

Yosemite National Park

National Park Service
U.S. Department of the Interior



2007 Public Scoping Comments



Merced Wild and Scenic River Comprehensive Management Plan

Correspondence ID: 1 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Williams, Glenn
Outside Organization: Unaffiliated Individual
Received: Apr,10,2007 00:00:00
Correspondence Type: E-mail
Correspondence: My concern is that the current proposal is purely defensive. Monitoring the various areas within the river corridor means that the only way we know if something is too much is for the resource to become damaged. Why does it need to get to that point? Isn't the point to prevent the damage in the first place? Monitoring means we allow the site to carry as many people as possible before the system breaks. Is that really the purpose of the National Park System? Shouldn't we rather set limits to the site before we damage it? I'm also concerned that there aren't enough resources to seriously monitor areas within the various zones. Who monitors these? How often? When budget cuts occur, how will this system sustain itself? With park personnel stretched beyond the capacity to maintain essentials, how do we expect them to also monitor these sites adequately? The only answer seems to be the need for an offensive, self-sustaining VERP ? and I think that unfortunately means actual head counts in certain areas. It seems like if we set limits in advance on the numbers of people the corridor can handle, it will provide better protection of the river without waiting until damage occurs to set limits. No one wants to say only "x number" of people are allowed in Yosemite Valley at any one time. But there is no healthy environment without it. In the end, the long-term viability of the river and the enjoyment of those who visit need a proactive VERP. Sincerely, Glenn Williams Portland, OR

Correspondence ID: 2 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Najarian, Karen
Outside Organization: Unaffiliated Individual
Received: Apr,13,2007 00:00:00
Correspondence Type: E-mail
Correspondence: With regard to the Merced River Plan: do everyone the favor of bulldozing Housekeeping Camp. It's an insult to the river, Yosemite, and the people that view it from the road or anywhere. I've seen better inner city slums. Sincerely, Karen Najarian

Correspondence ID: 3 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Buckley, John
Outside Organization: Central Sierra Environmental Resource Center Unaffiliated Individual
Received: Apr,26,2007 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mike and Park planning staff, As the Park moves again into the planning process for the Merced River, CSERC acknowledges openly that we have no doubts about the sincere intent of Yosemite National Park staff to protect the environment and to provide for a quality visitor experience. We respect the obvious dedication and extensive effort that went into the last attempt to finalize a plan for managing the Merced Wild and Scenic River on Park lands. That having been said, we believe that there is not only room for improvement over the last Merced River plan, but we respectfully believe that the Park planning staff needs to make a clear change in how the process is being approached.. . besides "how" the process is conducted. No matter how many public workshops or open house sessions are held, public input will not play a meaningful role in the final outcome if members of the Park planning staff hold rigidly onto the belief that the first two versions of the Plan were completely adequate and that it is only a fringe environmental group and a unreasonable judge who are the real problems. CSERC respectfully shares our perspective that our discussions with Park planners and even key Park officials over the past few months leads us to feel that the Park is still ignoring the substantive message from the court - that the first two plans were simply not legally adequate for substantive reasons. We initiate these CSERC comments for the new plan with the sincere wish for the Park planning staff to approach this third planning process with at least the open-minded perspective that plan critics may honestly be right - and if that is the case, then consider what needs to change in this plan to overcome valid criticism or another court judgment against the Park Service. CLARITY AND SPECIFICITY Our first point - and as you will see below, a central theme to our comments - is that we underscore the need for true clarity and specificity throughout the plan. In particular, the final plan should specify the resources that are most at-risk from visitor use and clearly detail how those resources will be protected from visitor use. This is such an essential part of the Merced River plan that we re-state it: This plan should clearly identify - clearly spell out - which resources within the Merced River plan area are most at-risk, and then clearly explain how will the plan will lead to clear, measurable, effective protection for those at-risk resources. Obviously, the at-risk resources that are tied in some way to Outstandingly Remarkable Values are the resources that a court judgment would most clearly require the Park to consider, but ill the over River ecosystem, it is both prudent and scientifically essential for the Park to aim to protect all the natural resources - since all are hitched to each other in one way or another. So, in order to identify which resources are most at risk within the Wild and Scenic River corridor and management area. it is essential that the new plan clearly analyze the baseline cumulative threats that now pose risk to the ORVs and natural resources of the River system, including: ? visitor use, which at excessive levels results in trampling, disturbance, pollution,etc .; ? impacts of vehicle use and traffic congestion, no matter at what level of visitor use; ? global warming impacts, both already observed and scientifically predicted; ? pesticide drift/fair pollution/water pollution; ? chytrid fungus and other threats to amphibians within the river system; ? introduced invasives; and ? other cumulative or direct impacts. In addition to the clarity and specificity of what the Park intends to do to protect the ORVs, there are other areas of clarification that are needed. To increase acceptance of the management plan by the general public, we suggest the final plan should set longterm ground-rules defining and limiting allowable management actions. We also suggest more detail regarding methods for

gauging visitor traffic. Finally, in addition to these general comments, we suggest specific changes to the language of the document that we feel will improve its clarity and specificity. 1) Overall, our central belief is that the plan should provide greater clarity and specificity than what was provided in the last plan. No matter how good the intentions of Park management are, much of the public that is concerned with this plan is inherently suspicious of Park management and will likely oppose any plan unless it clearly specifies or limits future management actions. The public fears a worst case scenario - a crowded, over-developed Merced River corridor, where Nature takes second place to visitor capacity. Your burden with this plan is to clearly demonstrate how the worst case scenario cannot come true because the Park will take these specific actions at this specific trigger point. 2) The plan should specify the resources that are most at-risk from visitor use and clearly detail how those resources will be protected from visitor use. Currently, we don't know exactly what resources are most at-risk and are in need of protection. The most at-risk resources need to be determined and used as indicators in the plan, rather than at some future date. Included in this analysis should be baseline distribution and abundance data for applicable species and habitat. At-risk species that we would like to see be used as indicators include, but should not be limited to: California red-legged frog, foothill yellow-legged frog, mountain yellow-legged frog, California spotted owl, Yosemite toad, American marten, Pacific fisher, and whichever birds (such as the willow flycatcher) that are most clearly tied to meadow and riparian habitat and which actually have historic and current presence in the Merced River management area. Some distribution and abundance data for these and other at-risk species may already be available as a result of the National Park Service Sierra Nevada Network Inventory and Monitoring Plan. The Inventory and Monitoring Plan, and information that it has generated, should be utilized as part of the Merced Wild and Scenic River Plan. Specific, quantifiable standards that will be designed to directly protect the most at-risk resources (indicators) from visitor use also need to be clearly and explicitly identified and discussed in the plan. We suggest that standards be set at "no measurable user-associated decline from baseline distribution and abundance." Specific monitoring protocols should be detailed in the plan, and the plan should explain how monitoring will; (a) be able to quantifiably determine the status of the indicators relative to their standards, (b) directly measure cause-and-effect visitor impacts on indicators, and (c) provide for long term trend analysis. In other words, the plan's monitoring component needs to clearly lay out how the monitoring will truly assess the status of at-risk resources and how that monitoring can realistically be carried out. Specific management actions for each indicator need to be clearly stated in the form of "if-then" statements. For example, "If the abundance of mountain yellow-legged frogs in any given location declines measurably (below 70%, for ex.) relative to the baseline abundance, and if there is any indication that the decline can be tied to impacts caused by visitor use, then that location will be closed to visitor use until abundance returns to baseline levels". 3) The plan should set long-term ground rules defining and limiting allowable management actions. The ground-rules should include all of the following; (a) a specific, absolute maximum limit on the number of users that will be permitted in a management area (river segment or management zone) per day, (b) a specific, maximum limit on the number of users acceptable for the entire corridor per year, (c) a specific, maximum limit on the development of facilities. Tied to these limits there needs to be specificity as to what the Park Service will do if such limits end up being approached, and then what the Park Service will do if responses fail and the limits are exceeded. While CSERC recognizes the value of VERP as a defined decision-making process, simply proposing a decision making process, without setting limits as to what can be decided and acted on, will not be accepted by the public, and perhaps, the courts. 4) The final plan should provide a detailed protocol for tracking visitor distribution and numbers. Tracking visitor use is a key, critical component in the Merced Wild and Scenic River Management Plan. A clearly defined, detailed plan for exactly how visitor use will be monitored is therefore necessary. As one method for tracking traffic, CSERC once again proposes a more assertive consideration and exploration of RF chip technology. When handed out to incoming vehicles (in windshield tags, etc.) , RF chips can store information on point of entrance, persons per vehicle and destination, and can be tracked using monitors placed at key locations such as intersections and parking lot entrances and exits. A more economical alternative involves automated car counters located at key locations (intersections and parking lot entrances and exits) and linked through a network. Such a system could give real-time information on the number of cars in any given area and be used to direct cars away from areas where quotas have been reached. As we expressed previously, we see absolutely no valid reason for the Park not to explore the possibility of the Yosemite Fund, Silicon Valley companies, or other enthusiastic potential funders working with the Park to develop fairly rapidly the technological design of such a visitor count system. Why should one of America's premier Parks not be on the cutting edge of visitor management and visitor monitoring? In closing, we recognize that the Park has made planning staff and resources available to our Center and members and the public as a whole by offering Merced River plan workshop opportunities and a clear willingness to listen. Unfortunately, each one of those opportunities has been on a date when all of our staff was unavailable. We look forward to future discussions and learning from your expertise. Thank you for the opportunity to submit scoping comments on the new Merced Wild and Scenic River Management Plan and Environmental Impact Statement. Please feel free to contact us directly if you have any questions or clarification concerning our comments. We are committed to working productively with all of you representing Yosemite National Park until a Merced Wild and Scenic River Revised Comprehensive Management Plan is adopted and legally finalized. Respectfully, Thomas S. Hofstra, Ph.D. CSERC Staff Scientist John Buckley Executive Director

Correspondence ID: 4 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Wilson, Otto
Outside Organization: Unaffiliated Individual
Received: Apr,26,2007 00:00:00
Correspondence Type: Other
Correspondence: I can't approve of the Judge's decision on the present change. The original proposal was OK.

Correspondence ID: 5 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Lind, Melanie
Outside Organization: Unaffiliated Individual
Received: Apr,27,2007 00:00:00
Correspondence Type: Park Form
Correspondence: My great Aunt and Uncle honeymooned in Yosemite in the early 1920's and our family has been watching Yosemite change and grow, for better and worse ever since. I am 50 years old now, disabled, and I am unable to bring your children here because

reservations are so difficult to obtain to camp in the Valley, and to enjoy the beautiful surroundings. I love the Merced River. I am disturbed by the Delaware/Curry massive rafts that are used in the river for financial gain every summer. I am horrified by Housekeeping Camp and the filth that gets dumped into the river by the people that use that facility every summer. Even as a young girl, we would float down the river on our blow up rafts and the water by housekeeping camp would be fross. I feel the activities on the Merced used for financial gain by Delaware North/Curry should be stopped, but I also feel I should be able to enjoy swimming and floating down the river with my kids as part of our camping experience (Upper Pines) I think leaving massive amounts of fallen trees in the river is silly, and dangerous, for young children, and all the signs placed to explain the trees in the river must cost a fortune! Impact: none. Hidden issues: Housekeeping Camp disposal, Delaware North rafting, fallen trees, sewage. The fishing issue I am unsure on - we tried to fish in the Valley as children and never caught anything ever - does anyone? In the High Country that would be a big issue.

Correspondence ID: 6 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Hackford, Norm
Outside Organization: Unaffiliated Individual
Received: Apr,27,2007 00:00:00
Correspondence Type: Park Form
Correspondence: I noticed that horses were being used on the south side of Mirror Lake. The soil was soft and the horses caused holes and ruts in the trail. Also there was the normal (excess) odor along the trail from manure. I feel that horse rides are not part of Yosemite Valley experience. The horse use should be curtailed by stopping use when the soil is soft and trails are damaged. Also on trails with heavier hiker use, the horse riders should be stopped.

Correspondence ID: 7 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Simpson, Jay
Outside Organization: Unaffiliated Individual
Received: Apr,27,2007 00:00:00
Correspondence Type: Park Form
Correspondence: My family and I have been coming to the Valley for 25+ years. Always impressed with the activities by Park Service personnel re river conservation, fencing and so on. But would like to see the 300+ campsites lost (not replaced) after 1997 flood rebuilt (different areas) Whatever necessary - a shame to limit usage in this way.

Correspondence ID: 8 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Duran, Ray
Outside Organization: Unaffiliated Individual
Received: Apr,27,2007 00:00:00
Correspondence Type: Park Form
Correspondence: We have enjoyed camping here for 30 plus years and have also stayed at Curry Village tent cabins and log cabins. Our comment is to encourage the continued campground availability for those who enjoy living in the outdoor environment. We welcome the addition of RV campsites as well as repair of the roads at Lower Pines and other Valley campgrounds. Thanks to all who work so hard to make this a place for all people for all seasons.

Correspondence ID: 9 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Aucoin, James
Outside Organization: Unaffiliated Individual
Received: Apr,27,2007 00:00:00
Correspondence Type: Park Form
Correspondence: In the interest of public safety and personal hygiene it would be nice to have dispensers of hand sanitizer in the wilderness potties, when soap and water are not available. Thank you for considering this idea. (We have seen such a service in other national parks)

Correspondence ID: 10 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Carnot Brezsny, Karen
Outside Organization: Unaffiliated Individual
Received: May,12,2007 00:00:00
Correspondence Type: E-mail

Type:

Correspondence: Dear Merced River Planners, My extended family and I maintain a cabin in Wawona that was build by my great grandmother in the 1930s. It is located yards from the North Fork of the Merced river, 7889 Forest Drive, Wawona (APN #010-22-0-012-0). The names are Carnot, Nekuda & Wortner. After visiting this area for the past 54 years, I have seen many changes in the wildlife and water quality of the Merced River. We used to see pollywogs and frogs in the summertime. They disappeared about 40 years ago. We used to freely drink the water in the Merced River, as it was always very cold and crystal clear, without moss. That changed about 25 years ago. There used to be trout, albeit small in size. In the last 15 years we see a foreign kind of bottom-feeding sucker fish, no trout. About 5 years ago, for two seasons, there was a family of ducks living on the river - entirely unheard of in the past. Lastly, in the past the river in our area was frequented only by the neighboring cabins. Now, there are hundreds of people using the river, all summer long, wearing sun block in the water. And they don't often pack their trash. I'm not sure what the solution is, short of not allowing swimming, or allowing it in designated areas. But from my experience, uncontrolled tourist use of the Merced River contributes dramatically to its decline. Thank you, and best wishes to you on this much-needed project.

Correspondence ID: 11 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Lindsey, I.
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail

Correspondence: I teach most sciences to students from kindergarten through professional teachers and am very concerned about the future of Yosemite. Years ago on our field trips students began to notice the effect of stock animals on trails, creeks and meadows. They asked how the park rangers justify the tradition of damage for profit? I have yet to justify for the students the park's tradition of putting profit over the park. The excessive use of stock animals results in trampled meadows, contaminated water, and eroded trails that are polluted by manure, urine, dust, and flies. The Park Service has allowed much of the Merced River watershed to become so degraded by stock animals that visitors are forced to endure a "barnyard" experience rather than enjoying their national park.

A big problem are the riding stables in Yosemite Valley. The existing Yosemite Valley Plan, adopted in 2000, called for the removal of the riding stables from Yosemite Valley. The Park Service has never implemented that key provision of the Valley Plan, and has improperly allowed the stables to continue operating, resulting in continued erosion and pollution of the trails (and water) in Yosemite Valley. The Merced River Plan needs to specify that the stables in Yosemite Valley will be closed at once and the site restored.

Another big problem is how commercial packstock enterprises are allowed to operate freely, with few limits, in the Yosemite backcountry. The Park Service has allowed these outfits to expand their operations substantially in recent years. Research has shown that commercial packstock operations are resulting in eroded trails, trampled meadows, and contaminated water. The Merced River Plan needs to place limits on these commercial enterprises to protect the River and surrounding meadows and wetland areas.

Every time we see the High Sierra Camps (HSCs) at Vogelsang, Merced Lake, Sunrise and May Lake we wonder how they can be open. They are polluting the Merced River and should be closed. These camps provide luxury vacations in the Yosemite backcountry, including tent cabins, bedding, extravagant meals, showers, and toilets. All the by-products of human occupancy are produced at the HSCs: sewage (human body wastes), "gray water" from showers, grease and detergent from kitchens. But there are no wastewater or sewage treatment plants. Wastewater and sewage from these facilities directly pollutes the meadows, soils, and waters of the Merced River watershed. And in order to service the camps, vast numbers of stock animals parade back- and-forth to haul the needed supplies. The result is badly eroded trails that are covered in stock manure, urine, flies and dust. The time has come to acknowledge the substantial impacts of these old fashioned commercial developments, and to close them once and for all. How do we teacher show our students how to respect the park service when we realize that their jobs are designed to damage nature for profit?

Correspondence ID: 12 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Ulman, Barbara
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail

Correspondence: Greetings:

Before going ahead with new building and development in Yosemite Valley, the Park Service needs to create a legally valid Merced River Plan. This was supposed to begin in 1987 and be completed in 1990. It still has not been done to the satisfaction of the court, and it is imperative -- and required by law -- to complete a satisfactory River plan before continuing with new construction.

