

## II. OBJECTIVES OF THE STOCK USE AND MEADOW MANAGEMENT PROGRAM

The goal of backcountry management in Sequoia and Kings Canyon is to allow natural processes to operate as freely as possible while allowing for human use as long as it does not result in significant impairment of park resources or the processes that shaped them. The following objectives for stock use and meadow management provide a more specific interpretation of this goal:

1. To manage free-roaming pack and saddle stock so that grazing and trampling does not result in:
  - a. continuous, unidirectional change in plant composition, density, cover and/or vigor; and
  - b. increasingly erodable, discontinuous, or irregular surface soils or sod.
2. To minimize the impact by pack and saddle stock to trails, camps, drainage patterns, and water quality.
3. To ensure that a series of meadows, including representatives of all major types within these Parks, be protected from all consumptive and destructive stock use so that they are perpetuated as natural functioning ecosystems in as near-pristine condition as possible.
4. To provide for an array of visitor experiences, including stockless areas, and to mitigate the potential for conflict between user types.
5. To maintain the general pattern and level of use currently found in these Parks.

In order to meet these objectives, unacceptable impact must be defined. The management program must be sensitive to annual variation in climate, the characteristics of specific forage areas, and the inherent ability of individual species to withstand grazing and trampling pressure. The system must also be workable. Management responsibilities must be reasonable and clearly defined. The needs and desires of users are to be accommodated insofar as objectives are not compromised.

SUMMARY AND ABSTRACT

Meadows are among the most attractive and important resources within Sequoia and Kings Canyon National Parks. They are the principal destination of many backcountry travelers, important habitat for many species of birds and animals, and encompass a tremendous reservoir of significant scientific knowledge.

Impact to forage areas is defined as unacceptable when grazing and trampling, either by its intensity, frequency or timing, leads to increasingly erodable, discontinuous, or irregular surface soil and/or sod; or result in a continuous unidirectional change in plant composition, cover, or vigor. Increased influence by grazing and trampling upon any and all park meadows is unacceptable except as the result of explicit management design.

The opportunity for stock use to continue at overall levels similar to those of recent years has been provided. A network of meadows, including representatives of the various physiographic types, geological origins, the meadow plant associations present within the Parks, and a number of meadows possessing unique features have been identified and given complete protection from all consumptive use.

Dates prior to which meadow utilization will not be permitted in order to prevent unacceptable mechanical disturbance to soil and vegetation are in effect for all forage areas. Opening dates have

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been prescribed for wet, dry, and normal years (defined in Appendix IV) for most park forage areas and are presented in Appendix III. Forage area locations are detailed in Appendix II. Animals will be permitted to utilize camps in forage areas prior to opening dates, provided they are properly teathered and fed and unacceptable damage to trails and camp areas associated with early season conditions does not occur.

Guidelines have been established to preserve the general pattern and level of use that are currently found in park forage areas and to prevent undesirable change resulting from excessive grazing. Only a small number of forage areas are likely to be restricted by these guidelines. Those most likely to be affected are identified.

Off-trail stock travel is permitted in those areas where regular use has occurred throughout the past and where the resource is tolerant of such use. These areas are specifically identified. Travel by stock and rider or by loaded pack is prohibited in all areas not listed (p. 29).

Monitoring of the moisture regime in specific forage areas will continue in order to recheck and if appropriate, modify opening dates. Utilization of the stock use reporting card will continue. A network of condition and trend plots will be established.

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V. THE MANAGEMENT SYSTEM

Pack and saddle stock permitted within Sequoia and Kings Canyon National Parks are limited to horses, mules, burros, and llamas. All regulations and the guidelines presented in this plan apply equally to all types of pack and saddle stock with the following exception: llamas are not permitted within the current and projected ranges of the Sierra Nevada bighorn sheep. The ranges include an area west of and contiguous with the Sierra crest between Mather Pass (Mt. Boulton Brown) in the north and the Park boundary adjacent Cirque Peak in the south and an additional area surrounding the Great Western Divide and Kaweah Crest regions into which bighorn sheep will be reintroduced in the near future (Figure 3). The principle reason for excluding llamas from sheep range is the potential role of llamas as a vector of disease, most probably scabies, to sheep populations (Wehausen 1983; Jessup 1983a). Despite the remote probability of such an occurrence (Fowler 1983, Jessup 1983a) the National Park Service must adopt a conservative posture. To jeopardize, even remotely, the integrity of such a limited and magnificent resource is incongruent with the mission of the National Park Service.

For the purpose of calculating stocking rates and tallying use levels, an overnight stay by a horse or mule is defined to be one animal-night. An overnight stay by a burro or llama is defined to be one-half of an animal-night.

