **"It was not the intent of Congress that wilderness be administered in so pure a fashion as to needlessly restrict its customary public use and enjoyment. Quite the contrary, Congress fully intended that wilderness should be managed to allow its use by a wide spectrum of Americans."** (emphasis added)

It is very obvious from the Congressional Record that, unless the actions were specifically prohibited, **Congress intended that they would continue at a level not less than that which existed at the time the wilderness was included in the National Wilderness Preservation System.**

### History of Packing

A 'Summary of the History of Commercial Packing in Sequoia and Kings Canyon National Parks' is included with these comments as Exhibit "C." This Summary provides a brief history of commercial packing in Sequoia and Kings Canyon National Parks and confirms the important role that packing has played in the development and protection of the Parks. Commercial packing services began in the 1800's. Commercial pack operations are a well-established historical use and an integral part of the "wilderness character" of the Parks that Congress intended to be preserved through passage of the Wilderness Act.

Over the course of the last century, the services of guides, the transportation of goods and visitors, and the wide range of assistance and support that have been provided by the pack stations operating in the Parks is a significant factor in each and every aspect of the exploration and protection of the Sierra as we know it today. The history of both Sequoia and Kings Canyon National Parks is rich and interrelated with the services, equipment, and knowledge that have been provided by the packers and guides, and the horses and mules who carried men and women throughout the mountains for leisure and work, exploration and study, and rejuvenation of mind, body and spirit.

- **1901:** Sierra Club Outings. Although some members would hike, many chose to ride.<sup>1</sup> "What better way to help preserve our few remaining wilderness areas and give our people a fine spiritual boost than to actually show them what a fantastically wonderful country we have? The Sierra Club outings have had that purpose since they were first started in 1901." An article in the Inyo-Mono Fishing Guide chronicles a Sierra Club Base Camp Trip that was located at the head of Minaret Creek Valley. "Counting the commissary group there were about 175 persons in this second two-week base camp period." The base camps were annual trips sponsored by the Sierra Club in which members could sign up from one to six weeks in the backcountry. In addition to having a camp naturalist who would identify the trees and plants, there were many who learned to fish. All of the gear, food and supplies were packed in on a regular basis.
  
- **1912:** Advertisements in the Inyo Register Magazine included:
  - The Nevada Stables, Bishop. "Tourists and Campers' Outfits"

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<sup>1</sup> "Sierra Clubbers in the Sierra" by Tom Henderson, Inyo-Mono Fishing Guide, 1956

- Pioneer Livery Stable, Bishop. "All kinds of outfits for tourists' mountain trips"
  - Ben R. Ransome, the Guide of the Sierras – Big Pine. "Outing in the Sierras" 10 day, 15 day and 30 day trips
  - Mt. Whitney Hotel and Anton's Resort – Lone Pine. "We outfit parties at Lone Pine for Sierra trips – Saddle and pack horses for hire."
- **1915:** "The State of California approved \$10,000 for the construction of the John Muir Trail ... Hiking, camping and other forms of recreation had taken its place early on. The push to build the John Muir Trail reflected a growing interest in back country recreation."<sup>2</sup> Roy Boothe was the Ranger in charge of the construction. Roy was the father of Dudley Boothe, who owned Rainbow Pack Station for many years.

➤ Many pack stations trace their history back to the 1920's and 30's. A study titled "The Tourist Packing Business of the High Sierra Region" by Norman B. (Ike) Livermore, Jr. conducted in 1935, reports there were 71 pack stations at that time serving the High Sierra area from Kernville to Yosemite, with over 2700 head of stock.

Today, the number of pack stations serving the same Sierra region is less than 30. Several operations were consolidated, and some eliminated. In the 1920's and 30's trips would take anywhere from 10 to 30 days. In today's world, there are fewer visitors who have that same amount of time for a backcountry vacation.

The historic role of the packing industry should be perpetuated for as long as their services are needed by the public as well as the hundreds of groups, universities, government agencies, institutions and others who use their services. It is because of the packers that many of the trails, bridges, and other improvements exist throughout the backcountry and wilderness areas. The Park Service would be remiss to reduce or place any additional limits on the commercial packers.

Commercial packing is a modern day link to our past, and it plays a critical role in sharing conservation values for current and future generations. As agreed to with Congressman Nunes, the Park Service should move forward with its promise to relocate and re-establish the pack station in the Wolverton area, and should re-establish the pack station at Mineral King. The General Management Plan calls for commercial packing at these locations, and it is imperative the Parks move forward with that commitment.

### Present Day Packing

"Is there a *need* for this service?" The wilderness resource was established for the "use and enjoyment of the American people." Without the services of the commercial pack stations, wilderness areas would be limited to only those who were skilled, knowledgeable about wilderness travel, have their own equipment, and are physically able to access the areas. That is not what Congress intended. More of today's society is untrained and unprepared for trips to rugged and isolated wilderness areas. The commercial pack stations provide access for *all* people to use and enjoy the wilderness.

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<sup>2</sup> Sierra Centennial by Gene Rose, 1994.

In addition to the historic traditions of traveling by stock through the mountains, maintaining the historic packing skills, and learning about the history of the area, there are some modern day benefits that Americans and foreign visitors derive from the packers' services.

Many Baby Boomers were backpackers in the 70's who are now fully engaged in their careers, are raising families, have limited time, cannot carry what they need, no longer have specialized equipment for backpacking, live in urban areas and are not in physical condition to access higher elevations and traverse steep and rocky trails. They want to expose their children to the same outdoor experiences they had in their lives. They may arrange for everyone to ride, and have all their gear packed. Or, they may arrange for some to ride, some to walk. Or, they may all walk, and have their gear dropped off. Regardless of how long they stay and what they do – they need the help and assistance of the commercial stock outfitters to access the wilderness. They seek advice and rely on the expertise of their guides for their wilderness experience.

Grandparents – and great-grandparents – who have spent many summers in the Sierra – want to share and experience the backcountry with their children, grandchildren, and great-grandchildren. With Americans living longer lives, these experiences are more possible today than ever before. For many, the ruggedness of the Sierra is too formidable for some older individuals to walk the trails and carry the loads, hence they *need* the services of the packers.

