



Public Scoping Comment Summary Supplement



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Introduction

NPS Summary of 2007-2010 Resource-Based Public Scoping Comments

This supplement to the *Yosemite National Park Merced River Comprehensive Management Plan Public Comment Summary* summarizes scoping comments received from the public pertaining to natural or cultural resources between 2007 and 2010.

The NPS analyzed these comments according to the same methodology as all other comments, with concern statements and representative quotes included for many different public comments about natural and cultural resources.

6.10 Resources

The Merced Wild and Scenic River CMP should include description of clear and objective methodology used to identify data gaps, determine baseline and desired conditions, and assess environmental consequences and adverse effects.

The public will be in a far better position to offer comment on this plan if the status of resources in the Merced corridor related to the ORV's is clearly communicated. (Letter 2010-314)

... it is critical that explanations of resource conditions-both existing and desired-be explained not only in clear, easy-to-understand language but in a way that the reader can relate the information to what s/he likes to do on the ground. The dots need to be connected between ORV's, management prescriptions and visitor experiences; if not, this Plan will face the same difficulties as other plans where the public perceives the Park is just using (even manipulating) the science, ORV's, etc. as an excuse to do what management wanted to do all along. That's not to say the Plan should be a public relations document, but it definitely needs to keep the reader in mind. (Letter 2010-402)

The Merced Wild and Scenic River CMP should describe specific enforcement measures that will be used to protect Park resources, informed by an evaluation of current resource protection enforcement practices. [This concern statement was the exact text of the scoping comment received.]

The Merced Wild and Scenic CMP should prioritize protection and enhancement of resource-based river values over recreational values.

Resource-focused opportunities unique to a national park setting, based on resource preservation as opposed to resource exploitation, provide the framework for such a definition (e.g., camping is a resource-based activity that requires minimal permanent infrastructure vs. the multitude of services and facilities required to support upscale lodging and bus touring). Past planners have stated that the visitor experience is "whatever the visitor wants it to be." That is true only in the absence of a plan which is required to protect the visitor experience...

... Perhaps a template or filter can be configured to help narrow the focus on the types of activities/facilities that exemplify the national park experience. Words like nature-focused or resource-focused; affordable to the average American; family friendly (across the whole spectrum of family from infants to elderly grandparents); "uncluttered by piecemeal stumbling blocks of commercialism and fragments of suburbia" (1980 GMP); freedom to explore/freedom to just "be"; rustic; etc. Couple that with the GMP definition of "doing, thinking, dreaming, and being in relationship with Yosemite's resources." Every activity/facility can then be evaluated for appropriateness using the template as a filter.

Another way to say this is what we said above: whereas the Planning Team can see as we do that the WSRA promotes a vision of the Visitor Experience which gives value to nature-focused experiences and activities traditional to national Park visitation, and differentiates this from "all experience." The Plan should consider what is going on in Yosemite through the filter of WSRA's values. The NPS could use public comments received to glean some of what needs protection and enhancement in the visitor experience.

NPS must begin with the correct frame of reference: ORV's should be expressed in a hierarchy. At the top, the Plan must emphasize the natural, scientific, scenic, and the native cultural ORV's or setting. As stated in Section 10(a) of the Wild and Scenic Rivers Act, the "primary emphasis shall be given to protecting [the River's] esthetic, scenic, historic, archaeologic, and scientific features." Recreation as a value within this scheme of values is dependent on the other values; it is not so much that "recreation" in and of itself is a particular ORV to the Merced River, but rather that clearly defined recreational activities, which are both exemplary in a regional or national context and dependent on the river's unique values determine ORV's. (Letter 2010-314)

As stated in Section 10 (a) of the Wild and Scenic Rivers Act, the "primary emphasis shall be given to protecting [the River's] esthetic, scenic, historic, archaeologic, and scientific features." The 1982 Interagency Guidelines go on to state that "each component will be managed to protect and enhance the values for which the river was designated, while providing for public recreation and resource uses which do not adversely impact or degrade those values." This is referred to as the nondegradation standard. WSRA then provides examples of possible River values such as scenery, recreation, fish and wildlife, geology, history, culture, and other similar values-but the primary emphasis still rests with the esthetic, scenic, historic, archaeologic, and scientific features. (Letter 2010-402)

The National Park Service should stop resource-damaging uses until substantial restoration has occurred.

Argument for a period of rest for the Merced River landscape. In short, non-native uses in the Park have grown to mimic and now exceed the kind of damage once seen primarily from non-native animals. But the solution is likely similar: rest and restore the soil, rest and restore the vegetation, rest and restore the water, and rest and restore the landscape by removing the damaging uses for a period of time that lasts until substantial restoration has been attained. (Letter 2010-341)

The National Park Service should lead the nation in best conservation practices.

[What is important to me as a Park user and taxpayer? A place that:] Leads in best conservation practices. (Letter 2010-319)

Cultural Resources

The Merced Wild and Scenic River CMP should identify goals, measurable objectives, and management prescriptions that explain specifically how the agency will define, protect, and enhance the Cultural ORV.

Cultural Resources including impacts to paleontological resources, historic resources and human remains. These resources should be protected and have a higher priority than their tourism value. Access to such resources should be restricted to qualified professionals. Prepare a Cultural Resources Preservation Plan as part of the plan. (Letter 2010-251)

Cultural ORVs concern both ancient and living native people in Yosemite. As we said above, the NPS needs to account for the native landscape and time and place of these cultures - past and living - in defining the cultural ORV. Cultural ORVs are unique among ORVs in that once a cultural site is destroyed or desecrated it is considered to be an irretrievable loss. WSRM mandates that 'Archaeologic' and 'Historic' are primary emphasis elements; therefore it is imperative that the Cultural ORV be clearly defined with goals, measurable objectives, and management prescriptions that explain specifically how the agency will protect the archaeological, historic, or cultural values of the Merced River Corridor. Some parts of the ORV are specific to the Paiute culture; the NPS should acknowledge them. Native American values must be embraced by the Park and embedded in park plans. Tribal representatives (not just those employed or contracted by the Park Service) must be included as a critical part of the planning team - as a highly valued resource. (Letter 2010-314)

Cultural ORVs are unique among ORVs in that once a cultural site is destroyed or desecrated it is an irretrievable, irreversible loss. WSRM mandates that 'Archaeologic' and 'Historic' are primary emphasis elements; therefore it is imperative that the Cultural ORV be clearly defined with goals, measurable objectives, and management prescriptions that explain specifically how the agency will protect the archaeological, historic, or cultural values of the Merced River Corridor. What about ORVs specific to the Paiute culture - and does the NPS even acknowledge them? And now that the Miwok Indian Cultural Center is under construction, will it provide sufficient "net gain" points to allow desecration of all other cultural sites along the River Corridor? This would be a tragic loss especially in light of the justifiable concerns of the Paiutes and the failure of the Park Service to recognize their ancestral ties to the Park.

Native American values must be embraced by the Park and embedded in park plans. Tribal representatives (not just those employed or contracted by the Park Service) must be included as a critical part of the planning team - not as window-dressing but as a highly valued resource. (Letter 2010-402)

Cultural Resources

(Historic)

The Merced Wild and Scenic River CMP should provide for the protection of all historic structures and buildings in the river corridor including bridges.

[What do you want to see protected?] I am very upset to read that the old, sturdy, historic, beautiful bridges may be destroyed for who knows what purpose. They need to not be destroyed. We need to be able to bike, hike, walk, photograph and enjoy these bridges. (Letter 2010-170)

I am certain that the new Merced River Plan will include an analysis of high and low water flows, and the scouring impact a debris swollen river will cause. Obstructions to the river's flows, such as bridges, are probably going to be further scrutinized for possible removal. However, where historic resources are proposed to be removed, clear documentation of the expected outcome, as well as specific documentation on how these historic resources have fared under past flood events should be provided. Artificial obstructions may actually simulate natural obstructions. Information and analysis on how these intrusions can be allowed to stay because they mimic natural processes should also be provided. (Letter 2010-287)

The National Park Service should promote the diverse heritage of Yosemite National Park by providing interpretive experiences, and access to resources and facilities.