Forage areas have been identified and delimited throughout these Parks (Appendix II). Meadow vegetation in all forage areas receiving one percent or more of these Parks' total stock use during the past five years has been classified. In this process, the amount of each plant association within each forage area has been estimated (Meadow Folder File and Classification Summary). Many forage areas receiving less than one percent of these Parks' stock use have also been so classified. Generally, the management of a specific forage area is keyed to that portion of the area that is most susceptible to impact. Key plant associations for each forage area are identified in Appendix III.

Impact to forage areas is defined as unacceptable when grazing and trampling lead to increasingly erodible, discontinuous, or irregular surface soils and sod. Grazing and trampling that, by its intensity, frequency, timing, or periodicity, results in unidirectional change in plant composition, density, cover or vigor or alters associated water quality parameters is unacceptable in all meadows.

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Additionally, increased influence by grazing and trampling upon any and all park meadows is unacceptable except as the result of direct management design. It is unacceptable for increased influences to occur without planned, justifiable, documented management design.

A. Grazing Management Tools and Techniques

1. Management of Mechanical Impact (Trampling)

a. Opening Dates

Dates prior to which no grazing will be permitted are in effect in all park forage areas. These dates are designed to prevent unacceptable mechanical disturbance to surface soil and vegetation. Imprints by hooves that regularly exceed one inch in depth in sensitive or key plant associations (defined in Appendix IV, listed for each forage area in Appendix III) within a forage area are unacceptable. Opening dates vary for specific forage areas with the type of hydrological year that precedes the summer season. Opening date prescriptions for wet, dry, and normal years for all major (and many incidental) forage areas are presented in Appendix III. Rationale for defining wet, dry, and normal years and methodologies employed in determining specific opening dates are presented in Appendix IV. It is the responsibility of the stock user to request opening date information for any forage area he plans to use that is not listed. This information will be available from the Sierra District Ranger. The Chief of Resources Management is responsible for promptly setting these dates when requested.

Opening dates for specific forage areas will be finalized immediately following receipt of the results of the May 1 snow survey each year. Tentative estimates will be available following the April 1 snow survey. Modifications of opening dates prescribed in Appendix III will occur only with written approval of the Superintendent.

- b. Trampling that results in the pulverization (nearly complete disintegration) of the soil-root complex is unacceptable. Dry meadow vegetation and meadow plant associations with discontinuous, tussocked or pedestaled vegetation are most susceptible to pulverization and will be monitored for such damage.

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- c. Stock use or behavior that results in disturbance to stream banks and their margins is not acceptable. Chronic problem areas may be closed to grazing.

2. Grazing (Herbage Removal) Management

The following guidelines are designed to preserve the general pattern of use distribution that is currently found in park forage areas and to prevent undesirable change resulting from excessive grazing (see plan objectives). Given the current levels and distribution of use, only a small number of forage areas are likely to be restricted by these guidelines. They are identified below.

Use levels for all park forage areas receiving reported stock use in at least two of the five years between 1977-1981 are presented in Appendix V. Meadow acreages and use levels stated there are presented as baseline standards to which the management guidelines below are to be compared. Grazing (Herbage Removal) Management guidelines are as follows:

- a. The stocking rate of any forage area will not exceed 30 animal nights per acre of primary meadow vegetation in either of the first two 30-day periods following its opening date. Primary meadow vegetation is defined as the total acreage of all meadow plant communities (Appendix II) present in a forage area. Total acreage of primary meadow vegetation is indicated for each forage area in Appendix III. Following this 60-day period, use levels are not to exceed 45 animal nights per acre of primary meadow vegetation.

A stocking rate of 30 animal nights per acre of primary meadow vegetation per 30 day period in vegetation comprised of plant associations that range from 200-1500 lbs/acre available forage (oven dry weight at maturity) might be considered excessive if animals were confined to those areas while foraging. Such stocking rates will be allowed to occur only where comparable use levels have occurred in recent years and then, only where observation indicates that unacceptable impacts do not occur. Ceilings on total use place further restriction on the amount of use that can occur in specific forage areas.