Those who have infirmities or disabilities *need* the services of the commercial packers to access the wilderness. The nature of those disabilities should remain private – and they should not have to provide proof of their impairment. Many of these are important trips for carrying on family traditions, and for mental and spiritual renewal.

Many groups have been taking pack supported trips for decades, some even pre-dating the Wilderness Act (e.g. Sierra Club Outings - 1901). Group trips are sponsored by: Boy and Girl Scouts, churches, YMCA's, schools, universities, companies, conservation groups, clubs, organizations, camps, inner-city youth programs, and others – and often they *need* the services of the commercial packers to provide guiding, equipment and skills.

Some trips are organized for a specific purpose, such as: educational aspects, photography, artists, writers, religions, research, wilderness medicine, nature study, etc. Agency sponsored trips are also frequently supported by pack and riding stock, and include trail crews, search and rescues, fish stocking, survey crews, mapping specialists, military personnel, Congressional representatives, and many others. They often *need* the services of a commercial packer to transport specialized equipment and/or the individuals who may not be 'wilderness' savvy.

There are visitors who travel individually or gather with a small group of friends, family, or work associates and take a pack supported trip to access and experience the wilderness. There are often members of the group who lack the skills, equipment and knowledge to travel on their own, thus they *need* the services of the commercial pack station.

## **II. *The Values and Benefits of Commercial Outfitting and Guiding.***

"Perhaps the ultimate riding adventure is a pack trip into one of the state's 129 National Wilderness Areas. Outfitters operate pack strings, sometimes with mules, into the backcountry for camping, fishing, and hunting."

Excerpt from "California Outdoor Recreation" published for the California Division of Tourism, California Trade and Commerce Agency, on behalf of the California Roundtable on Recreation, Parks and Tourism.

Outfitting and guiding are historical professions the world over. From expeditions and explorers to modern day vacationers, there have always been people capable and willing to share their knowledge, skill, and equipment with people needing their assistance. The Hudson's Bay Company, Lewis and Clark, John Wesley Powell, Jedediah Smith, Sacajawea, John Muir, Jim Bridger, the "Wagons West", and famed mountain guides of the Alps were associated with early outfitters and guides. Teddy Roosevelt, an ardent supporter of public lands, frequently utilized outfitters and guides to show him the country.

Outfitters and their customers play a vital role in the mix of constituents on public lands who support resource conservation. They are often the first link to the outdoors for many families and beginners. Outfitting fulfills deeply personal needs for many families. Some of the strongest childhood memories are derived from family outings and vacations. As the ethnic diversity of the American population undergoes significant changes, and as America becomes increasingly urbanized, the need for professionals to provide skills, equipment, facilities, and trip planning are constantly increasing.

Statistics from the Bureau of the Census indicate that the Asian and Hispanic ethnic groups are the fastest growing ethnic segments. It will be important to ensure these populations have connectivity with their public lands to help perpetuate and continue conservation goals.

The Bureau of Census also indicates the largest segment of the population will be the maturing segment – ages 55 and up – for the next 20 years. AARP reports the following:

- In 1994-95, more than half of the older population (52.5%) reported having one or more disabilities. One-third had at least one severe disability.
- Most older persons have at least one chronic condition and many have multiple conditions. The most frequently occurring conditions per 100 elderly in 1995 were: arthritis, hypertension, heart disease, hearing impairments, orthopedic impairments, cataracts, sinusitis, and diabetes.

As the population ages, the need for packing and riding services will be increasingly important to enable visitors to travel into the wilderness. Various levels of physical disabilities and infirmities will necessitate that these individuals have assistance to transport themselves and their equipment into the wilderness. As the statistics indicate, that will be a continuously growing segment of the population. The commercial outfitters continue to play a critical role for enabling people with disabilities access into the wilderness.

Recreation is critical to our mental, physical, spiritual and economic well-being. There is a solid need in the future for commercial service providers to continue to provide for education, enjoyment, economic stability, and sustainable resource management, while meeting the needs of a changing population of greater ethnic diversity and maturity.

An increasing number of international visitors come to experience the wilderness areas of Sequoia & Kings Canyon National Parks. Without the services of the commercial providers, many of these visitors would never be able to visit the wilderness. They *need* these services.

The history of the commercial pack stations shows they have been operating continuously for over 150 years. Their practices and methods are consistent with current trends and techniques

for taking proper care of the natural and cultural resources. They have the utmost concern for the well being of the wilderness. The pack stations work hard to ensure the trails, campsites, meadows, vegetation, water, and wildlife are protected and sustainable for the future.

The number of wilderness related search and rescues shows the predominance of wilderness rescues are private users – not customers of the pack stations. If anything, the Parks should consider requiring **more** people to utilize the services of a commercial guide to reduce life threatening accidents and risks to rescue teams. These rescues are very costly for state and federal agencies, with significant risks to the search and rescue team members and helicopter pilots.

Examples of rescues and evacuations include:

- ✓ 10/20/04: Two overdue hikers in the Sierra Crest Area of Sequoia & Kings Canyon National Parks. Four adults in the Mt. Whitney area, and an overdue lone hiker in the Bishop Pass area. These searches required search teams and helicopter use.
- ✓ 7/23/05: Two climbing fatalities on Mt. Whitney.
- ✓ 7/24/05: Hiker who was found submerged in a lake in Kings Canyon National Park wilderness. Another hiker went off-trail and his body was found submerged in the Marble Fork of the Kaweah River near the Pear Lake area.
- ✓ 7/28/05: Backpacker rescued for altitude sickness in Kings Canyon National Park wilderness. Helicopter and search teams were utilized.
- ✓ 8/4/05: One hiker killed and 11 others evacuated from the wilderness area of Sequoia National Park. Rescue included Park medics, multiple helicopters, and numerous rangers.
- ✓ 6/14/07: A couple was lost in Sequoia National Park (Mineral King wilderness area). Helicopter and 20-person search team were used.
- ✓ 10/16/09: 3 hikers rescued from a mountain ledge in Kings Canyon National Park wilderness. Helicopter and a 50-person search team were used.
- ✓ 10/21/10: Three hikers were rescued from Mt. Whitney. Two additional hikers were lost. Helicopter and a 45-person search team were used.
- ✓ 8/4/11: Two search and rescue operations in Sequoia & Kings Canyon National Parks. The second rescue involved 2 hikers who were lost, with injuries. A search team and helicopter were used for this evacuation.