Include more Latino history. Give Latinos something to identify with - that will be able to bring more Latinos inside (Letter 2010-84)

I would also like to see increased information throughout the park pertaining to history that took place in particular areas. Yosemite is rich in interesting history and information with historic pictures located at those historic sites adds so much to the park experience. (Letter 2010-145)

What climbers want to see protected: Yosemite's unique cultural resources
Climbers enjoy preserving and sharing with visitors our rich and remarkable history, culture, and traditions of climbing in Yosemite, as described above, through interpretive programs, presentations, and events. We have enjoyed providing free presentations about climbing in Yosemite to the visiting public (sponsored by The American Alpine Club) from May through September for the past nine years and look forward to continuing that interpretive service in the future. We look forward to collaborating with the NPS and park stakeholder to create a much-needed Climbing Museum in Yosemite Valley to make this process more accessible to all Yosemite visitors, as surveys have shown that visitors ask more questions about climbers and climbing than other subjects such as bears and waterfalls. (Letter 2010-411)

The Merced Wild and Scenic River CMP should call for the removal and ecological restoration of the area known as Superintendent's Residence (Residence 1).

Deconstruct Superintendent's Cabin, restore the area ecologically, and perhaps rebuild the historic house outside the 100-year floodplain and rockfall zone...

... The Superintendent's Cabin has been wisely closed. This cabin will be destroyed in the upcoming floods and restoration will prove to be more expensive. Rather than allow this beautiful building to be slowly reduced to ruin, it should be deconstructed and the site resorted back to its natural integrity. The site, at the confluence of the Merced River and Yosemite Creek, as well as on one of Yosemite's most beautiful meadows means it deserves more attention than it is currently given. It would perhaps be possible to rebuild the cabin on another site outside the floodplain. Moreover, the historic Superintendent's House should not be used as a storage yard. The use of this area to store recycling and trash bins, picnic tables, and various sorts of materials is clearly an ad hoc solution that demeans the valuable resources of the National Park. I would simply like to state the consequences of having a storage yard in a historic area as well as within the floodplain. (Letter 2010-383)

The National Park Service should protect and enhance the historic orchards of Yosemite Valley.

There are two apple orchards in Yosemite Valley, probably nearly 100 years old, as I recall. One at Curry Village and the other near the stables. To my knowledge, the Curry orchard (in the parking lot) has never been pruned and is therefore a complete mess of dead limbs, etc. The NPS prunes nature's trees beside the roadways for safety, so why not give the same consideration to the apple orchards? (Letter 2010-175)

The Merced Wild and Scenic River CMP should prioritize protection of American Indian values and resources over Euro American historic resources which should not be considered unique or exemplary.

Prior plans engaged in a very unwise balancing of things which are not ORVs against those which are legitimate ORVs; the valorization of the Euro American tourism "landscape" as "cultural" was particularly ill-considered. That culture and landscape displaced and dispossessed native Americans for Yosemite in undeclared acts of war. This conflict continues to this day, as witnessed by the destruction of an ancestral gathering area at Lower Falls, and the ongoing intentional damage to the sub-surface remains throughout Yosemite fully contemplated at this writing, in the built-out of Utilities Phase 1. (Letter 2007-95)

Cultural Resources

(Prehistoric Resources / Archeology)

The Merced Wild and Scenic River CMP should protect and enhance traditional cultural resources including archeological sites, scenic resources, and natural resources with traditional cultural uses that represent a continuum of cultural heritage that connects contemporary people to the archeological sites of their ancestors in the park.

It is both a disgrace and a lack of responsibility that the National Park is not preserving integrity of the historic Ahwahneechee village sites. Pounding holes and black oaks are being degraded into obscurity. This is not the honor natives deserve. The most rich, yet forgotten aspect of Yosemite's history deserves the oak trees to be protected at these sites from conifer encroachment.

To manage these spaces through the use of fire is a world-class educational opportunity. The wide-open views of Yosemite are due to their wisdom and ability to manage the land. These tools should be celebrated at their traditional sites. The Indian Village and the Museum are great resources, but so are these sites. This is not only one of the most important tools of the Ahwahneechee, but one of the most important tools to mankind. Not only is this one of the most amazing opportunities for education, but also it can enhance the availability of Yosemite's world-class scenery. (Letter 2010-383)

All cultural areas should be preserved and protected and not traded off as losses and gains. Archaeological areas are unique, significant and important and never be considered as a net gain or loss. These areas are remarkable outstanding values and if you lose one you have lost a history of those who came before. Burial areas needed to be preserved and treated with respect, just as you respect those who are interred in your cemetery, you must treat discovered areas with that same respect. They should not be removed, considered a trade or a loss because it has been previously impacted. (Letter 2010-60)

Should Yosemite Valley, El Portal, and Wawona be considered as cultural ORV areas, sets of important sites and features within a whole and indivisible cultural landscape? Aren't these really landscapes? Shouldn't we consider Native American subsurface and surface antiquities, sacred places, ancestral burials, where culture and use of the land and resources of native peoples' continue today (and will continue into the future)? Isn't it better to consider these factors as co-related spatially, and continuous across time? (Letter 2010-314)

The National Park Service should consider removing the abandoned sewage treatment plant at El Portal but take measures to protect the prehistoric burials in the area and consult with the traditionally associated American Indian peoples.

In the case of the Old Waste water Treatment plant, in 1961 UCLA school of Archeology did a study called the Fitzwater report which was commissioned by Yosemite National Park. This study was done to determine what was in the ground before the waste water treatment plant was constructed. There were 25 burials uncovered and removed from this area and remains were turned over to Yosemite National Park never to be found again. Recently Yosemite wanted to remove this plant area, the building and a cistern. The plan was to bring in earth moving equipment and ramrod construction in an area where known burials were and still are. As not to disturb others buried in this area I would like to see this area left alone. The building in this area could be removed by hand as not to disturb the ground. The cistern or sump needs to be looked at closely because of toxins (including mercury once used in mining) could have the capability of polluting the Merced as well as groundwater and water used by residents in El Portal. Several ground penetrating radar studies have been done in the past and I would like to see funding distributed to a new and more comprehensive ground penetrating radar study done in this area. The American Indian people especially the lineal descendants should be consulted on these plans and not limit consultation to the Southern Miwuk and the 7 tribal consortium. (Letter 2010-60)

The National Park Service should not remove the abandoned sewage treatment plant at El Portal to protect the prehistoric burials in the area.

El Portal 1962 sewer plant burial site. Leave it alone. Don't remove plant Just leave it alone (Letter 2010-84)

Cultural Resources

(Tribes and Traditional Cultural Properties, Practices, and Values)

The National Park Service should conduct consultation with traditionally associated American Indian peoples who are lineal descendants.

As for issues with the American Indian Community, you have stated that you consult with a 7 tribal consortium/ however you have neglected the lineal descendants of those who were in Yosemite at first discovery. I would insist that you include those lineal descendants in matters of consultation and not rely on the 7 tribal consortium for all decision making and planning in Yosemite valley. Signage has been placed in the park representative of only the Miwuk culture. These signs need to be corrected as the pictures indicate these American Indians are Miwuk when in reality they are Paiute people. Also many books have been written on the Miwuk culture in Yosemite which are in error. We believe that updated and corrected versions need to be placed and archived within the National park so the visitors are educated on Paiute fact and not Miwuk Fiction...

... I also would like to see impartial 3 party monitors used during construction projects going forward. In the past the monitors were employees of the NPS or hired by the Southern Sierra Miwuk Nation. There is a definite need for monitors who would be more objective and from an outside source. (Letter 2010-60)

[The Yosemite Indian community] recognizes that the guardian relationship between the NPS and Yosemite is indefinite. The National Park Service should also recognize that the nationalistic relationship between Yosemite and the lineal descendants of [Chief] Tenaya is just as perpetual. The correct balance is struck when both sides work together. Just as the NPS is required to properly consult with all valid Indian tribes, so too should all lineal descendants from Yosemite become involved with park planning goals and procedures. Until a proper federally recognized Indian nation is in place within Yosemite that is comprised of the correct lineal descendants, the NPS must know who the proper Indian tribes are before they begin consultation with them. For lack of this properly recognized Yosemite Indian nation, the NPS must consult with the lineal descendants of the Yosemite Indians. (Letter 2010-268)

Federally-recognized Paiute tribes should be involved in determination, identification, handling, ceremonies, and burials of Paiute skeletal remains and funerary objects inadvertently discovered in the Merced River corridor.

We object to the American Indian Council aka the Southern Sierra Miwuk group taking the lead if they are not a federally recognized tribe. Also if they claim they are Miwuks, we Paiutes request a federally recognized Paiute tribe in charge also of the Paiutes buried along the Merced River. We can prove that many of the most famous Yosemite Indians were Paiutes and many lived and are buried in the El Portal and along the Merced River. (Letter 2007-50)

Scenic Resources

The Merced Wild and Scenic River CMP should describe the scenic ORV in the Gorge (Main Stem) by describing the effect that the scenery and the experience has on a person.

