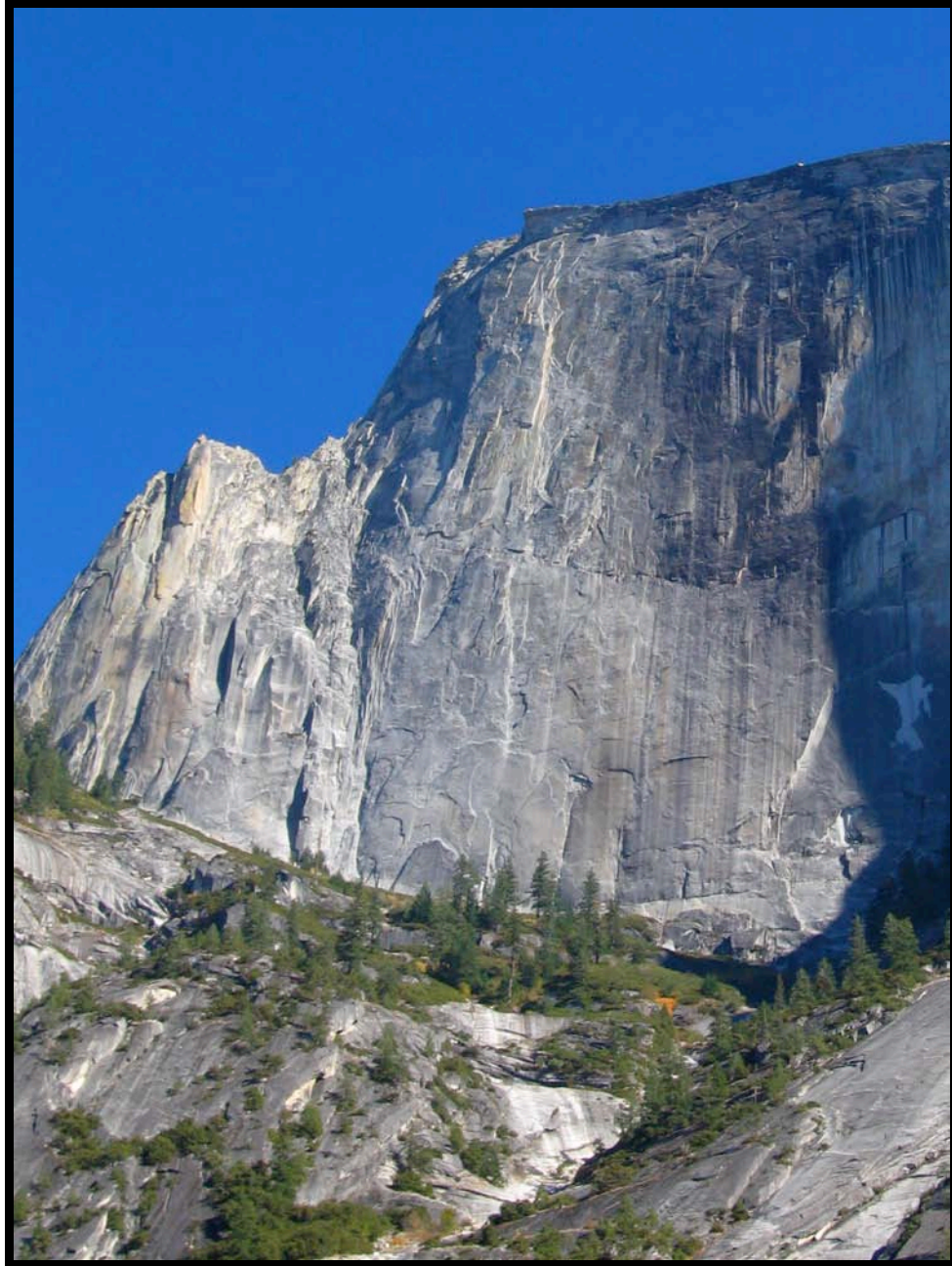


YOSEMITE NATIONAL PARK HALF DOME TRAIL STEWARDSHIP PLAN



Draft Public Scoping Analysis Report

December 2010

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Appendix A – PEPC Summary Information

List of Acronyms

NEPA National Environmental Policy Act

NPS National Park Service

PEPC Planning, Environment, and Public Comment

INTRODUCTION

Half Dome is perhaps the most recognized symbol of Yosemite National Park. Rising nearly 5,000 feet above the Yosemite Valley floor, it is one of the most sought-after landmarks in the park.

Half Dome was designated as Wilderness by Congress in 1984 and is managed according to the Wilderness Act of 1964, as well as the National Park Service Organic Act. By law, Wilderness is to be "without permanent improvements," "managed so as to preserve its natural conditions," and to have "outstanding opportunities for solitude or a primitive and unconfined type of recreation."

High levels of use on the route to Half Dome and cables that allow people to climb Half Dome have led to both safety and Wilderness concerns.