### ***III. Commercial Services fulfill the Recreational, Scenic, Scientific, Educational, Conservation, and Historical purposes of the Wilderness Act.***

Some of the pack stations pre-date the establishment of Sequoia and Kings Canyon National Parks, and nearly all pre-date designation of backcountry areas as wilderness. The pack stations serve diverse populations that would otherwise lack the means of accessing the wilderness. Individuals and groups without the necessary equipment, skills, knowledge, or physical ability are able to access the wilderness for the purposes for which it was established: recreation, scenic, scientific, education, conservation, and historical uses. There are no other services that serve as many different segments of the population as the pack station operators.

#### **Recreational**

Many visitors need help and assistance accessing the wilderness. They have questions, seek advice, and rely on the expertise of their guide to make sure they are relatively safe.

- ✓ Anna Allen Family. Anna was one of the survivors of an avalanche at Alpine Meadows where she was buried alive before being rescued. Anna lost a leg, toes and fingers. Fitted with a prosthesis, she made her first trip back into the wilderness through the services of a pack station.
- ✓ Numerous trips using the pack stations have been sponsored by the Boy and Girl Scouts USA, various churches, and YMCA's.
- ✓ Climbing and mountaineering explorations continue to use the services of pack stations. Many of the individuals who made first ascents of the peaks in the High Sierra region – and for whom the peaks are named – had pack stock support, including John Muir.
- ✓ Pack stations have been providing access for people to enjoy fishing since they began. The California Department of Fish and Game utilized pack stations to pack fish into many of the High Sierra lakes – solely for the enjoyment of fishing enthusiasts.

#### **Scientific**

Researchers contract with pack stations to provide trip support for personnel and equipment to collect data from field monitoring locations.

#### **Educational**

- 1) Documentaries
- 2) Natural History, Geology and Astronomy  
Three Corner Round has been conducting courses in geology and astronomy for over 95 years. Joseph Wampler conducted education trips on the natural history of the area.
- 3) General Education  
Many public and private schools bring students and classes for wilderness trips as part of their extended education programs.
- 4) Youth Enrichment  
Utilize pack stations to help assist trips provided to inner city youth.  
YMCA's have a long history of providing trips for youth into the wilderness.

## 5) Churches

## 6) Publications and Periodicals

Publications and periodicals feature articles about the wilderness areas of Sequoia-Kings Canyon National Parks. Staff from these publications have used the services of pack stations to help gather their story information and to help assist them with their trips.

## Conservation

### 1) Conservation Groups

Pack stations provide services to national and local conservation groups. Some of the national and local organizations utilizing professional packing services include:

- Sierra Club (Began High Trips in 1901)
- Nature Conservancy
- Wilderness Society
- Nature Expedition
- High Sierra Hikers
- California Alpine Club

### 2) Trail Maintenance and Reconstruction Projects

Numerous cooperative efforts between pack station owners and volunteer groups have been conducted to perform trail maintenance and reconditioning projects.

Park Service trail crew support for personnel, equipment and supplies has been provided by pack stations for decades.

### 3) Search and Rescues

Pack stations participate in search and rescues each year, providing stock and guides for the searchers and for those being rescued. Rescues include those suffering from: high altitude pulmonary edema, heart attacks, fractures and pneumonia. Pack stations are also called on to pack out persons who have deceased while in the wilderness.

### 4) Federal Agencies

Pack stations have and continue to assist the Park Service in conservation projects. These have significantly contributed to resource protection, accomplishment of wilderness objectives, and improvement of visitor services.

Park Service specialists use the pack stations to help support their trips to conduct their regular work duties. Examples include:

Archaeologists; Fire Crews; Wildlife Biologists and other specialists.

## Historical

### 1) Rock Climbing and Mountaineering

Many of the individuals who made first ascents of the peaks in the High Sierra region – and for whom the peaks are named – had pack stock support.

### 2) Sierra Club

Sierra Club Base Camp trips date back to 1901. In the 1950's, the Base Camps had 200 person in the camp at each period of the trip. Pack stations supplied these base camps with food and supplies on a regular schedule.

Sierra Club High Lite Trips were developed over the years and were trips that were oriented for hikers, with the food and equipment supplied by pack stock.

3) Place Names of the Sierra Nevada

- ✓ The Don Cecil trail is named after Don Cecil, who started the Cecil Pack Train in 1923.
- ✓ Rae Lakes and Crabtree Meadows are named for Rae Crabtree, who owned the Rae Crabtree Pack Stations.

4) Historic Trips

- ✓ During the 1939 World's Fair, customers from San Francisco brought their European guests on a trip to Mt. Whitney. The Cecil Pack Station provided the packing services.
- ✓ The Alpine Club from the San Francisco Bay Area would hike and have their duffel and supplies packed on mules. These trips took place in the 1950's.

**Wilderness Areas for the use and enjoyment of the American people...**

Over the past 100 years, pack stations have provided more opportunities for persons with disabilities to access the backcountry and wilderness than any other provider or group. There are many persons who do not disclose their disability, but who could not otherwise go into the wilderness without the assistance of the professional packers. Some infirmities disclosed are:

Amputees  
Polio  
Muscular Dystrophy  
Cancer  
Blindness  
Deafness  
Mental Retardation  
Downs Syndrome  
Paraplegics  
Cerebral Palsy  
Lou Gherig's Disease

Wheelchairs have also been packed into the wilderness for those who require their use.

**IV. Levels of Commercial Service**

A review of the legislative intent of the 1964 Wilderness Act shows that Congress clearly intended outfitting and guiding be permitted to continue at a level not less than that which existed at the time the wilderness area was added to the system. The law provides for historical and pre-existing uses. The history of the pack stations clearly shows that they existed well before each area was designated wilderness.

