

# Yosemite National Park

National Park Service  
U.S. Department of the Interior



## ORV Public Comment and Response Matrix



## Merced Wild and Scenic River Comprehensive Management Plan

**Contents**

Introduction ----- Page 03

Line number 01-04 ----- Page 04

Line number 05-07 ----- Page 05

Line number 08-12 ----- Page 06

Line number 13-17 ----- Page 07

Line number 18-22 ----- Page 08

Line number 23-25 ----- Page 09

Line number 26-29 ----- Page 10

Line number 30-32 ----- Page 11

Line number 33-36 ----- Page 12

Line number 37-41 ----- Page 13

Line number 42-47 ----- Page 14

Line number 48-52 ----- Page 15

Line number 53-56 ----- Page 16

Line number 57-60 ----- Page 17

Line number 61-62 ----- Page 18



## Introduction

Subject matter experts, both from the National Park Service and outside the agency, were intimately involved in the development of the Merced River Outstandingly Remarkable Values (ORVs.) Suggestions about ORVs from individuals familiar with the river were also welcome and valued. To that end, Yosemite National Park staff consulted with interested parties and conducted public workshops to discuss the proposed ORVs. The NPS solicited public comment on the Draft 2010 Outstandingly Remarkable Values Report for the Merced Wild and Scenic River, requesting feedback on three essential questions:

- 1) Do you know of any specific knowledge of locations with river-related or river-dependent features or resources that are not addressed by the NPS ORV report?
- 2) Do you have any knowledge or observations regarding the conditions of river features and values that should be addressed?
- 3) How should the NPS protect and enhance river resources and values?

The NPS reviewed public comment on the Draft Outstandingly Remarkable Values from six public workshops and over thirty letters. Substantive comments were coded by the ORV(s) they applied to, similar comments were grouped and summarized, and those comments were analyzed by the Planning Team, the Merced River Plan Interdisciplinary Core Team, and subject matter and user capacity experts. Many suggestions have been incorporated into the revised Merced Wild and Scenic River Outstandingly Remarkable Values Report. For those comments the NPS was unable to incorporate, we have provided clear rationale for that decision.

Many of the comments related to language, word choices, and the need to define ORVs as specifically as possible. As a result, language has been refined and specific suggestions from the public incorporated. For example, the experiential qualities of the activities named within the Recreation ORV have been detailed and emphasized.

Other public comments contained specific requests to consider changes to elements of the Draft ORVs. Significantly, in an effort to make 2010 ORVs as specific as possible, NPS staff refined the Biological ORV and renamed it, “Meadow and Riparian Complexes.” Public comment strongly advocated restoring the original name of Biological ORV, as it was thought that the NPS focus on habitat was overly restrictive. Thus, NPS has renamed the Biological ORV, but maintained the detailed description of the meadow and riparian habitat within it.

Finally, public comment suggested adding specific ORVs not included in the Draft ORVs. Several major revisions to the Biological and Geo/Hydro ORV through the El Portal river segment have been adopted in response to these comments and in consultation with subject matter experts. Specific examples are the inclusion of the boulder bar adjacent to the park boundary at Highway 140, and the valley oak grove at El Portal. Both of these are examples of public comments that were reviewed by NPS, fielded by subject matter experts, and were ultimately included in the revised Merced Wild and Scenic River Outstandingly Remarkable Values Report.