The purpose of the Half Dome Trail Stewardship Plan is to provide long-term management of the Half Dome route in a manner that is consistent with the Wilderness Act and the NPS Organic Act and that provides unimpeded travel conditions. More specifically, the plan will:

- Consider all possible ways to protect and enhance wilderness character. This may include a range of alternatives from removal of the cables, to access restrictions potentially involving day-use permits;
- Institute management prescriptions that protect and enhance the natural and cultural environment;
- Establish thresholds and management prescriptions for appropriate social conditions on the Half Dome trail;
- Provide unimpeded travel conditions; and
- Commit to a program of ongoing monitoring to ensure the goals listed above are met.

PUBLIC SCOPING PROCESS SUMMARY

Public scoping was initiated for the proposed Half Dome Trail Stewardship Plan on May 26, 2010. The 30-day public comment period was to end on June 25, 2010, but was extended until July 9, 2010 to include a federal holiday. The National Park Service provided information about the plan and the public scoping period through the following means:

1. An initial press release was distributed on May 13, 2010 through an electronic newsletter to area media outlets. The press release announced the public scoping period, the date (May 26) of the first public meeting, and included project information along with a request for public input. The electronic newsletters were emailed to 5,161 individuals, agencies and organizations, and 7 tribes or tribal representatives and included project information and a request for public input. Park records show that 1,143 of the electronic newsletters were opened.
2. The May 13, 2010 press release was also added to Yosemite National Park's Daily Report, an email sent to all Yosemite National Park employees, and to approximately 550 individuals or organizations that requested to receive the Daily Report.
3. An article was published in the *Mariposa Gazette*, the newspaper of record, on May 20, 2010 with public scoping details. A press release on May 27, 2010 announced the dates for the

additional two public meetings (June 5 and June 16), and a press release on June 30, 2010 announced the extended public scoping period.

4. The three public scoping meetings were held on May 26, June 5, and June 16, 2010 in Yosemite Valley, Fresno, and Berkeley, respectively.
5. On June 4, 2010, scoping information was emailed to the Commercial Use Authorization list, consisting of 577 agencies, organizations, businesses, and individuals. Park records indicate that 133 of the emails were opened.
6. Public scoping information was posted on the National Parks Traveler and the Wilderness Watch websites.
7. Public scoping information was posted on the National Park Service's Yosemite and Half Dome websites at <http://www.nps.gov/yose/planyourvisit/halfdome.htm>, and links to the NPS Planning, Environment, and Public Comment (PEPC) website were provided.

During the public scoping period, a total of 96 correspondence items (including letters, faxes and emails, and meeting notes) were received. Of the 96 items, 90 were from individuals; 3 were from businesses, 2 were from conservation/preservation groups including Wilderness Watch and Friends of Yosemite Valley, and 1 was from a non-governmental organization. Other comments were received through public meeting participation and public scoping form submittals.

All correspondence received was entered into the National Park Service's PEPC database and is a part of the public record. Each comment letter was carefully reviewed, and individual ideas were identified and assigned a code according to the subject matter addressed. These discrete individual ideas are known as public comments. A total of 361 public comments were identified. The public comments were then grouped into concern statements used to identify common themes expressed by individuals or groups requesting particular lines of action by the NPS. Concern statements were developed using the comment analysis process described below.

This scoping report provides a synopsis of the concern statements generated during the scoping period.

THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the plan's interdisciplinary team. The plan's interdisciplinary team is comprised of park specialists from a variety of backgrounds including wilderness, visitor use/ social science, recreation planning, resource management and science, public information, and environmental compliance.

Comment analysis assists the interdisciplinary team in organizing, clarifying, and addressing technical information pursuant to the National Environmental Policy Act (NEPA) regulations. It also aids in identifying topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding public comments
- interpreting and analyzing the comments to identify issues and themes
- preparing concern statements and selecting representative comments

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The National Park Service's PEPC database was used for comment management. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondence and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding comment sources. A selection of PEPC output summaries are provided in Appendix A, including tables summarizing the number of comments received by topic and the number of correspondence received from individual states. Appendix A also contains a table summarizing the number of correspondence received from the different types of groups that submitted comments (i.e., businesses, conservation/preservation groups, non-governmental organizations, and unaffiliated individuals).

All comments were coded and analyzed. Concern statements were developed to summarize the themes expressed in public comments. Public concern statements are intended to help guide the interested public to understand the essence of comments expressed on the specific topics of interest. Concern statements do not replace the actual comments received from individuals. Rather, concern statements should be considered as an efficient and effective way of accessing information contained in original letters and the coded comment database. All comments are captured in public concern statements, whether they were presented by hundreds of people or a single individual.

GUIDE TO THE PUBLIC SCOPING CONCERNS SUMMARY

Information in the concerns summary is organized by topic, along with a representative sample of supporting quotes. The following organization is used in presenting the comment information and concern statement:

SCOPING CONCERN CATEGORY

Concern Statement (expressed as a sentence).

Letter (Correspondence) Numbers: (i.e., 1, 2, 4)

Direct quote from a representative public comment (i.e., "Better site delineation is needed at several park trailheads.")