In 1964, at the time of the initial Wilderness Act, the total stock numbers were 1807 under permit to the pack stations. In 1984, after passage of the California Wilderness Act, the total stock numbers were 1420. This indicates a net **decrease** of over 20%. The intent of Congress in passing the Wilderness Act was to preserve the condition and provide for appropriate uses that existed at that time.

Data shows that the largest increase in use over the past 20 years has been with hikers and day users, but limits have continued to be placed on the pack stations. It is a gross inequity to continue to restrict the commercial packers when the component of use that has changed the most is backpacking and day use.

Pack stations need to allow for growth to accommodate the public who will need their services and to provide for economically viable business operations. The population trends indicate:

- growth of the overall total population, with significant growth in California;
- an increasingly aging population with health and disability issues;
- an increase in minority populations; and
- an increase in urban populations.

***Summary of the Need for Commercial Services:***

1. The Wilderness Act provides for commercial services, and the congressional intent of that law supports the provision that accepted uses will be allowed to continue at a level not less than that which existed at the time of designation.
2. Commercial pack stations have an established **history** of use in the areas pre-dating their designation as wilderness. That use will continue to be *needed* in the future.
3. Values and benefits of commercial services to the public include:
  - Continued conservation and opportunities for minorities and non-traditional users;
  - Continued service to the public for recreation, education, conservation, historic, scenic and scientific purposes;
  - Continued public safety service, including search and rescues;
  - Continue to provide conservation ethics to foster supportive constituencies;
  - Continue to sustain and contribute to economies of a local, regional, national and international basis for recreation and tourism.
4. The commercial pack stations impart conservation practices with their customers. It is incorporated into their regular course of business, such as the trip planning and assistance they provide their customers, selection of campsites and destinations, preparation and provisions for safety and emergencies, orientation to proper backcountry management of horses and mules, and protection of the natural and cultural resources.

## HIGH SIERRA PACKERS - 1935

*From the Report:*  
**"The Tourist Packing Business of the High Sierra Region"**  
 Norman B. Livermore, Jr. - February, 1935.

<u>Name of Packer and/or Outfit</u>		<u>Location</u>
1.	Slim Tatum	Silver Lake
2.	Lloyd Summers "Mammoth Camp Pack Outfit"	Mammoth, Lake Mary, Agnew Meadow, Red's Meadow
3.	McGuffin "Lake Mary Pack Outfit"	Lake Mary
4.	Vance Brown	Hilton Lakes Resort
5.	D.G. McComber "Broken Bar Pack Outfit"	Rock Creek Lakes
6.	George Brown	Pine Creek
7.	Cecil Thorington	McGee Creek
8.	Schober	Bishop Creek (North Lake)
9.	Halliday "Halliday's Rainbow Pack Outfit"	Bishop Creek (South Lake)
10.	R.H. Logan	Big Pine Creek
11.	C.H. Hyers "Circle Dot Pack Train"	Independence
12.	Archie Dean	Independence
13.	Allie Robinson	Independence, Onion Valley, Symmes Creek, Oak Creek, Davis Creek, Taboose Creek
14.	Chrysler and Cook "Mt. Whitney Pack Trains"	Lone Pine Creek, Carrol Creek
15.	Wally Wilson	Lone Pine
16.	Dick Burns	Olancha
17.	Burkhart and Olivas	Olancha
18.	Dan Cook	Olancha
19.	Barney Sears	Olancha
20.	Walter Dow "Jordan Hot Springs" South Fork	Headwaters of Kern River,
21.	Sam Lewis	Haiwee Canyon
22.	Thelan	Kennedy Meadows
23.	Cecil Pascoe "Bar 53 Pack Outfit"	Kernville
24.	Earl Pascoe "Camp Pascoe" River from	20 miles up Kern  Kernville
25.	Bob Welch "Kern River Pack Train" Pascoe	¼ mile below Camp
26.	"Fairview Pack Outfit"	½ mile below Welch
27.	"Dunwood's Pack Outfit"	Above Pascoe

28.	Gregory		Near Greenhorn Pass
29.	Hobbs		Balance Rock
30.	Frank Burton		Mt. View Resort
31.	Ed Snider		California Hot Springs
32.	Nelson Smith	"Camp Nelson Pack Train"	Camp Nelson, Quaking Aspen
33.	Walter Greigg		Quaking Aspen Meadow
34.	Kenneth Rutherford		Camp Wishon
35.	George Dillon		Near Balch Park
36.	Art Griswold		Near Balch Park
37.	Phil Buckman	"Mineral King Packing Company"	Mineral King
38.	Tom Carrol		Three Rivers
39.	Phil Davis		Three Rivers
40.	Roy Davis		Three Rivers
41.	Frank Eggers		Three Rivers
42.	Ord Loverin		Three Rivers

### HIGH SIERRA PACKERS - 1935

#### Name of Packer and/or Outfit

#### Location

43.	Earl McKee		Giant Forest
44.	Roland Ross		Mineral King
45.	Craig Thorne		Silver City
46.	Ernest Cecil	"Cecil Pack Train"	Big Meadows
47.	R.T. Coker		Big Meadows
48.	Dick Wilson		General Grant National Park
49.	Poly Kanawyer		Hume
50.	Hugh Traweek	"Bar-Seven Pack Train"	Hume
51.	Crabtree Bros.	"Arrow-Heart Pack Train"	Coolidge Meadows
52.	Bill Bash		Coolidge Meadows
53.	J. Robinson		Coolidge Meadows, Shaver Lake Heights
54.	Clyde Johnson		Crown Valley
55.	Ted Anderson		Dinkey Creek
56.	John Dale		Dinkey Creek
57.	Berryhill		Huntington Lake, Blayney Meadows
58.	E.R. Casner		Near Mono Hot Springs
59.	V. Cunningham		Lakeshore
60.	Burns		Lakeshore
61.	Milo Lemm		Hogue Ranch
62.	Tom Jones		10 miles below Jackass
63.	Billy Brown		Jackass Meadows
64.	W.F. Dillon		Below Jackass Meadows
65.	Fred Dupzyk		Near Bass Lake
66.	George Hamby		Koontz Meadows