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Forage areas that have received use in recent years at levels in excess of this standard are listed below:

<u>Meadow</u>	<u>Primary Mdw. Vegetation (acres)</u>	<u>Max. No. of Nights Permissible in Each of the First Two 30-Day Periods Following Opening</u>
Scaffold Mdw.	7.0	210 nights/30 days
Austin Camp	2.3	70 nights/30 days
Pinto Lake	4.3	129 nights/30 days
Upper Funston Mdw.	6.3	189 nights/30 days
Castle Domes Mdw.	2.4	72 nights/30 days

It should be anticipated that these meadows will be closely monitored and may be temporarily closed one or more times during the season. Closure is most likely to occur near the end of one or both of the first two 30-day periods following the opening date. Administrative use of these areas will be only for essential services (i.e., those requiring working stock such as bridge repair and trail rehabilitation) when that use occurs in forage areas where a substantial proportion of use is from commercial and/or private sources. Forage areas that approach maximum levels will be reviewed annually for possible inclusion on the above list. They may be included if 1) use exceeds (or would have exceeded) standard levels during the previous season; or 2) if a significant portion (i.e., a preferred plant association) of the meadow in question is excessively grazed (more than 35-45 percent of the average annual production removed, depending on the plant association (Ratliffe 1980) and use exceeds 30 nights per acre for that type during one of the 30-day periods even though the number of animal nights does not exceed 30 nights per acre of total meadow vegetation. Meadows that should be monitored carefully and reviewed annually include:

Cony Camp

Bench Lake Area

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Simpson Meadow

Upper Vidette Meadow

Grasshopper Meadow

Brewer Creek

9,400 ft Camp (Kern River)

Funston Meadow

Shorty's Meadow

Cement Table Meadow

Upper Rattlesnake Meadow

Forester Lake Meadow area

- b. The number of animal nights permitted per annum in low-use forage areas will not exceed twice the 1977-1981 average, nor will it exceed a total of 100 nights/season or 10 nights acre/season whichever is less, unless specifically approved by the Superintendent for management purposes. Low-use forage areas are forage areas that received an average of 10 or less animal nights per acre of primary forage per season during the 1977-1981 period and that did not exceed an average total use level of 100 stock nights per season during that period (see Appendix V for a list of low, moderate, and heavy use forage areas). A factor of two times the 1977-81 mean use level is used to allow in part, the highly variable annual use levels characteristic of low use forage areas to continue while not allowing average annual use levels to increase sufficiently to alter the character of the forage area. A similar rationale is extended toward the use of a factor of one and one half times the 1977-81 mean use levels for moderate and heavy use forage areas.
- c. The number of animal nights permitted in moderately used forage areas shall not exceed 150 percent of the 1977-1981 average in a single season, nor will it exceed a total of 200 nights or 20 animal nights/season/acre, whichever is less, unless specifically prescribed as a management directive. Moderately used forage areas are forage areas that receive from 10 to 20 animal nights per acre of primary forage per season and that do not exceed an average total use level of 200 animal nights per season, and

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those areas that receive less than 10 animal nights per season but receive an average of between 100 and 200 animal nights per season.

- d. The number of animal nights permitted in heavily used forage areas shall not exceed 150 percent of the 1977-1981 average in a single season unless specifically prescribed as a management directive. Heavily used forage areas are forage areas that receive an average of more than 20 animal nights per acre per season or that have an average annual use in excess of 200 animal nights.

Paragraphs b-d are summarized in Table 4.

3. Management of Off-Trail and Cross-Country Stock Travel

Three types of "off-trail" stock travel occur at present. First is the traditional use of unmaintained routes (i.e., Ferguson Creek, Upper Goddard Canyon). Second is more or less true cross-country travel to infrequently visited destinations. Third is the continued use (in variable amounts) of trails recently removed from the maintenance inventory (Shepherd Pass, Sixty Lakes Basin, Baxter Pass, John Dean Cutoff).

Current regulations prohibit off-trail stock travel except where designated by the Superintendent (CFR 36 Sec. 1.16(b)). The general management direction applied has been to permit off-trail stock travel to those areas or places where regular use has occurred throughout the past and where the resource is relatively tolerant of such use. Use is permitted on all maintained trails (those on these Parks' inventory). Specific policies for off-trail use and identification of areas and places where off-trail stock use is permitted follows:

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Table 4 Summary of Use Level Class Characteristics

	a	b	c
	Maximum Annual Levels of Use Permitted Within Confines of b and c	Max. No. Nights/Season	Max. No. Nights/Acre Season
Low Use Area	$\leq 2 \times 1977-81$ average	100	10
Moderate Use Area	$\leq 1.5 \times 1977-81$ average	200	20
High Use Area	$\leq 1.5 \times 1977-81$ average <sup>d</sup>	$>200^d$	$>20^d$
<sup>d</sup> =limited by the 30 night/acre/30 day rule as are low and moderate use areas			

If a forage area fails to meet b and c for a Use Level Class, it moves to the appropriate class

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a. Travel by stock and rider or by loaded pack stock is prohibited on all but officially maintained trails with the following exceptions:

- (1) Direct travel to camps within one-quarter mile of maintained trails is permitted.
- (2) No restriction of off-trail travel is in effect in Travel Zones 69-72 (Roaring River), Zone 86 (Lower Kern Canyon), Zone 87 (Chagoopa Plateau), Zone 89 (Rattlesnake Creek), and Zones 90-91 (Hockett Plateau-South Fork of Kaweah River). See Figure 1. Llamas are not permitted within bighorn sheep range within these zones as delimited in Figure 3.
- (3) Utilization of unmaintained trails and routes into or through the following areas (see Figure 1) is permitted provided unacceptable resource damage does not result from continued stock travel:

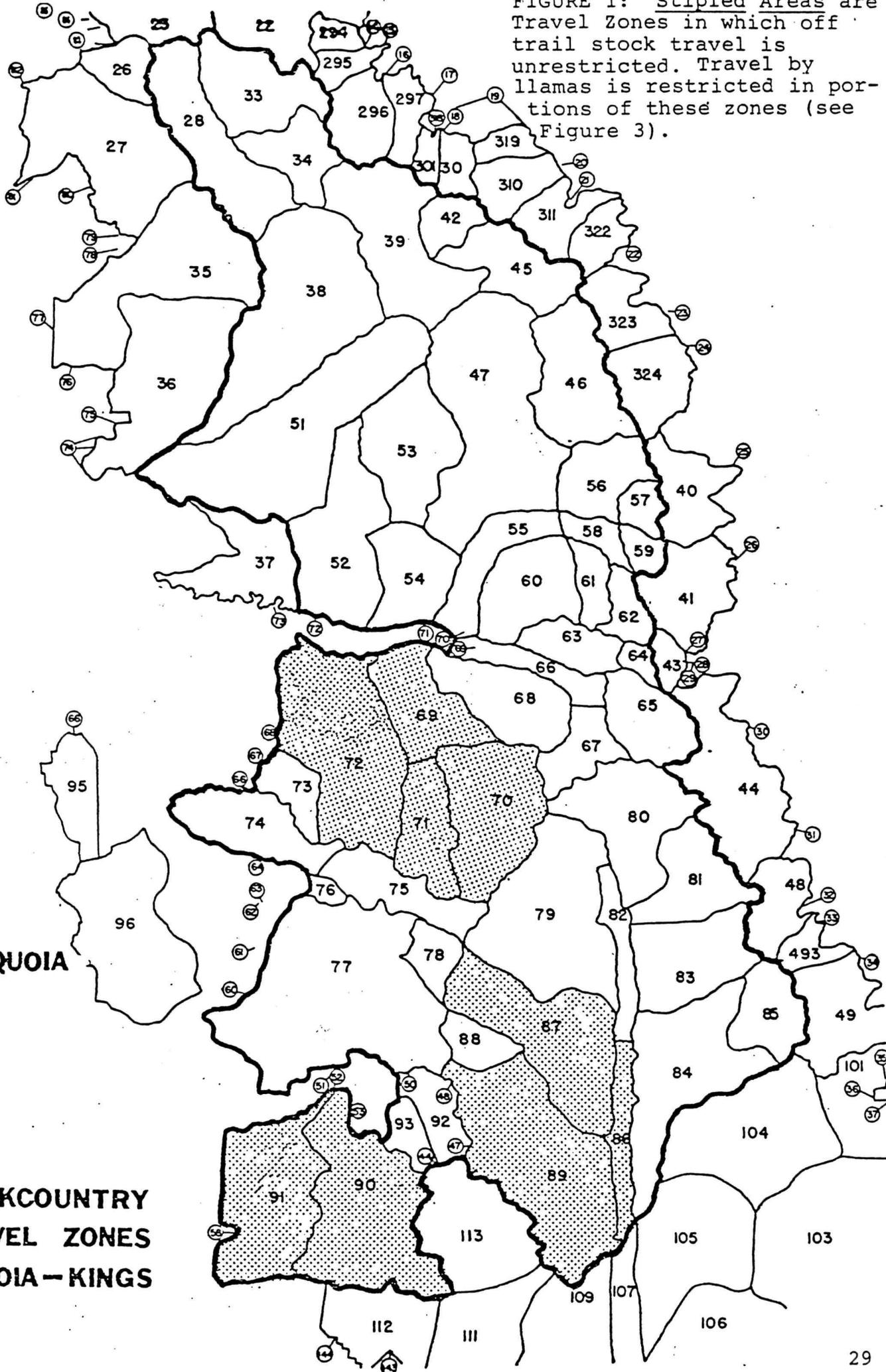
Zone 33	Lower McGee Canyon
38	Blue Canyon
53	Glacier Lakes
54	Grouse Lake
57	Woods Lake Basin (no grazing at Woods Lake)
61	Sixty Lakes Basin (spot trips only - no overnight grazing)
68	Sphinx Lakes
80	Shepherd Pass Trail
80	John Dean Cutoff
81	Wright Lakes Basin
83	Lower Whitney Creek
84	Forgotten Canyon-Funston Lake
84	Lower Rock Creek (West of trail crossing of Rock Creek below Ranger Station)

FIGURE 1: Stippled Areas are Travel Zones in which off trail stock travel is unrestricted. Travel by llamas is restricted in portions of these zones (see Figure 3).