Type of commenter and comment code number: (Individual, Comment #4-1)

PUBLIC SCOPING CONCERNS SUMMARY

PUBLIC ACCESS

Concern 1: The National Park Service should assure public access to Half Dome.

Letter Number: 31

"In preserving our natural resources, it is imperative not to destroy access: if people are not able to visit and enjoy areas like Half Dome, the personal motivation to preserve these areas decays. Half Dome is not a museum exhibit."

(Individual, Comment #152058)

Letter Number: 1

"I feel it would be a tragedy if future generations of Americans and foreign visitors were denied the opportunity to complete this unique challenge and I urge the NPS to work towards keeping this trail open and mitigating the impact on the beautiful wilderness it passes through."

(Individual, Comment #141816)

Concern 2: The National Park Service should not implement any restrictions on access to Half Dome Trail.

Letter Number: 80

"My expectations of a Half Dome experience: that I can go up it, weather permitting. I have been up Half Dome four times and expect to have the possibility to do so many more times throughout my life. Half Dome access is in line with the purpose of National Parks. National Parks are to be set aside for all to enjoy. National Parks protect natural treasures from the control of a wealthy elite and are supposed to provide opportunities for economical recreation and to ensure access to people of all socio-economic statuses."

(Individual, Comment #152378)

Concern 3: The National Park Service should limit trail usage to the cables by requiring hikers to start from places other than Happy Isles.

Letter Number: 16

"Possibly require half dome cable users to start from places other than Happy Isle. This would still allow access to all points for all, but would limit trail usage by separating Mist Trail users from those going on the Half Dome cables. For instance, Half Dome cable users could be required to start from Glacier Point. This could be enforced with stamping or card dispensing along with a ranger at the cables."

(Individual, Comment #141937)

Concern 4: The National Park Service should consider how access restrictions could impact families where hiking Half Dome has become a family tradition.

Letter Number: 91

"I like the availability of being able to climb mon-thurs without permits. If this option didn't exist I would not have been able to go and I do so look forward to this trip every year. It has become a family tradition."

(Individual, Comment #152001)

WILDERNESS EXPERIENCE

Concern 5: The National Park Service should change the designation of Half Dome to something other than wilderness.

Letter Number: 19

"I don't think most people would consider the half dome trail a wilderness experience."

(Individual, Comment #152004)

Letter Number: 6

"The Half Dome trail may have once been wilderness, but today the Happy Isles - HD corridor merits a different, special designation; it is not Wilderness anymore . . . Why must it be under the Wilderness Act?"

(Individual, Comment #141832)

Letter Number: 37

"I would urge you to let safety and enjoyment rule the Half Dome hike, but not to classify it as wilderness."

(Individual, Comment #152084)

Concern 6: The National Park Service should manage Half Dome to meet users' expectations of a wilderness experience.

Letter Number: 29

"A wilderness experience entails infrequent contact with others. It involves trails that are primitive in character, not mega trails designed to handle 4 abreast."

(Individual, Comment #152046)

Letter Number: 26

"Unrestricted access along the trail and on the final cable ascent of the Dome creates conditions incompatible with wilderness values and presents serious and unacceptable public safety and resource issues."

(Conservation Organization, Comment #152038)

Concern 7: The National Park Service should manage the Half Dome trail to limit contact with others.

Letter Number: 29

“A wilderness experience entails infrequent contact with others. It involves trails that are primitive in character, not mega trails designed to handle 4 abreast.”

(Individual, Comment #152046)

Concern 8: The National Park Service should remove the cables to preserve wilderness character.

Letter Number: 90

“In summary, Wilderness Watch urges NPS to include and adopt an alternative that removes the cables and establishes visitor use limits at a level that preserves the area's wilderness character, including its experiential and biophysical values. We also urge NPS to use this opportunity to educate visitors about why the cable system conflicts with wilderness policy and values, and the need for both visitors and managers to practice restraint in order to preserve an enduring resource of Wilderness.”

(Conservation Organization, Comment #152408)

Concern 9: The National Park Service should not add a third cable to Half Dome as doing so would violate the Wilderness Act.

Letter Number: 26

“Adding a third cable to would clearly be in violation of the Wilderness Act and should not be considered as an option. It would not resolve the crowding, safety and resource issues on Half Dome.”

(Conservation Organization, Comment #152039)

CABLE MODIFICATION

Concern 10: The National Park Service should remove the cables.

Letter Number: 26

“Removing the existing cable system, developed by the Sierra Club in 1919, is an alternative solution to resolve the resource, crowding and safety issues on Half Dome and should be among the range of alternatives considered in environmental documents.”

(Conservation Organization, Comment #152039)

Letter Number: 81

“Remove the cables & replace them with fixed anchors.... mountains are for mountaineers not tourists! When you put people with relatively no experience in alpine environment up there it leads to a variety of troubles such as: inexperienced decision making, overcrowding etc. If you required at least people to have

some knowledge of ropes, belays etc I think that would serve double purpose: thin the crowd down to those who really want to do it & force those who actually do it to at least do some homework first Of course it you do that could you also put a few anchors on the vertical face of it while you're out there."