25.	Dudley & Alice Boothe	Rainbow Pack Outfit	Bishop
26.	Eugene Burkhart	Sequoia Kings High Sierra Pack Trains	Independence
27.	Charles Morgan & Tom Jefferson	M. Whitney Pack Trains	Lone Pine
28.	Purnel Brothers	Jordan Hot Springs Pack Station	Lone Pine
29.	C.W. Vinnedge	Frontier Pack Trains	June Lake
30.	Russ & Ann Johnson	McGee Creek Pack Station	Bishop
31.	Art Schober	Schober Pack Train	Bishop
32.	Hugh & Ivadell Carpenter	Glacier Pack Train	Big Pine
33.	Robert White	Tunnel Pack Station	Lone Pine
34.	Bob Moore & Tiny Moore	Cottonwood Pack Trains	Olancha
35.	Sam N. Lewis, JR.	Sam N. Lewis Pack Train	Coso Junction
36.	Irwin & Alice Burkhart	Kennedy Meadows Pack Trains	Inyokern
37.		Horse Corral Pack Station	Big Meadows
38.	Karl & Adeline Smith	Muir Trail Ranch	Ahwahnee

Estimated Total Number of Stock : 1807

Various photographs which are attached show or refer to historic stock use in SEKI. Exhibit "D" is a picture taken in the Giant Forest of Sequoia National Park in 1915. Horseback was the mode of travel for the first visitors to Giant Forest. The party in this photo poses in front of the Giant Forest hotel dining room. This photograph is from the National Park Service Collection. Exhibit "E" shows the Mount Whitney Power Company dam under construction at Franklin Lake in what is now the Mineral King area of Sequoia National Park. The picture was taken in 1904. Thousands of pounds of cement, sand, rock, wood forms, and constructions supplies were hauled in by mules to this location. Exhibit "F" is a picture taken in the year 1926 of a Ranger-led pack trip. This picture is in what is now Kings Canyon National Park. This picture came from the Sequoia National Park Archives.

Thank you for the opportunity to comment on the proposed Wilderness Stewardship Plan. Our organization expects to continue to be involved in the plan process until the process is concluded.

Very truly yours,

PUBLIC LANDS COMMITTEE  
HIGH SIERRA UNIT  
BACKCOUNTRY HORSEMEN OF CALIFORNIA

  
RICHARD H. COCHRAN, Co-Chairman

RHC/db  
File No. 9397-20  
cc: Congressman Devin Nunes  
Congressman Jeff Denham  
Jim Harvey, Co-Chairman  
Bill See  
Art Jones  
Ron Peregien  
Marily Reese  
Ann Lang

# **EXHIBIT “A”**



# United States Department of the Interior

## NATIONAL PARK SERVICE

SEQUOIA AND KINGS CANYON NATIONAL PARKS  
THREE RIVERS, CALIFORNIA 93271

IN REPLY REFER TO:

D18

October 18, 1985

Mr. Richard Cochran  
2929 West Main Street  
Suite A  
Visalia, California 93291

Dear Mr. Cochran:

We have carefully reviewed comments received on the Backcountry and Stock Use and Meadow Management Plans. Most of the comments received on the Backcountry Plan were supportive. Almost all of the concerns raised in comment letters were relative to the Stock Use and Meadow Management Plan.

Based on our review of the comments and evaluation of the Stock Plan, we are considering several modifications to it. We have incorporated these modifications in a new draft of the Plan and are sending it to a few people to get an initial reaction before preparing it for final review.

The revisions are basically as follows:

1. The format has been revised to put the objectives, rationale, and processes in the text portion of the Plan and the details of actual limitations and specific guidelines in the appendices. This will simplify the Plan for our own management use and also responds to comments that the Plan was too complex.
2. In this Plan we are indicating that the 1971 Park Master Plan will be revised to be clearly supportive of continued use of stock in the backcountry. The Master Plan called for ultimate elimination of stock use.
3. Make clear that there will be opportunity for public review when any significant changes to the Plan are proposed. This further simplifies the same provision in the draft Plan.
4. Simplify the forage area opening dates so that a set of dates applies to a general drainage basin rather than for each separate meadow. The same basic opening dates are retained but there are fewer of them, which makes it easier for the visitor to understand and follow and easier for us to manage.

5. Simplify grazing use levels to the effect that average use levels of the period from 1977 to 1984 continue until data from the monitoring program indicate a need to change. We have eliminated the detailed limits of stock use nights per acre and per month and the three levels of use. Actual use will be correlated with monitoring data and when an unnatural trend becomes evident by comparison with similar ungrazed forage areas, or by evidence from other data, we will consider limits on the number of nights per meadow, number of stock per meadow, adjustment of opening dates, or temporary closures. These are the same controls we have used in the past.

This responds to comments that use levels were much too complex to follow. At the same time a process is established that allows for control of grazing use levels when biological data from the monitoring program indicate a need.

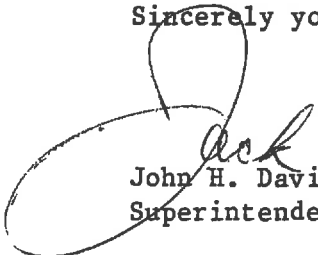
6. Expand the distance stock parties can travel from designated trails to campsites from 1/4 mile to 1/2 mile with provision for designating other special camp areas at greater distances where appropriate. This will allow opportunity for more separation between stock users and backpackers. It also responds to comment that some traditional stock camps would have been closed by the 1/4 mile distance.
7. Leave some additional trails and areas open to stock travel.
  - Cartridge Pass Trail
  - North Monarch Divide off trail travel area (Horseshoe, State Lakes, Lake of the Fallen Moon)
8. Make it clear that occasional, inadvertent stock drift through protected meadows will be tolerated but camping next to and turning stock out on those meadows will not be allowed.
9. Modify the list of meadows closed to grazing for scientific study and visitor enjoyment by eliminating from this list those meadows that had already been permanently closed to grazing in the past, substituting Mt. Guyot Meadow for Sandy Meadow, and including Lower Rock Creek Lake #2 Meadow.