**KINGS  
CANYON**

**SEQUOIA**

**BACKCOUNTRY  
TRAVEL ZONES  
SEQUOIA - KINGS**



SEQUOIA & KINGS CANYON NATIONAL PARKS

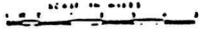


FIGURE 2: Network of meadows closed to all consumptive use.

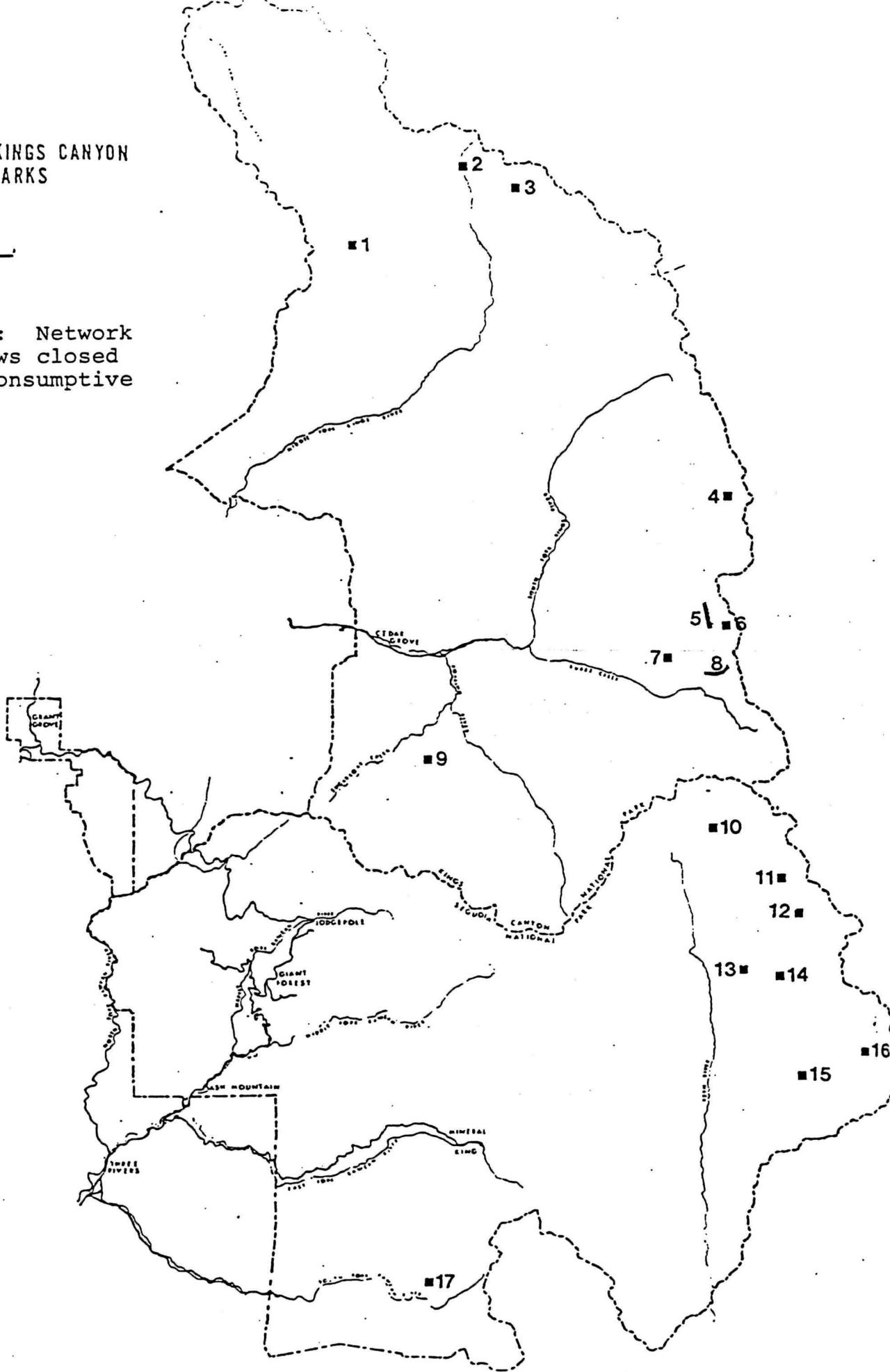
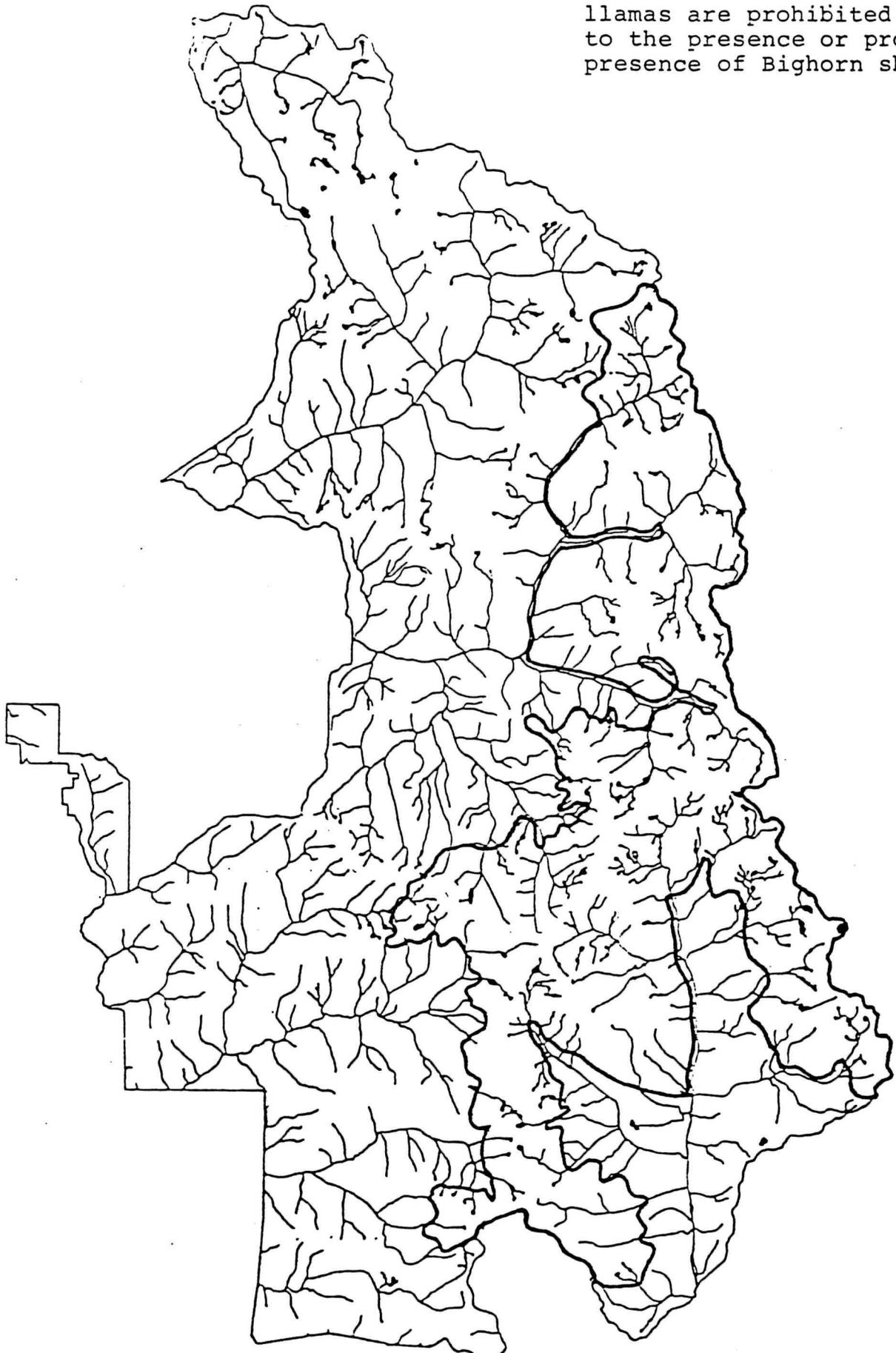