(Individual, Comment #152381)

Concern 11: The National Park Service should add a third cable to allow users to ascend and descend on separate lines.

Letter Number: 10

"My suggestion would be to construct a third cable line alongside the present two sets of cables. That way people could ascend the face of half dome on one side and descend on the other side."

(Individual, Comment #141844)

Letter Number: 10

"My experience is that the greatest safety danger in using the cables comes from people ascending and descending at the same time between the two present cables. This results in hikers spending a lot of time standing and waiting for each other, creating additional fatigue in hikers already tired from hiking up to eight miles or more. It also presents a safety hazard as they try to go around each other. Having a third cable would eliminate these hazards."

(Individual, Comment #141845)

Concern 12: The National Park Service should evaluate *the structural capacity of the cables to determine the number of people that can safely use the cables at one time.*

Letter Number: 41

"Engineering study should address the safety of the maximum people at one time."

(Individual, Comment #152106)

Concern 13: The National Park Service should keep the cables to provide a safe route for non-technical climbers.

Letter Number: 29

"I believe there is great good involved in people being able to do this hike, as a hike. I would advocate the cables remain...for safety."

(Individual, Comment #152047)

Concern 14: The National Park Service should modify the cable route and add infrastructure to make conditions safer.

Letter Number: 56

"Half Dome very fortunately has become available to climb to even the most beginners of hikers as seen by the rangers at the entrance. Because literally thousands climb it every year the rock has become extremely slippery. If not controlled, I believe the park is grossly negligent. A simple solution would be to have different route drilled in as needed for traction control, which may be every 10 to 20 years.

I also would suggest the next cable change include a tethering system to give even more safety.

I understand there are extreme limitations to what can be done as far as maintenance to the park but life safety has to be to ultimate top priority. Without addressing this issue I strongly feel you will have more frequent injuries and even death."

(Individual, Comment #152214)

Letter Number: 88

"The Half Dome Trail and the cables at the top are a national treasure. If there is a crowding problem at the cables during high season weekends, I might suggest the following measures: . . .Add another single line of cables/posts alongside the existing route to create a second path- so one path would be for uphill hikers and the other for downhill hikers. This would have the affect of perhaps tripling the capacity of the cables since now there can be a fast and slow lane in each direction. This would also reduce the incidence of bolder hikers going up or down the outside of the cables to speed their ascent/ descent. Also this system could improve safety by having the "slow lanes" be on the inside of the cable route (see diagram on the hard copy), where a slip and fall would be less likely to end up with the hiker sliding outside the cable zone. -Add a second set of posts and 2x4s to offer more frequent rests and reduce length of potential slides. -The cables path has been worn smooth by millions of footsteps. Sandblas or acid etch the polished granite path until the friction is similar to that of the granite outside the path."

(Individual, Comment #152401)

Concern 15: The National Park Service should substitute the current cables with nonconductive cables to reduce risks of electrical shock.

Letter Number: 13

"Substitute non-metallic posts and cables for the existing steel post and cable elements, so that the high risk to climbers from electrical conductivity during sudden lightning storms will be reduced."

(Individual, Comment #141857)

OTHER INFRASTRUCTURE IMPROVEMENTS

Concern 16: The National Park Service should maintain trail and restroom facilities and/or provide sanitary bags and collection areas to reduce the impact of human waste in the vicinity of Half Dome.

Letter Number: 18

“The trail and restroom facilities should be well maintained and kept in top shape in order to reduce any impact to the areas surrounding the heavy used trails to Half Dome (because digging of cat holes would not be appropriate with that many visitors).”

(Individual, Comment #142236)

Letter Number: 72

“I would also like to bring up the issue of sanitation below sub-dome. Venturing off the trail 100-300 feet I found a lot of human waste and soiled toilet paper exposed. I believe there needs to be better education at the trail head of packing out waste. Maybe supplies should be made available at the trail head for packing out human waste. Bags and receptacle for collecting waste at the trail head and possible along the restrooms in Little Yosemite Valley.”

(Individual, Comment #152345)

Letter Number: 5

“(I suggest) increasing/ adding another managed sanitation facility . . .perhaps just below the cables.”

(Individual, Comment #141834)

Concern 17: The National Park Service should not expand the Little Yosemite Valley campground, even if there is a current overcrowding problem at this location.

Letter Number: 29

“The current overnight option is primarily LYV, which is another overcrowded problem, and should not be expanded.”

(Individual, Comment #152050)

Concern 18: The National Park Service should improve water source at approaches to the Half Dome Trail.

Letter Number: 6

“Perhaps improv(e) the water pool at the last water source, ~2 miles before the Dome (after Clouds Rest Junction)”

(Individual, Comment #141840)

Concern 19: The National Park Service should mark the trail so it will still be visible when snow is present.

Letter Number: 35

"It is easy to lose the HD trail about a mile from the top when heavy snow is covering sections of trail. People go off trail to avoid the snow, so other areas off the trail get filled with footprints. It then becomes a guessing game where the trail is. Consider somehow marking these areas."