We feel that through the above mentioned modifications we have addressed and resolved the major concerns to the Plan without compromising resource protection.

Because of the revisions being considered, we did not include the usual maps with this draft. They will be in the final draft. We have made no firm decisions. Your comments at this time will help us to decide on these proposals. Also, this is an informal review; your reaction to these proposals can be made by calling, visiting us at the office, or in writing. We do need to hear from you by November 20, 1985, so that we can decide on these proposals and prepare a final draft for public review.

Thanks for your time and interest.

Sincerely yours,

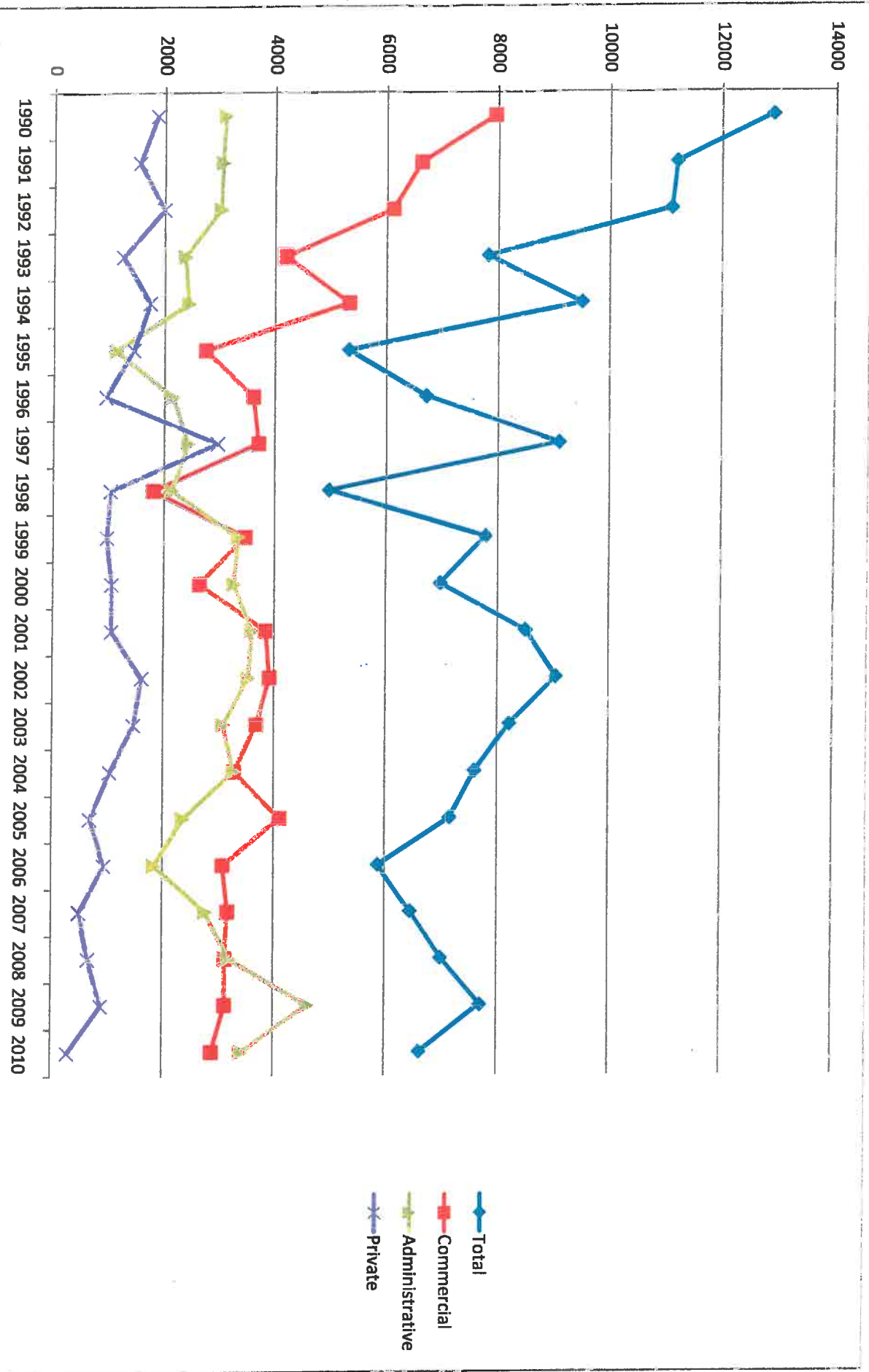


John H. Davis  
Superintendent

Enclosure

## **EXHIBIT “B”**

# Stock Use Nights in Sequoia and Kings Canyon National Parks – 1990 through 2010



# **EXHIBIT “C”**

## EXHIBIT C

### Summary of the History of Commercial Packing in Sequoia and Kings Canyon National Parks

Excerpts from 'The MULE MEN – A History of Stock Packing in the Sierra Nevada'  
Reprinted with permission by Louise A. Jackson

The mule arrived on this continent in 1519 with the Spanish explorer Hernando Cortez, and it played a key logistical role in the conquest of Mexico, providing the means to carry supplies and munitions to inland territories. After Cortez came Coronado, Rivera, Portola, Father Junipero Serra, and other Spanish explorers and missionaries, who also brought in pack animals on their North American land expeditions... The continuing exploration of California and the development of new communities were almost totally dependent on the movements of pack trains.. Probably the first domesticated pack animals in the area were those accompanying Father Francisco Garces in 1776. Although Garces was not the first European to reach the southern Sierra Nevada foothills, he was the first to record his findings and to open a primitive trail for future pack trains... During these early Spanish and Mexican explorations of the late 1700s and early 1800s, pack trains were the most common means of long-distance transportation in California.

By 1832 trading trails had begun to crisscross the West, extending from the old Spanish missionary trails out of Mexico and the American Southwest to California... Before long, horses, mules and donkeys were common couriers in the foothills and valleys of California...