FIGURE 3: Area in which llamas are prohibited due to the presence or project presence of Bighorn sheep.



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- (4) The following are examples of recognizable areas that have received occasional off-trail use and that are now closed to stock travel. This is not a complete list of every place closed to stock. It is for clarity only.

Zone 33	Lake 11106
33	Darwin Bench-Canyon
42	Dusy Basin (off trail)
42	Rainbow Lakes
59	Baxter Creek and Lakes drainage one-quarter mile east of South Fork of Woods Creek
60	Gardiner Basin
65	Center Basin including Golden Bear Lake
67	Lake Reflection
79	Nine Lakes Basin
79	Milestone Basin
79	Kaweah Basin
80	Upper Kern Lakes one-half mile above Milestone Creek
81.	Wallace Lakes drainage one-half mile east of the John Muir Trail
83	Crabtree Lakes
84	Siberian Creek
85	Miter Basin

4. Supplementary Management Techniques

- a. A maximum of 20 head of stock are permitted per party. Parties in excess of 20 head may be approved on a case-by-case basis by the Superintendent. A detailed itinerary must be received in writing by the Superintendent at least two weeks in advance for such consideration.

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- b. In order to prevent unacceptable impacts, it is sometimes necessary to distribute the use of specific forage areas through time. Practices such as length-of-stay limits, head limits, and special opening or closing dates may be prescribed for this purpose. Such practices will be detailed in the annual grazing regulations and will be distributed to all commercial packers in May of each year. The grazing regulations will be given to private stock parties when obtaining a wilderness permit and will be distributed to representatives of local private stock user associations in May of each year.
- c. Rotation systems may be employed to rest specific forage areas or meadows within forage areas where feasible and conditions warrant such action. Rotation systems must be approved by the Superintendent, and closure or special regulations will be included among the annual grazing regulations mentioned above.
- d. Although forage areas are closed to grazing by pack and saddle stock prior to their opening dates, the utilization of associated camp areas prior to this opening is not prohibited provided pellets and/or grain is carried and fed to animals and they are properly tethered between trees on relatively flat, unvegetated ground or to hitch rails where such are provided. If unacceptable impact to trails, camp areas, or tethering sites occur due to early season conditions, this practice will be modified or curtailed. Grain (or pelletized feed containing seeds) must be processed if it is used in portions of the Parks where a reasonable possibility exists for its germination and establishment.
- e. Drift fences are provided in specific locations for purposes such as visitor safety, resource protection, and visitor or administrative convenience (see Appendix VI for location and classification of existing fences). Even fences maintained primarily for convenience have indirect resource protection functions. These include the dispersal of stock use by increasing the number of areas in which stock can be held and the decreasing of heavy, localized impact caused by picketing and tethering of animals through encouragement of free-roaming grazing. Fences that fall into disrepair, that lose their function, or that become unnecessary, will be removed.

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Guidelines for drift-fence management include the following:

- (1) The establishment of new fences, temporary or permanent, must be approved by the Superintendent prior to their construction. Detailed justification and a description of the fence route and dimensions must be provided for consideration.
- (2) Fence posts will be of natural material. Exceptions must receive specific approval by the Superintendent.
- (3) Pole gates will be utilized throughout the Parks. Swing gates will be replaced by pole gates as they fall into disrepair.

f. Special Closures

Specific meadows, forage areas, or camp areas may be closed to grazing or stock use for special reasons relating to resource protection, health and safety, and the reduction of user conflicts. Reasons for which such closures may occur include but are not limited to the following:

- (1) Where meadow surfaces are highly irregular or hummocky and the vegetation is discontinuous, sparse, or without sod and is therefore especially susceptible to trampling.
- (2) Where water quality is biologically compromised by the presence of stock (i.e., changes in coliform levels, introduction of giardia, etc. that can be attributed to stock).
- (3) Where, in the judgment of the Superintendent, the aesthetics of an area are or would be unacceptably compromised by the presence of stock.
- (4) Where located near trailheads receiving a substantial amount of day use.
- (5) For the purpose of scientific study as approved by the Superintendent.

Meadows closed for these reasons will be listed on the Annual Grazing Regulations.

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B. Network of Meadows Closed to All Consumptive Use

Selected park meadows are closed to grazing and other types of consumptive use so that they are perpetuated as natural functioning ecosystems in as near-pristine condition as possible. Meadows representative of different general physiographic types (basin, slope and stream-side stringer); meadows of both pre-glacial and post-glacial origins; and meadows representative of the area's common meadow plant associations are included. Additionally, meadows possessing features unique or uncommon to these Parks are featured.

Among the desired characteristics of the nominee meadows are:

1. that they have received little or no stock use during the last 20 years, and where possible, during the last 50 years or more;
2. that fences, etc. not be necessary to protect the meadows from occasional use associated with nearby forage areas;
3. that a significant number be accessible via arterial routes so that they can be easily observed by the public.

The following meadows are closed as per the above criteria. Their general locations are presented in Figure 2.

1. Goddard Creek Meadow Chain; Zone 38, along Goddard Creek at an elevation of 10,200 ft-10,400 ft.
2. Northward wooded section of Big Pete Meadow; Zone 39 on John Muir Trail - 2 miles north of LeConte Ranger Station at 9,200 ft.
3. Dusy Basin snow survey course meadow; Zone 42, along Bishop Pass feeder to the John Muir Trail at 11,000 ft.
4. Woods Lake proper; Zone 57, on Sawmill Pass access route off the John Muir Trail.
5. Rae Lakes Basin; Zone 62, at 10,400 ft on John Muir Trail.
6. Dragon Lake Meadow; Zone 62, 11,600 ft on spur trail to Dragon Lake off John Muir Trail.