(Individual, Comment #152075)

PERMITS

Concern 20: The National Park Service should implement the permit system every day of the week.

Letter Number: 50

"I have seen the conditions on the Half Dome trail on both weekends and weekdays since the permit system has been implemented and can say that the restrictions should be in place every day of the week. . . I believe permits should be required every day of the week to lessen the impact to the wilderness."

(Business, Comment #152165)

Letter Number: 85

"I judge the partial permit system to be a failure. Either every day should require a permit to climb Half Dome, or none."

(Individual, Comment #152392)

Concern 21: The National Park Service should redistribute unused permits.

Letter Number: 24

"(T)here should be a procedure in place that allows for the daily reissuing of permits that are not used, due to "no shows" or cancellations. For example, if the original permit holder does not check in at a designated site by 10am, the permit is reissued on a first come - first served basis. I believe that a similar procedure is already in practice for some back country permits. This would allow people visiting the park, who were not fortunate enough to secure a permit on-line, a chance to get a shot at the cables."

(Individual, Comment #152027)

Concern 22: The National Park Service should establish higher permit fees to encourage people to return unused permits.

Letter Number: 43

"(C)harge far more than the current \$1.50 per permit to implement a permanent system, especially if you are to consider a system in which unused permits and/or last-minute permits will be available. The only

way to encourage folks to turn in permits that they will not be using it (is) to initially charge an amount that is significant enough that they have an incentive to cancel their permit and request a refund. Somewhere in the neighborhood of \$10/permit might do the trick."

(Individual, Comment #152135)

Concern 23: The National Park Service should make some (or all) permits available on a first come, first served basis on, or close to, the day of the hike.

Letter Number: 41

"Why aren't there "same day" permits or first-come-first-served?"

(Individual, Comment #152098)

Letter Number: 20

"I believe there needs to be a provision, for day-of-entry permitting of day hikers or overnight hikers intending to climb Half Dome. It need not be 50-50, in terms of the distribution of advanced reservation vs. day-of-entry hikers; but the distribution needs to be clear."

(Individual, Comment #152012)

Concern 24: The National Park Service should not reserve any first come, first served permits.

Letter Number: 38

"I agree strongly with the permit process limitation of no walk-up permits. That should provide a good shot at a level opportunity, in addition to relieving the pressure on YNP staff in the Valley."

(Individual, Comment #152087)

Concern 25: The National Park Service should auction permits instead of selling them at a set fee.

Letter Number: 2

"If it is determined that permits are required, they should be auctioned - not given away. By auctioning the permits more money would be available to the Park Service and the unfair advantage now provided to the indolent would be removed."

(Individual, Comment #141820)

Concern 26: The National Park Service should not charge a permit fee.

Letter Number: 84

"I oppose a permit system, but if one is chosen, then I believe that charging any fee is not appropriate."

(Individual, Comment #152388)

Concern 27: The National Park Service should distribute permits in a way that does not favor any group.

Letter Number: 2

“Whatever set of restrictions (and I understand the requirement for some restriction) should be crafted in such a way that no group is favored by the way the permitting system is established. When processes are set up that favor people living close to the park, or who have nothing better to do than stand in line for hours and hours, or who can clear their calendar months in advance because they are not employed, the result is UNFAIR to the hard-working individuals who actually pay taxes and support the park.”

(Individual, Comment #141818)

Concern 28: The National Park Service should use a lottery system to distribute permits.

Letter Number: 16

“If permits are going to be required without enacting fees to bring the number of permit requests down to the number of permit issued, then a fair lottery needs to be in place. Everybody should get a chance to get a lottery ticket and then a drawing should be held. A suggestion might be a 2 week period to enter the lottery. Multiple entries for a single date should not be allowed and an applicant could be limited to the number of dates allowed.”

(Individual, Comment #141935)

Concern 29: The National Park Service should make permits valid for several days.

Letter Number: 16

“If permits are going to be required, it might be good to have them good for multiple days.”

(Individual, Comment #141936)

Concern 30: The National Park Service should not require permits for rock climbers who only use the trail for descents.

Letter Number: 77

“Rock climbers, who only use the trail for descents, should be allowed without permits. They have come a long way, and deserve the easy trip down.”

(Individual, Comment #152369)

Concern 31: The National Park Service should manage peak trail usage by indicating hike start times on the permits.

Letter Number: 50

“Permit Time Slots Setting time slots for the permits would also improve the wilderness experience for

many on the trail. . . There is still a significant wave of people on line at the cables between 9am-2pm. Limiting how many people may attempt the cable route, is a good start, but it still seems that most permit holders are arriving at the same time. By setting time slots for the start of the hike, you could eliminate much of the congestion.”

(Individual, Comment #152162)

Concern 32: The National Park Service should prioritize permits for those who have not previously made the climb.

Letter Number: 49

“Prioritize the permit system, with permits going to those who have not made the climb. . . Each person needs to apply under their own name for a permit. And you are allowed one permit per season.”