The NPS believes that through the process of public dialogue and discussion, the statements of the Merced River’s Outstandingly Remarkable Values have been made even stronger. The NPS has developed this ORV Public Comment and Response Matrix in the interests of promoting transparency, accountability, sharing incremental work products, encouraging dialogue and building understanding between the NPS, visitors and stakeholders.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
1	All ORVs	Please provide easy public access to all comments and park responses.	The NPS will make this document, the ORV Public Comment and Response Matrix, as well as the actual Draft ORV Report public comments, available to the public on Yosemite's website at <a href="http://www.nps.gov/yose/parkmgmt/mrp_documents.htm">http://www.nps.gov/yose/parkmgmt/mrp_documents.htm</a>
2	All ORVs	Please post the Planning Team on Park's Merced River Plan (MRP) website.	The NPS posted a list of the MRP Interdisciplinary Planning Core Team members on its website on July 28, 2010, and has updated it as necessary. The document is available at <a href="http://www.nps.gov/yose/parkmgmt/mrp_documents.htm">http://www.nps.gov/yose/parkmgmt/mrp_documents.htm</a> .
3	All ORVs	NPS seems to have reduced the number of ORVs since 2004. Rather than a conservative application of ORV criteria, NPS should identify a maximum, not minimum # of ORVs.	16 U.S.C. Chapter 28, Section 1271, establishes that any Wild and Scenic River possesses certain "outstandingly remarkable values" (ORVs.) Section 1273 states that a river is eligible for listing when it possesses one or more of those values identified by Section 1271. Prior iterations of the Merced River Plan (now rescinded) responded comprehensively to the list of possible ORVs recited as samples in Section 1271. For the new Merced River Plan, park staff determined that it should focus on what is truly river-related, river-dependent and rare, unique or exemplary, according to criteria established by the Interagency Wild and Scenic Rivers Council (hereinafter referred to as the "Interagency Council") and cited on page 6 of the "Draft 2010 Outstandingly Remarkable Values Report for the Merced Wild and Scenic River."
4	All ORVs	Why are certain 2004 ORVs not in 2010 ORVs? Please provide a scientific basis for elimination of specific 2004 ORVs, including a clear tracking of changes between the 2004-2010 MRPs.	The current planning effort draws upon the Wild and Scenic Rivers Act and guidelines that were developed by the Interagency Council under the auspices of the Secretary of Interior and Secretary of Agriculture. The ORVs identified in past Merced River planning efforts were subject to review and revision as per the provisions of the 2009 Settlement Agreement. In developing the new ORVs, the NPS relied upon the expertise of subject matter experts, consistent with Interagency Council guidelines. In the interest of informing the decision-making process and promoting dialogue, a comprehensive comparison of all versions of the Merced River ORVs along with the rationale for the changes made in each iteration has been developed. The document, entitled "Comparison of Merced River ORVs Over Time," is posted at <a href="http://www.nps.gov/yose/parkmgmt/mrp_documents.htm">http://www.nps.gov/yose/parkmgmt/mrp_documents.htm</a> .

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
5	All ORVs	All ORVs need to be better defined in clear, concise terms. Specifically, include identification of individual ORVs, defining what is measureable in each ORV, prioritization of ORV per section, and summary. Please also provide a description of individual elements, identity, location, and status.	The NPS agrees that, where possible, more detail should be included on the ORV maps. Additionally, the NPS has clarified the ORVs where appropriate and feasible. However, there is no basis in law or Interagency Council guidelines for the requirement that ORVs be measureable. Measurability is addressed in the Indicators and Standards that are used to monitor ORVs. But, many of the river values identified are difficult to quantify and are inherently subjective. Moreover, the Interagency Council discourages prioritization of ORVs because the Wild and Scenic Rivers Act requires that all ORVs be protected or enhanced. The NPS concurs that more detail should be provided on the maps, and is working to refine them for the revised Merced Wild and Scenic River Outstandingly Remarkable Values Report.
6	All ORVs	The 2009 Settlement Agreement emphasizes the need to focus on the identification, status, and geography of the ORVs as the foundation of the Plan. A plan with vague, ill-defined, or omitted ORVs will be weakened because it provides no demonstrable way to protect these values. The ORV report lacks details, definitions, and basic information; please provide a description of individual elements, identity, location, and status.	The proposed ORVs are consistent with the substance of the Settlement Agreement. In fact, the Settlement Agreement does not provide specific direction with regards to the focus or substance of ORVs and does not speak to identification of ORVs, status or geography. Instead, the agreement compels the NPS to integrate named subject matter experts within the development of ORVs, and more broadly in the planning process. The principle guiding documents that the NPS is using to identify the river's ORVs are the Wild and Scenic Rivers Act, the 1982 Secretarial Guidelines, and the Interagency Council guidelines, as outlined in the 2009 Settlement Agreement.
7	All ORVs, Recreation, M&RC	Please develop a clear, objective methodology to evaluate situations where ORVs come into conflict with each other. How will conflicts between ORVs be resolved (i.e. a weighting system)? How will we ensure that this methodology is consistently applied? How will we explain this methodology to the public?	The Wild and Scenic Rivers Act includes guidelines for determining how to reconcile conflicts when they occur. Specifically, " <i>Each component of the national wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values. In such administration primary emphasis shall be given to protecting its aesthetic, scenic, historic, archaeological, and scientific features. Management plans for any such component may establish varying degrees of intensity for its protection and development, based on the special attributes of the area.</i> " [PL 90-542, as amended; 16 USC 1281(a).]