When the plan is completed and accepted, then the construction should encourage people of all income levels to stay in the Valley. Decreasing campsites and increasing space in the Lodge favors people with wealth, to the detriment of others who want a more simple -- and natural -- stay in the park.

As for restoration: only 6% of the substantial funds available is designated for resource stewardship. This, after all, should be the primary focus of the park, not enriching the Delaware North company.

Please consider these issues before continuing with extremely costly development in Yosemite.

Correspondence ID: 13 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Chaney, Dr. Sky
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Superintendent: I glad to hear that you folks are developing the new management plan for the Merced River. We've been visiting and fishing the river for years and hope that your new plan will afford greater protection for this national treasure. Based on our experience, the greatest environmental impacts on the river come from riding and pack stock that are degrading the watershed and areas adjacent to the river. Please include strict limitations on both riding and mule packing in your new management plan.

Correspondence ID: 14 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Taylor, Marcus
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail
Correspondence: May 14, 2007

Superintendent Yosemite National Park Attn: Merced River Plan P.O. Box 577 Yosemite, CA 95389

Dear Mr. Superintendent:

I am writing regarding the Merced River plan and specifically regulation of pack and saddle stock as they relate to water quality in the basin. I have been involved in commenting on plans for Yosemite since the mid-1970's when the General Plan of 1980. Sadly, I watched the entire plan pre-empted by the Superintendent at the time. I again contributed comments to the formulation of the General Plan for 2000, and am disturbed to find that once again it appears that the recommendations are being ignored. Specifically, the operation of the riding stables in Yosemite Valley have resulted in contaminated water and eroded trails that are polluted by offensive manure, urine, odors, dust, and flies. The riding stables should be closed, and the site rehabilitated to pre-project conditions, as called for in the Yosemite Valley Plan.

One of the most amazing part of water quality regulation is the lack of protection afforded rivers at their headwaters. In the case of Yosemite National Park this lack of protection is exemplified by the High Sierra Camps (HSCs) at Vogelsang, Merced Lake, Sunrise and May Lake are polluting the Merced River and adversely affecting the recreation experience of countless park visitors. All of the HSCs should be closed, and the sites rehabilitated as they lack any treatment for black and gray waters generated by their human and equine inhabitants.

But closing the Yosemite Riding Stables, as mandated in the Plan, and closing the HSCs will not be sufficient to protect the Merced. The Merced River Plan needs to address the currently excessive impacts due to pack and saddle stock uses throughout the Merced River watershed. Commercial packstock enterprises must be strictly limited to protect the Merced River corridor and the experience of park visitors who are adversely affected by the many impacts of these operations. The USPS needs to undertake a scientifically based program for assessing and redressing negative impacts to both ground and surface waters. The activities of pack and saddle animals need to follow strict Best Management Practices. Such BMPs are used in the Grand Canyon where each animal is required to be equipped with a manure bucket to preclude the deposition of feces from contaminating water resources or providing breeding grounds for flies.

Yosemite National Park is a nation jewel, and deserves to be protected against the negative impacts of pack and saddles animals . I appreciate your time, and look forward to hearing from you.

Correspondence ID: 15 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Carpenter, Alan F
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail

Type:

Correspondence: TO: Superintendent, Yosemite National Park: Starting in 1948 I have made extended and regular trips into the High country of Yosemite. Initially these were with mule pack train supported Sierra Club High Trips. Later, I was backpacking. More recently I have treasured the Vogelsang and other High Sierra Camps' supports for my aging and arthritic disabilities. It is clear to me (with this history) that the Yosemite Backcountry needs Wilderness protections, which means protection from human overuse. This requires rationed use for backpackers. The Merced River Plan for Yosemite N.P. needs to include the elimination of riding and pack stock in the back country, and needs to include the elimination of all of the High Sierra Camps including Tuolumne Meadows Lodge.

Correspondence ID: 16 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Natriomi, Edward

Outside Organization: Unaffiliated Individual

Received:

May,14,2007 00:00:00

Correspondence Type: E-mail

Correspondence: Dear Sir: I have been hiking in the Sierras for a half century and have witnessed the damage that horses inflict on trails, especially when the trails are muddy in the spring and after rains. The trails in Yosemite are the most heavily used in the Sierras. People also damage the trails but far less than 1,000 pound horses. To preserve Yosemite, the damage should be minimized and the best way is to ban horses within the park.

Correspondence ID: 17 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Van Winkle, William B

Outside Organization: Unaffiliated Individual

Received:

May,14,2007 00:00:00

Correspondence Type: E-mail

Correspondence: Dear Superintendent, I have several concerns that I believe need to be considered in the Merced River Plan. 1. Strict limits must be applied to commercial pack trains in Yosemite, especially the Merced River drainage. Research shows that these operations result in contaminated water, eroded trails and badly damaged meadows. Based on my experiences backpacking in Yosemite on the John Muir Trail, I have experienced the aforementioned situations. 2. The riding stables in Yosemite Valley should be removed. The results of their impact include: trails that are polluted by offensive manure, urine, odors, flies and dust. The Yosemite Valley Plan call for there closure. These conditions detract from the wilderness experience of most visitors who are not on horseback. 3. The High Sierra Camps are polluting the Merced River. The results of high numbers of humans occupying these camps are sewage, grey water and grease and detergent form the kitchens. With no wastewater or sewage treatment plants these pollutants go right into the Merced River drainage. Having backpacked past Sunrise High Sierra Camp, I have seen the impact of large numbers of humans on the area. These camps should be closed to eliminate these sources of pollution. The Park Service has been derelict in its duties as outlined in the California Wilderness Act of 1984. It has never conducted the requested monitoring or prepared any of the "annual assessments requested by Congress. 4. Yosemite National Park is one of America's treasures. We need to save it for future generations to enjoy in its pristine state.

Correspondence ID: 18 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Bjorkholm, Mary

Outside Organization: Yosemite Association, Sierra Club, Yosemite Fund Unaffiliated Individual

Received:

May,14,2007 00:00:00

Correspondence Type: E-mail

Correspondence: I am concerned about the trail damage and the pollution of streams caused by the continued use of horses in the Yosemite area.

As a hiker, I practice "leave no trace" wherever I go and whenever I go on any trail. This is certainly not the case with horses or their owners/wranglers. Restricting or eliminating the use of horses in our natural areas would be a wonderful idea. The horses pollute the trails with poop and their hooves damage the trails far more than hikers. The parks are already short of money to repair the trails so restricting damage would be a good idea. It is very easy to see the damage caused by the pack animals and horses. There is no reason that this problem needs to worsen by increasing the of usage by horses and pack animals. I would like to see the elimination of these animals in our parks with the exception of emergency/special circumstances.

Thank you for allowing me to express my thoughts.

Correspondence ID: 19 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Ghysels, Linda

Outside Organization: Unaffiliated Individual

Received:

May,14,2007 00:00:00

Correspondence Type: E-mail

Received: May,14,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Yosemite National Park Superintendent, I would like to comment against the continued overuse of horses and pack animals in Yosemite National Park. Besides eroding trails and contaminating water, the waste and smell they leave create a much diminished Yosemite experience. As an avid hiker and backpacker, it puzzles me that there would be so many pack animals allowed in this, my favorite National Park.

Correspondence ID: 20 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Polster, Laurie
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail
Correspondence: To whom it may concern:

I've backpacked and day-hiked in Yosemite for years, averaging two trips per season - and I LOVE this incredible park! Over the past several years though, the impact from horses has gotten worse, and each year I ask myself, do I want to hike on trails that allow horses?

We've hit an intolerable condition with respect to pollution from pack animals and riding stables which directly impacts the Merced River, Yosemite Valley and the entire backcountry of this exquisite national park. The riding stables should be closed, as stipulated in the Yosemite Valley Plan, and the area allowed to return to it's natural status. The excessive amount of urine, manure, dust, flies and obnoxious odor on the trails makes for very unpleasant hiking - not to mention the potential for disease. The backcountry is getting polluted from pack animals going to the HSCs, and commercial packstock enterprises must be restricted to protect the river and surrounding areas.

Please STOP or severely curtail the use of horses in the park. It's crucial that we do whatever we can to reduce pollution and save this park for generations to come.

Thank you,

Correspondence ID: 21 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Eremko, Matt
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Superintendent, As a back packer and former Boy Scout, I have always adhered to the philosophy of low impact in the wild.

The issue of reducing pack and saddle stock use throughout the Merced River watershed is long overdue. Phrases like The John Manure Trail should be a thing of the past. The idea that when backpacking, people should be acutely aware of their disposal of waste is in sharp contrast to the operations of the High Sierra Camps at Vogelsang, Merced Lake, Sunrise and May Lake. Human waste from the camps combined with the waste and trail destruction of commercial packstock enterprises directly pollutes the Merced River watershed. Trampled meadows and dodging road apples is not part of my definition of a low impact experience. The time has come to close the camps, restore the area and severely reduce or eliminate the packstock business. The argument that "We've been here for so long" or "We've always done it this way" no longer is acceptable. The same issue of pack animals applies to the riding stables in Yosemite Valley. Here again, the polar opposite of low impact is the reality. These horses cause water contamination by their manure and urine and erode trails. As I understand it the Yosemite Valley Plan called for these riding stables to be closed and the area restored. What happened? Business as usual in the Valley and in the High Sierra is no longer acceptable.

Correspondence ID: 22 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Sager, Judy
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Superintendent Yosemite National Park Attn: Merced River Plan P.O. Box 577 Yosemite, CA 95389

The Merced River Plan needs to address the currently excessive impacts due to pack and saddle stock uses throughout the Merced

River watershed.

The riding stables in Yosemite Valley are resulting in contaminated water and eroded trails that are polluted by offensive manure, urine, odors, dust, and flies. The riding stables should be closed, and the site naturalized, as called for in the Yosemite Valley Plan.

The High Sierra Camps (HSCs) at Vogelsang, Merced Lake, Sunrise and May Lake are polluting the Merced River and adversely affecting the recreation experience of countless park visitors. All of the HSCs should be closed, and the sites restored.

Commercial packstock enterprises must be strictly limited to protect the Merced River corridor and the experience of park visitors who are adversely affected by the many impacts of these operations.

Correspondence ID: 23 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Rendon Sr., Hector G
Outside Organization: Unaffiliated Individual
Received: May,14,2007 00:00:00
Correspondence Type: E-mail
Correspondence: TO WHOM IT MAY CONCERN :

FOR THE LAST 22 YEARS I'VE BACKPACKED IN ALL THE HIGH SIERRA'S NAT'L PARKS AND MOST OF IT'S DESIGNATED WILDERNESS AREAS. I'VE ALSO HIKEED AND BACKPACKED MANY, MANY COASTAL TRAILS OF OUR STATE PARKS , WILDERNESS AREAS AND NATIONAL MONUMENTS, NOT TO MENTION LOCATIONS IN BETWEEN. I BELIEVE THAT I DO KNOW OUR NATURAL PROTECTED AREAS QUITE INTIMATELY. I'D LIKE TO SHARE A COUPLE OF MY MANY PERSONAL EXPERIENCES THAT PERTAIN TO THIS SUBJECT AT HAND. A FEW YEARS BACK WHILE BACKPACKING THE RAE LAKES LOOP TRAIL FOR THE SECOND TIME. I WAS HIKING UP BUBBS CREEK CANYON AND STOPPED TO FILTER SOME WATER AT CHARLOTTE CREEK WHEN I HAD TO YIELD WAY FOR A PACK TRAIN THAT WAS ALSO GOING UP TRAIL. I WITNESSED FIRST HAND (2) HORSES FROM THIS PACK TRAIN, DEFECCATE MID-STREAM WHILE CONTINUING UP TRAIL. ONE CAN ONLY IMAGINE WHAT ADVERSE EFFECTS THIS TYPE OF RECREATIONAL USAGE CAN HAVE ON OUR SO CALLED PROTECTED NATURAL RESOURCES. WHAT TYPE OF NEGATIVE CONSEQUENCES THIS ALLOWED PRACTICE CAN HAVE ON OUR LIMITED REMAINING WATERSHEDS ? I'VE BEEN ON AND SEEN MANY, MANY TRAILS THAT CONTINUE TO BE RUINED BY THE EFFECTS OF EQUESTRIAN TRAIL RIDING. THEY TURN THE SOIL ON THE TRAILS INTO POWDER, LOOSEN AND TEAR AWAY THE ROCK , THAT LITERALLY DESTROY THE INTEGRITY OF THESE OTHERWISE WONDERFUL TRAILS. WHILE BACKPACKING UP TO VOGELSANG LAKE LAST SUMMER, I CAN'T HELP BUT TO REMEMBER NEGATIVE MEMORIES OF THE TRAIL CONDITIONS CAUSED BY EQUESTRIAN USAGE. THEN TO ENCOUNTER CABINS AND NUMEROUS PEOPLE AS I PASSED THROUGH THE HSC. THESE TWO UNPLEASANT MEMORIES COMPROMISED MY PERSONAL WILDERNESS EXPERIENCE. I'M SAD TO SAY THAT I DON'T THINK I'LL BE VISITING THIS PART OF YOSEMITE NAT'L PARK AGAIN AND THATS A SHAME BECAUSE VOGELSANG LAKE AND IT'S ENVIRONS ARE TRULY ONE OF THE MAGNIFICENT ACCESSIBLE AREAS OF YOSEMITE'S HIGH COUNTRY !

PLEASE BE PRUDENT AND USE SOUND, WELL INFORMED JUDGMENT (FORESIGHT) WHEN CARING AND GUARDING FOR OUR LAST REMAINING FINITE NATURAL RECREATIONAL RESOURCES. IF NOT FOR US , THEN FOR OUR FUTURE GENERATIONS.

THANK YOU,

Correspondence ID: 24 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Searfus, Lauren
Outside Organization: Unaffiliated Individual
Received: May,15,2007 00:00:00
Correspondence Type: E-mail
Correspondence: To Whom it may concern: I am writing because of information I have learned regarding horse use of trails and other matters. The Yosemite area and backcountry are pristine, fragile environments that we need to manage extremely well. I oppose the excessive use of pack and saddle stock animals throughout this area. I have learned that the use of the animals are causing erosion, polluting the trails and streams and in general are degrading the enjoyment of the nature experience for others. The Park Service needs to implement the Valley plans to remove the riding stables from Yosemite Valley. I oppose the High Sierra Camps at Vogelsang, Merced Lake, Sunrise and May Lake. I believe these should be closed. There is no tolerance for all of the human waste to enter this pristine and valuable area. The Secretary of the Interior should know about all of this and hopefully the use of nature in this way to be cut back and neutralized. Thanks,

Correspondence 25 **Project:** 18982 **Document:** 36040

ID:
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Urquhart, Andrew W
Outside Unaffiliated Individual
Organization:
Received: May,15,2007 00:00:00
Correspondence E-mail
Type:
Correspondence: May 15, 2007

Superintendent Yosemite National Park Attn: Merced River Plan P.O. Box 577 Yosemite, CA 95389

Dear sir or madam:

Please accept these comments on the Merced Wild and Scenic River Comprehensive Management Plan.

I am concerned with excessive commercial activities throughout this area, resulting in trampled meadows, contaminated water, and eroded trails that are polluted by manure, urine, dust, and flies. Too much of the Merced River watershed has become so degraded that visitors are forced to endure a "barnyard" experience rather than enjoying their national park.

There are three types of commercial activities in this area that need to be addressed:

I. The first is the riding stables in Yosemite Valley. The existing Yosemite Valley Plan, adopted in 2000, called for the removal of the riding stables from Yosemite Valley. This has not been done, and the result is contaminated water and eroded trails that are polluted by offensive manure, urine, odors, dust, and flies.. The Merced River Plan needs to specify that the stables in Yosemite Valley will be closed at once and the site restored.

II. Second, commercial packstock enterprises must not be allowed to operate freely, with few limits, in the Yosemite backcountry. These commercial packstock operations are resulting in eroded trails, trampled meadows, and contaminated water. The Merced River Plan needs to place stringent limits on these commercial enterprises to protect the River and surrounding meadows and wetland areas.

III. Third, the High Sierra Camps (HSCs) at Vogelsang, Merced Lake, Sunrise and May Lake are polluting the Merced River and should be closed. All the by-products of human occupancy are produced at the HSCs: sewage (human body wastes), "gray water" from showers, grease and detergent from kitchens. But there are no wastewater or sewage treatment plants. Wastewater and sewage from these facilities directly pollutes the meadows, soils, and waters of the Merced River watershed. Also, in order to service the camps, vast numbers of stock animals travel back-and-forth to haul the needed supplies. The result is badly eroded trails that are covered in stock manure, urine, flies and dust.

The Merced River Plan needs to address the currently excessive impacts due these commercial activities throughout the watershed.