(Individual, Comment #152157)

Concern 33: The National Park Service should not allow resale of permits for a profit.

Letter Number: 49

“Don't let the permit system become controlled by the locals, guides, and folks wanting to resell them for a profit. If word gets out that the permit system is anything but fair, the Parks will lose a lot of credibility and trust.”

(Individual, Comment #152157)

SAFETY

Concern 34: The National Park Service should manage Half Dome to reduce crowding to maintain safe conditions.

Letter Number: 96

“The volume of ascent/descender is the main safety concern, and the reservation system seemed to address this.”

(Business, Comment #151991)

Letter Number: 70

“The foot traffic to Half Dome was too great to afford the opportunity of safely climbing the cables on Thursday, June 24th. The cables were packed and hikers were limited to using only one of the cables going up or going down (I always use only one cable on the descent, two cables on the ascent.) Some hikers moved outside one of the cables to pass other hikers.”

(Individual, Comment #152334)

Concern 35: The National Park Service should consider how scarcity of permits provides incentives to climb in bad weather or other unfavorable conditions.

Letter Number: 33

“If permits are very difficult to come by, as they probably will be, then someone who does manage to get a permit will be less likely to turn back in marginal weather or conditions, knowing that the likelihood of being able to get another permit won't be very good. My own experience last year is illustrative: It started raining just as I reached the base of the cables. I reluctantly turned back, telling myself that I could try again another year. But if there'd been a permit system in place, and I'd known it was unlikely that I'd ever get another permit, then it would have been more difficult to turn back, and I might not have.”

(Individual, Comment #152063)

PLANNING PROCESS AND POLICY

Concern 36: The National Park Service should not prejudice the scoping process toward limiting access or removing the cables.

Letter Number: 24

“My initial concern upon reading the Halfdome Trail Stewardship Plan is that, from the very start of the planning process, it appears to be slanted heavily toward severely limiting the public's access to the Halfdome trail.

It would seem to be a foregone conclusion that the final result will be a plan that significantly restricts access to the trail and, quite possibly, eliminates the cable portion of the trail entirely.”

(Individual, Comment #152024)

Concern 37: The National Park Service should coordinate development of the Half Dome Stewardship Plan with the Merced Wild and Scenic River Plan.

Letter Number: 44

“(W)e must oppose the decision by the National Park Service (NPS) to initiate scoping and commence a planning process on a Half Dome Trail Stewardship Plan EA at this time, in advance of completion of a final Comprehensive Management Plan (CMP) for the Merced River.”

(Conservation Organization, Comment #152139)

Concern 38: The National Park Service should host a conference call or web meeting to give more opportunities for public input.

Letter Number: 4

“The first public meeting is scheduled for Wednesday May 26. This is a work day and difficult for the largest visitor base (San Francisco Bay Area) to attend. Can you please set up a conference call-in capability or other modern technology to allow greater participation? I have well over 200 daily readers

of my Half Dome blog that are very interested in the Half Dome hike and would like to participate.”

(Individual, Comment #141829)

Concern 39: The National Park Service should clarify whether management of Half Dome is driven by the need to increase safety or to increase environmental protection.

Letter Number: 33

“When you first described the new permit system on your website, you were describing its main purpose as being to increase hiker safety, and citing the two deaths last year as the main motivator for the permit system. But now you are describing the main reason for the permit system as being environmental protection. If the permit system is proposed mainly for environmental protection, then you may have a point. But if it is mainly for reasons of safety, it will probably backfire and have the opposite effect, making people behave more dangerously.”

(Individual, Comment #152062)

Concern 40: The National Park Service should prioritize compliance with the Wilderness Act ahead of meeting social demands regarding access.

Letter Number: 51

“First and foremost, an area so far into designated wilderness must be managed in a fashion that is fully consistent with the intent and legal specifications of the Wilderness Act. With all due respect to the political realities that Park planners and managers must carefully evaluate, the bottom line for management is to follow the law. Accordingly, because Half Dome and much of the trail corridor approaching it are within officially designated wilderness, then the Park must prioritize compliance with the Wilderness Act ahead of meeting social demands. That certainly allows for some level of judgement as to how to ensure that compliance, but the Park will be highly vulnerable to a successful legal challenge if the Park chooses to inch towards compliance with the rationale that fewer hiker/cable climbers decreases crowding less than the historic situation. The fact that the Park Service has NOT been in compliance with the Wilderness Act for decades in the manner in which it has managed or failed to manage visitor use and access to Half Dome does not now justify the Park only inching towards compliance.”

(Conservation Organization, Comment #152168)

Concern 41: The National Park Service should evaluate the reliability of the visitor use study.

Letter Number: 41

“RSG visitor use study didn't seem that competent? Small sample size, questions didn't address spectrum of wait issues”

(Individual, Comment #152117)

Concern 42: The National Park Service should determine, by science or environmental impact statement, the environmental and safety limits for the number of people who can use Half Dome at one time.

Letter Number: 84

“Clearly, there is a limit on how many people should be allowed to be present in a single period of time, based on safety and environmental concerns. The question is where is the line drawn. That line should be determined by scientists who determine environmental concerns, and public safety officials who determine known hazards.”