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
8	All ORVs	How is the research being performed by the Research, Management and Science Division of NPS being incorporated into the planning process and management decision-making? How is the public to learn about this research?	There are a number of studies currently underway to inform the Merced River Plan process. The results, once peer reviewed, will be made available to the public in the form of a River Values Baseline Condition Report, which will form the basis of the Affected Environment section of the Environmental Impact Statement. The results will also be shared with the public in scientific presentations and peer-reviewed summaries and journal articles. Consistent with the Interagency Council guidelines, the River Values Baseline Condition Report will inform the choice of indicators and standards for protecting and enhancing the ORVs. Similarly, the Draft ORV Report is a product of both internal collaboration within the NPS and consultation with external subject matter experts.
9	All ORVs	How will the park evaluate degradation resulting from management actions? Who will define the thresholds for degradation? What is the baseline for condition assessment?	The NPS will evaluate the condition of specific resources and ORVs, including effects stemming from natural variability, visitor use, and management actions or inactions. There is no singular method that can be used to assess all ORVs, and each assessment will be defined according to the specific needs of each ORV. This process will be managed by park staff, scientists, and consulting subject matter experts and will ultimately benefit from public review and comment. The river values baseline conditions will be determined through research and collaboration between park staff, scientists, and consulting subject matter experts.
10	All ORVs	Who will be "evaluating past and ongoing effects from existing facilities and uses within the river corridor"?	The NPS will evaluate these effects as part of the River Values Baseline Condition Report and the Merced River Comprehensive Management Plan and Environmental Impact Statement.
11	All ORVs	It seems that the ORVs have not been mapped in detail; please do so.	The NPS is developing more detailed maps, as suggested; those maps will be incorporated into the revised Merced Wild and Scenic River Outstandingly Remarkable Values Report.
12	All ORVs, Scenic, Visitor Experience	Scenery and visitor experience are threatened by air pollution caused in part by high volume of individual vehicle traffic.	This comment has been incorporated within a working document of planning issues to address in the alternatives development planning process, and will be more fully considered as the NPS prepares the River Values Baseline Condition Report for the ORVs. However, it should be noted that while the MRP can address vehicle congestion, it is not possible to manage air quality at the scale of a 1/2 mile river corridor.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
13	All ORVs, Scenic, Visitor Experience	Increased access to public transit from gateway communities, increased access to mass transit within the Park, and greater access to information regarding current and projected traffic conditions will protect and enhance all ORVs (but especially the Scenic ORV, Visitor Experience).	The NPS acknowledges receipt of this recommendation to protect and enhance river resources and values. The comment is included within a working document of possible management actions to be considered in the alternatives development planning process.
14	Cultural	What is the status of the study of Yosemite lineage launched by Acting Superintendent Dave Uberuaga in 2009, resolving Paiute claims?	The Park's relationships with Native American tribes and tribal representatives will not be resolved through the process of ORV development, nor by the Merced River Plan. An internal advisory report is being conducted with support by the NPS regional office and agency specialists in tribal consultation. When completed, the report will be submitted to the Park Superintendent for further action.
15	Cultural, Meadow and Riparian Complex	Please call out specific plants in El Portal and Yosemite Valley (Indian hemp, bracken fern, redbud, willow) with cultural significance in both the Cultural and Biological ORV.	Culturally significant plants are considered part of the Yosemite Valley Traditional Cultural Property, which is already included as part of the Cultural ORV. While culturally significant plants in El Portal are not identified as part of the Cultural ORV, these would be protected through other mechanisms such as environmental planning and resources management, in consultation with the communities for which these plants have significance. Regarding protection under the Biological ORV, see response to line number 29, below.
16	Cultural, Scenic,	Include Yosemite Valley black oaks as ORV.	Black oaks are considered part of the Yosemite Valley Traditional Cultural Property, which is already included as part of the Cultural ORV.
17	Cultural	NPS needs to adopt a strict non-degradation standard for archaeological and cultural landscapes.	As with any project the NPS undertakes, the NPS will follow the intent of Section 106 of the National Historic Preservation Act by initiating consultation with the State Historic Preservation Office with the goal of identifying historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
18	Cultural	Please utilize a broader outreach to native community, especially the Paiute people.	The NPS acknowledges receipt of the suggestion as to how park managers should include all Native American tribes that have cultural ties to Yosemite as we strive to protect and enhance cultural resources and values. The NPS has received a project scoping letter and other comments from Paiute tribal representatives.
19	Cultural	Family auto-based drive-in camping should be included in the Cultural ORV.	Camping is identified as one of several activities that contribute to the Recreational ORV. The Wild and Scenic Rivers Act requires that all ORVs be protected and enhanced. Since this activity is included within the Recreational ORV, it will be protected and enhanced to the extent that is appropriate subject to the influence of user capacity evaluation and site planning processes. The characteristics of auto-based, drive-in camping have evolved over time according to consumer preferences, new technologies and market trends. Thus, camping is not easily or most appropriately defined as a cultural attribute.
20	Cultural	Indian Bridge, Washburn Ditch, Galen Clark property, and the Wawona campground should be included as an ORV.	Camping is identified among other activities that occur and contribute to the Recreational ORV in Wawona. As noted on line 19, camping will be protected and enhanced subject to the influence of user capacity evaluation processes. Indian Bridge was destroyed by a recent flood and is a resource that can no longer be protected or enhanced. Although it is river-related, Washburn Ditch has been abandoned as an irrigation diversion and is not emblematic of free-flowing conditions that are incumbent upon the status of a Wild and Scenic River. Further, there are many examples of water supply ditches that exist in the Sierra, so it is not rare, unique, or exemplary. Historic resources have been removed from the Galen Clark property and the site irrevocably altered by golf course development. The site is neither river-related nor dependent. Thus, each of these latter three features are not appropriate components of the Cultural ORV.
21	Geological/Hydrological	The glacial gorge, deep alluvial valley, and/or presence of Class V+ rapids should qualify the South Fork of the Merced through Wawona as a Geo/Hydro ORV.	The stated attributes of South Fork Gorge are not unique, rare, or exemplary in the context of the Sierra Nevada. Other rivers, such as the Kern River, South Fork Kings River, Marble Fork Kaweah River, or Tuolumne River contain deep bedrock gorges with Class V+ rapids. The high country upstream from Wawona is similarly typical of environments throughout the Sierra Nevada.
22	Geological/Hydrological	NPS should include a direct reference to free-flow within the description of the Geo/Hydro ORV.	The Wild and Scenic Rivers Act stipulates that a designated river's free-flowing condition must be preserved. The free-flowing character is protected without specific inclusion in an ORV.



Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
23	Geological/Hydrological	Restoration of the El Cap moraine should be considered within the scope of this plan.	The NPS acknowledges receipt of the recommendation to protect and enhance river resources and values. The comment is included within a working document of possible management actions to be considered in the alternatives development planning process.
24	Geological/Hydrological	The Gorge should be mentioned in the Geo/Hydro ORV in addition to the Scenic ORV.	The geology and hydrology of the Merced Gorge is noteworthy; however, as indicated previously, the gorge's river morphology is typical of the Sierra, and comparable to the Kern River, Kings and Kaweah in Sequoia-Kings Canyon National Parks. For this reason, the geology and hydrology of the gorge has not been regarded by park staff as rare, unique, or exemplary.
25	Geological/Hydrological, Scenic	The unique, exemplary El Portal landscape should be called out in Geo/Hydro ORV because this is where the glaciers ended and the parent rock transitions from granite to metasedimentary. Also, the same ORV should include the dynamic changes of the river channels through the boulder bar and the El Portal Pond.	The transition from granitic to metamorphic rocks is not unique, rare, or exemplary in the Sierra Nevada and therefore does not merit recognition in the Geo/Hydro ORV. The Kings, Kaweah, Tuolumne, Stanislaus, Mokelumne, and American Rivers display similar bedrock transitions. The San Joaquin and Kern Rivers are the only major rivers draining the Sierra Nevada that do not exhibit the same geologic transition. El Portal is indeed thought to occupy the location of the terminal extent of the largest glacial advances in the Sierra Nevada. Every major river canyon in the range contained large trunk glaciers during Pleistocene glaciations. In many canyons the terminus occurred within the transition zone from granitic to metamorphic rocks (e.g., the Kaweah, Kings, and Tuolumne Rivers). NPS agrees that glaciation has led to one rare and exemplary feature in El Portal, as noted within this comment: the boulder bar that begins at the park boundary and extends downstream to approximately the intersection of El Portal Service Road (at "Old El Portal") and El Portal Road. This alluvial sedimentary deposit contains many very large boulders (>1 m in diameter) that were likely transported through the Merced River Gorge during high flows. When the river encounters the low grade in El Portal, the boulders accumulated in an extensive bar-type deposit. These boulders are occasionally mobilized by large floods, creating a dynamic and unique reach of the river. The NPS will therefore incorporate the boulder bar in the Geo/Hydro ORV. Odger's Pond (the El Portal Pond) is a small wetland in El Portal. The wetland was originally a side channel to the Merced. Its hydrology has been substantially altered by construction of Highway 140, so that it is now a seasonal pond. Because the wetland is partially an artifact of human activity and because the species found in it are common throughout California (with the exception of the valley oaks, which have been included within the Biological ORV--see line 32), the pond is not seen as rare, unique or exemplary.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
26	Meadow and Riparian Complex, Biologic,	Please restore the Biological ORVs referenced in 2005, along with identification of specific species for protection and species listing by segment. This form of Biological ORV will better protect fragile riparian habitat and species. Please do not substitute the "Meadow and Riparian Complex" ORV for the Biological ORV.	In response to public comment, the NPS has renamed the former Meadow and Riparian Complex ORV to "Biological ORV." Language including rare and river-related species has been retained from the original (2010) ORV description. Also retained was language emphasizing that this ORV protects fragile riparian habitat. The intention of this ORV is to protect and enhance the habitat sustaining special status and river-related species.
27	Meadow and Riparian Complex	The management goal of MRP should be to leave large woody debris in place in the river.	The NPS acknowledges receipt of the recommendation to protect and enhance river resources and values. The comment is included within a working document of possible management actions to be considered in the alternatives development planning process.
28	Meadow and Riparian Complex, Biologic,	Wildlife and biological resources should be separate ORVs; values should not be lumped under the Biological ORV.	Wildlife is considered part of the field of Biology. Wildlife cannot exist without the habitats that are comprised of, or relationships with, a host of natural resources upon which they depend. Animals also influence that habitat, so to distinguish animals from other components of an ecosystem would isolate and detract from the complexity of larger biological relationships. According to the professional judgment of park natural resource managers, there is no reason to identify wildlife as separate and distinct from the Biological ORV.
29	Meadow and Riparian Complex, Biologic,	Regarding rare, threatened, and endangered animal and plant species found in the WSR corridor through El Portal, several species (valley elderberry longhorn beetle, southwestern pond turtle, sierra pygmy grasshopper, osprey, bat diversity, side-banded snail, Tompkins sedge, congdon's wooly sunflower, congdon's lewisia, valley oak complex) should be included in the Biological ORV.	The valley oak forms the basis for the Biological ORV in the El Portal segment. While some species named in these comments are river-related and -dependent (turtle, osprey, eagle and bats) and others may be rare (beetle, grasshopper and snail; sedge and sunflower), none of these species demonstrate a special relationship with the Merced River or Sierra Nevada region, as promulgated by Interagency Council guidelines. None are regarded by the NPS as being both (1) river-related or river-dependent and (2) rare, unique or exemplary. None of these species are present in extraordinary abundance or demonstrate reliance on the Merced River. Many of these species are considered as being among a suite of species that are common to riparian habitats in the region. The status conveyed upon species that are protected by the Endangered Species Act (rare, threatened and endangered) is different and distinct from the Wild and Scenic River guidelines that obligate the park to define those attributes that are rare, unique or exemplary and river-related or river-dependent.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