As the River leaves Yosemite Valley, it drops another 2000 feet as it roars through the rugged Merced River Gorge. Classified as "scenic," road access enables visitors to enjoy sightseeing, picnicking, photography, exploring the rock formations, water play in favorite tucked away swimming holes, fishing, bird watching and other low impact activities while appreciating the scenery and powerful dynamics of the river.

Though the above description is far from complete, it's an effort to capture the soul of the Yosemite experience - an experience where the visitor leaves a bit changed, coming away with something out of the ordinary upon departure, something much deeper than a trinket purchased at a store. This is what makes the Yosemite experience "outstandingly remarkable" something not just that one does, but something that is done to one. (Letter 2010-314)

The Merced Wild and Scenic River CMP should consider the effects of rafting and other visitor infrastructure (such as tennis courts, golf courses, Housekeeping Camp, gift shops) on the scenic resources of the river corridor.

Remove visitor activity and infrastructure not consistent with NP purposes or resource protection mandates. This includes and may not be limited to a golf course, tennis courts, an artificial ice rink, a large screen TV pavilion, and excessive numbers and size of T shirt and hat shops currently located at Curry and Yosemite Village. The number of rafts currently allowed on the Merced River must be significantly reduced to mitigate view shed impacts and protect river bank resources and benthic biota. (Letter 2010-44)

1. Keep developed areas for public in the east end of the valley, but remove employee residences and employee parking. Provide electric shuttle service for employees.
2. Remove or at least replace "housekeeping cabins" - the ugliest structures in the valley
3. Don't destroy El Portal to save the valley
 - a. don't allow El Portal to become like West Yellowstone
 - b. remove the trailer park at El Portal
 - c. keep parking areas away from the river
 - d. no new development between Hwy 140 and the river
 - e. purchase the land for sale on the south side of the river just outside the park to prevent private development
4. Restrict further hotel development along the river bank and near the park boundary
5. The existing hotels at El Portal are too close to the river
6. Trade land across hwy 140 for land along the river for any new development
7. Remove golf course at Wawona (Letter 2010-233)

Valley rafting in the Merced River impacts resource and aesthetic values. Consider reducing or eliminating this activity. (Letter 2010-342)

The Merced Wild and Scenic River CMP should consider the scenic effects of lighting, vapor trails, and laser pointers.

1. control vapor trails with "no fly zone" north and south of valley
 - a. currently planes are routed near the valley causing vapor trails to accumulate over the park impacting sunshine and weather - clouds often form over Yosemite when surrounding areas are clear.
2. night sky
 - a. keep all outdoor lighting to a minimum and fully shielded to preserve the dark sky
 - b. ban the use of laser pointers except for organized astronomical events like those at Glacier Point during the summer (Letter 2010-233)

Regulate the motels' lighting along the Merced River at minimal levels to preserve Dark Night Skies (Letter 2010-351)

The Merced Wild and Scenic River CMP should consider small parking lots to protect scenic resources from the impacts of large parking lots.

Rather than advocating for large, major satellite parking lots, consider a number of small, unobtrusive, dispersed parking lots scattered throughout the Valley with access to a shuttle system that would cover the entire Valley. To facilitate the viewing of Yosemite's incomparable resources contemplate adding more roadside turnouts and eliminate roadside parking where the visual impact is greater. (Letter 2010-345)

The Merced Wild and Scenic River CMP should consider the effects of above-ground utilities on the scenic resources.

Most of the utilities along Forest Drive and within sight of the Merced River are underground. This presently includes water, sewer and telephone. Only the electric utilities are above ground. PG&E is presently planning to double the number of (unsightly) power poles in Section 35 along Forest Drive. YNP should require that ANY FUTURE CHANGES to the electric system in this area, on or over Park Lands, be put underground. This would:

- a. Greatly improve the aesthetics along Forest Drive within sight of the Merced River.
- b. Improve safety by eliminating the likelihood of fire from downed power lines.
- c. Totally eliminate the YEARLY mutilation and killing of trees by PG&E. (Letter 2010-163)

The Merced Wild and Scenic River CMP should consider the effects of wood smoke on scenic resources.

In addition to impact on human health, the impact of wood fires (both "civilized" and wildland) on visual resources needs to be considered differently than has been the case. The impact on scenic values has often been unacceptable. For those who go to Yosemite frequently, it doesn't matter. But for those who go there once in a lifetime, it can be a huge problem. (Letter 2010-313)

The National Park Service should add more vehicle turnouts so that visitors may stop safely to enjoy scenic resources.

[What needs to be fixed?] More and better turnouts for viewing (Letter 2010-82)

The National Park Service needs to consider the visual and potential pollution effects of high bus traffic and associated transfer centers and bus stops.

With respect to the outstandingly remarkable values and the free-flowing character of the river area—already irreversible damage has occurred due to the widening and realignment of El Portal Road, a project that destroyed historic, cultural, hydrologic, and biologic ORVs. A primary purpose of the project as stated in the EA was to meet the "long-term need for buses to use the road as part of a regional transportation system" (i.e., YARTS). And should there be a decision to 'Carry forward the conversion to mass transit, Park resources will be at even greater risk as the development infrastructure needed to accommodate buses continues to expand.

Recognizing that buses bring in more people per hour than private vehicles, the radiating impacts of busload after busload of visitors loading/unloading will result in toxic hot spots caused by trampling, noise, diminished air quality, and on-going environmental degradation. The Park has already stated that the justification for allowing the obtrusive oversized bus stop structure adjacent to Yosemite Falls—clearly not in keeping with the 'scenic' ORV—was to accommodate increased bus traffic to the Falls. (Letter 2010-402)

Wilderness

The National Park Service should remove the High Sierra Camps because of their effects on Wilderness character.

The services provided should be consistent with a wilderness camp, not a front country, or resort experience. The camps are also incompatible with direction in the Wild and Scenic Rivers Act. A wild river area is defined as having "watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America." Webster's defines primitive as "original, primeval." These camps are neither primitive nor nonpolluting. Instead, they harken to the expanding settlement and growing mechanization to which wilderness and wild rivers serve as an antidote. Wilderness Watch believes the plan needs to give serious consideration to removing the High Sierra Camps and restoring the sites. The camps are incompatible with the Yosemite Wilderness. They significantly detract from the natural setting. The number of people, noise and structures coupled with the overly commercialized provision of goods and services exceed any reasonable interpretation of a wilderness setting. The amount of sewage, trash and other pollutants produced from such concentrated use impairs the area's natural conditions. The amount of pack stock needed to maintain the camps pulverizes the trails into dust and manure, and the use of helicopters to service the camps violates the Park Service's responsibility to preserve the wilderness character of the surrounding area. (Letter 2010-173)

Why don't you at least acknowledge both sides of an issue, and ask what we HATE about the Merced Lake High Camp?

I HATE that the camp is a visual intrusion & eyesore.

I HATE that the camp pollutes Yosemite with sewage, wastewater, garbage, and noise.

I HATE that the camp relies on endless pack trains of animals that spread weeds, pollute water, degrade trails, and makes Yosemite's trails & backcountry smell like a domestic barnyard.

I HATE that the camp network entices people into the backcountry who should not be there in the first place (witness the old woman with dementia who caused a massive search a couple years ago).

I HATE that the elitist camps cause all of this damage for the pampered convenience of a relatively moneyed few, at the expense of everyone else. (Letter 2010-232)

The High Sierra Camp has for too long degraded the Yosemite wilderness and the Merced River's wild & scenic character. This camp (and all of the other High Sierra Camps) should be removed, and the sites restored, as provided by Congress in the House Committee Report for the California Wilderness Act. Yet some member (or members) of your staff is doing the exact opposite: disseminating biased questionnaires, posing leading questions, and actively soliciting comments favorable of the camps, in an apparent effort to rationalize the continued existence of these unnecessary, elitist, polluting commercial developments. These prejudiced staff person(s) should be removed from your planning team, and replaced with unbiased professionals. (Letter 2010-284)

The National Park Service should expand the Congressionally-designated Wilderness area to provide additional protection to areas within the Park.

The CMP should also expand wilderness and other zones with a low degree of visitor use and facility development. Preserving existing wilderness zones, and where possible expanding upon them, will help insure that ORVs are adequately protected. Similarly, zones allowing a moderate range of visitor use and facility development should be managed in such a way that at least some portion of these zones can one day be restored to their former wilderness condition. See 16 U.S.C. § 1281(a) (requiring "a nondegradation and enhancement policy for all designated river areas, regardless of classification.")

Management zoning should be designed with the goal of providing optimum protection for ORVs. As such, analytical information needs to be provided in the ORV demonstrating that NPS considered the impacts of management zoning decisions on ORVs and that their conclusions are consistent with protecting ORVs. (Letter 2010-263)

[2. What do you want to see protected?] Everything within the gorge should be wilderness. (Letter 2010-391)

Natural Resources

The Merced Wild and Scenic River CMP should maximize and restore the ecological functioning of the Merced River.