(Individual, Comment #152387)

Letter Number: 84

“If a permit system is chosen as the method of enforcing the Wilderness Act, then the number of allowable hikers should be determined by an environmental impact statement.”

(Individual, Comment #152389)

Concern 43: The National Park Service should use minimal rules and restrictions necessary to meet Half Dome stewardship goals.

Letter Number: 2

“I understand the problems associated with crowds and would be sympathetic to reasonable controls, as long as they do not inappropriately favor (certain) groups, and as long as they are the minimum (controls) necessary.”

(Individual, Comment #141819)

Letter Number: 19

“I would hate for half dome to be so difficult that one cannot enjoy the experience because there are too many rules. The wilderness experience is about the wild, that means to me a limited amount of restrictions and oversight. Although some is needed to protect what we all love.”

(Individual, Comment #152005)

Concern 44: The National Park Service should enforce regulations on Half Dome on a case-by-case basis instead of a static permit system.

Letter Number: 84

“A permit system is not the method to implement this limit. The limit should be enforced on a case-by-case basis, just as the Park Service determined when closing the entire Park Boundary from additional vehicle entry during high-volume visitor days in summer months.”

(Individual, Comment #152387)

Letter Number 91:

“A ranger may need to be stationed to shut (Half Dome) down during inclement weather as people use very poor judgment.”

(Individual, Comment #152002)

PUBLIC AWARENESS

Concern 45: The National Park Service should require mandatory safety education for Half Dome users.

Letter Number: 76

“(T)hey sign a form that says they UNDERSTAND what they SHOULD HAVE to do this hike, footwear, enough WATER, endurance, etc. I saw a LOT of people that needed a much greater education of this. If there is a way to enforce this even better as there were a lot of people sliding down the cables because they weren't wearing proper shoes. We saw a guy heading up through Little Yosemite Valley at 3PM with NO WATER whatsoever, wearing Dockers and sport shoes with no tread!”

(Individual, Comment #152365)

Concern 46: The National Park Service should conduct a mandatory orientation briefing to educate users about trail etiquette, safety, and conservation.

Letter Number: 52

“(M)ake an orientation briefing mandatory to ensure all hikers are educated to proper etiquette, safety, and conservation practices. You could also...make it a requirement in order for a trail pass to be validated.”

(Individual, Comment #152197)

Letter Number: 46

“A robust education should be undertaken. The current (June 2010) emphasis with website and signage is a great leap forward. If permits are used, I highly suggest that individuals getting a permit be required to accomplish a positive action to affirm that they understand the basic elements of a safe hike(,) weather awareness, boots, use of Hiking poles, water treatment and consumption, pre-conditioning, etc. This should be via a personal encounter with a ranger, the wilderness staff, or the YC volunteers. This should include hearing a brief lecture, watching a safety film, reading a safe practices summary, etc. Sessions could be in a group for everyone getting a permit.”

(Individual, Comment #152150)

Letter Number: 62

“Maybe hikers should be required to pass an online quiz in order to receive a permit.”

(Individual, Comment #152308)

Concern 47: The National Park Service should work to increase public awareness and minimize human impacts through education.

Letter Number: 84

“The Park Service should work to minimize impacts, and monitoring the trail entrance beginning with Happy Isles and/or the top of Nevada Falls to turn people away based on a reasonable figure (reasonable = see above comments). Public education on the environmental impacts and safety issues of massive overuse should accompany this presence. Permanent signs should also be posted, at Happy Isles, identifying this problem, and specifying the normal dates of high travel.”

(Individual, Comment #152391)

Concern 48: The National Park Service should use more tactics than public education to reduce impacts and improve the wilderness character on Half Dome.

Letter Number: 51

“The Park will likely receive large numbers of suggestions for how education and active supervision or management policies can reduce inappropriate behavior along the trail and at the sub-dome and thus decrease social encounter conflicts, reduce resource damage, and improve the wilderness character. The reality is that education works for a majority of the general public, but education is not effective for all visitors. In Yosemite education becomes an even greater challenge given the multitude of languages spoken, the great diversity of social and cultural attitudes, the vastness of wild areas, and the iconic image that Half Dome represents.”

(Non Governmental Organization, Comment #152170)

Concern 49: The National Park Service should station a ranger at the Half Dome Trail to regulate traffic and advise users on safe use of the cables.

Letter Number: 17

“Once there, let a Ranger regulate how many can go up the cables at 1 time. People can be advised of heavy travel periods and be told that they risk not being able to climb the cables because of crowds. If it was that important to them, they could have got up early. (We typically start around 5:00 a.m. and nobody is on the trail).”

(Individual, Comment #142190)

Letter Number: 13

“Manage the unreasonable level of climber traffic that often exists during peak summer months by positioning a NPS ranger with climbing skills and strong interpersonal skills at the base of the cables. Some of the foolish climbing behavior that regularly occurs on the cables would be reduced (not eliminated) by having a NPS Ranger there to steward the situation and regulate traffic.”