Mule trains by the hundreds coursed the California foothills from 1848 through the 1850s... In addition to government efforts, private interests invested in road development in the Sierra Nevada. The central and southern High Sierra areas, where wagon roads were considered impossible, were surveyed for packing trails. In the late 1850s, after gold and silver were discovered in the deserts east of the Sierra, entrepreneurs on the west side who wished to supply the isolated east side had only two trails to choose from. The Dennison Trail was a rough, winding affair that linked nearly every mining camp, stock range, and sheep camp south of the Kings River... Commercial companies also built toll roads from supply bases to the bigger mining communities. In the early 1860s two toll trails began construction in the wilderness area of the Kaweah and Tule Rivers. For four consecutive summers, pack trains carried supplies to crews building the Jordan and Hockett Trails. The Jordan Toll Trail, which extended almost one hundred miles, was built in 1861 and 1862. The Hockett Trail, completed in 1864, was one of many roads and trails built during the gold rush that were used by the military during the Civil War and throughout the western Indian campaigns.

..in 1860 the legislature of California mandated a series of geological field surveys of the Sierra Nevada to map the area and catalog its resources. Professor Josiah Dwight Whitney, who had conducted several geological surveys in the eastern United States, was selected to head the project. Whitney's team conducted the field work for fourteen years, beginning in December 1860. Few of the surveyors had experience traveling with pack trains, so for longer expeditions they hired hunters, cooks, and mule drivers.

In June 1863 Whitney, Brewer, and engineer Charles Hoffmann conducted an extensive survey of Yosemite Valley, Tuolumne Meadows, and the high regions around Mono Pass. They hired a man named John to accompany them with two pack mules for their provisions... The next year another field party began extensive explorations of the highest portions of the Sierra. Those explorations, begun in May 1864, lasted into October. Brewer, Hoffmann, and Gardner made up the field team that explored the wilderness regions of the Kern, Kaweah, Kings and San Joaquin headwaters. Dick Cotter, a miner, rancher, carpenter and jack-of-all-trades, joined the surveys as packer.

In the late 1850s and early 1860s, the military used horse, mule, and even camel trains in their western Indian campaigns... With the outbreak of the Civil War, military concerns dominated development in the West. As it had during the Mexican War and early Indian wars, the U.S. Army enlisted westerners – including mule packers – to help in the war effort... In California, the Union needed a quick and direct route across the Sierra to protect its interest in the Coso mines and to facilitate the movement of troops and supplies between Camp Babbitt in Visalia and Fort Independence in Owens Valley. In 1863 a new trail was begun by John Hockett and Union soldiers were dispatched to help with its construction. For two summers weekly pack trains wound up the finished portions of the trail to supply the crews as the work progressed. Portions of the older Jordan Trail were incorporated into the route, so other trains had to use the more northern Mono Pass during the construction. The Hockett Toll Trail was completed in the summer of 1864 and remained the principal trail route across the southern Sierra for the next forty years.

Throughout the West after the Civil War, the army employed civilian pack trains equipped with aparejos rather than using wagon convoys on campaigns against transitory Indians. Their mobility and speed were proven to be so successful in operations against the Paiutes, Shoshones, and Bannocks that General George Crook convinced the government it should purchase three of the trains he had used in the campaigns. Thus started the pack service of the United States Army.

The influx of government packing work in the Sierra began in the 1880s, serving military projects. One of the first, the 1881 Langley and Army Signal Corps scientific expedition to Mount Whitney, engaged a pack outfit to carry the group's astronomical instruments and supplies from Lone Pine to a base camp at Guitar Lake below the summit.

From 1891, with the creation of Yosemite, Sequoia, and General Grant National Parks, the army was appointed to manage the new parks in absence of adequate personnel and funding sources. Pack trains were the main mode of transportation in the parks, and cavalry deployments were some of the largest pack outfitters both inside and outside park boundaries. With military packing needs increasing, local ranchers were often called upon to provide pack animals and act as guides.

Cavalry units maintained control of summer operations in Yosemite, Sequoia, and General Grant National Parks until 1914, when the Department of Interior took over the management with civilian superintendents and employees. By that time, with the sheep and cattle grazing problems resolved, new trails could be constructed and maintained for easier recreational use. Soon recreation became the primary focus of the Sierra's national parks.

Even before there were good trails, the 1870s and 1880s saw growing recreational use of the High Sierras. Whole families escaping the summer heat and unhealthy conditions of the central valley headed into the highlands to camp at old mining and lumbering “resorts.” From these bases they adventured farther into the backcountry on pack trains, usually using the stock of nearby ranchers.

With the first ascents of Mount Langley and Mount Whitney in 1871 through 1873, mountaineering parties began to take packing expeditions across the Dennison, Jordan, and Hockett Trails, as well as other rough mule trails. Soon adventurers, hunters, fishermen, and nature enthusiasts also started packing into the alpine regions. For the first time, ranchers hired out their horses and mules and acted as guides for those recreationists.

By 1868, on the west side, Frank Dusy was offering his professional services, packing and guiding parties into the Kings and Kaweah backcountry... even Muir himself, an intrepid walker, used pack mules, if reluctantly. In 1875, with George Bayley, Charles Washburn, and “Buckskin Bill” as mule master, “all well mounted on tough obstinate mules,” Muir explored the Kings and Kaweah high country.

The first expedition to Mount Whitney that included women, the Porterville group of 1878, involved over two weeks of mule and horse packing from Dillon’s Mill to Mount Whitney and back.

Several professional packers were operating that year (1890). On the east side, guided parties from Independence and Lone Pine traveled the Hockett Trail on fishing and hunting trips and on excursions to Mount Whitney. On the west side, Dyer and his friends met packer John Fox in the Visalia Big Tree Grove, later renamed the General Grant Grove, who led them across sheep trails to his camp at Cedar Grove on the Kings River. A year later, John Muir wrote of “Mr. J. Fox, bear killer and guide, who owns a pack train and keeps a small store of provisions in the valley for the convenience of visitors.” Muir and his party engaged him to “Manage our packs” and lead them down the rough trail into Paradise Valley.

With the formation of Yosemite, Sequoia and Grant Grove National Parks in 1890 and the forest reserves in 1893, commercial tourist packing became even more popular, but the trails and access roads still were a mess... Visitors to the national parks depended on commercial pack outfits to lead them through the undeveloped terrain of the high country.