... Biological function along the Merced River should be a foundation of the Merced Wild and Scenic River Plan. While much of the biological integrity would improve with improvements in the natural flow of the surface and ground water, there is still much management that can actually enhance the biological integrity of native organisms. A useful rule of thumb when managing biological systems is to maximize diversity of native flora and fauna. This does not mean excessive planting to force nature to become diverse, but rather use the tools of fire, and the already stressed restoration crews to enhance biodiversity in National Parks. (Letter 2010-383)

The National Park Service should ecologically restore the Merced River Corridor back to a time period before modern impacts.

[What do you love about the Merced River, Yosemite Valley, Wawona, El Portal and/or Merced Lake High Sierra Camp?] To answer that I have to ask you to imagine something: Yosemite, as it was 1000 years ago. That is the essence of what I love about it...

[What would you like to see kept the same?] Everything that was there before the Park Service ever existed. (Letter 2010-92)

The National Park Service should not ecologically restore the Merced River corridor to a static snapshot, but should protect a dynamic ecological system.

Over a hundred years of records have detailed the development of Yosemite Valley from a valley that supported perhaps thousands of Ahwahneechee residents to a World Heritage Site open to more than 3 million people from all over the world. With this evidence, we are better equipped than ever to make good decisions concerning how we manage National Park's integrity for countless generations. In moving forward the question always will become to what "state" should we restore Yosemite Valley. For the Merced Wild and Scenic River Plan, I believe, this date is 1987, the date of designation of the Merced as a Wild and Scenic River. This is inherently a shallow question and viewpoint. Yosemite is not a display, it is a living process interrelated movement of water on the land. All these systems are dynamic and Yosemite is always evolving. It is this state that should be protected, the continual movement of the natural processes. There is no ideal "state" to which we should be preserving Yosemite National Park. The National Park has an obligation to bring to light to every visitor that these processes are the tools and hands that created the magnificence of Yosemite National Park. The three processes that should be given priority above all else are the geologic, hydrologic, and biological processes. All work for restoration, mitigation, and future planning must be taken into this context. While the Environmental Impact Statement requires this for all new development in the National Parks, a plan that maximizes natural processes by minimizing visitor impact should be in place for the National Parks. (Letter 2010-383)

The National Park Service should not allow natural ecological impacts as trade-offs for visitor use, recreation, or development.

No loss of wetlands; no construction in or adjoining wetlands. No new construction of any kind outside of developed area footprints. No construction of any kind within or adjoining meadows (Letter 2007-95)

[What needs to be Fixed?] No tradeoffs of rehab one area so you can impact another (Letter 2010-108)

The overriding goal for the planning and management of Yosemite National Park should be the preservation of nature for future generations. This means the protection and preservation of natural processes, natural environments, and natural ecosystems. Within these confines of protecting nature, we need to allow people to enjoy, marvel at, and use the park so long as they do not interfere with other visitors, natural features, or the natural processes that govern the park. (Letter 2010-313)

Thank you for the opportunity to comment on the Merced River Plan. It is timely and very important to move forward with bringing the natural resources of the park into their rightful place in the management of Yosemite National Park - and that place is front and center, of primary importance. Once lost, the costs to restore grow and grow. (Letter 2010-341)

The National Park Service should allow for some compromise to natural resources in the Valley to provide for visitor use

It is unreasonable to expect the entire Valley to have the look of a place undisturbed by human activity. It is also unreasonable to expect that the entire length of the River in the Valley have an undisturbed look. And it is most unreasonable to expect that there will be a broad band of natural area surrounding the River as it flows through the Valley. The Valley is not wilderness and I do not believe that it should be as it is too scenic to be seen only by a few. One would expect that the historically existing development would remain and be maintained. (Letter 2007-107)

Allow some compromise to natural resources in the Valley to provide for visitor use (Letter 2010-76)

The National Park Service should consider alternatives to surface hardening methods to protect and enhance ecological processes.

[What needs to be fixed?] Reduce amount of development and surface hardening (i.e. pavement) in the corridor (Letter 2010-72)

Be thoughtful of the environmental damage that asphalt and petroleum products cause to the natural ecosystem. Research sustainable pavement alternatives currently available for road and trail repair and consider replacing all asphalt surfaces with context sensitive pavement materials that will limit the visual impacts of trails, paths and roads. (Letter 2010-345)

There are several natural areas where visitors can access the river and meadows without damaging the resource. Swinging Bridge and Yellow Pines are great access areas to the river and the Stoneman boardwalk are excellent examples of proactive resource protection. Regulation of social trails by simple use of sticks is enough to keep visitors away from social trails to access potentially damaging areas of the stream bank. This protection is essential for habitat of fish and the declining frog populations. Ad hoc management of eroding stream banks, for example split rail fencing, is a reactionary policy that will not prevent future impacts. Visitors must be educated through their visitor maps and active management of social trails should be implemented before trails give visitors access to erode the stream bank. El Capitan Meadow may benefit greatly from the establishment of a boardwalk as well as educational signage. (Letter 2010-383)

The Merced Wild and Scenic River CMP should identify specific actions for the protection of threatened and endangered species in addition to programmatic habitat protection.

Going forward in the new CMP for the Merced River, if the "programmatic and prescriptive nature of the project" makes it difficult for NPS to accurately assess impacts to individual species - species they have a duty to protect - then NPS should change the programmatic and prescriptive nature so this work can be performed with a greater measure of professionalism. The new CMP should have baseline studies and ongoing plans to monitor natural resource conditions. (Letter 2010-127)

The Plan should document, in detail, the specific areas that Park staff expects to manage to protect the plant and animal species and associated habitat areas that are most heavily impacted by past/existing levels of visitor use. The current, historic, and potential range of affected key species should be clearly presented in the Plan. The locations at greatest risk should be identified and prioritized for effective management. Actions that can be taken in particular areas to reduce the negative impacts of excessive visitor should be clearly developed within an implementation program. Measures must be proposed to address real concerns that are identified at this planning stage. It is not sufficient to merely implement adaptive management once problems arise. (Letter 2010-238)

The Merced Wild and Scenic River CMP should use management thresholds that are triggered before the resource or river value is degraded.

Initiating management activities only after threshold levels have been exceeded allows for an unacceptable and unnecessary level of harm to Merced River ORVs. Practically speaking, substantial time could pass before NPS officials notice actual harm or are able to begin implementing management activities once thresholds are violated. From a management perspective, it makes far more sense to implement an early warning system whereby potential environmental harms must be addressed before they exceed threshold levels, thereby decreasing the time and resources NPS would otherwise waste in rectifying avoidable environmental damage.

Initiating management activities only when threshold levels have been surpassed is also a violation of the WSRA requirement to "protect and enhance" Wild and Scenic Rivers. 16 U.S.C. § 1281; see also, *Friends of Yosemite III*, 520 F.3d at 1033-1034 (failure to address environmental degradation until after thresholds are surpassed violates the WSRA) *Oregon Natural Desert Ass'n v. Singleton*, 47 F.Supp.2d 1182 (D. Or. 1998) (court overturned CMP EIS that did not adequately "protect and enhance" river). Without developing specific and binding management protocols when it appears that thresholds may be surpassed, NPS has not devised a CMP that actually protects and enhances the Merced River. (Letter 2010-263)

The Merced Wild and Scenic River CMP should consider the unique ecological value of floodplains in Wawona, Yosemite Valley, and Little Yosemite Valley.

In the Biological Assessment of the 2000 MRP, on pg. I-4, NPS provides a long list of adverse effects that could impact threatened and endangered species (TES) without indicating effects on non-TES species; which comprise a large part of the ORVs that contribute to the visitor experience. Roads, bridges, ditches and campgrounds are identified as "imposing unnatural barriers to plant and wildlife movements." However, commercial structures such as lodging units, hotels, an ice skating rink, stores which sell groceries and liquor, garage auto maintenance facilities, cafeterias, restaurants, gift shops, as well as administrative and employee housing, support facilities and offices are omitted. These also represent "unnatural barriers" to plant and wildlife movement. (Letter 2010-127)

Recognize the unique and exceptional ecological value of Yosemite Valley floodplains. Protect and restore hydrologic and biological connectivity between the main river channel and its floodplains. (Letter 2010-406)

The National Park Service should examine the impacts of stock use on exotic plant dispersal, water quality, song birds, native vegetation, and the hiker's experience, including banning all stock use and/or quarantining stock animals before use in the park.