Sincerely,

Correspondence 26 **Project:** 18982 **Document:** 36040

ID:
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Douglas, Graham
Outside Unaffiliated Individual
Organization:
Received: May,15,2007 00:00:00
Correspondence E-mail
Type:
Correspondence:

Dear Superintendent of Yosemite National Park, The National Park Service is drafting a new plan for the Merced River, the "Merced Wild and Scenic River Comprehensive Management Plan", covering Yosemite Valley and portions of the Yosemite Wilderness that drain into the Merced River. There are a couple issues that absolutely need to be addressed in this plan, especially considering the historic failure of the National Park Service to act on congressional legislation, specifically the California Wilderness Act of 1984, designed to assess the environmental impact of the High Sierra Camps and excessive stock use around the Merced River. I can attest from personal experience that the excessive use of stock animals results in trampled meadows and eroded trails that are polluted by manure, urine, dust, and flies. Believe me, hiking through some of this stuff is not conducive to the wilderness experience and certainly can't be good for the Merced River. In addition, high concentrations of visitors at the High Sierra Camps without proper waste water disposal facilities must be polluting the Merced River as well. I would like to urge the following actions ASAP: The Merced River Plan needs to address the currently excessive impacts due to pack and saddle stock uses throughout the Merced River watershed. Pack use needs to be reduced, monitored and enforced. Commercial packstock enterprises must be strictly limited to protect the Merced River corridor and the experience of park visitors who are adversely affected by the many impacts of these operations. The riding stables in Yosemite Valley should be closed, and the site naturalized, as called for in the Yosemite Valley Plan. These stables are resulting in contaminated water and eroded trails that are polluted by offensive manure, urine, odors, dust, and flies. The High Sierra Camps (HSCs) at Vogelsang, Merced Lake, Sunrise and May Lake are polluting the Merced River and adversely affecting the recreation experience. These HSCs should be closed, and the sites restored. Thank you for your address of these important issues when generating the Merced Wild and Scenic River Comprehensive Management Plan. Regards,

Correspondence ID: 27 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Arndt, Louisa
Outside Organization: Unaffiliated Individual
Received: May,15,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Attn. Superintendent

One need only step out on virtually any of the trails in Yosemite Valley to know that the use of saddle and pack animals has gotten completely out of hand and must be curtailed!

I love horseback riding. It's lots of fun, gets one out into the wilderness, and sitting in the saddle is a most enjoyable experience. BUT -- I also enjoy hiking, and the manure, urine, and churned up earth left behind on the trails by horses is not at all enjoyable!

What also must be considered is the erosion of the trails and the runoff from this equine cesspool, which contaminates countless streams and lakes, water resources that are used by the wildlife living nearby.

Then there are the flies, which are obnoxious and can spread disease.

The bottom line is that many park visitors as well as local wildlife are being adversely affected in the service of a relative few who ride and even fewer who profit from operating stables.

It is time for the Park Service to put serious limits on the presence of saddle and pack animals in Yosemite Park, and I believe it is your duty as Park Superintendent, in the service of ALL visitors to recommend such restrictions.

Respectfully,

Correspondence ID: 28 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Redmon, Floyd M
Outside Organization: Unaffiliated Individual
Received: May,15,2007 00:00:00
Correspondence Type: E-mail
Correspondence:

Dear Sir, Please address the problem of sewage from the High Sierra Camps. If they are to remain open, and they are a nice intro or limited strength way for people to experience the backcountry. They need to lessen their impact on the country they sit in, septic tanks and leach fields(?). I fail to understand the Park Service continued dependence on stock. In a time when backpackers are being told they may have to pack out their waste. Stock animals are defecating directly into streams if they wish. This is above and beyond their destructive hooves on trails and wherever they are penned. These are not traditional animals, remember they are not native to the USA. Foot traffic is traditional. I would prefer helicopter resupply to stock traffic on the trails. The stables in the Valley are supposed to be closed. Apparently someone forgot to comply. I would be in jail if I was this remiss. Lucky for the NPS they are above the Law. Thank you,

Correspondence ID: 29 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Riopelle, Richard
Outside Organization: Unaffiliated Individual
Received: May,17,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Superintendent Yosemite National Park Yosemite, CA 95389

Attn. Superintendent, Yosemite National Park

Subject: The need to address, in the new Merced Wild and Scenic River Comprehensive Management Plan, ways to eliminate the deleterious effects of pack and saddle animals and the High Sierra Camps on Yosemite National Park and on the experience of visitors and park personnel

Dear Superintendent,

As a long time visitor to Yosemite National Park, and as a member of the Yosemite Association and the Yosemite Institute, I would like to address the problem of pack and saddle animals and of the High Sierra Camps in Yosemite.

Though I like and enjoy horses and deluxe camps, I feel that they don't belong in Yosemite National Park, especially in the back country. Pack and saddle animals should be used only to the minimum degree for ranger patrols and rescue operations and eliminated from elsewhere in Yosemite, including Yosemite Valley, while the only non-intrusive High Sierra Camp is the one at Tuolumne Meadows.

Here are my reasons, for your consideration:

Whether stabled or carrying tourists and supplies on Yosemite Valley trails, on the trails from the Valley to the surrounding uplands (including to Little Yosemite Valley and Half Dome) or to the various High Sierra tourist camps and back country fishing and camping sites, pack and saddle animals contaminate rivers, meadows and streams, gouge deep ruts in meadows, wetlands, hillsides and trails, support irritating and biting horse flies, and create clouds of suffocating, polluted dust to breath and cover clothing, not to mention long lines of them intruding on many popular trails.

If you have ever been on one of the many Valley trails eroded by these animals into rocky, dusty fissures and irregular slabs of asphalt, and containing piles of fresh, smelly, manure and clouds of flies and dust while you try to munch a nice, crisp apple or eat a sandwich, you will know what I mean. Just try to take a quiet walk along one of the quieter side trails in the already overcrowded Valley, or around Mirror Lake, or up the trails to Vernal and Nevada Falls, Glacier Point, Little Yosemite Valley, Half Dome, or Merced Lake; or on trails out of Tuolumne Meadows; or out of Wawona; or into the wilderness areas of Yosemite from the eastern Sierra, then you will know what I mean.

There are trails to places we love to visit that just haven't been worth hiking for years because of the dust, erosion, defecation and flies of the pack and saddle animals, and the cesspools they create as they go. Being near them, and having to get off narrow trails in the high country to let 'trains' of pack and saddle animals and riders pass, is not a wilderness experience. It's more like a freeway with dust.

And all the excrement from these unnecessary animals pollutes streams, creeks, rivers, meadows, and lakes, as well as the plants, animals and the country side that people walk and backpack miles to view, fish in, and drink, places the National Parks were created to help preserve, 'for eternity.'

Pack and saddle animals are not like the deer, foxes and other animals in Yosemite. Horses and mules are much bigger and heavier, even without carrying riders and packs, and are shod with trail-destroying steel hooves, and they move in long lines, polluting and trenching and gouging the trails as they go. Look at the Valley-edge trails between Yosemite Village and Mirror Lake, for example.

Pack and saddle animals are outlawed on the streets in most towns and cities, most of which are no where near as busy and crowded as the Valley and trails of Yosemite. People have lots of other places to experience horseback riding and pack animal benefits: on Forest Service and Bureau of Land Management lands as well as private ranches. They don't need to run down and abuse National Park lands.

What also must be considered is the erosion of the trails and the runoff from this equine cesspool, which contaminates countless streams and lakes, water resources that are used by the wildlife.

The outfitters and packers have had years of notice and consideration, past the deadlines set when the National Parks system was created. What the public sees now is just another . Now it is time to put a stop to such commercialization in Yosemite, as well as other national parks. They outfitters and packers have plenty of other places to pollute and erode, just as snowmobiles and motor bikes do.

The bottom line is that many park visitors as well as local wildlife are being adversely affected in the service of a relative few who profit from operating stables. Let's put a stop to it now. For ourselves, our children and our children's children's benefit.

In addition, the High Sierra Camps are polluting the Merced and Tuolumne River and adversely affecting the recreation experience of countless park visitors every year. All of the High Sierra Camps, except the on at Tuolumne Meadows, should be closed, and the sites restored to their natural state. They are an unnecessary commercialization, intrusion, pollution and eyesore in many of the best parts of Yosemite. We avoided having Disney in a far corner of the park, only to continue to put up with pack and saddle animals and luxury camps through-out much of the park. It's time we stopped.

It is time for the Park Service to remove the commercial saddle and pack animals and High Sierra Camps from Yosemite National Park, and I believe it should be your duty and honor as Park Superintendent, in the service of the park and of ALL, visitors to recommend and diligently work for passage and implementation of such restrictions on your watch. Only rangers in the line of duty should be allowed to have and use pack and saddle animals in Yosemite National Park. Most tourists can go to a stable in their home

town.

Thank you.

Respectfully,

Correspondence ID: 30 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Cortes, Corrine
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,06,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent Tollefson, Attention: Merced River Plan, PO Box 577, Yosemite National Park, CA 95389 Merced Wild and Scenic River Comprehensive Plan. Quoting the original (Year 2000) Merced River Plan, "For the area zoned jointly 3A/3C on the south side of the South Fork of the Merced River in Section 35, should the National Park Service determine that new, high density housing is not required to be located in this zone, it is the intent of the National Park Service that any development for administration or operations in this zone be compatible in character, density, and scale to existing residential and commercial development in Section 35. The potential use of this Zone (as described under management zone 3A) will not change."So far as we can determine, there is no intent by NPS to modify this statement in the Revised Merced River Plan. In other words NPS continues to reserve the option of developing the south side of Wawona into camp grounds and administrative centers. We Wawona residents and property owners are currently engaged in hot debate over a proposed redevelopment of Camp Wawona, the Seventh Day Adventist facility located at the extreme end of Forest Drive on the south side of the Merced River in Section 35. Many of the issues raised in the current Camp Wawona debate will apply directly to any future NPS development on the south side. These include traffic on the single-lane Forest Drive, fire safety, water supply, and overloading the existing waste water treatment plant. However, the primary argument against the current Camp Wawona redevelopment plan is that it will set an unfavorable precedent for high density development by NPS under the language quoted above i.e. "compatible in character, density, and scale to existing residential and commercial development in Section 35." So we propose that park planners modify the Revised Merced River Plan language to remove the threat of high-density NPS development on Wawona's south side. So long as the language remains intact, many thoughtful Wawonans will be motivated to resist all NPS development in Yosemite. They will partner with MERG, FOYV, and the Sierra Club to delay everything in the Yosemite Valley Plan. They will lobby congress to cut the NPS budget in so far as it affects Yosemite development. As we see it, modifying the threatening language will enable us to engage in a sensible dialog where NPS and Wawonans identify common ground regarding Wawona's future. There have been many contentious issues in Wawona over the years. However, resisting high-density development is one issue where Wawonans are nearly unanimous. This includes Section 35 property owners, concessionaire employees, and NPS personnel that reside here. We invite park planners to join us through our representative organizations (WAPOA and WTPAC) to develop mutually acceptable revisions to the original Merced River Plan language. Sincerely,

Correspondence ID: 31 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Pederson, Pam
Outside Organization: Unaffiliated Individual
Received: Jun,06,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent, Yosemite National Park, P.O. Box 577, Yosemite, CA 95389 RE: Merced River Plan Dear Sir, My comments for future plans for the Merced River are: Save all the bridges in Yosemite Valley. They are not only National Monuments, they are scenic and useful. Please provide water fountains along trails so hikers and tourists can refill water bottles or just get a drink rather than drink straight from the river. Save the old Superintendent's House in Yosemite Valley. The building could be used as an educational center for all types of programs especially the Yosemite Institute. The restroom facilities should be reopened now since the area around the house is presently being used for art classes for the Art Center as well as Yosemite Institute. There are also picnic tables on the grounds around the house which serve well for outdoor classroom settings. Please, save the historic house along the Merced River and let it serve a useful purpose. Thanks for any consideration in this matter - especially the possibility of saving the old Superintendent's House next to the Merced River which could serve as an educational center.

Correspondence ID: 32 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Hamilton, David W
Outside Organization: Unaffiliated Individual
Received: Jun,06,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent, Yosemite National Park, Attn: Merced River Plan, P.O. Box 577, Yosemite, CA 95389 Dear Sir or Madam: I write to comment on the new "Merced Wild and Scenic River Comprehensive Plan. As a hiker and backpacker I am very concerned about the adverse impacts caused by excessive pack and saddle stock use in the Merced River watershed. This is especially problematic in the back country, where hikers expect a wilderness experience in a natural environment uncontaminated by stock animal manure, urine, odors, dust, and flies. But this is also noticeable and extremely offensive in Yosemite Valley because of the riding stables,

which result in contaminated water and eroded trails. Commercial pack stock enterprises do not have an inalienable right to conduct their profit-seeking operations in national parks belonging to us all. They must be strictly limited to protect the Merced River watershed and the experience of park visitors who are negatively affected by their excessive and polluting operations. In addition the High Sierra Camps at Vogelsang, Merced Lake, Sunrise, and May Lake pollute the Merced River and adversely affect the wilderness experience for all park visitors. These camps provide luxury vacations for relatively few people but result in far greater disruption to the wilderness and damage to the natural environment than do hikers or even stock users. They should be closed permanently.

Sincerely,

Correspondence ID: 33 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Peterson, Stan
Outside Organization: Unaffiliated Individual
Received: Jun,06,2007 00:00:00
Correspondence Type: Letter
Correspondence: Sir, Thanks for your hard work on the Merced Wild and Scenic River Revised Comprehensive Management Plan. Of the alternatives presented, I prefer and support Alternative 4. I'm particularly supportive of the lower annual visitor numbers.

Correspondence ID: 34 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Severns , Jamie
Outside Organization: Unaffiliated Individual
Received: Jun,07,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent Yosemite National Park, Attn: Merced River Plan, P.O. Box 577, Yosemite, CA 95389 As a frequent visitor to Wawona, I wish to voice my concern with the up and coming Merced Wild and Scenic River Comprehensive Management Plan. I am very concerned that the designated land use placed in Wawona would permit public campgrounds, and high density would be severely detrimental to the small mountain residential vacation home community, where I visit often. If this plan were implemented in Wawona, it would cause long-term major adverse impacts on the Wawona population and add lots of traffic and congestion. Additionally, the crime element would increase with high density. Please take into consideration of a frequent visitor to Wawona, by preserving the character of the Wawona Community by not allowing this designated land use. Sincerely,

Correspondence ID: 35 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Stevens, Mark
Outside Organization: Unaffiliated Individual
Received: Jun,07,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent Yosemite National Park Dear Superintendent Tollefson, When drafting the Merced River Plan please instruct your planners to address the impacts of stock animals on the Merced River drainage area. In particular, the plan should call for: Removal to the stables in Yosemite Valley as called for in the Yosemite Valley Plan adopted in 2000. All of the trails from the valley receive way too much human traffic. Stock animals contribute far more damage to trails than human plus the manure and flies they bring make for a barnyard rather than a wilderness experience on the trails. Reasonable limits on commercial stock animals on back country trails need to be established and enforced to prevent further trampling and damage to meadows, and to protect water quality. The High Sierra Camps need to be closed down if they can't be maintained without the trails leading to them being turned into the disaster areas they are now. Because so many stock trains are required to support these camps, the trails they use have been turned into miserable, dusty, manure ridden and fly infested lateral barnyards. Thank you for considering my points when drafting this new plan.

Correspondence ID: 36 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Edlund, David M
Outside Organization: Unaffiliated Individual
Received: Jun,07,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent, Yosemite National Park, Attn: Merced River Plan, P.O. Box 577, Yosemite, CA 95389 Dear Superintendent, The High Sierra Camps at May Lake, Merced Lake, Sunrise and Vogelsang severely pollute the Merced river. Use of these camps results in concentrated pollution of the Merced watershed from human waste from urine and excrement, gray water waste from showers, and kitchen waste from cooking grease and detergent use. With no sewage treatment these concentrated waste products directly pollute the water, meadows and soil of the Merced Watershed. In addition to the human caused waste pollution, the large number of stock animals needed to supply the camps result in excessive trail erosion and trails covered with stock manure and urine with the resulting

flies and sickening dust. Please include in the Merced River plan an immediate closure of these camps and their restoration to pre-use conditions. Please immediately implement the Yosemite Valley Plan of 2000 with regard to removal of the riding stables. Removal of these stables would reduce the stock travel necessary to maintain these stables. This would result in the reduction of eroded trails, contamination of water and trampled meadows. The particularly disgusting part of this stock travel is the urine, manure, flies, on the trail and manure dust breathe in while walking on the trail. Please specify in the Merced River Plan that the stables in Yosemite be closed immediately and the site restored to pre-use condition. The Park Service has allowed the use of stock to increase too much in recent years. The increased use of commercial stock are causing increasing erosion and pollution of the trails and contaminated water. Please have the Merced River Plan place severely reduced limits on these commercial enterprises in your effort to protect the Merced River and its meadows, wetlands, and trails from pollution and erosion. My personal recreation experience on the trails is very negatively affected by stock caused erosion and stock manure and urine which results in odors, flies and manure dust. I also worry about the resulting water pollution and its affect on my health. Thank you for your consideration of these suggestions. Sincerely,

Correspondence ID: 37 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Klein , John
Outside Organization: Unaffiliated Individual
Received: Jun,07,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent, Yosemite National Park, Attn: Merced River Plan, PO Box 577, Yosemite, CA 95389 Dear Superintendent, Re: The Merced Wild and Scenic River Comprehensive Mangement Plan revision, my wife and I urge the responsible committee to eliminate any thought of placing high density housing and/or more public campgrounds in Wawona. Since its founding as privately owned property, Wawona has offered visitors the opportunity to experience Yosemite in many unique and different ways. Today, visitors can still enjoy the character and quaintness of the Wawona Hotel, take a stage coach ride, walk through the restored pioneer village, rent their choice of rustic or modern cabins, enjoy the South Fork, swim and hike, and generally step back in time to see how life "used to be". We purchased land and built our cabin 25 years ago to be able to enjoy Wawona's uniqueness while escaping the crowds of suburbia. As parts of Californis continue to be inundated with huge growth and population density it is obvious to any observer that these areas soon lose the charm that attracted people in the first place! High density housing, more public campgrounds and the like are not in keeping with the small mountain residential community and would certainly be detrimental to the current tranquility that exists here now. Whenever huge crowds with outside interests congregate in an area, i.e. campers, part time employees, or whatever, there is a greater chance of unlawful conduct and the trouble and strife that comes with it. As conscientious owners of property and taxpayers we need reassurance that our efforts to retain the peace and harmony within Wawona are supported. Please keep Wawona as it is now so that future generations can enjoy what we all enjoy today. Respectfully,