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7. Charlotte Lake Meadows; Zone 63, adjacent Charlotte Lake. Includes 3 distinct meadows (one east of the lake; one immediately below the lake; one about 1/4 mile below the lake). All meadows are above the lower Charlotte drift fence at 10,300 ft.
8. Kearsarge-Bullfrog Lakes Basin; Zone 64 within one mile of JMT on well-traveled spur trail. Most frequently visited by people coming from the Onion Valley Trailhead east of the crest via Kearsarge Pass at 10,600 ft -10,900 ft.
9. Ellis Meadow; Zone 72 about 1-1/2 miles south of the Roaring River Trail and midway between the east and west forks of Ferguson Creek at an elevation of 8,700 ft. Not on a maintained trail.
10. Lake South America Col Meadow; Zone 80 on the trail to Lake South America (just south of Lake South America Col), at 12,000 ft.
11. Wright Lakes Drainage Meadow #27; Zone 81, in east central Wright Lakes Basin at 11,000 ft.
12. Wallace Creek Drainage Meadow #38; Zone 83 east of the JMT along Wallace Creek at 11,000' - 11,200 ft.
13. Sandy Meadow; Zone 83 on the JMT about 1-1/2 miles north of Crabtree Meadow at 10,500 ft.
14. Crabtree Stringer; Zone 83 on JMT adjacent the Crabtree Ranger Station.
15. Rock Creek Ranger Station Meadow; Zone 84 on the Pacific Crest Trail, adjacent to the Rock Creek Ranger Station at 9,600 ft.
16. Rock Creek Pinned Up Meadow; Zone 85 on path from Rock Creek Lake Meadow to Miter Basin at 10,600 ft.
17. Mitchell Meadow, Zone 90, off the trail about 1/4 mile east of Sand Meadow at 8,600 ft.

The location, size, physiographic type, meadow plant associations present, special features, use history, and any anticipated management problems are detailed for each of the meadows listed in Appendix VII.

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C. Criteria for Assessing Impact

A guide to assist field personnel in evaluating impact to meadows is presented in Appendix VIII.

D. Stock and Camp Etiquette

In order to minimize the impact of stock to camps and trails and to allow for the restoration of damaged areas, the following regulations must be followed:

1. Tie stock to trees for no more than 5-10 minutes. Animals pawing the soil away at the base of individual trees cause soil disturbance, root damage and debarking of trees. Deep depressions and exposed roots are visible evidence of the problem.
2. When tying stock for periods longer than 5-10 minutes, tie a line between two trees or rocks and tether the animals to the line. The line must be located on a hardened (flat, sparsely vegetated) site to minimize damage to tree roots and plants. Animals that continue to paw should be hobbled while tied.
3. When camping, animals must not be tied within 100 feet of lakes, streams, trails or campsites except while loading or unloading. Manure deposited within or at the perimeter of camps while loading or unloading must be dispersed to points at least 100 ft from camps, water, or trails. This distance protects water quality, lessens impact on the campsite, and helps reduce insect problems.
4. Stock present in forage areas prior to their opening dates or that have been closed to grazing for other reasons should be tied as stated in 2 and 3 and fed.
5. Pack out EVERYTHING you pack in. This includes all cans, bottles, aluminum foil, fire grates, and other trash you cannot burn. The old tradition of burying your trash NO LONGER APPLIES!
6. Scatter the manure and smooth over areas where stock have been kept. This speeds up the decay process and reduces odor and visual impact. A short-handled rake is a helpful item to pack along for this purpose.
7. Short-cutting trails and switchbacks is prohibited. Loose herding is not permitted except when conditions are deemed hazardous.

8. Picketing is prohibited.

By following these practices, impact associated with stock use will be reduced to minimum. Users will be able to take pride in the absence of evidence that they or their animals were there.

E. Procedures for Requesting Management Review of Site Specific Regulations and for Obtaining Variances to Existing Regulations

Proposed changes in site specific regulations including opening dates, head limits, length of stay limits, special closures, and rotation systems will be submitted with appropriate documentation to the Chief of Resources Management. These proposals must be received by February 1 to be considered for the upcoming summer season. The Chief of Resources Management will review proposals and make recommendations for approval by the Superintendent. Environmental Management Committee review may be necessary in selected cases.

Variances to existing regulations may be granted on a case-by-case basis (i.e., stock per party in excess of 20 head, use in excess of calculated standard or historical use levels, etc.). Detailed application for variances must be received by the Superintendent at least two weeks prior to the date of the activity planned. Variances will be granted only with the written permission of the Superintendent or his designated representative.