Because domestic livestock (i.e., horses, mules, etc.) are known to pollute water, spread weeds, erode trails, and cause significant conflicts with foot travelers, your plan for the Merced River should adopt strict limits and controls on this harmful activity. Specifically: 1) all commercial horse rides should be banned within the Wild & Scenic river corridor; 2) when stock must be used, stock parties should be kept as small as possible (i.e., limited to no more than 12 "heartbeats" per group); 3) all stock animals should be strictly required to wear manure catchers to prevent pollution of trails, campsites and water from animal manure. Such products are now widely available and inexpensive. (See, for example, the websites: Bunbag.com and Eguisan.com.au); and 4) to prevent the spread of harmful invasive weeds, all stock animals must be sufficiently quarantined before entering the park, and must be tied up and supplied weed-free feed, with no open grazing or roaming on park lands. Because livestock are known to spread invasive weeds by importing weed seeds on their coats and in their manure, all stock animals should be strictly required to be properly washed and quarantined before they are allowed to enter Yosemite, all grazing within the Merced River corridor should be prohibited, and only weed-free feed should be allowed. (Letter 2010-49)

The plan should adopt strict controls and procedures regarding the use of domestic livestock within the Merced River Corridor. Examples of such controls and limits include:

- a. Stock parties should be kept as small as possible.
- b. Commercial use of horses should be eliminated from the Wild & Scenic River corridor.
- c. Strict procedures must be adopted to eliminate the spread of harmful weeds by livestock.
- d. Stock animals must be required to wear manure catchers to avoid pollution of waters and trails.
- e. Open grazing or roaming of livestock must be prohibited. (Letter 2010-57)

All livestock should be sufficiently quarantined before entering the park to prevent the spread of harmful and invasive weeds. Livestock should be fed weed-free feed and be kept from open grazing. (Letter 2010-251)

Natural Resources

(Hydrology)

The National Park Service should examine impacts of altered hydrology on Merced River function, including acreages of impervious surface area (and gain or loss of such from present) for each alternative.

[the Merced River Plan EIS should:] Describe acreage of net impervious surface gain/loss for parking, roads, facilities or other uses under each proposed plan alternative, and describe related storm water, runoff pollution, flooding, erosion, and all other related impacts that would occur. The soil types and functions of areas proposed for new coverage or restoration should be described. (Letter 2010-79)

Natural hydrological function should be a foundation of the Merced Wild and Scenic River Plan. Past impacts of the surface and underground water systems include roads and other impervious surfaces, campground, sewer and drainage systems. While much impact has already occurred, documenting and reassessing impacts years after their construction will be useful to future planners. A comprehensive report detailing our current baseline will be a useful ongoing process. I imagine that much of this information already exists, but I question if the information can be found in one central and usable format for future planners. From this a comprehensive plan detailing how hydrological function can best be restored. Possible solutions include replacing impermeable roads and trails with permeable surfaces, modernizing the archaic sewer system, and removing barbs from the river bank. (Letter 2010-383)

The Merced Wild and Scenic River CMP should remove unnecessary diversion dams, including that at top of Liberty Cap gully, to restore free-flowing conditions.

[What should stay the same/be protected?] Is small dam OK regarding free flowing? Is there a process looking to alternate water sources that the little dam provides? (Letter 2010-109)

To enhance the free flowing conditions, remove the diversion dam at the top of Liberty Cap Gully. The historic bridge abutments remain which spanned this former overflow channel. This dam removal would rewater this braid of the Merced, which has been dry for a century. Some trail rerouting would be needed as well as a bridge placed on the historic abutments. (Letter 2010-115)

[3] What needs to be fixed?] a. Any man made dams should be removed and cleaned up. (Letter 2010-370)

The National Park Service should consider restoring El Capitan moraine.

Take action to restore the function of a healthy river system including the retention of woody debris, logjams, and the restoration of the El Capitan moraine. The human manipulation of the moraine had drastic negative effects on the river ecosystem with major changes to the vegetation and cultural landscape all the way upstream to Yosemite Lodge. Early park settlers witnessed changes to the landscape almost immediately after the moraine was blasted. Please do not dismiss the restoration of the moraine as an unattainable goal. It is possible to experiment with phased reconstruction using multi ton, nylon polypropylene sand bags. This is an opportunity to show the world that we truly care about the ecological health of the river corridor, and it would be a cool project for restorationists and engineers alike. (Letter 2007-91)

The CMP should propose to restore Yosemite's terminal moraine as an enhancement of the Valley's hydrology. (Letter 2007-95)

The 1995 report, Prediction of Effects of Restoration of the El Capitan Moraine (Smillie, Jackson and Martin) concludes that such a project would result in a moderate (0-4 feet) increase in riparian water tables in the west end of the Valley. This could be enough to restore some wetland habitat for birds such as rails that have bred in Yosemite in the past, but haven't been seen there for years. At any rate, a more detailed study using current hydrological techniques might reveal more important beneficial effects of such a restoration. (Letter 2010-166)

The Merced Wild and Scenic River CMP should restore riverbanks by removing riprap and restoring riparian vegetation.

During the past 160 years of recorded weather patterns in the park there have been at least 8 major floods in the Merced Drainage. As tourist development commenced in Yosemite Valley in the 1850s the impact of these high water events became more significant in terms of "damage to infrastructure." One of the significant responses to floods was river channelization. As banks were armored with rock and concrete to protect roads and prevent river meandering, the river simply overflowed or eroded banks further down river from these "protective structures." Over millennia the river has meandered from one side to another in Yosemite Valley as well as the lower Merced Canyon. This natural process is not conducive to fixed developments such as roads and buildings...

River banks naturally erode and there are currently numerous areas in Yosemite Valley and along highway 140, Foresta Rd, and Incline Road along in the lower Merced Canyon where roads are being undermined. The continued practice of bank armoring will only cause erosion elsewhere. As the river cuts new channels it will continue to erode road beds, trails, and impact bridges. The practice of preventing these natural river channel shifts through bank armoring will result eventually in a river that resembles an irrigation ditch. Investigations should be made into the possibility of re-engineering roads to allow the river to discharge into historic overflow channels during periods of high flow. One of these channels exists behind the current El Portal Market, Motor Inn cabins, old hotel, community hall and post office. The old channel continues on the other side of El Portal Road continues in between Odgers Petroleum plant and the telephone office. (Letter 2010-166)

[What do we need the W&S River to protect?] Riparian Areas. Riparian systems form a dynamic and intricate buffer strip along stream banks between base flows and high water levels. Riparian areas slows runoff, serve as important nutrient sources and sinks, stabilize river banks, and provide a source of organic matter and input such as woody debris, and habitat. Large terrestrial woody debris alters channel hydraulics and provides unique aquatic habitat. Many of the same issues with meadows apply to riparian zones. Not all riparian zones are considered wetlands. We need the W&S Rivers Act to protect entire riparian zones, and restore impacted riparian zones to the extent possible. (Letter 2010-392)

The Merced Wild and Scenic River CMP should consider altering the bridges over the Merced to accommodate peak flood events and to correct over-widened channels.

Consider reducing obstruction of the river during flood levels by lowering the bridges so the high water can flow over them or by providing portable bridges that can be moved as the river changes its course. Study the consequences of riprap removal and how it will affect the river channel. Determine the natural condition of the river and let that govern decisions on how best to protect this precious resource. (Letter 2010-345)

Some of the largest impacts are on the Merced River. The historically deep, narrow, and steep sided Merced River channel is now in many places shallow and wide due to user trails accessing the water. There are many drainage pipes that serve as overflow directly from parking lots. The roads themselves have shifted the natural flow of groundwater, which in turn affects the biologic distribution in Yosemite Valley. (Letter 2010-383)

The National Park Service should consider constructing additional overflow channels for the Merced River, to protect visitor structures and experience.

Lastly, the one idea I've been thinking about is a compromise with mother nature. That would be to construct "overflow" channels for times when the river swells to some danger point then allowed to flow into special flood channels and away from public access areas. Sort-of a divide and conquer approach. I know, the Valley has only so much available space, but to give up some of that space to protect the public might be worth it. (Letter 2010-359)

The Merced Wild and Scenic River CMP should protect and enhance river floodplains by not allowing storage or temporary structures.

Placing of temporary structures by NPS, such as fiscal office (which has been there over 25 years), trailers, and metal buildings, diminishes the historic values of the El Portal Community. The random storing of new and old materials, bone yards, through El Portal and Yosemite Valley are not only unsightly, but are apt to swept into the river during high flood stages. Likewise, construction staging areas have caused considerable damage to many areas in the river corridor. (Letter 2010-166)

Prohibit the use of historic areas and floodplains as storage areas, such as the Superintendents Cabin area. (Letter 2010-383)

The Merced Wild and Scenic River CMP must consider restrictions on water usage (both surface and ground) for Wawona, especially in drought periods.