Correspondence ID: 38 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Mattson, Phyllis
Outside Organization: Unaffiliated Individual
Received: Jun,05,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Linda Dahl Management. Yosemite National Park Linda and all, These are my main comments on the Merced Wild and ScenicRiver Comprehensive Management Plan which is now about 17 years overdue. I've been a visitor at Yosemite for over 50 years, and a volunteer NPS for 8 seasons. I love Yosemite, and hate to see it become a playground for the rich. Nevermind the Ahwahnee--but the cabins and rooms have become so expensive, especially the tent cabins. I believe we need to have more of the low cost accommodations to allow families to enjoy the beauty. Also, I think there should be more places where people can cook out and picnic. When I stay in a tent cabin, it is impossible to store the food in the small lockers near the bathroom, then take it to the car to drive around the park to picnic at the Sentinel Bridge, the closest place. How about having some tables near parking in the car lot of Curry to avoid long drives around the park? Or set some of those areas in the old river campgrounds. As an old person I need to stay in a cabin with bath, but that shouldn't prohibit me from enjoying outdoor cooking that is convenient (lockers near cars, tables close by) We need to encourage young people and nature lovers to visit and enjoy the park. They will be the potential supporters of parks in the future. After all, the park was established to protect the beautiful natural setting for future generations. It was not set aside as a means of making money. " Parking spaces are limited and not convenient for picnicking. A carrying capacity study is needed before making any changes. Refusing to do the River plan for almost 20 years, has wasted park (tax-payer's) money and time on law suits. Sincerely,

Thanks,

Correspondence ID: 39 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Rothell, Glen
Outside Organization: Unaffiliated Individual
Received: Jun,05,2007 00:00:00
Correspondence Type: E-mail

Correspondence: Merced River Plan Public Scoping Comments

1. The plan needs to include design guidelines

The plan should include design guidelines for the built environment that is in close proximity to the river. Such items as road and trail bridges, retaining walls, rip rap, etc that are built across or adjacent to the river need to be addressed in these guidelines. I raft the lower Merced frequently and always admire the masonry retaining walls that support Hwy 140. These walls are built of the same metamorphic rock that is present in this section of the river. On the other hand I am offended by the grouted granite rip rap that was placed following the flood. The grouted rip rap and granite materials are out of place in this section of the river. In the park there need to be guidelines that designers would have to adhere to whenever developing plans for development/reconstruction of facilities along the river. I recently referred to the section 7 guidelines for guidance on a project and the guidelines said to refer to the respective river plan for guidance. This river plan needs to include the guidance referred to. I would recommend all trail bridges be constructed of wood with stone masonry abutments/piers. For example, whenever Swinging Bridge needs replacement the formed concrete cribbed piers need to be replaced with stone masonry. I would also recommend the banning of grouted rip rap. A portion of the El Portal Road is scheduled to be reconstructed this fall. The grouted rip rap in this section needs to be replaced with masonry or dry laid retaining walls. Whenever rip rap is placed to protect a historic bridge the materials chosen need to match those present in vicinity of the bridge. These are but a few of the examples where guidelines are needed. The park has design guidelines for Yosemite Valley however these are not specific to the river environ and they do not apply to areas of the river outside the Valley.

2. The plan should include noise management

The park should manage noise within the river corridor. I find it very disturbing to hear loud unnatural noise while visiting the park. In particular the park should limit motorcycles access to the park if they do not meet certain noise levels. Many motorcycles have been modified to remove or limit their mufflers. These motorcycles should not be permitted to pass the park entrance station. Decibel meters could be available at each entrance for the staff to check the noise emitted by motorcycles. Those that exceed the standard should be denied access.

Thank you for considering these comments

Correspondence ID: 40 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Outside Organization: Brohm, Jim
Received: Unaffiliated Individual
Correspondence Type: Jun,07,2007 00:00:00
Correspondence: E-mail
Correspondence: Elexis: That Town Hall Meeting was held on the 29th of May. Sorry about that. You can use these comments as part of the public scoping. As far back that I can remember part of the master plan in the early 1980's was to ban vehicles within the valley and have staging areas for parking?? I thought one proposal was to have two areas one near El Capitan and the other at Foresta? If the surrounding communities were pro active they would work to develop staging areas near their communities. Maybe this would be on National Forest land which would include first class campsites. YARTS and Yosemite Transportation would shuttle to the Valley.

Correspondence ID: 41 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Outside Organization: Spindler, Gene
Received: Unaffiliated Individual
Correspondence Type: Jun,07,2007 00:00:00
Correspondence: E-mail
Correspondence: Thank you for the opportunity to provide scoping comments for the preparation of the Merced Wild and Scenic River Management Plan. I own a residence on Chilnualna Falls Drive in Wawona and the focus of my comments pertains to the portion of the South Fork of the Merced River as it traverses Section 35 in Wawona. As the NPS contemplates various land uses along this corridor I would urge that public campgrounds and high density employee housing not be considered as potential uses. These uses would be incompatible with the existing small mountain community of predominantly private dwellings in Section 35, many of which have absentee ownership. Among other things, the security issues raised by the potential of campers and concessionaire employees intruding on, and periodically making unauthorized use of private property would pose great opportunity for conflict and would in all likelihood create a heavier law enforcement burden on the Park than currently exists. Thank you again for this opportunity to offer comments and for your consideration of these remarks. Sincerely,

Correspondence ID: 42 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Outside Organization: Cano, Ramiro A
Received: Seventh Day Adventist Unaffiliated Individual
Correspondence Type: Jun,07,2007 00:00:00

Correspondence E-mail

Type:

Correspondence: Superintendent Yosemite National Park Attn: Merced River Plan PO Box 577 Yosemite, CA 95389 RE: Merced River Plan Scoping Comments As a church member and administrator of the Central California Conference of Seventh-day Adventists, owners of Camp Wawona, a 32-acre parcel located in Section 35, I would like to share a few thoughts regarding the Merced Wild and Scenic River Comprehensive Management Plan. It is my understanding that the plan would allow for public campgrounds and/or high density housing to be placed within Section 35. Camp Wawona has offered a consistent year-round camp experience for more than 78 years to families and children alike. We have long been a part of the Wawona community and any impact to the tranquil environs of Wawona directly affects the long-standing ministries of our church at the Camp. Our constituency, over 32,000-members strong, are committed to maintaining our nature-based ministries for many, many years to come. Although this is a Seventh-day Adventist owned and operated camp, those benefiting from its facilities and ministries have been individuals of all faiths and walks of life. The quiet, serene, peaceful, natural environment has been the center of our ministries and programs. In addition, the location of our property has been ideal for maintaining a "safe haven" for our children while maintaining the alcohol-smoking-drug free environment expected by parents who send their children to camp. Adjacent high intensity uses, as permitted by the proposed Merced River Plan in Section 35, would greatly impact, if not, alter the existing character of Wawona and significantly affect our church's ability to maintain the tranquil, worshipful, safe characteristic of our spiritual retreats and camps. Therefore, I respectfully request that you locate the high-density uses to areas outside of Section 35 that could more easily accommodate the demands of the planned uses. Sincerely, Executive Secretary

Correspondence ID: 43 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Sischo, Pat and Dave

Outside Organization: Unaffiliated Individual

Received: Jun,07,2007 00:00:00

Correspondence Type: E-mail

Correspondence: Merced River Scoping Comments This letter is in regard to the Merced Wild and Scenic River Scoping process. We are concerned about how the proposed management plan will affect the area we live in. Specifically, we are concerned about the zoning and planned use of federally owned areas in Wawona and especially within Section 35. The NPS recognized the value of Wawona years ago and joined with Mariposa County to co-sign a Specific Town Plan that prevented high-density housing. Even Yosemite National Park Superintendent David Mihalic, in letter to the Mariposa County Board of Supervisors recognized the uniqueness of Wawona: "Based on the congressionally mandated mission, the NPS cannot agree to any amendments to the town plan which change the small mountain community atmosphere of Wawona or which allow for more intensive development of the area." - David Mihalic, 17 February 2000 It appears the fate of Wawona is now in your hands. Will you decide to keep the charm of the last century or make Wawona just another busy "company" town? Wawona is a vital part of Yosemite National Park for the benefit of all visitors and should not be considered as an alternative site for possible development. The proposed re-zoning of Wawona for NPS or concessionaire employee housing should not be approved. We trust that after consideration of all the issues surrounding this difficult decision you will have the foresight to preserve the beauty, integrity and "small mountain community atmosphere of Wawona." OUR CONCERNS: 1. There should have been an OFFICIAL scoping meeting in Wawona. After all, the South Fork of the Merced runs through Wawona. 2. The Merced River plan should be complete before any further projects in the Valley Plan are carried forward. 3. The Swinging Bridge area in Wawona should have a user capacity established. 4. The Wawona Swinging Bridge area should have portable restrooms and garbage containers furnished by the NPS. Currently the Wawona Area Property Association funds potable restrooms there. 5. The expansion of Camp Wawona and the camp's adverse impact on the use of the Wawona Swinging Bridge area should be examined. 6. The Camp Wawona EIR fails to adequately address the project's adverse impacts on Park Service lands and resources, including the South Fork of the Merced River, water quality, fish and wildlife, noise and air pollution, and hydrologic resources. Will this be addressed in the new river plan before the Camp Wawona expansion is approved in its entirety? 7. The Camp Wawona EIR fails to address the project's adverse impacts on human health and safety, including air pollution, impacts on traffic congestion and safety, and fire hazards. Will these issues be addressed before final approval of the Camp Wawona expansion? 8. We also have a concern about what is done with the 'reclaimed' water from Wawona at the Wawona Wastewater Treatment Plant. If the river flow is adequate during the months of December or January to the month of June, this reclaimed water can be dumped into the South Fork of the Merced. When the river flow is low during those months, the reclaimed water cannot be sprayed on the golf course if it is covered with snow, and must be stored in on-site storage tanks. In the past, occupancy in Wawona during those months has been low, but with the increase in the occupancy of Camp Wawona of a potential of up to in excess of 200 guests, will the storage tanks be able to accommodate the additional amounts needed to be stored in a dry year? 9. The sewer line on the south side of Wawona is operated by lift stations along the line. When the power goes out, the pumps do not operate. A technician from the plant must come to the lift stations and manually turn on the generators. As times, heavy snow prevents that happening in a timely manner creating the possibility of a sewage spill. Is there a plan to prevent sewage spills in the South Fork of the Merced? 10. Will there be a NEPA study done on the widening and creation of turnouts on Forest Drive (as specified in Mariposa Staff Report for conditions for the Camp Wawona expansion) , which is adjacent to the South Fork in Wawona, to accommodate the traffic to Camp Wawona if the camp's expansion is allowed? 11. Will the additional construction, bus and automobile traffic created by the Camp Wawona expansion on Forest Drive create adverse impacts on the South Fork? 12. The northern half of the Wawona meadow is a 9-hole golf course, which was opened in 1918, and is the spray field for the reclaimed water from the Wawona Sewer Treatment Plant. The water in the meadow south of the golf course flows through two ditches, which were constructed to irrigate the meadow when it was a pasture. Most of the water in the creek, which flows through the golf course in the summer months, comes from seepage from the Wawona Sewer Treatment Plant spray field. The golf course is watered with treated sewer water. 13. Verify that when the Park Service purchased the Wawona hotel in the 1930's they agreed that the golf course would always remain a golf course. 14. There is a loop road around the south end of the Wawona meadow. This road is used as a bike and hiking trail. The DNC stables offer two-hour rides several times a day around the meadow loop. Park Service volunteers conduct flower, bird and other nature walks on the meadow loop. Clearly, the meadow loop has become one of the central recreation areas of Wawona. A part of the east side of the Wawona meadow has been cleared and is used as landing field and staging area for helicopters and fire crews for fire suppression and medical emergencies in the south end of the park. 15. A part of the intermittent creek which was classified as a "scenic river area" is within ten yards of Highway 41 (The Wawona Road). The Wawona Hotel, the Wawona Chevron Station, and the Wawona

Store and Gift Shop and their parking lots are located across Highway 41 from that creek. Because Wawona has become a parking lot for the Mariposa Grove of Big Trees, cars, recreational vehicles, and buses are parked between the highway and the creek. Many of the major Wawona tourist activities, including the Mariposa Big Trees Shuttle Bus stop, are located along that corridor. 16. The Wawona meadow should be excluded from the boundaries of the Wild and Scenic River Management Plan. By no stretch of the imagination do the developed areas of the meadow fit the description of a scenic river area as stated in the Act. The Wawona meadow has not been wild or scenic since the 1880's. It was the site for a dairy and a cow pasture irrigated by the Washburn Ditch from the South Fork. During the 1920's the meadow was a landing field for airplanes. From 1940 through the 1970's, the Curry Company used the Wawona meadow for company livestock. Until the Park Service purchased the Wawona Hotel in the 1930's, a large part of the Wawona meadow was used for the cultivation of vegetables for the hotel dining room and an apple orchard. IF the Wawona meadow must be included under the act, it should be placed in the "recreational river" classification. This section of the act includes areas "readily accessible" by road and has some development along their shoreline. If the Wawona meadow is to be included in the plan under the Wild and Scenic River Act, as the plan is advanced, a detailed map should be provided that illustrates which part of the Wawona meadow is to be classified as "Scenic" and which part is "Recreational". 17. Need for clarification of the use of the Flat Rock swimming area (formerly the Vagim property) and the need for adequate safe parking, restrooms, trash dumpsters, and picnic tables because of high use of river for recreation. The Wawona Area Property Owners Association currently funds portable restrooms at this area. 18. Area at the end of River Road in Wawona needs clarification - the need for restrooms, trash dumpsters, and picnic tables at that location because of the high use of river for recreation. 19. The abandoned government owned homes in the river corridor that need to be demolished or rehabbed for occupancy needs to be addressed. They are an 'attractive nuisance' and a fire hazard. 20. We believe that any designated land use placed in the Merced Wild and Scenic River Comprehensive Management Plan which would permit public campgrounds or high density employee housing within Section 35 would be severely detrimental to our small mountain residential and vacation home community: A) Wawona is a very small community 9 months of the year. There are approximately 150 residents here during the off-season. Placing 200 entry-level employees in Wawona would more than double our population. The Park planners need to look at the census data for Wawona. B) Employees living in the Valley do not need transportation. They can walk to work. They can eat in the cafeteria or buy fast food. They can rent a bike, hike, swim in the pools, ride the shuttle to various areas, or if they are injured or need medical help they can use the clinic. Wawona has none of the above. Does your plan include building the necessary facilities for this unwanted population? C) In the winter, when the road to the Valley is closed because of snow, how will the employee get to work? Have the planners looked at the record of how often Highway 41 is closed between Wawona and the Valley? D) The record indicates that the entry-level employee hired by YCS has a high incident of alcohol and illicit drug use. Do planners consider providing sufficient law enforcement protection for the local population? When a crime is committed in the Valley, facilities are available to incarcerate the individual. Do you plan to build a jail in Wawona, or provide additional law enforcement staffing? E) A location selected for the housing in dorm type buildings in Wawona is adjoining the SDA camp (a religious summer camp before their planned expansion). Are your planners sure they want to expose children in a religious camp to what will go on in these dorms? For a number of years we lived next door to the Spelt House in Wawona, where girls were house that worked at the Wawona Hotel. Our experiences were not positive to say the least. F) The employees who will be required to live in Wawona, and work in the Valley will not be happy about it. It will be at least a 45 minute ride to work 21. Replace parking spaces that have been eliminated/removed from the floor of the Valley to eliminate road congestion (air pollution) as drivers search for a place to park, or park illegally. 22. Rebuild drive-in campgrounds to pre-flood 1975 numbers (in and out of the Valley). 23. Establish a carrying capacity for the Valley. 24. Do not expand commercial operations at the expense of the campers, seniors, disabled, low income families with children, rafters, hikers, climbers, swimmers, fishermen and more. Don't turn the park into an elitist experience for only the wealthy!