Beginning in the 1890s the creation of three new national parks and the forest reserve system generated a consistent source of income for packers. To encourage tourism in the parks, the government launched major trail-building and maintenance efforts, hiring local commercial packers to haul supplies to the workers... In 1914, after the cavalry moved out, the parks were left with little stock of their own, which created the need for still more commercial packers. As the years passed, government packers replaced many commercial pack outfits on trail crews, but both the parks and the national forests still hired outside packers throughout the twentieth century.

The three main types of government projects that packers supported in the early 1900s were fire suppression, trail construction and maintenance, and bridge construction, as well as miscellaneous work such as the construction and supplying of ranger stations and railroads...

Other government projects of the period also brought business to the growing number of packers. The United States Geodetic Survey continued to send out surveying parties to create topographical maps of the High Sierra region. These expeditions spent whole summers in the backcountry and depended on mule packing for supplies.

In addition to working directly on park development projects, packers reaped the benefits of the growth in tourism resulting from that development. One of the first operations to take advantage of the new opportunities was Broder & Hopping. In 1898 homesteader John Broder began a commercial packing operation out of Three Rivers when an attorney from San Francisco hired him to guide a party into the Giant Forest area.

In 1901 Charles Robinson expanded his Owens Valley mining pack train to include tourist packing, taking several parties over Kearsarge Pass into the backcountry. When Robinson's son Allie took over the operation, he directed even more resources into the growing tourist trade. The Robinsons handled all the Sierra Club High Trips from 1912 until World War II.

In addition to tourists and the Park Service, water and power companies needed the services of pack outfits, too. As early as 1886 the Mount Whitney Power Company and the San Joaquin Electric Company employed pack trains to support their explorations of the backcountry in search of hydroelectric plant and reservoir sites. When the first power plants were built on the Kaweah in 1886, the Kern in 1897, the Tule in 1909, and the Kings River in 1919, mule trains hauled supplies to the construction sites. On the Kaweah River, dams were built at Wolverton Creek and Monarch, Crystal, Franklin, and Eagle Lakes in the summers of 1904 and 1905.

One of the most unusual jobs was undertaken in 1909. Six years earlier, a military reservation for scientific and weather observations had been established on the summit of Mount Whitney. After the citizens of Lone Pine completed a pack trail to the summit in 1904, the Smithsonian Institution made plans for a stone shelter and three-room observatory, and in 1908, a packing contract was awarded to Charles W. Robinson of Independence.

As recreational fishing became more and more popular, the stocking of fish in the southern Sierra's barren streams and lakes became another job of packers in the late 1800s and early 1900s. Officials at both Yosemite and Sequoia National Parks actively promoted fish planting to encourage recreationists.

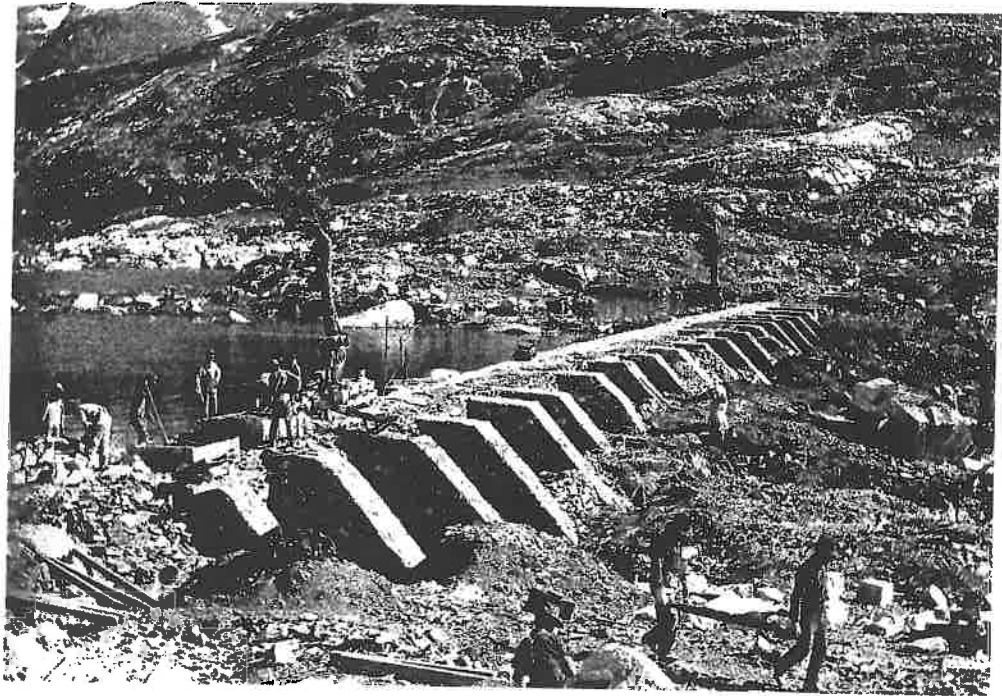
The founding of the Sierra Club in 1892 created a new form of recreation for hundreds of California city dwellers. Between 1902 and 1946, the club's annual High Trips brought commercial stock packing its biggest impetus to date. The Sierra Club's second expedition, in 1902, was the largest backcountry trip into the southern Sierra yet undertaken. On the 1902 trip, over two hundred Sierra Club members were packed into a two-week base camp in the Kings River Canyon. The packers for this outing were from Kanawyer's Resort at Millwood, and Broder & Hopping in Giant Forest.

The interest generated by Sierra Club trips in the 1920s gave birth to more packing outfits and higher profits... The growing tourist trade was not the only source of income for commercial packers. Providing services to cow camps and backcountry resorts brought in some income, too. But it was government contracts that provided the most reliable source of work. Commercial pack outfits supplied backcountry rangers in various survey, insect control, logging, firefighting, and other assignments. They also hauled materials for building and repairing ranger stations, fire lookouts, trails, bridges, dams, and camps.

# **EXHIBIT “D”**



# **EXHIBIT “E”**



# **EXHIBIT “F”**