Decreasing and rationing water use and groundwater pumping when it appears that surface or subsurface water supplies are declining below prescribed minimum levels (Letter 2010-263)

The National Park Service should install restrooms and trash containers at the Swinging Bridge and at the Vagim property (Flat rock) to avoid contamination of the river in those areas. (Letter 2007- 101)

Natural Resources

(Wildlife)

The Merced Wild and Scenic River CMP should contain provisions for native fish reintroduction, particularly if fish ladders on downstream dams are built as proposed.

Steelhead Salmon have historic range in the Merced Wild and Scenic River Corridor. In 2014, the dams downstream on the Merced may receive a fish ladder that would allow salmon to re-colonize their previous range in this part of the Sierra. If the National Energy Commission allows the fish ladders, then there would need to be room in the Merced Wild and Scenic River Plan for allocating these species of fish. I would recommend that the designers of this plan are informed and in contact with the upcoming process and provide room for protecting salmon habitat in the future. Fishing restrictions, habitat protection, and access issues are sure to become important if those ladders are built. If the planners are not forward thinking on this issue a great opportunity is likely to be stalled out until another political deadline and a revision of the Merced Wild and Scenic River Plan is due. Frankly, salmon in California do not have much room for error, if they are to survive this next century...

Open communication to the National Energy Commission about the possibility of a fish ladder on the downriver Merced dams in 2014 and plan for possible regulation of salmon resources (Letter 2010-383)

The National Park Service should install more bear food storage boxes in popular visitor destinations to protect wildlife.

Bear Box Shortage: I fully applaud and follow the policy of placing all food and odoriferous items in bear boxes. Unfortunately, bear boxes are almost harder to find in Yosemite than camping spots. Other than a paltry row in the Curry Village parking lot, there are no publicly accessible bear boxes in on the valley floor. Compounding this problem, there are no or insufficient bear boxes at popular climbing destinations, including Arch Rock, the Cookie Cliff, El Cap Meadow, Cathedrals, the Rostrum, Red's Five and Dimmed Cliff and the Ahwahnee Hotel [sic]. A simple fix would be to either install or expand bear box coverage at all of these locations. (Letter 2010-420)

The National Park Service should consider the reintroduction of the grizzly bear.

[What needs to be fixed?] Re-introduction of the Grizzly Bear (*Ursus horribilis*). (Letter 2010-107)

Natural Resources

(Vegetation and Meadows)

The Merced Wild and Scenic River CMP should include restoration of ecological function of the Yosemite Valley meadows.

It is clearly time for a minimum ten-year rest for the natural areas of the park, as is often applied to overgrazed range. The damage in the Merced River landscape is so extensive that it is conceivable that the land will have to be rested for even longer. The parallels are certainly close, as described below. Range is degraded by overuse, including eating up the grass to the degree that it cannot regenerate except in sparse ways that provide not enough nutrients to the livestock, and seriously damage the soil and the habitat for wildlife, from large animals to small bugs that keep the soil healthy. In addition there is ongoing damage to streams and meadows from trampling, expanding animal trails, and the inevitable feces, which never seem to totally deteriorate, and pollute the waters of the Park. (Letter 2010-341)

Estimate the degree of floodplain and wetland loss that has taken place in the river corridor since the mid-1850's to provide overall context in the plan. Estimate the corresponding loss of function and species richness. (Letter 2010-406)

The Merced Wild and Scenic River CMP should protect alpine meadows in the river corridor.

Protect subalpine meadows in the river corridor, and understand the impacts of pack stock use associated with these meadows (Letter 2010-406)

The National Park Service should adequately delineate wetland areas, both historic and contemporary, and rare plant populations to protect them--before any new developments are planned.

In 2005 there were also problems with inadequate delineation of wetlands. Again, we urge that the problem not be repeated. (Letter 2010-313)

Delineate wetlands (to GIS mapping standards) where development or redevelopment may take place in the EIS. This may include Wawona, Yosemite Valley, Little Yosemite Valley, Merced Lake, etc. (Letter 2010-406)

The Merced Wild and Scenic River CMP should include landscaping and/or hardening campgrounds and access points to river for visitors, to both provide access and also protect natural resources.

Do something to landscape campgrounds with native vegetation - too much dust and disturbed areas (Letter 2010-84)

Landscaping for controlled human access to the beaches of the Merced (Letter 2010-462)

The National Park Service should manage conifers in Yosemite Valley to restore views and ecological function (of meadows in particular).

[What needs to be Fixed?] Restore scenic views at scenic view pullouts by cutting down the trees (Letter 2010-108)

There will people who will definitely abhor the idea of conifer management. As long as management is concentrated to specific sites, is properly phased in and out, and is used in ways to enhance ecological integrity, then there is little argument against conifer management when compared to the benefits of enhancing meadow habitat, recognizing cultural significance, protecting Yosemite's views, reducing river bank erosion, and concentrating visitors on durable surfaces. Not one square foot of Yosemite's Valley floor has avoided impact by humans. We have 100 years of record of what piecemeal protection will do to Yosemite's resources. Impact is going to occur and has occurred for thousands of years, the question is if we will allow casual ad hoc management or visionary management that increases biodiversity, embraces cultural heritage, and protects Yosemite's precious views. (Letter 2010-383)

The Merced Wild and Scenic River CMP should protect and enhance Odger's Pond in El Portal.

Recognize the ecological importance of the wetland pool adjacent to the Odger's Fuel storage facility in El Portal. In high water events, this off-channel wetland is a sanctuary for river-dependent wildlife such as beavers. (Letter 2010-406)

The National Park Service should designate heritage trees in the Merced River corridor.

[What do you Love about the Merced River in Yosemite? (Yosemite Valley, Wawona, El Portal, high country)] The heritage trees in the river corridor (valley oaks and other special trees? would like to see them designated and protected like other communities are doing). Check Visalia and Austin, TX (Letter 2010-72)

The National Park Service should protect and restore black oak and valley oak groves throughout the corridor.

On the El Portal Administrative Site, which is federal land outside of the park, there exist some of the few groves valley oaks (*Quercus lobata*) in the entire river corridor. Throughout the state of California there are numerous restoration projects to restore valley oak woodlands. The small number of these oaks in the Merced River corridor are a rare resource and worthy of protection and restoration.

There is grove of mature heritage valley oaks across from the Yosemite Association office, bordered by the Foresta Road and Odgers Petroleum plant. The grove itself is used for employee and community parking. This parking area needs to be removed to ensure that this grove can continue to exist through propagation of new seedlings. It is a rare resource that is being ignored and abused.

Below this area in the old river channel where the telephone company office and more of the petroleum plant is located, another grove with magnificent mature trees This grove and the valley oak grove across from the El Portal community hall is also a significant resource that needs to be inventoried, monitored for reproductive health, and set aside for permanent protection. (Letter 2010-166)

Protect oak woodland communities in the river corridor: Oak woodlands are revered for their aesthetic and ecological values. Acorns served as a fundamental food source for Native Americans. California black oaks (*Quercus kelloggii*) and Valley oaks (*Quercus lobata*), in particular, are associated with the main river corridor and its floodplain. California black oaks outline meadow margins, and to some degree are adapted to sustain annual flooding. The only population of Valley oaks in the park is in El Portal, where large majestic specimens have lived for centuries across from the Yosemite Association office. Valley oaks are considered a riparian species, and are adapted to survive with periodic high water tables. (Letter 2010-406)

As our Center has interacted with Park planning staff and with various residents in El Portal and others who have high levels of knowledge about the River corridor, we have come to recognize that despite general vegetative and zonal characteristics that can be expected within the corridor, there are also unique or high value resources that contribute to unusual scenic, wildlife, cultural, or other values, but are not easily lumped into broad ORVs. One example is the mature Valley Oaks located at El Portal. The fact that large, old Valley Oaks are so limited at the relatively high elevation of El Portal is just one reason why these oaks (and Biological Resources) deserve ORV designation. These large Valley Oaks are especially important due to the fact that they have persisted for at least 100 years throughout changing climatic conditions, periods of development associated with impacts, and during periods of increased air pollution and other stresses. The genetics and site uniqueness of the Valley Oaks at El Portal have even greater value because our staff believes that there are NOT similar Valley Oak groves along the Tuolumne River or Stanislaus River at elevations as high as El Portal. We encourage the Park to give careful attention to the Biological Resource values of the Valley Oaks and to include appropriate protective measures to sustain Valley Oak habitat at the present location on into the future. (Letter 2010-463)

The National Park Service should remove Himalayan blackberry and restore such habitats as possible, using native seed sources.