30	Meadow and Riparian Complex	Valley Oaks ( <i>Quercus lobata</i> ) in El Portal should be included within the Biological ORV, due to the uniqueness of their age distribution, rare location at high-elevation, their location east of typical distribution, and their significance in the cultural and aesthetic character of El Portal.	The NPS has revised the Biological ORV in El Portal to include valley oaks. Valley oaks are a facultative wetland species, restricted to habitats with accessible water tables, generally in floodplains with typical inundation patterns of one to five years. Valley Oaks in El Portal thrive because their root systems connect to the subterranean water table associated with the Merced River drainage. Urbanization and land conversion have destroyed about 90% of valley oak stands that existed prior to European contact. Remaining valley oak riparian and woodland areas comprise critical habitat of high value to wildlife. Other Valley Oak populations in the Sierra Nevada region at this elevation are scarce, and the El Portal population is disjunct. Valley Oaks are the largest oak in North America and the El Portal population contains a range of individuals from small to very large, mature trees. The ages of the large valley oaks in El Portal have not been established, although general age estimates of very large valley oaks range from 400 to over 500 years old. The El Portal population is exemplary because it contains a healthy range of age classes. In short, valley oaks are generally river-related or dependent, and the El Portal population is rare and exemplary. The Biological ORV has been revised to include specific mention of the El Portal Valley Oaks. However, the Valley Oaks in El Portal are not considered part of the cultural ORV for the Merced River because they have not been identified at this time as a key culturally significant, river-related resource that is rare, unique or exemplary. While the Valley Oak acorns were historically relied upon as a food source, current available data do not suggest that the Valley Oaks continue to play a key role in any ongoing river-related, rare, unique or exemplary cultural traditions.
31	Meadow and Riparian Complex, Biological	A Biological ORV should be included, as rare or remarkable species may be present within the corridor but outside of the Meadow and Riparian Complexes.	In response to public comment regarding the Meadow and Riparian Corridor ORV, the NPS has decided to rename it to "Biological ORV." Language that includes rare and river-related species has been retained from the original (2010) ORV description. Also retained was language emphasizing that this ORV protects fragile riparian habitat. The intention of this ORV is to preserve the habitat sustaining the special status and river-related species.
32	Meadow and Riparian Complex, Biological,	Extirpated Chinook salmon should be restored (as Sierra Nevada Bighorn Sheep were) as part of WSRA mandate to enhance ORVs.	Anadromous fish were absent from the Merced River at El Portal due to downstream impoundments (New Exchequer, McSwain and Crocker-Huffman Diversion Dams) and lakes stocked with non-native fish species (McClure and McSwain) prior to the River's designation in 1987. Restoration of fish habitat would require actions at locations that lie beyond the scope or authority of the NPS. Moreover, the Wild and Scenic Rivers Act and Interagency Council implementation guidelines do not compel the NPS to assess conditions that existed before the river was listed in 1987, or beyond an extent that restoration is feasible or practical.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
33	Meadow and Riparian Complex	The Biological (formerly Meadow and Riparian Complexes) ORV is not defined clearly enough. An array of other species should be included in description, as well as their status, habitat requirements, relationships, sensitivity to human effects, and location (describe from a "systems" perspective).	As noted previously, the NPS concurs that biological resources can be better expressed under the Biological ORV, and has renamed that ORV. However, the ORVs are not intended to be a comprehensive inventory of the natural resources of the Merced River corridor. Rather, the ORVs have been developed through the filter of a two-stage test that is defined by Interagency Council guidelines: (1) is a value, feature, or attribute river-related or dependent? (2) And if so, is it rare, unique or exemplary in the context of the Sierra Nevada region, or the nation?
34	Meadow and Riparian Complex, Biological,	Impacted meadows in the El Portal area that are unique to this elevation should be restored; removing Odgers Petroleum facilities would especially improve the ecological integrity of the area.	The NPS acknowledges receipt of the recommendation to protect and enhance river resources and values. The comment is included within a working document of possible management actions to be considered in the alternatives development planning process.
35	Recreational, Scenic, Visitor Experience	There is a need to manage noise in Yosemite Valley for appreciation of scenery and visitor experience; consider implementing a program to protect park soundscapes.	Sound and soundscapes were suggested as an ORV by one or more ORV workshop and scoping meeting participants. The NPS subsequently determined that sound (or in the alternative, quiet) is not river-related nor river-dependent (nor is it rare, unique or exemplary), and is therefore not subject to the scope of the ORV report or a comprehensive wild and scenic river plan. The NPS has other regulatory authorities and methods available for controlling sound in the park (e.g., permit regulations attached to tour bus operations, NPS management of the park shuttle and trams through a concessionaire, collaboration with state and federal agencies on controls over vehicle and aircraft noise). However, soundscapes will be considered as a possible Indicator Category within the User Capacity analysis for the Merced River Plan.
36	Recreational	More camping and affordable lodging is needed.	The NPS acknowledges receipt of the recommendation to protect and enhance river resources and values. The comment is included within a working document of possible management actions to be considered in the alternatives development planning process.



Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
37	Recreational, Meadow and Riparian Complex,	Manage visitor access for day use at Upper and Lower River Campgrounds, but do not return these areas to campgrounds.	The NPS acknowledges receipt of this suggestion to accommodate visitor use while protecting and enhancing river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process.
38	Recreational	Replace some camping at Upper and Lower Rivers, but farther from the river, with controlled access to river via boardwalks. Also, consider modifying use of Upper and Lower River Campgrounds with limited sites and camping setbacks.	The NPS acknowledges receipt of this suggestion to accommodate visitor use while protecting and enhancing river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process.
39	Recreational, Scenic, Biological	Plant/wildlife species are directly tied to Recreational and Scenic ORV. Also, at-risk plant and wildlife species should be included in the Biological ORV with a clear delineation of the biological resources in each segment.	Plant and wildlife species in Yosemite are indeed integral to recreation and scenic values, but are more appropriately included in the Biological ORV, which is primarily focused on the riparian and meadow habitat that supports special status species. Special status plant and wildlife species that are part of the Biological ORV will be researched and evaluated for the River Values Baseline Condition Report, which will form the foundation of the Affected Environment section of the Environmental Impact Statement, as well as guide park planning efforts for the Merced River Plan.
40	Recreational	Riverside camping is integral to the Recreational ORV; associated riparian damage is an issue for mitigation.	Camping near the river is identified as a value within the current Recreational ORV: "Visitors realize these experiences through a wide variety of activities occurring in and along the river. They include active pursuits such as ...camping, etc...." However, the Wild and Scenic Rivers Act prohibits the "grandfathering of recreational uses along the river corridor absent the adoption of a comprehensive management plan, so all facilities, including campgrounds, remain subject to further consideration. The Merced Wild and Scenic River Plan will consider mitigations as necessary.
41	Recreational	A hard limit on day use visitors should be set in user capacity analysis.	The NPS acknowledges receipt of this suggestion to protect and enhance river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
42	Recreational	NPS should maintain use of personal watercraft in MRP. Signage along the river corridor would help to inform floaters about risks to their personal safety.	The NPS acknowledges receipt of this suggestion to protect and enhance river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process.
43	Recreational	Consider dispersing campgrounds over a larger area to reduce perception of crowding.	The NPS acknowledges receipt of this suggestion to protect and enhance river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process.
44	Recreational	Expand boating opportunities for kayakers along specific stretches of river.	The NPS acknowledges receipt of this suggestion to accommodate visitor use and enjoyment of river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process.
45	Recreational	Campgrounds closed after 1997 flood should be restored to camping .	The NPS acknowledges receipt of this suggestion to protect and enhance river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process.
46	Recreational	The Recreational ORV must be defined to prioritize the protection and enhancement of low-impact and resource-focused activities.	The Yosemite Valley segment of the Recreational ORV was updated to read, "the Merced... allows people to immerse themselves in their surroundings, taking in the sights, sounds and feel of the river... connecting to the natural world."
47	Recreational	Recreation is the most important area for defining the ORVs, needing as much specificity as possible.	The Recreational ORV description has been refined to be more concise and specific. In particular, both setting and experiential attributes of recreational opportunities are described along with a representative list of river related and/or river dependent activities that commonly occur in this segment.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
48	Recreational	Upper Rivers, Lower Rivers, and Group Campground should be included on maps showing campgrounds because there is no legal plan in place that has authorized their removal.	The NPS only includes functional campgrounds on our maps. To include these campgrounds on our current maps, which were severely compromised by a flood event over 14 years ago, when the campground infrastructure has since been removed, would give a false impression of current conditions. However, rebuilding or repurposing these campground sites will be considered in the alternatives development planning process. In addition, the Wild and Scenic Rivers Act prohibits the "grandfathering" of recreational uses along the river corridor absent the adoption of a comprehensive river plan and the status of all recreational facilities remains subject to further consideration.
49	Recreational	Why is "boating" included within the Recreational ORV? Please clearly define boating or omit this activity from the description of the Recreational ORV.	The term "boating" is commonly used in the recreation profession as a reference to paddlecraft, rafting and other uses of personal non-motorized watercraft on rivers throughout the Wild and Scenic Rivers System. Nevertheless, to avoid confusion, the term "floating and water play" has been used instead of boating to denote activities such as rafting or simply playing in the water with inflatable inner-tubes or mattresses.
50	Recreational	Climbing should be included in the list of recreational activities called out in the Recreational ORV for Yosemite Valley.	The Recreational ORV description includes climbing in a list of activities representative of this ORV in this segment.
51	Recreational	Please replace the words "educational experiences" with "interpretive experiences."	The term "interpretative pursuits" has been added to the ORV description for the Yosemite Valley segment. Both education and interpretation are valid and appropriate forms of visitor use and enjoyment of the river.
52	Recreational	The definition of the Recreation ORV (especially in Yosemite Valley) is too vague to be meaningful or to serve as a filter for appropriate types and amounts of recreation within the corridor; example of more detailed language provided.	The Yosemite Valley segment of the Recreational ORV description has been refined to be more concise and specific. In particular, both setting and experiential attributes of recreational opportunities are described along with a representative list of river related and/or river dependent activities that commonly occur in this segment. The attributes focus on resource dependency and closeness to nature rather than commercial activity.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
53	Recreational	Consider using the word “campsites,” instead of “camps,” so that this is not misconstrued as justification for retention of High Sierra Camps.	The NPS agrees that clarification is warranted. The Recreational ORV description for the wild segments has been changed to the phrase "backcountry camping near the river".
54	Recreational	Please use greater specificity regarding the importance of the lack of human-built environment in the Wilderness section; example of more detailed language provided.	The Recreational ORV description has been refined to be more concise and specific. In particular, both setting and experiential attributes of recreational opportunities are described along with a representative list of river related and/or river dependent activities that commonly occur in this segment. The attributes focus on resource dependency and closeness to nature rather than commercial activity.
55	Recreational	NPS should consider discontinuing use of Merced Lake High Sierra Camp due to water quality impacts.	The NPS acknowledges receipt of this suggestion to protect and enhance river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process, pending the outcome of the condition assessment process. Scientific literature indicates that a link between horse manure and water quality degradation has not been established and that concerns may be largely aesthetic. Water quality monitoring consistently indicates that Yosemite has some of the best quality water in the Sierra.
56	Recreational	The Recreational ORV should focus on low-amenity, resource related, and individually supported activities (therefore those which de-emphasize commercially based recreation and amenities) that harmonize with traditional park visitor experiences.	This comment has been incorporated into the Recreational ORV, which includes a description of the setting and experience attributes of the recreation opportunities found to be river related and river dependent and rare, unique, or exemplary in a regional or national context. The opportunities and their attributes are listed by river segment and include an emphasis that recreational activities are "resource based"; that is, they rely on direct interaction with the environment.



Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
57	Recreational	Commercial recreation like raft rental and trails rides are inappropriate in the WSR corridor.	The NPS acknowledges receipt of this suggestion to protect and enhance river resources and values. The Wild and Scenic Rivers Act directs the NPS to address user capacities (such as rafting and trail rides) in the comprehensive management plan. User capacity is defined as the kinds and amounts of visitor use that can be accommodated without degrading to river values. The comment will be considered as a possible management action to be considered during the alternatives development planning process. Both setting and experiential attributes of recreational opportunities are described in the Recreational ORV, along with a representative list of river related and/or river dependent activities that commonly occur in this segment. The attributes focus on resource dependency and closeness to nature rather than commercial activity that is unrelated to the river.
58	Recreational	NPS should follow the General Management Plan (GMP) proposal to reduce overall number of campsites and use camping setbacks.	The Merced River Plan, as directed by Congress, will amend the GMP as needed. The setback suggestion will be considered as a possible management action to be considered during the alternatives development planning process.
59	User Capacity	Users cannot be successfully dispersed into other areas of the park outside of the East Valley without setting a daily visitor cap at the park entrance gates.	As noted previously, the Wild and Scenic Rivers Act directs the NPS to address user capacities in the comprehensive management plan. A variety of visitor use program management techniques will be considered as possible management actions during the alternatives development planning process.
60	User Capacity	It is important and equitable to limit day use and commercial use since camping and overnight use are limited.	The NPS acknowledges receipt of this suggestion to accommodate (or place limits) visitor use and enjoyment of river resources and values. The comment will be considered as a possible management action to be considered during the alternatives development planning process.