Correspondence ID: 44 **Project:** 18982 **Document:** 36040

Project Name: Merced Wild and Scenic River Comprehensive Management Plan

Outside Organization: Aceto, Jeanne and Lou

Received: Unaffiliated Individual

Correspondence Type: Jun,06,2007 00:00:00

Correspondence: E-mail

Correspondence: June 6, 2007 Yosemite National Park Attn: Merced River Plan PO Box 577 Yosemite, CA 95389 To Whom It May Concern: In response to your call for scoping comments on what is supposed to be a new comprehensive management plan for the Wild & Scenic Merced River, we submit the following. We are less than enthusiastic about this exercise since you've made it clear you'd rather appeal the decision of the U.S. District Court than develop a plan that would truly protect the Merced River. In the past we've spent days, even weeks, analyzing and researching information in an effort to provide meaningful comments with the hope that the planning process would be conducted with integrity and that Park officials really were interested in guaranteeing protection for the River. We no longer believe that. When the 1997 flood occurred and Park officials conned Congress into front-loading Yosemite with \$200 million plans approved or not all in the feel-good name of flood repair, the planning process was permanently corrupted. With so much money burning a hole in the Park's pocket, officials admittedly gathered their special interest friends (i.e., Johanna Wald, Jay Watson, etc.) and together they redesigned Yosemite to fit their vision the public be damned. Unfortunately (for them/you), the best laid plans hit a pesky snag when in 1999 the U.S. District Court found the Park in violation of the Wild & Scenic Rivers Act for failing to develop a comprehensive management plan for the Merced River. And for the past 8 years, it's been more about how to get this River Plan thing over with and to get on with the bigger plans of spending all that money to remake Yosemite Valley. Ms. Mayer, and before her Ms. Rylands and Ms. Schneckenburger perhaps had all the best intentions but without support from the powers that be, intentions are meaningless. Now we have the Chief of Planning openly stating there is no intent to revisit the Yosemite Valley Plan. Yet the River Plan is supposed to provide direction and guidance for managing visitor use, development of lands and facilities, and resource protection" within the Merced River corridor while providing a "template against which future implementation plans are judged." So once again, it appears we will have a pre-determined River Plan designed to accommodate the already existing Valley Plan and its tiering EAs. Quite obviously, protection of revenue-generating facilities/activities is far more important than protection of the river. Previous Plans fail to connect the dots. The ORVs are poorly defined. They are supposed to be rare, unique, or exemplary in a regional or national context and must be river-related. The previous plans use the buzz words scenic, geologic, biological, cultural, recreation, scientific, and hydrologic processes. What do these words actually mean on the ground, what protection needs to occur, and how will that happen? For example, biological riparian areas and low-elevation meadows are the most productive communities in Yosemite Valley. The high quality and large extent of riparian, wetland, and other riverine areas

provide rich habitat for a diversity of river-related species, including special status species, neotropical migrant songbirds, and numerous bat species." Should it be assumed from reading this that biological is only about special status species?? Is habitat for special status species the only value of the riparian areas and low-elevation meadows? Am also unclear as to the uniqueness in terms of regional or national context. What scientifically objective method is used to decide which of these areas to protect and not protect? What constitutes protection and how do you plan to do that?? How do boundaries fit into that? Reviewing the indicators and standards: How does counting vehicles and parking spaces protect riparian/meadow habitat for special status species? How does 95% or greater compliance with food storage regulations in selected campgrounds and parking areas protect riparian/meadow habitat for special status species? Am assuming you are concerned about bears, squirrels, raccoons, etc. but are they the special status species the biological ORV is designed to protect? What does finding an open table at concession food service have to do with protecting riparian/meadow habitat for special status species? Your indicators and standards appear meaningless in light of how inadequately you've defined the biological ORV. You've then imposed a set of possible management actions; because you haven't connected the dots between the ORV, its current condition, why it needs to be protected, plans for protection and how the management elements (e.g., classification, boundaries, RPO, zoning, etc.) guarantee that protection, the public views this charade as just a bunch of arbitrary rules and regulations with no real purpose. Another example: Cultural ORV. You made the case that El Portal may contain the best-preserved archeological resources from the protohistoric and early historic periods associated with American Indian cultural change;" the area is listed on the National Register of Historic Places containing 17 known sites; and more. Yet you turned around and zoned most of the area 3C. Even the EPA objected to that. And your indicator/standard for protection of the cultural ORV in 3C is number of parking spaces occupied?? It makes no sense. The entire valley is culturally rich, but it is unclear exactly what needs to be protected and how it will be protected? Again, parking seems to be the primary indicator along with Usability of Ethnobotanical Resources. WHY does the cultural ORV always take the hit when it comes to development e.g., Yosemite Falls project, Yosemite Lodge, campground expansion, utilities, etc. Again, you have failed to connect the dots between the ORV, the zoning, and the indicator/standards and your decisions appear arbitrary and self-serving. Management zones appear to be based on transportation and development plans rather than based on protection of ORVs. For example, it is no secret that the 1994 Alternative Transportation Feasibility Study recommended closure of all campgrounds north of the Merced River for purposes of consolidating traffic circulation in preparation for mass transit. You claim this 175-acre area will be "restored," yet you turn around and zone it for day-use. NPS Director Fran Mainella testified at an April 22, 2003 Congressional subcommittee hearing: "Mr. Chairman, on replacement of campsites in the Lower Pines, Lower River, and Upper River campground areas in the valley. Using these areas for campgrounds that serve a limited number of overnight visitors would preclude making them available for greater numbers of day visitors to enjoy for hiking, picnicking, bicycling, and other activities." It is unclear how removing campsites serving a "limited number" of campers to instead make the area available for "greater numbers of day visitors" fits with ecological restoration. In the meantime, you are using this area as the source of all your environmental "net gain" as the other construction projects destroy the Valley only to ultimately turn it into day use serving "greater numbers." Meanwhile, plans call for the dismantling of long-established North Pines Campground to create some RV and walk-in sites across the street a transfer of impacts to a currently undeveloped area. There is no discussion as to how this decision relates to ORVs or to visitor capacity. The 1982 WSRA Federal Register Guidelines states that "studies should be conducted during preparation of the management plan to determine the quantity and mixture of recreation and other public use which can be permitted without adverse impact on the resource values of the river area." Where are these studies and what options with respect to quantity and mix of recreation did they offer?? Could campgrounds be rotated? What about an area set aside for auto-based tent camping separate from RVs and trailers as was suggested in the 1980 GMP? What about pockets of auto-based camping dispersed throughout the area as opposed to stuffing as many campers as possible in one spot as happens at Upper Pines? What about mixing uses some pockets for camping, some pockets for solitude, etc.? The Park autocratically closed this area down and then zoned it for day use. In a gesture of arrogance, you rushed to tear the utilities out ASAP to further dismantle the area as if day visitors won't have to go to the bathroom?? The public has never had a chance to consider other options or a mix of options that would still protect the nebulous ORVs. Why not?? As stated earlier, another example is the 3C zoning in El Portal with respect to the Cultural ORV. Documents indicate it was more about accommodating the pre-existing Valley Plan than about protection. And there are numerous other examples where the zoning is tied to previously planned infrastructure development. Yet you want to rezone low amenity, low impact picnicking opportunities (e.g., Swinging Bridge, Church Bowl) while imposing restrictions on other area (e.g., Cathedral Beach, Sentinel Beach) less about preserving the River than preserving your busing plans and rafting concession. You haven't connected the dots to any of this with respect to preserving/enhancing ORVs, capacity, zoning, RPO, etc. An observation based on your current land-use zoning: Seems you need to consider a couple of new ORVs as justification. One might be Revenue Generating Facilities/Activities for the Concessioner especially since Delaware North/Yosemite enjoys "the richest single contract in the national park system" (LA Times, 5/26/07). Such an ORV would legitimize the destruction caused by the commercial raft concession, the upscale lodging development at Yosemite Lodge and Curry Village, elimination of Valley campgrounds to facilitate the busing scheme, expanded restaurant seating, the utilities expansion, etc. Another ORV might be Fundraising/Public-Private Partnerships enabling the Yosemite Fund to continue to leave its imprint on the Valley. Such an ORV could justify the destruction that occurred with the Lower Yosemite Fall project with the cutting of hundreds of trees, building the mini-lodge bathroom, and construction of the outrageous bus stop. \$12 million in exchange for eradication of Native American heritage what a trade-off!! And now the Fund wants to raise another \$12 million to rebuild the Happy Isles Bridge (after Superintendent Tollefson raved about the benefits to the River with respect to its removal) and redo the Valley Loop trail enabling Yosemite Valley to look more and more like Central Park in New York City. Do we sound cynical you bet!! But that's about as much sense as your current land use zoning makes. User capacity should determine types and levels of use, rather than allowing types and levels of use (management zoning) to define user capacity. Cause and effect It might be interesting to study who exactly is your "day visitor." Did you actually manipulate increased day visitation by removing 60+% of overnight accommodations? And won't your plans to develop campsites outside of the Valley end up creating even more day visitors? You are concerned about the trampling impacts on the banks of the Merced from residents of the new employee dorms across the street from the River; you are concerned Southside Drive might fail as a result of the tremendous amount of digging for the utilities as part of the placement under the road should the river rage at some point? Now you have to build fences everywhere to stop what you have created while the River and the visitors bear the brunt of your decisions. Why is there a commercial rafting concession? Do the profits justify destruction of Sentinel Beach? Again, the NPS is allowing the concession and the oversized diesel pick-up vehicles knowing full well that the "effect" will be destruction of the riparian area and the solitude of this tucked away low amenity family picnic facility. You want to put visitors on buses as a way of ensuring open-ended visitation. But the "effect" of that decision means over-engineering the roads with increased asphalt, widening/realigning the roads to accommodate oversized vehicles, and the creation of centralized and expanded infrastructure; how many more natural and cultural resources will be destroyed. Does a 22-bay transit depot belong in the heart of Yosemite Valley?? You are changing the visitor experience from one of individualized exploration to assembly-line tourism as individuals are hurried from profit center to profit center. This is the third time we've participated in scoping. Though you've indicated our earlier comments will be considered, we've pasted in our 2005 comments anyway since they deal in depth with the

subject of user capacity. Sincerely, Jeanne and Lou Aceto

Correspondence ID: 45 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Oswald, Caron
Outside Organization: Central California Conference of Seventh-day Adventists Churches, Religious Groups
Received: Jun,07,2007 00:00:00
Correspondence Type: E-mail
Correspondence: June 7, 2007 Superintendent Yosemite National Park Attn: Merced River Plan PO Box 577 Yosemite, CA 95389 RE: Merced River Plan Scoping Comments Superintendent: I have just learned that the National Park Service is seeking comments regarding the Merced Wild and Scenic River Plan and its impact on Section 35. For 78 years, we, the Central California Conference of Seventh-day Adventists, have been part of the Wawona community. We own a church camp at the end of Forest Road that operates year-round for families, church groups, retreats, and summer camp. We are so blessed to own property in the beauty and majesty of Yosemite. The natural setting, the quiet, the safety create the perfect atmosphere to experience God as our creator, to educate our children about the wonder of nature, to provide a place for rest and relaxation and community with each other and God. I have two major concerns for you to consider when planning high-density employee housing and new public campgrounds: #1 The safety of our children during summer camp season (June-August) and our weekend retreat attendees, which often include children, during September through May. #2 The impact and significant change to the environment in Section 35 ? its character, sound, feel, safety. Our camp ministries would be forever negatively altered if the above changes were made. The experiences that we so value and want to continue to pass on to future generations would certainly be compromised. In time ? maybe even extinct. Thank you for your thoughtful consideration in these matters. Sincerely,

Correspondence ID: 46 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Minault, Paul
Outside Organization: Access Fund Unaffiliated Individual
Received: Jun,07,2007 00:00:00
Correspondence Type: E-mail
Correspondence: June 7, 2007

Superintendent Michael Tollefson Yosemite National Park P.O. Box 577 Yosemite, CA 95389

Re: Scoping Comments on the Merced River Plan

Dear Superintendent Tollefson:

The Access Fund is pleased to submit these scoping comments on the Merced Wild and Scenic River Comprehensive Management Plan ("MRP" or "Plan").

The Access Fund The Access Fund is the only national advocacy organization with the mission to keep climbing areas open and conserve the climbing environment. A 501(c)3 non-profit supporting and representing over 1.6 million climbers nationwide in all forms of climbing rock climbing, ice climbing, mountaineering, and bouldering the Access Fund is the largest US climbing organization with over 15,000 members and affiliates. The Access Fund promotes the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers.

The Access Fund has a long history of participation in Yosemite National Park ("YNP") management initiatives. For example the Access Fund submitted extensive comments on the 2000 Valley Plan, the 2001 Yosemite Falls Plan, the 2003 Yosemite Lodge Redevelopment Plan and Valley Implementation Plan, the 2005 Merced River Plan and scoping comments for the Tuolumne River Plan in 2006. The Access Fund also testified at a 2003 congressional field hearing in YNP regarding the Yosemite National Park Parkwide Out Of Valley Campgrounds Study, and provided lengthy informal input regarding a climbing management plan for Yosemite Valley and a redesign project for Camp 4 (which was partially addressed in the Lodge Redevelopment Plan). The Access Fund also provided grant funding for bear boxes placed at strategic locations in Yosemite Valley to serve the needs of wall climbers who lack food storage in the Valley while they are on overnight climbs. The Access Fund continues to work with NPS planners at YNP regarding future planning initiatives and implementation plans, such as those scheduled that will affect El Capitan Meadow, Camp 4, general climbing policies and camping issues parkwide.

The Access Fund supports all types of climbing, from urban sport climbing to pristine alpine wilderness mountaineering, including climbing experiences in protected environments such as those mandated by the Wild and Scenic River Act (WSRA). NPS policies support activities (like climbing, backpacking and camping) that promote a "direct association with park resources." Accordingly, the Access Fund supports the protection required by the WSRA while also supporting NPS planning and management decisions that

maintain the current level of climbing activity and facilities used by climbers in Yosemite Valley and the Merced River corridor.

Access Fund Scoping Comments The Access Fund's primary comments regarding the scope of planning for the MRP are as follows

? Increase camping opportunities, especially the more primitive, walk-in and group sites that best serve climbers and other low-impact recreational users.

? Preserve and enhance roadside parking in the Valley that provides access to climbing and other recreational opportunities.

? Preserve and increase picnic facilities. Picnic facilities in Yosemite Valley and along the river are valued by climbers and other day users who are camping outside the Valley or the park.

? Reduce noise from motorcycles and RV generators. These noises significantly degrade the experience of climbers and other park visitors. The plan presents an excellent opportunity to bring them under control.

? Recognize climbing as one of the outstanding recreational values of the river Corridor. The Valley's granite walls are recognized by the U.S. and international climbing communities for the seminal role they played in the development of climbing and for the challenge they continue to present to climbers today. If there is one place in the U.S. where the climbing opportunities present a remarkably outstanding value to the world community, Yosemite Valley is the place.

The NPS Should Retain and Increase Camping Opportunities in and Near Yosemite Valley

As the Access Fund testified at the congressional field hearing on the 2002 Yosemite Parkwide Campground Planning Study (the Campground Study), Yosemite has a parkwide shortfall of 1,000 campsites from the number projected for the park in the 1980 Yosemite GMP, with a shortfall of nearly 300 campsites in Yosemite Valley. Currently, the demand for camp sites greatly exceeds supply in both Yosemite Valley and YNP as a whole. Accordingly, in the Plan, the NPS should make every effort possible to increase the number of campsites in the Valley. Providing camping opportunities furthers important park management policies. In our comments to the Valley Plan and the Campground Study, we pointed out the many ways that camping promotes the enjoyment of Yosemite National Park through the direct association with park resources called for in NPS Management Policies, enhances the visitor experience, and furthers park values.

For purposes of the MRP, camping is an important recreational activity. The MRP should explicitly recognize camping as consistent with the recreation ORV. The MRP should also explicitly distinguish camping, which a recreational activity appropriate to a park, from staying in developed lodgings, which is a form of leisure more appropriate to a resort. The camper is exposed to the park environment and has to carry, prepare and manage his own food, shelter, light, heat and protection from wildlife, insects, and the elements. Staying in developed lodgings is not a recreational activity but a form of leisure emphasizing the consumption of personal services in a highly developed physical plant that separates the visitor from park resources. Camping brings the visitor into a direct relationship with park resources and distances the visitor from the commercial values of comfort and convenience and the expression of social status through consumption that pervade American society. Camping brings the visitor closer to nature, the simple necessities of daily life, and the way people lived in the past.

Also, camping is democratic. In campgrounds, social distinctions account for little, and camping has the potential to bring people together in shared appreciation of their natural surroundings in a manner that reduces social barriers. The nations' great parks present an opportunity to be a force for social equality. Unfortunately, the lodging picture in Yosemite, particularly the Valley, preserves the social distinctions of the greater society, rather than leveling them, which we believe should be a goal of the parks.

Further, camping is inherently communal. Campers live in the open in close proximity to others and have to adapt their behavior to accommodate others' needs. Campers thus have an enhanced opportunity to associate with other people, develop new relationships, and broaden their social horizons through the camping experience. Camping also fosters the development of relationships within existing groups by bringing people together in simple and informal surroundings free of the consumer competition and hierarchical relationships of the greater society. This aspect of camping is recognized in the Campground Study, which calls for more group sites and more closely-related "buddy" campsites.

The NPS Management Policies' emphasis on visitor experiences that foster a "direct relation" to park resources immediately suggests a natural hierarchy of overnight opportunities for park visitors. Visitors' overnight experiences that foster the most direct relationship with park resources should be accorded the highest priority in park planning, while those that foster the least direct relationship with park resources should be accorded the lowest priority. Accordingly, the most primitive experiences that rely on the least man-made infrastructure should be the overnight experience that is most preferred by the NPS, as reflected in planning documents. Thus, for the MRP, in considering visitors' overnight experiences, the NPS should prioritize backcountry camping first, followed in order by walk-to and walk-in campsites, drive-in campsites, RV camping, and finally developed lodgings.

The NPS Should Preserve and Enhance Roadside Parking that Serves Recreational Uses including Climbing.