Removal of invasive Himalayan Blackberry (*Rubus discolor*) should be part of a bigger plan to restore the original native riparian vegetation that existed before the disturbances that created the opportunity for alien plant species to invade. For example, at the El Portal trailer park there are specimens of native blackberry (*Rubus ursinus*) that could be a source of re-establishing this species. (Letter 2010-166)

The National Park Service should leave the blackberries in the Tenaya Creek drainage in place.

Leave Tenaya Creek blackberries in place (Letter 2010-82)

The Merced Wild and Scenic CMP should limit the development of lands and facilities within the river corridor.

To protect and preserve the river and its ORVs as required by the WSRA, NPS must limit the development of lands and facilities within the river corridor. Unchecked development within the corridor can only lead to degradation of the river and its ORVs.

As an essential step in achieving this required protection, NPS should reevaluate management zones with the goal of optimizing protection of ORVs. The 2005 RMRP/SEIS, relying entirely on its 2000 predecessor, states that "the existing management elements, which include management zoning, as analyzed in the [2000 CMP] remain unchanged and are not addressed as part of this planning effort." RMRP/SEIS F-144. As such, NPS relied on a system that merely assumed, without analysis or scientific verification, that existing management zones were adequate to protect ORVs.

The CMP should limit "developed" land use zones (zones allowing intensive visitor use and/or developed facilities) in order to insure that Yosemite National Park is not overburdened with facilities such as hotels, cabins, and restaurants that attract an excessive number of visitors and consume an unsustainable quantum of the Park's resources such as ground-water. Highly destructive resource uses such as dam or water diversion projects, mining, wetland fill, and expansion of parking areas (which impacts the river both by destroying habitat and by degrading air quality by accommodating more vehicles), must, of course, be prohibited entirely. Strictly limiting developed zones is essential to insuring protection of ORVs. (Letter 2010-263)

The National Park Service should eliminate roadside parking from El Capitan Meadow to enhance views and protect the meadow.

[Some actions to consider in developing a new MRP.] 8. Eliminate roadside parking at El Cap meadow. The Cathedral Rocks/Spires view shed is one of the most iconic in the Park and it is permanently debased with a solid line of vehicles and visitors trampling El Cap meadow to dust trying to get a look at rock climbers on nearby cliffs. There is a suitable non-sensitive area north of NSD on an old road alignment that could accommodate vehicles and observe where they would be out of sight of the meadows and view shed and not impact sensitive meadow wetlands. Additional restrooms and increased shuttle service should be included in this restoration effort. (Letter 2010-124)

Natural Resources

(Water Quality)

The Merced Wild and Scenic River CMP should include actions to mitigate effects of historic dumps, mine tailings, and petroleum facilities to protect and enhance water quality.

Until the 1960s open burn dumps were used to "landfill" in Yosemite Valley. These dumps continue to have physical and chemical impacts to the river and watershed. River formed topography and landform such as cutoff channels and oxbows were filled with garbage from tourism and residents, burned, and then capped with gravel from an adjacent river bar. The restoration and remediation of these sites will enhance, protect, and restore river values as well as water quality throughout the watershed. (Letter 2010-115)

For the past 25 years the danger of having a petroleum storage site in the middle of El Portal and on the edge a riparian area has been noted as a serious fire and possible toxic spill issue. In the case of a wildfire sweeping through that area it is hard to imagine there not being a major conflagration due to the petroleum products in the tanks catching on fire. In addition, in the event of a flood of major proportions, it is possible that these tanks would be damaged and the petroleum would spill into the river. A study of these potential hazards should be done before this facility is "grandfathered" under the river plan. Additionally other potential toxic spill hazards inside the river corridor, such as, gas stations in the Valley and El Portal, should be examined.

There are several known toxic mine tailing sites in the river corridor. These include waste material from the old barium mines at Rancheria and Cold Canyon. In Yosemite Valley there are remnants of old dumpsites that need to be fully cleaned up before toxic materials get into the river. (Letter 2010-166)

Hazardous materials impacts due to gasoline storage and dispensing and hazardous materials brought by visitors such as camping fuel and dripping crank case oil. Gasoline stations should be removed from the park. Fuel depots for park vehicles should be constructed to eliminate the possibility of spills and impacts to groundwater. Limit the use of camping fuel to canisters and provide for their recycling. Require private automobiles to be parked outside of the park and provide electric trams to transport visitors. (Letter 2010- 251)

The National Park Service should examine the effects of the sewage systems at the HSCs on water quality.

These effects have not been studied in Yosemite and it is critical that you consider their impact on the Merced River ecosystem and on recreational uses as part of your planning process. Although I suspect the effects are less, it's also critical you look at the human caused sources for Giardia and crypto. The latter should include both recreational hiker use and the effect of the sewage systems of the High Sierra Camps on water quality. (Letter 2010-312)

Natural Resources (Geology)

The new Merced River Plan must include updated information and maps concerning rockfalls, debris flows, and other geologic hazards as integral to siting of facilities.

The very definition of user capacity requires that decisions about the quantity of recreation use be considered in terms of avoiding adverse impacts on public health and safety. Such a discussion must include a comprehensive reevaluation of rockfalls, talus zones, and shadow zones as they relate to the River Corridor. It is irresponsible to dismiss rockfalls as a common occurrence in the Park when geologists are fully aware of areas where the dangers are greatest. (Letter 2010-314)

There are many lessons learned from the 1997 flood, including the removal of River Campgrounds, closure of the Superintendents House, and tent cabins in the floodplain. Serious consideration needs to be given to removing development in the 100-year floodplain. If development is determined necessary, then these developments need to be both sensitive to hydrological systems and flood savvy. (Letter 2010-383)

Natural Resources

(Air Quality)

The National Park Service should quantify the effects of new transportation alternatives on air quality.

Diesel fuel is essentially low-grade petroleum that is refined just enough to burn in engines. The new standards for diesel engines do not apply to buses that operate in federal territory. California mandates 20 ppm sulfur by 2002 for gasoline. However, diesel fuel contains on average about 150 PPM and can not use catalytic converters to reduce emissions due to the high sulfur content. Diesel engines produce less carbon monoxide than gasoline engines but more particulates and nitrous oxides (NO_x). Sulfates and NO_x are precursors of ozone. Studies by the SCAQMD have shown a high level of respiratory disease along the 710 corridor between Long Beach and East Los Angeles. This corridor is rated as having the most diesel traffic of any corridor in California. It is traversed by thousands of trucks daily and also has railroad traffic. Diesel exhaust particulates are known carcinogens. (Letter 2010-1)

[the Merced River Plan EIS should:] Quantify the impact of proposed transportation options on the amount of impervious surface required for roads, parking lots, and related infrastructure, as well as emissions of carbon, NO_x, PM 2.5, PM 10 and other pollutants. (Letter 2010-79)

Prior plans for mass transit assumed visitation growth without end. Recognizing that buses are capable of transporting more people per hour than private vehicles, the radiating impacts of busload after busload of visitors loading/unloading will result in toxic hot spots caused by trampling, noise, diminished air quality, and on-going environmental degradation within the park. Transit would create a system wired for and having the values of growing visitation; both public and private funded transit relies on increasing fare recovery for viability. The Park has already stated that the justification for allowing the obtrusive oversized bus stop structure adjacent to Yosemite Falls' clearly not in keeping with the 'scenic' ORV as noted, id. 'was to accommodate increased bus traffic to the Falls. As stated in a 1994 Alternative Transportation Feasibility Study: "potentially higher levels of particulate and nitrogen oxides (NO_x) emissions would be generated by high volumes of bus travel on park roads;" "increased noise levels on park roads and in the Valley would be associated with high volumes of bus travel." (Letter 2010-314)

The Merced Wild and Scenic River CMP should quantify the effects of greenhouse gas emissions in each alternative.

[The Merced River Plan EIS should:] Analyze the impact of each plan alternative on greenhouse gas emissions (total and per person), and which plan will produce fewest impacts per visitor (measure in terms of carbon emissions, impervious surface area/visitor, energy use, total waste generated, etc). Please describe mitigation measures to offset greenhouse gas emissions. The greenhouse gas emissions inventory in the EIS should account for emissions from electricity, vehicle trips, water supply and transportation, operation of construction vehicles and machinery, transportation of construction materials, and waste disposal. (Letter 2010-79)

The Impacts of Climate Collapse and Greenhouse Gas Emissions Must Be Factored in to the Consideration of User Capacity and ORVs.