Line #	All ORVs / Concern Issues	Summarized Comment	Planning Team / Core Team / Subject Matter Expert Response
61	User Capacity	Development of site-specific plans before completion of MRP will “predetermine/prejudice the capacity outcome of the MRP.” Example of Boystown for Yosemite Institute accommodations in Yosemite Valley given.	The NPS agrees that site planning will not drive the decision making processes or alternatives development planning process. Nonetheless, site planning is an integral part of planning that will allow park managers and stakeholders to analyze existing development, understand visitor use and estimate user capacities, and to visualize the ramifications of policy proposals. Site planning is also required pursuant to the Settlement Agreement. The Henness Ridge Yosemite Institute project is located well outside the river corridor and is being analyzed under a separate environmental document. However, the final disposition of the Boystown site will be determined through the Merced Wild and Scenic River comprehensive management plan. Finally, the Merced River Plan will be provide direction and guidance with regard to site-specific planning within the river corridor; the 1980 General Management Plan, as well as lower-tiered plans, will be amended pursuant to the Merced River Plan.
62	User Capacity	The stated goal of comprehensive restoration for the East end of YV seems to predetermine actions for the MRP. Does this goal interfere with the stated goal of “letting natural processes prevail?”	Any restoration actions taken in the East Valley are intended to protect and enhance natural and cultural resources and to allow natural processes to prevail. Pursuant to the NPS Organic Act and other laws, the NPS will continue to accommodate visitation, but not to the point of impairment or degradation of such resources. Restoration efforts by the NPS are part of the Resources Management Plan and the overall goal of proactive and adaptive management.