Many small and informal parking areas, particularly in the West Valley, serve to provide access to climbing routes. Until a transportation system is developed that serves the West Valley with a frequency and duration that effectively serves climbers' needs (including off-hour and off-season), these informal roadside parking areas should be preserved for use by climbers and other

recreational users.

We also think that overnight parking for big wall climbers should continue to be available at trailheads, including trailheads for the West Valley walls at Leaning Tower and El Capitan. And providing this parking should not be considered as giving climbers special treatment, it is simply affording climbers the same level of convenience for overnight parking that lodgers, campers, and wilderness users have.

The NPS should Preserve and increase Picnic Facilities

Picnic facilities serve the day visitor in much the same way that campgrounds serve the overnight visitor. They offer a place to escape the developed facilities of the Valley and enjoy the park in a more natural, less commercial setting. Current picnic areas are often crowded, however. The west-Valley and mid-Valley areas offer opportunities for additional picnic areas that should be considered in the Plan. The NPS Should Reduce Noise from Motorcycles and RV Generators

Loud noise from motorcycles and electric generators has greatly diminished the ability of climbers, campers and other visitors to enjoy the natural soundscape of YNP, particularly in Yosemite Valley, where motorcycle noise reverberates in the confines of the valley and strongly impacts other park visitors.

Such urban intrusions are especially inappropriate in a park setting, particularly one where wilderness overlooks all park roads. Motorcycles roar into Yosemite Valley daily, with large groups on holiday weekends that fill the road corridor with a tremendous ear-shattering thunder that can be heard for miles into the wilderness. This noise exceeds not only NPS regulations and soundscape management standards but the standards of the California Vehicle Code, and the mandates of the Wilderness Act and the WSRA. Inexplicably, the Park Service has made absolutely no effort to enforce the noise standards of any of these authorities. The MRP is an opportunity to correct that deficiency.

Likewise, RV generators in the Valley campgrounds regularly violate NPS soundscape standards, as well as the soundscape standards outlined in the WSRA. Under the park's camping regulations, RVs are allowed to run their generators from 7 a.m. to 7 p.m. This generous period makes it impossible for tent campers enjoy preparing and eating their dinners without disturbance or sleep late in the mornings. Our members have had frequent conflicts with inconsiderate RV users in the campgrounds. The Plan presents an excellent opportunity for the NPS to correct this long-standing deficiency in its campground management.

NPS policy strives to "preserve, to the greatest extent possible, the natural soundscapes of parks . . . [which] exist in the absence of human-caused sound." NPS policy also endeavors to "restore to the natural condition wherever possible those soundscapes that have become degraded by unnatural sounds (noise), and will protect natural soundscapes from unacceptable impacts."

Accordingly, in the plan the NPS should analyze and propose mitigation measures for loud motorcycle noise along the river corridor, RV generator noise in campgrounds and other noise sources that violate California law, NPS policies, and the mandates of the WSRA and the Wilderness Act. NPS planners should identify what levels of human-caused sound can be accepted within the river corridor and propose specific actions to reduce noise above those levels. At a minimum, this must include reducing motorcycle and RV generator noise to levels acceptable to other park visitors.

Climbing Should be Explicitly Recognized as One of the Outstanding Recreational Values of the Merced River Corridor

The Wild and Scenic Rivers Act provides that, unless otherwise designated by the managing agency, the planning boundaries of a river "shall generally comprise that area measured within one-quarter mile from the ordinary high water mark on each side of the river." For the Merced River, this area includes most if not all the major climbing areas in the Valley, including its big walls. The Valley's climbing resources are recognized as having worldwide significance. Consequently, climbing should be recognized in the Plan as one of the outstanding recreational values of the river corridor.

The Access Fund welcomes this opportunity to comment on the Merced River Plan. We hope that these scoping comments assist the NPS in identifying the proper planning scope for the river management corridor and produce a better plan.

In short, we support increasing the number of campsites in Yosemite Valley, preserving existing parking areas along the river corridor that serve climbing and other recreational uses, retaining and increasing picnicking areas, reducing motorcycle and RV generator noise, and recognizing climbing as an outstanding recreational use in the river corridor.

Sincerely yours,

Correspondence ID: 47 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Organization: Page, Jerry N
Received: Seventh Day Adventist Unaffiliated Individual
Correspondence: Jun,09,2007 00:00:00
Letter: Letter

Type:

Correspondence: Superintendent, Yosemite National Park, Attn: Merced River Plan, PO Box 577, Yosemite, CA 95389, Subject: Merced River Plan Scoping Comments Superintendent: I've been informed that the National Park Service is now seeking comments regarding the Merced Wild and Scenic River Plan. Please accept the following observations and comments. As president of the Central California Conference of the Seventh Day Adventists, I have been elected to speak on behalf of the 32,000 members of our church in the central portion of California. We have long been a part of the Wawona Community, specifically Section 35, as we have operated Camp Wawona within this community for over 77 years. We appreciate our relationship with the Park Service and over those years have been able to bring thousands of young people and adults to appreciate the beauty and natural environment of Yosemite. The peaceful and grand atmosphere of Wawona has been a wonderful environment for our people to appreciate the great Creator and come apart for worship, training, fellowship, and to commune quietly with God. My understanding is that you are preparing a new land use plan which will dictate the continued use of Wawona. We would like to ask that you consider not locating new public campgrounds or high-density employee housing within Section 35. We believe that such high intensity uses could be a serious detriment to the mission and ministry of Camp Wawona. I would personally hope that you could locate any such high-density uses in some other area which would not have a negative effect on the tranquil environment, children, and other benefits derived from the current situation in Section 35. We have also chosen to maintain an environment free of alcohol, smoking, drugs, and secular music for our guests and church members. We also have numerous children on the campground during various camps and would be concerned about high-density housing or campgrounds being too close to them. Camp Wawona as a Seventh-Day Adventist camp, does observe the Sabbath from Friday sundown until Saturday at sundown. This leads to a quiet atmosphere for worship, prayer, reflection, and the avoidance of unacceptable activities. It is seen as a "safe haven" in the beauty of Yosemite and nature for the carrying out of Seventh-Day Adventist beliefs and teachings. Adjacent uses which prevent or negatively influence that Sabbath observation could deprive Adventists of their right to worship according to our beliefs. Again, we appreciate very much the relationship that we have had with the National park Service over the years and are only expressing our comments during this scoping period as requested. Thank you for serious consideration of our comments. We pray for wisdom for you all as you try to manage the tremendous asset and gift that is Yosemite National Park. Sincerely,

Correspondence ID: 48 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Tabingo, Nelson

Outside Organization: Seventh Day Adventist Unaffiliated Individual

Received: Jun,09,2007 00:00:00

Correspondence Type: Letter

Correspondence: Superintendent, Yosemite National Park, Attn: Merced River plan, PO Box 577, Yosemite, CA 95389, Subject: Merced River Plan Scoping Comments Superintendent: It is my understanding that the National Park Service is now seeking comments regarding the Merced Wild and Scenic River Plan. I would like to offer the following observations and comments. As a member of the Central California Conference of Seventh-Day Adventists, I (we) have long been a part of the Wawona community, specifically Section 35. The Central California Conference has operated a church camp within this community for over 75 years. During that time, we have been instrumental in introducing thousands of young people and adults to the majesty and tranquility of Yosemite. Yosemite and Wawona in particular has provided us with the magnificent showcase of God's holy creation. Within the peaceful environs of Wawona, we have been able to educate the mind, the body and the soul of our campers. As you prepare the land use plan, which will dictate the continued use of Wawona, we would ask that you consider not locating new public campgrounds or high-density employee housing within Section 35. Such high intensity uses would forever alter the existing character of Wawona and significantly affect the environment, which we have come to rely on as an integral component of the Camp's ministry. I would urge you to locate such high-density uses in an area that can more easily accommodate the increased noise, traffic, and demand for commercial uses, which will be the byproducts of such uses. I respectfully request that you look elsewhere for the land to develop these uses. Thank you for your consideration of our request on behalf of the Treasury department of Central California Conference. Respectfully Submitted,

Correspondence ID: 49 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Neuman, Beverly

Outside Organization: Unaffiliated Individual

Received: Jun,09,2007 00:00:00

Correspondence Type: Letter

Correspondence: Superintendent, Yosemite National Park, Attn: Merced River Plan, PO Box 577, Yosemite, CA 95389 Sir: I have been backpacking in the Sierra Nevada range since 1975. Mostly, I have enjoyed my 10-12 day hikes stemming from Tahoe south to Cottonwood. Of course, I have noticed the horrible results from too many pack and saddle stock on most of the trails. I have voiced my opinion before and will continue to do so until the situation is remedied. In the Calif. Wilderness Act of 1984 congress stipulated that the Secretary of the Interior should document current baseline operational and environmental impact conditions of all the High Sierra Camps with annual assessments and documentation to the Secretary. If adverse impact on the environment was found, these facilities were to be promptly terminated, the facilities removed, and the sites naturalized. Section 9 of that bill states that these areas should be designated as Wilderness. The Park Service has never conducted the monitoring requested by Congress. How can this be? It is very clear that pollution has and is occurring. Please close them once and for all. There there are the riding stables in Yosemite Valley. The Yosemite Valley Plan which was adopted in 2000 (and still exists) demanded removal of the riding stables from Yosemite Valley. They are still in operation. How can this be?? There is continual erosion and pollution of water and trails in Yosemite Valley. I avoid that area as much as I possibly can. The Merced River plan needs to place definite limits on commercial pack stock. In recent years they increased doing much damage to trails, meadows and water. Crabtree Meadows used to be so beautiful. The last time I was there the camp sites were so full of horse manure, the ranger had to spend much time clearing it away. The people operating the

pack stock seem to have no manners for others regarding their animals' waste. The number of backpackers allowed to hike is well regulated. Why not the stock? They do more damage to trails than all the backpackers put together. I love the Sierra Nevada Range and have enjoyed my hikes except for the pollution caused by careless packstock of the soil and water and meadows. The whole beautiful range should be kept pristine in every area. The odors, dust and pollution by pack and saddle stock is increasing and offensive to those of us who enjoy nature as it was meant to be. Thank you for doing what you can to remedy this situation. Hikingly yours,

Correspondence ID: 50 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Andrews, David

Outside Organization: Yosemite-Mono Lake Paiute Indian Community Unaffiliated Individual

Received: Jun,09,2007 00:00:00

Correspondence Type: E-mail

Correspondence:

RE: Merced River Plan: Public Comments from Interested Parties and the Public Many of our group have concerns that our Paiute people are not being properly cared for and not being properly identified, especially during excavation and burial in and around Yosemite, Hetch Hetchy, El Portal and along the Merced River. We Paiutes are aware that many items found in El Portal and along the Merced River in previous digs were obsidian from Paiute areas and brown ware that comes from the Owens Valley Paiute area. Before whites entered the area Paiutes and Miwuks did not get along. C. Hart Merriam wrote that trade between the two groups did not occur until the 1870s. That would indicate that early Yosemite items were more likely found there because of a Paiute presence, and not Miwok. Certainly Paiutes traded with Tenaya's band, but Tenaya was documented to be born and raised at Mono Lake and Tenaya was documented in Dr. Lafayette H. Bunnell's book Discovery of the Yosemite, the bible of Yosemite Indian history, to be the founder of the "Paiute Colony" of Yosemite, Chapter 18. Tenaya was himself 1/2 Ahwahnee and 1/2 Mono Lake Paiute. Ahwahnee is part of our known legends. Something the park service does not know. Tenaya married a Mono Lake Paiute woman and that is documented. His children were 3/4s Mono Lake Paiute and not Miwok. Yosemite National Park Service should really read the only major book written by one of two white men to meet Chief Tenaya. The other person was a Stockton Republican newspaper reporter who went with Mariposa Battalion. He wrote that the Yosemitees were the "Monahs" from the other side. We spoke to a Yosemite NPS ranger and he stated that they are supposed to interpret Yosemite History accurately and not deviate from the earliest sources. Then we don't understand why Yosemite NPS is not using the earliest written accounts of the men who met Chief Tenaya and his band? If they wrote that the Yosemitees were Mono Paiutes and Tenaya was the founder of the Paiute Colony of Ahwahnee, that Tenaya spoke Paiute and that the majority of his people were Mono Paiutes, than why are they still identified as Miwuks? Is it because current and former Yosemite National Park Indian employees can meet the seven point criteria for federal recognition as Southern Sierra Miwuks? It was written in the Guide to the Yosemite Cemetery by Park Service employee Martha Lee and Hank Johnston for the Yosemite Association that Captain Sam is buried in El Portal on page 28. Captain Sam was a full blooded Paiute and not a Miwok. All his governmental documentation and Indian census rolls state he is a full blooded Paiute. Many of his descendants are shattered through out the many different Paiute bands. Henry or Chaparrada was a Mariposa and Mono Lake Paiute who also lived in El Portal. He is a full blooded Paiute. He was documented living at El Portal, Yosemite and Mono Lake. Chief One-eyed Dick is a descendent of Topay'nia, it is documented that he shares the same ancestor as Paiute Lancisco Wilson. There is no getting around Lancisco Wilson's grave marker in Yosemite Indian Cemetery with the large "Piute". Chief Dick's son Charlie Dick, brother of Sally Ann, in early Yosemite census, while others, mainly Yokuts, said they were Diggers, he said he was "Piute". The name Topay'nia, written by white people, looks exactly like "Rock Chief "(father) in Paiute "Tupee'na'ah". Chris Brown's ancestor on his father's side was "Mono" Brown, not Miwok Brown. On his mother's Lena Brown, she was Yokut, Washo-Paiute. Rube was a Washo-Paiute who ended up like the other Yosemite Indians living around Coleville. That were Lena, Joe and Lulu got their name "Rube" from. Not from Paiute Captain Rueben, the orphan who ended up in Benton. Rube was not the orphan as Craig Bates wrongly wrote that was captured by the Mariposa Battalion, because he knew his parents. Also Lena Brown's mother was not Indian Mary, who was documented in early times as "Mono" Mary. This was another mistake written by Craig Bates. We would like these questions answered and added to the comment period regarding the Merced Plan; 1. If items along the Merced River during any excavation are made up of obsidian from Mono Lake Paiute area and brown ware from Owens Valley, why are the skeletal remains identified as Miwok? 2. If Yosemite National Park Services uses C. Hart Merriam as identification of sites why is there no mention of trade starting in 1870s? Meaning that the Paiute items found in the area were from Paiute occupation and not a Miwok presence. 3. What happened or happens to the early Indian remains found at El Portal and along the Merced River? Where are they stored? 4. Who determines what tribe the skeletal remains are or what or how are the remains are to be handled? 5. Why is the non-profit group The Southern Sierra Miwuks in charge of Paiute remains if the group is identified as Miwok? 6. Which Paiute group is in charge of the Paiute remains and burial ceremony? The group should be from a federally recognized Paiute tribe and not a non-profit group. A letter from the Tuolumne Mewuks, to let the non-profit Southern Sierra Miwuks, take the lead in Miwok burials and ceremonies does not cover the Paiutes buried along the Merced River. There should be a Paiute group from a federally recognized tribe in charge of burial ceremonies and any remains found along the Merced River. The Paiute people are not the same as Miwoks. We have a different language, customs and burial ceremonies. 7. There should be federally recognized tribes there to officiate, pray in the Paiute language and use Paiute tribal burial and recovery of remains ceremonies. 8. Why is a non-profit Southern Sierra Miwok in charge of burial and recovery? A letter from Tuolumne Mewuks is not satisfactory for many Paiute people. 9. Why is Yosemite National Park Service using current and former employees, who also formed a non-profit called the Southern Sierra Miwuks, to be the lead group in any identification, handling, ceremonies, burial, or determination? They are not a federally recognized tribe. The non-profit Southern Sierra Miwuks do not even know their own history and have changed many aspects of their own genealogy to fit their seven point criteria to become a federally recognized tribe. Just this fact should disqualify them as the group in charge. We object to the American Indian Council of Mariposa aka the Southern Sierra Miwok 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. We object to the fact that the non-profit American Indian Council of Mariposa and persons who are in the group have not proved they are an official BIA and United States recognized group are handling our ancestors and burial sties. They have not proven that they are even American Indians by BIA and U.S. government standards. We Paiutes request that official recognized tribes from the different groups be in charge of the Merced River Plan and not non-profits made up of current and former Yosemite NPS employees who have not been of ficially recognized by the federal government. We are also aware

that the American Indian Council of Mariposa is paid consultation fees. We request the same consultation fees for the Paiute tribes that are included in this process. Yours truly,

Correspondence ID: 51 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Peterson, Norman
Outside Organization: Seventh Day Adventist Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Superintendent, Yosemite National Park, Attn: Merced River Plan, PO Box 577, Yosemite, CA 95389, Re: Merced River Plan Scoping Comments Superintendent: Camp Wawona has been conducting summer camps for Children and Spiritual Retreats for members of the Central California Conference of Seventh-Day Adventists for more than 75 years. We are very blessed to have a quiet area in Yosemite National Park to conduct our programs. Our children's camps include camps for kids with life threatening diseases. These include Diabetes, Asthma, Epilepsy, and HIV/AIDS. I understand that you are considering land use adjacent to our camp for public campgrounds or high-density employee housing. I'm concerned about the impact his will have on our programs. When we have our children's camps it is very helpful to be in a secluded area. I'm concerned that either of your proposed uses would create an environment that would be potentially unsafe for the children that attend our camps. I'm also concerned about the Spiritual Retreats that we conduct year round. Our church members come to Camp Wawona for quiet reflective time in nature. Once again either of your proposed uses would create an environment that would be contrary to how we used our camp over the last few decades. I appreciate you considering these concerns as you make your plans. Sincerely,

Correspondence ID: 52 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Modin, John and Chris
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Public Scoping Comment New Merced River Plan

Superintendent, Yosemite National Park P.O. Box 577 Yosemite, CA 95389

June 8, 2007

Current visitation in Yosemite has declined in recent years and is presently far below the intolerable levels that prevailed during the 1960's. Lower visitation levels observed in recent years does not diminish the need to address "excess capacity" that occurs on a few spring and summer holiday weekends now or how to manage the inevitable increased day use that will certainly occur as future population pressures increase. We have an opportunity with this new Merced River planning process to explore the many alternatives that will be required to regulate access when demand becomes excessive and overwhelms present NPS policy to regulate use.