The impacts of climate collapse must be evaluated and factored in as this new CMP is developed. How will the climate change and what are the likely affects on the Merced River and the ORVs? What may be the impact on identified development that the plan may embrace. What requirements and standards are necessary to ensure that ORVs will be protected into the future? The list goes on and on, as we learn more about the impacts of climate collapse, both in the near term and over the next 10 to 20 years.

The effects of use on greenhouse gas emissions must also be thoroughly evaluated. Whether dealing with concessionaire facilities, camping, or transportation, the potential for reducing and eliminating greenhouse gas emissions must be identified and embraced as much as possible. In the end, if we are to protect Yosemite and the Merced River, these essential environmental issues must be fully evaluated and addressed so as to provide protection. (Letter 2010-314)

The National Park Service should prohibit prescribed fires in the summer to protect and enhance air quality.

I would also stop the prescribed burning in the Valley during the summer and fall months. People travel from all over the world to view the park and when they get there, there is nothing to see except smoke. If you can't burn during the early spring, then stop it all together. Your prescriptions are too hot (all over the park, not just in the valley). You are leaving more dead trees than you started with. You are simply not benefiting the reduction of the fire hazard with these hot prescriptions....and in fact are adding to the fuel problem. The hand piling work done along the Wawona road was much more effective in reducing fuels (except that they burned to piles when it was too hot) . (Letter 2010-379)

The National Park Service should ban generators to improve air quality and reduce noise.

Although I don't have solutions for accomplishing this, I could wish for the elimination or drastic reduction of gasoline in the park. RV generators, traffic, air pollution, are all things that do not belong in Yosemite. Preventing the park from turning into Bakersfield seems like a good goal. (Letter 2010-445)

Soundscapes

The National Park Service should examine the noise from diesel tour buses, RVs, RV generators, loud radios, leaf blowers, supply trucks, motorcycles, loud partying, barking dogs, helicopters, dumpsters (being emptied), loudspeakers on buses (including that on the Tram Tours), and construction in its analysis. In all cases, NPS needs to examine the noise generated by its own activities/vehicles, and to model the volume of noise at which wildlife and the river become inaudible.

Reduce noise from motorcycles and RV generators. These noises significantly degrade the experience of climbers and other park visitors. (Letter 2007-46)

The noise generated by the use of large diesel engines and the need to upgrade roadways to accommodate large fleets of buses is inadequately presented. (Letter 2010-1)

Concerned about soundscapes in the park, natural quiet. Helicopters are used in emergency ops. But noticed that more and more, training ops are being conducted and land in Valley. (Letter 2010-84)

The National Park Service should meet or exceed state and federal vehicle noise regulations, and effectively enforce such regulations.

[What do you want to see protected?] See if CA code requires motor cycle mufflers and how that is enforced.

NPS should consider this or even a stricter noise limit. (Letter 2010-111)

Address need for regulation of decibel emissions. On a group basis as well as an individual basis. This would apply to Harley tours. (Noise from one vehicle might be within the standard, but if there are a number of them, as a group they might exceed the standard.) . (Letter 2010-313)

Visitor Experience

The Merced Wild and Scenic River CMP should allow the types of activities that focus on the river and its values to provide for optimal visitor experiences.

As the Merced River drops into world-famous Yosemite Valley, its gentle meandering beneath towering granite cliffs and scenic waterfalls enables visitors to enjoy a spectacular front country experience. While many people use the river for traditional recreation activities, others see it as an opportunity for spiritual growth, inspiration, or meditation. Low impact activities along the river corridor include water play, sunbathing, exploring the rock formations, picnicking, fishing, bird watching, photography/ videography, painting, writing or just appreciating nature and enjoying the scenery and peacefulness of the river. In addition to the river associated activities, users like to hike on the natural trails along or near the river or access one of the multiuse trails in the East end. Drawn by the scenery, there are opportunities to explore and photograph the spectacular falls, float the river, and camp or picnic on its banks. Self-guided and economical access, including by private vehicle and shuttle, enables visitors to enjoy scenery, with the freedom to explore nature on their own terms, while still experiencing solitude within this world-renowned environment. This is scenic viewing at its best where all of the senses are engaged in the opportunity to listen to the sounds of the river and the wind blowing through the trees, to smell the freshness of the great outdoors, to see the natural dark night sky filled with stars and maybe even witnessing a moonbow, to feel the soil beneath our feet and the weather, and to do so in the absence of the elements of suburbia with the bustle of crowds.

Such activities should provide an opportunity to relieve stress and to get away from a human-built environment; preferred activities should be resource dependent (e.g., wildlife viewing, nature study, hiking) with opportunities to see, hear, and smell natural resources and occasions to enjoy periods of solitude; modest evidence of development, human activity, and natural resource modifications but harmonious with the natural environment; presence of others is expected and tolerated with encounters ranging from low to moderate; conventional motor vehicle use is permitted on paved, graveled, and unsurfaced roads; settings should offer a sense of independence and freedom over comfort and convenience; The challenge and risk associated with more primitive types of recreation are not very important; practice and testing of outdoor skills are important. (Letter 2010-314)

While many people use the river for traditional recreation activities, others see it as an opportunity for spiritual growth, inspiration, or meditation. Low impact activities along the river corridor include water play, sunbathing, exploring the rock formations, picnicking, fishing, bird watching, photography/videography, painting, writing or just appreciating nature and enjoying the scenery and peacefulness of the river. In addition to the river-associated activities, users like to hike on the natural trails along or near the river, bicycle on one of the paved multi-use trails in the East end, or enjoy the challenge of Yosemite's world-renowned bigwall climbing; drawn by the scenery, there are opportunities to explore and photograph the spectacular falls, float the river, and camp or picnic on its banks--or snow-shoe or cross-country ski as snow permits. Easy access by private vehicle enables visitors to enjoy pleasure driving and sightseeing, with the freedom to explore nature on our own terms, while experiencing solitude within this world-renowned environment. This is scenic viewing at its best where all of the senses are engaged-the opportunity to listen to the sounds of the river and the wind blowing through the trees, to smell the freshness of the great outdoors, to see the natural dark night sky filled with stars and maybe even witness a moonbow, to feel the soil beneath our feet and the weather-and to do so in the absence of the elements of suburbia with the bustle of crowds.

Such activities could be accommodated in what might be referred to as a Rural/Roaded Natural Setting: should provide an opportunity to relieve stress and to get away from a human-built environment; preferred activities should be resource dependent (e.g., wildlife viewing, nature study, hiking) with opportunities to see, hear, and smell natural resources and occasions to enjoy periods of solitude; moderate evidence of development, human activity, and natural resource modifications that are designed to be harmonious with the natural environment; presence of others is expected and tolerated with encounters ranging from low to moderate; conventional motor vehicle use is permitted on paved, graveled, and unsurfaced roads; settings should offer a sense of independence and freedom over comfort and convenience; the challenge and risk associated with more primitive types of recreation are not very important; practice and testing of outdoor skills are important. (Letter 2010-402)

The National Park Service should recognize that visitor experiences are enhanced by wellprotected natural resources.

The more time people spending in hiking, camping, climbing, canoeing, the more they'll be able to really appreciate what the park has to offer. These are the things I wish to see protected. These activities are what create a profound relationship between the park visitors and Yosemite. Hotels, dining, and shopping do not. (Letter 2010-445)

[Critical to maintaining the outstandingly remarkable values of the climbing experience in Yosemite Valley and Merced River Gorge are the following qualities:] - A healthy and protected natural environment. (Letter 2010-306)

The National Park Service must balance between providing access to natural and cultural resources without undermining the quality of the resource itself. While this is a difficult practice, the question of prioritizing the visitor's experience versus the protection of the resource is simple. Without the quality of the resource there is no value in the visitor's visit, thus protection of the resource takes precedence over the visitor. Protection of the resource will bring visitors. Still, allowing visitors into Yosemite National Park will inherently impact the hydrological, geological, and biological systems. (Letter 2010-383)

The National Park Service should consider constructing a gondola to Glacier Point.

With respect to environmental impact, gondolas are silent, extremely energy efficient and clean, compared to buses grinding down into the valley or up to Glacier Point. Impacts are primarily in the installation phase. The final footprint is minimal. The impact on wildlife is also reduced - zero road kill. (Letter 2010-372)

The National Park Service should remove split-rail fencing in campgrounds to allow visitor access to the river.

[What do I want to see protected?] Access to it from all banks... including the river in the campground should be available to all in the park ... not just the campers. (Letter 2010-139)

Remove all split-rail fencing along the river that forces higher impact and concentration of bank traffic at the ends of the fence for visitors and, by the nature of their installation, damages tree and other root systems of vegetation (Letter 2010-154)