(Individual, Comment #141859)

Concern 50: The National Park Service should install permanent signs at Happy Isles stating the environmental impacts and safety issues related to overuse of the trail.

Letter Number: 84

"The Park Service should work to minimize impacts, and monitoring the trail entrance beginning with Happy Isles and/or the top of Nevada Falls to turn people away based on a reasonable figure (reasonable = see above comments). Public education on the environmental impacts and safety issues of massive overuse should accompany this presence. Permanent signs should also be posted, at Happy Isles, identifying this problem, and specifying the normal dates of high travel."

(Individual, Comment #152391)

Concern 51: The National Park Service should develop a written protocol for cable use.

Letter Number: 62

"In addition to permits there should be written protocol for how to ascend and descend. For example, no sitting or lying down, and go up on your right and go down on your right to keep the flow moving. We were there on 6/30/10 and there were actually people sitting or lying down. It took over an hour just to get up the cables and another to get down. People need to realize that when they freeze up, they are putting others, who are holding on and waiting behind them, in danger. The protocol should also include "No Trace Left Behind" info."

(Individual, Comment #152308)

Concern 52: The National Park Service should improve signage about the Half Dome hike at the park gates and at Curry Village.

Letter Number: 61

*"Provide more signage (posted 24/7) and up to date information about this hike at park gates, Curry Village, etc. *I found online information about the new permit system and trail condition for this hike to be adequate, but once I was at Curry Village (6/5/10 to 6/8/10) official information was difficult to come by. The sheer popularity of the hike resulted in a lot of rumors and misinformation. **"*

(Individual, Comment #152133)

Letter Number: 61

"A clear list of items needed for the hike posted at the base of Half Dome."

(Individual, Comment #152302)

Appendix A

PEPC Summary Information

TABLE A-1. SUMMARY OF ISSUE TOPICS, CODES, AND NUMBER OF COMMENTS RECEIVED

Code	Code Description	Total	Substantive
HD1000	Purpose and Need	31	No
HD2000	Wilderness	69	No
HD2100	Wilderness Character - Solitude/Crowding: Not too crowded now Too crowded now User capacity studies Visitor experience studies	32	Yes
HD2200	Wilderness Character - Natural Conditions: Environmental issues/consequences Environmental protection education	25	Yes
HD2300	Wilderness Character - Development: Add additional cable Add bathrooms/drinking fountains Install more signs	36	Yes
HD2400	Wilderness Character - Undeveloped: Remove the cables	17	Yes
HD2500	Wilderness Character - Primitive or Unconfined Recreation: Ranger presence	16	Yes
HD2600	Wilderness Character - Boundaries: Remove Half Dome Trail from Wilderness	5	Yes
HD3000	Permits	70	No
HD3100	Permits - 7 days/week	15	Yes
HD3200	Permits - No permits	10	Yes
HD3300	Permits - Redistribution of unused permits	8	Yes
HD3400	Permits - First-come-first-served permits	12	Yes
HD3500	Permits - Permit fees	14	Yes
HD3600	Permits - Socio-economic factors of permit system	8	Yes
HD3700	Permits - Timing of permit sales/availability	17	Yes
HD3800	Permits - No permits for technical climbers descending cables	2	Yes
HD3900	Permits - General Support for Permit System	22	No
HD4000	Safety	30	No
HD4100	Safety - Education	6	Yes
HD4200	Safety - Tethering system/ via ferrata/ safety nets	2	No
HD4300	Safety - Improve existing cables for safety	6	No
HD5000	YOSE Planning Context and NEPA Process	5	No
HD5100	YOSE Planning Context - Merced Wild and Scenic River Plan Coordination and Conflicts	9	Yes
HD5200	YOSE Planning Context - Public involvement and input	9	No
HD6000	Cultural	3	No
HD6100	Cultural - Historical	0	No
HD6200	Cultural - Traditional cultural practices	0	No
HD7000	Miscellaneous Substantive Comments	9	Yes
PO1000	Park Operations: Guiding Policies, Regs And Laws	1	No
SE2000	Socioeconomics: Methodology And Assumptions	2	No

TABLE A-2. CORRESPONDENCE INDEX OF ORGANIZATIONS

Organization Type	Signatures on Correspondence*
Business	3
Conservation/Preservation	2
Non-Governmental	1
Unaffiliated Individual	91

*A total of 97 signatures were received on 96 items of correspondence.

TABLE A-3. STATE DEMOGRAPHIC INFORMATION OF COMMENTERS

State	Percentage	Signatures on Correspondence
UN	10.31%	10
MN	1.03%	1
CA	68.04%	66
IL	1.03%	1
UT	2.06%	2
CO	2.06%	2
DE	1.03%	1
MT	1.03%	1
MO	2.06%	2
FL	1.03%	1
TX	1.03%	1
HI	1.03%	1
WA	2.06%	2
PA	3.09%	3
OR	1.03%	1
NC	1.03%	1
Total		97

*A total of 97 signatures were received on 96 items of correspondence.