There will be increasingly frequent periods when the methods preferred by the NPS for a conditions based adaptive management user capacity approach supported by the scientific community will not be sufficient to protect the Merced Rivers Outstandingly Remarkably Values (ORV's) from excessive use. The NPS plan to regulate use may be an acceptable and even perhaps a preferred method to minimize visitor impacts under normal conditions but it will fail when visitation becomes overwhelming, resulting in unacceptable gridlock and human congestion as many long time Yosemite visitors can attest. During these events Park resources are damaged and the visitor experience is reduced to near zero. In order to avoid these unfortunate events a reservation system needs to be in place to back up the NPS's preferred methods to address user capacity that will be implemented when excessive day use visitation is anticipated. It is our opinion that this safety valve approach to limiting user capacity on federal lands should not be used to invalidate management plans across the NPS, USFS, and other federal agencies but that it be used to support those efforts when conditions become extreme. A properly designed back-up reservation system with a first come first serve component should emphasize guaranteed entry during heavy use periods and not be presented as a restriction of access as many now fear. This check on unregulated day use will protect the Merced Rivers many ORV's, and provide for a quality visitor experience as well. This effort must be developed with and supported by commercial interests in the gateway communities where stakeholders can provide to their advantage increased levels of food, lodging and other visitor services during these periods when visitation is projected to exceed capacity. Focus on this issue should be the primary objective in the new planning process for the Merced, and it should proceed regardless of the outcome of future court actions. Finding a solution to the user capacity problem will be a long and complicated process but with all concerned working together it can and must be done.

Some other thoughts to consider:

1. Efforts to significantly expand visitor use in West Valley should not be considered. West Valley remains a relatively pristine area where Valley admirers who abhor East Valley crowds can enjoy the relative solitude of the Merced River. Any plans to develop West Valley to accommodate increased visitation should be quashed.
2. Reduce visitor impacts along sensitive river shoreline by allowing access to non-sensitive sand and gravel bars, and restricting access to resource sensitive river sites and to high level view-sheds like Woski Pond. Roadside parking along El Cap straight significantly impacts the scenic value of the Merced in this high quality view-

shed. Alternatives should be considered to resolve the parking problem and the resulting human impacts to El Cap meadow. 3. Visual and physical impacts of rafting on the Merced's ORV's are excessive. The numbers of rafts permitted on the river should be significantly reduced. 4. Ensure current NPS objectives to restore the Upper and Lower River campgrounds to natural conditions do not yield to pressures to restore camping in these resource sensitive areas. The juxtaposition of the river and these former campgrounds should confirm restoration objectives. 5. Encourage interpretive activities (natural and cultural) over recreational activities that would be appropriate outside a National Park. Bird watching, floral identification, photography, and hiking have little impacts and should be encouraged. 6. The size and numbers of tour busses and unregulated emission standards for those vehicles greatly impacts the ORV's of the Merced. Public transportation is an important objective to relieve congestion along the Merced, but the impacts of the number and size of these vehicles needs to be evaluated and reduced. Emission standards should be set and made a mandatory requirement for entry. Belching clouds of black gas and soot emanating from unregulated numbers of many of these commercial vehicles is simply unacceptable in a National Park.

We would like to comment on the co-operative and responsive way the planning team has worked to resolve public concerns on the many issues that affect the future of Yosemite. As a result of public input there have been several modifications by the planning team to preliminary plans on several projects currently underway or scheduled to begin in the near future. Those changes in response to public concerns have not gone unnoticed and serve as an exemplary example of the planning teams willingness to modify plans in response to public input. We look forward to continuing this cooperative and positive approach to solving the many issues facing Yosemite's future.

Thanks for listening,

Correspondence ID:	53	Project:	18982	Document:	36040
Project:	Merced Wild and Scenic River Comprehensive Management Plan				
Name:	Ouzounian, Brian H				
Outside Organization:	Yosemite Valley Campers Coalition Non-Governmental				
Received:	Jun,09,2007 00:00:00				
Correspondence Type:	E-mail				
Correspondence:	<p>June 8, 2007 Dear YNPS Planning Staff: This is to submit comments for the latest Merced River Plan (MRP). I ask that you incorporate all past comments regarding the previous MRP's, Yosemite Valley Plan, General Management Plan and other relevant comments that I have submitted to you in the past. Specifically, all comments related to camping in Yosemite Valley and its recognition as an ORV. All comments can be combined to be from myself personally and the Yosemite Valley Campers Coalition. I plead with you to recognize that the long standing tradition of camping along the Merced River is generic to the tenants and purpose of visitation to the Park. Certainly in the river's long length of meandering through the Park, the section from Happy Ilse to Sentinel Bridge can be zoned for camping use. It is without question that when President Lincoln commissioned the Park in 1864 to the State of California (Ref: Frederick Law Olmstead's book "Mariposa Grove and Yosemite: A Preliminary Report" camping was the main form of visitation, although for the elite class. Since and before this date, campers have been the major visitors of the Park and continue today. The YNPS has not given weight to this long standing tradition and passion as they illegally removed Upper and Lower River Campgrounds and refused to repair flood damaged campgrounds in Group Camping, North Pines and Lower Pines Campgrounds after the 1997 Flood and even when Congress appropriated monies for such repairs. Since the 1980 basically left out campers as respondents when the survey was taken, the YNPS has made it a habit of leaving out this major visitation group in their planning projects since 1979. Further, they have limited their open houses, scoping meetings, comment hearings to very local communities and have confused the public on when and where they take their public outreach. Although 70% of the visitors are from California, never has San Diego, Orange County, The Inland Empire, The Central Coast, and Northern California been included in the process. The public is confused and this writer believes it is by design of the YNPS. Camping in the Valley should be returned to pre-flood conditions or better with restrooms returned and tied into the new sewer system. North Pines should be retained and improved to include cold showers with waste water control to the new sewer system. Disabled standards need be applied to all campground restrooms as the YNPS has failed to meet minimum federal standards of their own Rehab Act. Universal designed sites need be incorporated into each campground. Camping needs to be encouraged and promoted as a favorable and preferred method of visitation. Rafting/floating on the Merced river should be allowed via personal watercraft/floatation devices only, not via concession, spreading out the use along the river from Happy isles to Sentinel Bridge in a low impact fashion. Hazards such as fallen trees should be removed for safe travel (like where the Merced and Tenaya Rivers meet), which are small sections of the river. CAMPING IN YOSEMITE VALLEY IS AN ORV. At a previous MRP hearing, I asked the 30 some YNPS officials if any of them had floated down the Merced River. Not one hand was raised. I explained that no one can appreciate the awesome experience of seeing Yosemite from such a grand perspective, yet they are doing the planning. FLOATING DOWN THE MERCED RIVER IS AN ORV!!!!!! By sheer number of years and numbers of visitors, the campgrounds and sites belong on the National Registry for Historical Places. Surely, if the YNPS can grant Camp 4 for such status, the other Campgrounds qualify since they precede the climbers camp in years and numbers of visitors. Is the only way to get this point across to sue the YNPS? That is how the climbers got Camp 4 to remain till perpetuity, isn't it? Must campers sue the YNPS to keep the campgrounds, bridges, access road, etc? The idea of cutting more trees and damaging more riverbanks to make way for new sites is absurd! Virgin undisturbed land being graded for new sites when established and repairable sites are already established and available. Walk-in sites and RV sites do not equate to replacing North Pines and should be excluded from the new plan. The YNPS states it will meet the Rehab Act requirements in these two projects is absurd as there are no standards for the disabled for "walk-in and RV sites." Simply upgrade the campgrounds established in the existing footprint. The disruption of natural scenes along the Merced River have become an everyday project via the YNPS. The blasting and rough grading that occurred to renovate the concession on glacier point may have affected the rockfall contours along the southern wall near Glacier Point. The huge radius turns needed and flat land needed to park the buses took huge equipment sending shock waves through the granite strata, which could only be relieved to the open area to the north toward the Valley. This in itself may have caused the rock slide near Happy Isles that disrupted the Merced River at that time. The emphasis on fixed roof housing has disproportionately given priority to "visitation for fee" in our park. Other than day visitors, currently paying 20 dollars for a day, camping is the next most accessible and enjoyable and economical way to experience the Park. 20 to get in, 140 for 7 nights = \$160 plus ice and milk. There is no other economical way to access a visitation in Yosemite. For a family to stay at the most</p>				

modest concession, the numbers climb to \$600 per night for housekeeping. Campers bring their dry firewood, their bikes, much of their food, recycle their trash, stow their trash in bear proof containers, abide by camping laws and respect the natural scene of the park. We hike the trails, we climb the rock, we take pictures and we make new friends. There is a code of happiness in the Park among campers. There is a sense of "legacy" that we wish to preserve for our children. My family started camping in Yosemite Valley back in the 1920's when my two grandfathers, who were just friends at the time, made it an annual trek. They spoke of how far down river they could see w/o trees insight. Today, the meadows are lush and restored, the trees are grown, the River has taken its natural course (despite our camping presence), the animals are more frequent, the bats still hunt moths at dusk, the coyotes still howl at the moon, and children still enjoy floating on the river with their brothers, sisters, moms, dads, cousins and friends. They enjoy the campfire with the same passion. Camping has now become an "endangered activity" due to actions of the YNPS. The rules are stiff, the supervision is over the line intrusive, yet we still want to preserve it as an ORV to pre-flood conditions. We request that the flood damaged sites be restored and camping and floating along the Merced River in the areas mentioned above be allowed in the new plan. To do this, you must recognize the tradition, the benefits and assets established by President Lincoln in 1864 and understand the relief camping brings to the family in today's modern and ever changing culture.

Correspondence ID: 54 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Harder, M.D., Ralph H

Outside Organization: Wawona Property Owners Association Unaffiliated Individual

Received: Jun,09,2007 00:00:00

Correspondence Type: E-mail

Correspondence:

As a property owner in Wawona (on the south fork of the Merced River) since 1968, I am concerned about maintaining the quality of life we have enjoyed there. With the exception of the SDA Camp which operates under a pending Conditional Use Permit, most of Section 35 (Wawona) is zoned for low-to-mid density residential housing. As part of Yosemite National Park's (YNP) effort to decrease the NPS presence in Yosemite Valley Floor, Wawona has been considered for providing housing and offices for the NPS. El Portal has been the preferred site, keeping all Government offices in the same location. High density office or dwelling units in Wawona would change the character of the area drastically. This would be strongly opposed by WAPOA, the property owners' association. Further problems would be apparent in the winter, when the Wawona Rd. is commonly closed by snow at the 6,000 ft. Chinquapin intersection. The bulk of NPS land is on the south side of the Merced River, served by Forest Dr. This is a two-way, one-lane road, that YNP is not willing/able to improve, that makes it difficult to move around heavy construction equipment. Increased travel on the road by YNP vehicles would be impeded by the lack of turn-outs to allow passing. There also has been consideration given to moving the campground to the south side of the Merced in Wawona. Another bad idea. The present campground is beautifully-situated on the river at the historic site of the Woods Army Camp. Problems with collection and dispersal of sewage could be mitigated by pumping up to the treatment plant, as is done in other areas. A public campground in the middle of a residential area in Wawona would be incompatible and, again, strongly opposed by WAPOA. Thank you,

Correspondence ID: 55 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Whitmore, George

Outside Organization: Sierra Club Unaffiliated Individual

Received: Jun,09,2007 00:00:00

Correspondence Type: E-mail

Correspondence:

9 June 2007

Superintendent Attn: Merced River Plan

Yosemite National Park PO Box 577 Yosemite National Park California 95389

fax: (209) 379-1294

This is being emailed to <yose_planning@nps.gov>.

Sir:

These scoping comments for the Merced River planning process are being submitted on behalf of the Sierra Club.

Please ignore the fact that the computer chose to bold some of what I have written. I do not know how to unbold it. NPS should communicate respectfully and productively with interested stakeholders in all park planning efforts. This includes local grassroots and national environmental groups, all concerned Native American groups, even those not previously consulted in park planning efforts, and well-informed recreation groups. This actually is a planning issue, as the lack of respectful and productive communication will render any adopted plan useless, no matter how well written it may have been.

The Merced River is the life artery for much of Yosemite National Park . A protective and legally valid Merced River Plan should be

the programmatic foundation for a large scale implementation plan like the YVP. Numerous major problems are being caused by the fact that the YVP is still driving park projects, even while it has been openly acknowledged by park staff that there are serious problems with major foundational portions of the current YVP. Issue: The foundational basis (satellite parking lots and out-of-Valley shuttle) of the YVP has been acknowledged to be flawed, so how can any project legitimately proceed if is based on the assumption of satellite lots and out-of-Valley shuttle?

NPS should not be implementing Yosemite Valley Plan projects until a legally valid and protective Merced River Plan is in place; NPS should re-visit the YVP before implementing its projects.

Given the inextricable linkage between the MRP and the YVP, this planning process should address YVP issues as well as MRP issues.

It is sometimes difficult to decide whether it would be more proper to discuss an issue under the MRP or the YVP. In the following comments, we have not attempted to segregate the issues according to whether they are more nearly MRP or YVP related.

NPS should, at the very least, have some type of baseline data so that they can adequately address user capacity-- an accurate count of people and vehicles through the entrance gates, accurate population statistics for El Portal, etc.

Consideration should be given to declaring Yosemite Valley in its entirety to be an ORV. We proposed this during the 2000 planning process. We still believe it to be a valid idea.

A number of issues are listed below, with no attempt made to present them as complete sentences.

Limits on tour buses arriving in the Valley. They are not limited by the number of parking spaces allotted to them any more than cars are limited by the number of available parking spaces. Some mechanism needs to be in place to avoid tour buses driving around looking for parking which may or may not be available. Just as with cars.

The impact of commercial rafting. The river bank at Stoneman Bridge has been transformed into a wasteland by what is apparently excessive commercial activity.

Some type of real limit (below whatever it is now) on how many concession rafts can be floating down the Merced on a given afternoon.

The impact of having interpretive rangers providing a service to the for-profit Green Dragon tours. To what extent have legitimate interpretive services been degraded by diverting NPS rangers to the for-profit commercial tours?

Address that element of the YVP which calls for extending the free in-Valley shuttle to the west end of the Valley. Is it going to happen or not? The fact that this comment immediately follows the comment on the Green Dragon operations is not coincidental. Has implementation of the in-Valley shuttle expansion been placed on hold because the concessionaire does not want the Green Dragon operation to have competition? We have been told by NPS staff that this is the reason expansion of the shuttle system is not being considered, even though it is in the YVP. NPS should clearly define "ecological restoration" in the draft and final EIS. The term "restoration" is being used to mean everything from unleashing the river to go wherever natural forces take it on the one hand, to laying fresh asphalt on the other hand. The same term should not be used to describe both types of activity.

NPS should clearly define "development" in the draft and final EIS. It sometimes seems as though any human activity is viewed as being a form of "development". This results in projects such as re-vegetation or control of invasive exotics being treated no differently than construction of 27 buildings where there was formerly a mixed conifer/oak woodland. (Or projects such as the former being scrutinized more closely than the latter!) The issue is how some level of reason can be introduced into the process to avoid these anomalous situations.

NPS should make all public comments related to this planning process easily available for citizens to view on the NPS website.

NPS should make proposed Draft Alternatives available for public comment prior to publication of the DEIS. Much of the problem with planning processes is the result of poorly constructed Alternatives during the environmental review process. More public involvement in the creation of the Draft Alternatives could head off a lot of the problems.

NPS should develop the draft and final EIS to be no larger than one volume, and intelligible to the general public.

NPS should include all tributaries of the Merced River within the designated river corridor boundaries.

NPS should take a serious look at a fresh approach to zoning/management prescriptions within the Merced River corridor boundaries.

NPS should conduct soundscape studies and include findings for each segment of the Merced River in the EIS.

NPS should conduct rare plant studies for the entire Merced River corridor and include findings in the EIS.

NPS should do a complete biological inventory of the Merced River corridor as part of this planning process and include at least a condensed version of this inventory in the EIS.

NPS should conduct air quality studies for the entire Merced River corridor and include findings in the EIS.

NPS should reconsider appropriateness of the High Sierra Camps in YNP, in general, and their impacts on the Merced River, specifically, in this planning process.

NPS should study High Sierra Camp stock use in relation to water quality, visitor experience for hikers, and trail maintenance costs and include these findings in the EIS.

NPS should more thoroughly monitor water quality in the Merced River and its tributaries (above and beyond current data gathering under the VERP framework).

NPS should make every effort to allow families to participate in resource-based, low-cost, low-amenity activities in the Merced River corridor (such as picnicking, tent and traditional auto-camping, rafting with their own rafts, sledding with their own snow devices, riding their own bicycles).

NPS should consider more seriously the impacts of concession rafting on the Merced River in Yosemite Valley.

NPS should consider more seriously the impacts of concession bike rentals on the Merced River and its related meadows in Yosemite Valley.

NPS should identify swimming as a recreational ORV for all segments of the Merced River.

NPS should zone community swimming holes in El Portal (such as Patty's Hole) for appropriate recreation and cultural activities (such as swimming, lawful fishing, and Native American gathering) rather than for maximum possible impact/development.

NPS should consider the findings of the SNEP Report in this planning process, especially regarding the El Portal segment.

NPS should develop a "scenic" category for El Portal ORVs.

NPS should have and make available to the public accurate and up-to-date maps of wetlands in El Portal.

NPS should zone all wetlands in El Portal for maximum protection rather than for high visitor use.

NPS should re-consider having a bulk fuel facility such as Odger's Petroleum next to the Merced River in the El Portal segment.

NPS should identify and zone accordingly for Native American cultural ORVs within the entire river corridor; this type of zoning could offer maximum protection from ground disturbing projects while allowing for true ecological restoration AND respectful access/Native American traditional use.

NPS should re-consider the "historical" status and significance of some structures in YNP that may no longer be appropriate to the NPS mission or cost-effective to maintain.

NPS should protect wetlands and other riparian areas along the Merced River in the western portion of Yosemite Valley from any increase in impermeable surfaces (additional asphalt and concrete).

Thank you for this opportunity to participate in the planning processes for the Merced River.

Correspondence ID: 56 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Organization: Bragaw, Jackie
Received: Seventh Day Adventist Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence: E-mail

Type:

Correspondence: Dear Superintendent:

I understand that the NPS is now looking for comments regarding the Merced Wild and Scenic River Plan.

As a member of the Central California Conference of Seventh Day Adventists, we have long been a part of the Wawona community, specifically Section 35. Our camp has been in existence for over 75 years and my father and brother both attended camp, in the 40's and 60's respectively.

Yosemite and Wawona have been an incredible play to see God's creation and bring respite and healing to many people.

As you prepare the land use plan, which will dictate how Wawona will continue to be used, I would like to personally ask that you consider not locating new public campgrounds or high-density employee housing within Section 35. This would change the character of Wawona. It would also affect our camp's ministry. I would like to urge you to consider locating such high-density uses in an area that canmore easily handle increased noise and traffic. I respectfully request that you look elsewhere for the land to develop this use.

Thank you for considering this request.

Sincerely,

Correspondence ID: 57 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Outside Organization: Sutherlin, Bette
Received: Unaffiliated Individual
Correspondence Type: Jun,09,2007 00:00:00
Correspondence: E-mail

Dear Yosemite National Park Service, As it relates to the Merced River Scoping study, I would like to quote David Brower from a statement he made back in 1966, when he so precisely expresses my view regarding the Merced River Plan Scoping Study in these simple words, "We feel you don't have a conservation policy unless you have a population policy." By "population policy", I equate that to a "carrying capacity". To have a Wild and Scenic River Plan, you need an human impact study. And in order to do that, you should pin point the level of humans that the eco system can handle along the Yosemite Valley section of the Merced River well before river eco system degradation is a factor. In other words, a "carrying capacity" which would allow a set number of people allowed into the park on a busy day should be established as a part of an well conceived Merced River Plan. Once you establish that, it will be time to reopen the Yosemite Valley Plan, the old one of which has now been eclipsed by the Federal Court's requirement that a "carrying capacity" must be included. The Yosemite Valley Plan has to have a blue print to follow, which is of course a correctly completed Merced River Plan. Because this has yet to take place, according to the current court system's decision, you must conclude that the Yosemite Valley Plan that you have now should be deemed outdated, obsolete, and tossed out. A new Yosemite Valley Plan will need to be re-constructed, from scratch, after you have a new Merced River Plan. To do this, you need to make all Yosemite Valley Plan evaluations relative to what the park was like before the flood, and, before the old, out dated Merced River Plan. All campgrounds that were in place before the flood and before the previous plan should be put back on the table as if they were never removed, regardless of the fact that the park managers believed that the flood, by way of some "Divine Hand", gave them an opportunity to reevaluate what to do with the park. This is false. This statement by the Yosemite National Park Service and Bruce Babbitt, former Secretary of Interior is absolutely irrelevant, because only a Merced River Plan complete with Carrying Capacity can make that kind of a determination. The fact is, the park service wants the public to believe that the flood gave them the opportunity to skip the Merced River Plan when it comes to these campgrounds, because God intervened and made a Divine determination regarding the campgrounds. This is not so. Floods happen. They damage campgrounds all the time. All that is needed is to repair the damage as the park told congress they would do when asking for Flood Recover money from congress in 1997. The park service's feet should be held to the fire and these campgrounds should be replaced, or, they should have to give that flood recovery money back. ONLY a Merced River Plan, complete with a court ordered carrying capacity, should be the prevailing authority to determine what is allowed in the Yosemite Valley Plan. By allowing the park service to make the statement that it was God's idea to wipe out these campgrounds is the same as believing that the flood has power over the court system and is the authority over a properly constructed Merced River Plan. Not true. There is a legal system in place here, and that system has declared that a Merced River Plan with a Carrying Capacity should be the governing power over what is allowed or not allowed in the Yosemite Valley Plan. Because this wasn't factored in, a new Yosemite Valley Plan should be the course of action after the new Merced River Plan is completed. I would like to suggest, that camping would be a great use for the Merced River's seasonal and hundred year flood zone because campers use the area during the opposite seasons of the year. The average elevation of Upper Rivers Campground, for a point of reference, is easily ten feet above the average spring water elevation of the river. I have measured it. This campground could only flood about once or twice in a hundred years, which should be mentioned in the Merced River Plan, as this scientific data is undisputable, and relevant to the Merced River Plan. The people's voice should prevail more in this planning process than in the last planning process. To accomplish this, you already have tens of thousands of names and addresses of the many previous Yosemite Valley campers who probably have strong opinions regarding these issues, so why don't you contact them? There is no question that those former campers, many of whom have camped in Yosemite for generations, should be directly solicited for their input on what to do with these campground areas BEFORE you allow yourselves to believe that Bruce Babbitt is capable of identifying God's intervention. You have their contact information, and you should use it to get them involved. The park had been given money by congress to do just that in the flood recovery effort. The fact that Bruce Babbitt even made that statement about the "Divine Hand" being involved before the original Merced River Plan was finished, clearly suggest that it was actually the park's plan to circumvent the planning process with that one statement. The truth is that the park had already said that they wanted to remove all campgrounds

on the north side of the river in a statement two years prior to the 1997 flood, back in 1995. The park service new that the public would never have allowed them to take all those campsites out, so they claimed that God was liable for that decision. By doing this, the park service claimed to be divinely justified in taking the entire subject of restoring these campgrounds off the planning table during the remainder of the Scoping studies that still needed to be completed at that time. Just about every time someone claims to know the Divine will of God, the odds are good that that this person is going to tell you that for some odd coincidence, God's ideas just happen to coincide with their own ideas, just as was the case this time. That the park service said this is what they wanted to remove those campgrounds, two years prior, suggests to me that God clearly had nothing to do with this flood coincidence. Let's cut to the chase and let your former campers weigh in on a New Merced River Plan, as mentioned above, and after that you need to develop a brand new Yosemite Valley Plan that makes better use of these campgrounds. If you don't want to, I hope the courts make you do it. As mentioned above, you have all the contact information of your former campers. So, why not bring them into this discussion? They too want what's best for Yosemite. Thank you,

Correspondence ID: 58 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Ouzounian, Brian
Outside Organization: Yosemite Valley Campers Coalition Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail

Correspondence: June 9, 2007 Dear YNPS Planning Staff: This is to submit second comments for the latest Merced River Plan (MRP) as a supplement to my previous submission on June 8, 2007, on behalf of the Yosemite Valley Campers Coalition. This writing is to address process and procedure related to all planning efforts by the NPS and the following elaborates: a. No clear structure or procedure for the public process has been established; b. Allowing the NPS to formulate this procedure is like the "fox guarding the hen house;" c. At a minimum, Congress, including the House Resource Committee, should establish guidelines so as to prevent the private interests within all our parks and the Department of Interior from conflicts of interest. Private individuals from the public should assist in this planning procedure process. d. The NPS has shown itself incompetent to be fair, reasonable, and just in its outreach to the public for its plans, specifically related to Yosemite, which is the spear head of planning for other national parks. e. To date, scant and scattered hearings and open houses have occurred to give the perception of a public process. The General Management Plan (GMP) was the start of their misguided policies. As it went unchallenged except for this writer's efforts locally and in Washington DC, it has continued on a path of deception and unfair practices. f. Evaluating each plans' demographic and quantitative analysis clearly shows the poor and declining response over the years, which translates as "unproductive" and "cloudy" and "suspect" results. The public participation in the planning process has dwindled to a few over the years based upon the public continuing negative view of our NPS. Simply count the numbers of respondents over the years, plan by plan. The only get smaller. This writer was the only one to testify at a past Southern California MRP hearing in Burbank, in 1995 on a Thursday evening. Only one other elderly woman attended but when she saw the court reporter and the 5 minute limit and the 35 NPS staff watching her, she left the venue out of worry! The questions to me by the Superintendent Mike Tollefson was "Why do you believe there is such a poor turnout tonight?" The answer was simple; "The NPS has lost the trust and confidence of the public to be effective and responsive to their participation." Many of past respondents were campers and the NPS failed to show positive response to their comments. g. Even after federal courts slapped the hands of the NPS over the MRP, the NPS continued on the same process for the Tuolumne River Plan (TRP) without shame. Would this alone not disqualify the TRP as it now is in planning? A "HOLD" on that plan should be implemented. h. Past NPS personnel have tainted the MRP as joint spouses conducted the planning process, carried over from previous plans using different names that deceived the public. Specifically, these were dependents of the past Western Regional Director. i. All Yosemite Plans should be suspended until a process is agreed upon, including the subject, court ordered revised MRP and the illegal Yosemite Valley Plan. j. It is clear that the NPS has gone unsupervised over the past two decades and that private interests have corrupted the NPS. Since the NPS has a financial interest in the profits from the operation of the parks, an objective process is needed and warranted. k. The current planning efforts in Yosemite have profit motives written all over them, including the closure of the two "Rivers" campgrounds after the flood to allow the busing plan to be implemented in the future master scheme and so that the NPS can pat itself on the backs, in public, as to how the development plans are qualified to proceed based upon the "greening up" or "restoration" of these parcels; when in fact the NPS planned this land swap for their own profit motivations or that of the concessionaire present and future. l. The closure of the Rivers Campgrounds allowed the NPS to continue their development master plan by using this land as a laydown yard for the master plan utilities project. Were it not for this land, the project would have had harder alternatives for construction temporary facilities. All in all, much more needs to be addressed by the NPS to properly be good stewards of our Yosemite, the MRP and future projects. Failure to address the above, egregiously breaches the duties of the NPS, charged with care, custody, and control of its original 1864 commission by President Lincoln (a good camper). No doubt President Theodore Roosevelt felt the same and loved to camp. Contrary to Yosemite's Superintendent, Mike Tollefson in his May, 2007, newsletter (Volume 31), the NPS does not have the "privilege" of managing the Merced River; it has the DUTY to manage it for the public trust via preservation and enjoyment to perpetuity.

Correspondence ID: 59 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Clohessy, Lucille
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail

Correspondence: Superintendent: I would like to make the following comments for the Merced River Plan:

As a frequent visitor to Yosemite I believe the following changes should be considered for the good of ALL the people. Due to the environmental impact on trails and wilderness areas the riding stables should be closed and the site returned to a natural state as

called for in the Yosemite Valley Plan. Trails have become eroded and water contaminated due to saddle stock and pack animals. The Merced River corridor must be protected from the over use of commercial packstock enterprises. I long for a hiking and backpacking experience that is pristine and free from contamination of pack animals. To preserve our wilderness these changes must be considered.

The High Sierra Camps (HSCs) at Vogelsang, Merced Lake, Sunrise and May Lake are creating a negative impact on the Merced River. These campsites are luxury vacations for the minority. There is no sewage treatment plant, and wastewater from these facilities pollutes the meadows, soils, and waters of the Merced River. In addition, stock animals must travel back and forth to carry needed supplies to these camps adding to the already critical situation that exists on our hiking trails.

Correspondence ID: 60 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Yee, Audrey L
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: To: David A. Mihalic, Superintendent, Yosemite National Park Dear Superintendent Mihalic, Our family purchased our cabin in Wawona in 1950 and since that time, four generations of XXXX have enjoyed the serenity and beautiful natural setting it offers. Also during those years, as we own the last cabin on the river side of Forest Road, we have seen an increase in traffic and noise heading to the Seventh Day Adventist Camp as well as to the swinging bridge. We would like to go on record commenting that any designated land use placed in the Merced Wild and Scenic River Comprehensive Management Plan which would permit public campgrounds or high density employee housing within section 35 would be severely detrimental to our quiet Wawona community. We cherish the peacefulness of the area, and we believe that the public, park employees, and Wawona residents alike would not benefit from further degradation and high density use of Wawona. Thank you,

Correspondence ID: 61 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Freund, Jim
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Sirs

As the owner of a cabin on the river in Wawona, I am concerned that the Park Service not develop their land in a manner inconsistent with the community of Wawona.

Since there are so many parcels of private property in Section 35, my suggestion would be to simply exempt this section from the Management Plan. This would have several beneficial effects:

1) It would simplify the plan, in-as-much as there are so many different situations which would have to be addressed in the town 2) It would have a positive effect on the relationship between the Park Service and the property owners 3) It would foster a greater sense of community within Wawona (among all parties- Park Service employees, Concessionaire employees, property holders, Redwoods, and so forth. This sense of community might well find expression in the form of donations beneficial to the Park and other public service activities.

If, in the alternative, it is not possible to exempt section 35 from the new plan, any development should be strictly limited to that which is keeping with the character of the town. Certainly public campgrounds or high density employee housing should be entirely avoided.

Please do not hesitate to contact me with any questions regarding these comments you might have. I appreciate the opportunity to provide you with my concerns.

Correspondence ID: 62 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Kingma, Kevin
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Superintendant, Yosemite National Park Attn: Merced River Plan

Dear Sir;

I am fortunate to be a resident of California and to live close enough to have visited Yosemite National Park many times for the past 20 years. As a person who cares about nature (probably like yourself or you would not be in the job you are in) and who is a fairly careful observer of nature, I would like to share some observations and give you input on the Merced River Plan.

All erosion and all sources of non natural runoff affect the Merced River. Horses have a disproportionately high ability to cause trail erosion and to trample meadows leading to erosion. They also have the ability to spread non-native grasses/plants and contaminate water directly thru defecation. And the smell of manure certainly detracts from the experience of visiting Yosemite when most people are there to smell the pines and fresh air.

Over time I have seen the effects of pack stock on the Merced Rivershed and that is Why I urge you to carefully consider their negative effects in completing the Merced Wild and Scenic River Plan:

1) I find it hard to believe that the riding stables still exist in the Yosemite Valley. The Yosemite Valley Plan of 2000 called for their removal and at the time even the commercial outfitter did not disagree. One can only imagine what was flushed into the Merced River during the 1997 flood (Yosemite Valley is predicted to flood into the Merced River about every 10 years).

2) All the area between the Tioga Pass Road and Yosemite Valley are high use areas and the only responsible way to manage them is to strictly limit if not ban the use of pack animals. This is not an unusual idea. The trail from Mt. Whitney Portal to the summit is closed to stock animals for just this reason.

3) I have hiked the trail thru Vogelsang camp only once because of all the unnatural clutter that is at the camp. To protect the Merced River watershed the high sierra camps should be closed. A few people may complain that the camps are a part of their childhood memories and they couldn't bear to see them closed. Well, firefall displays made by pushing bonfires off the valley rim and feeding the bears in front of spectator stands were part of some peoples's Yosemite memories, but they were stopped because of the damage they did to the environment. So it is with the high sierra camps and the bears, many supply horses, flies and sewage that accompany them. This is a high use backcountry area and it is easy enough to hike there.

Please consider these official public comments and keep me informed during this process.

Sincerely,

Correspondence ID: 63 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Atwater, David
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: To Whom It May Concern, I am another yosemite lover, one of the first "clean" climbers, a back packer, a Camp 4 Rat, a true environmentalist who has a over ten year old \$11 billion State environmental program on my resume that is going strong and will continue on for years (without court involvement, I might add). My large business facilities are totally solar powered also with a 135KW system (that takes about 1000 panels). I have not participated in the planning process in quite a while as I am totally disallousioned by the process. We have been involved in Park planning since the very beginning, way before the flood gave people so many excuses to eliminate input. In the beginning the process looked like it might lead to something good, then the courts were brought in to "supervise the process" much later the flood came and the wakos won and removed the river campgrounds in a classic knee jerk, heavy on the JERK, reaction (fully supported by the Park Service (light on the service part). Now all planning is in the hands of the courts and we all know where that will go. The ultimate goal is not to make Yiosemite user safe and friendly, the goal is simply the elimination of all visitors except the chosen few who feel that they are above use "normal folk" because they are true "protectors of the environment." "Fence it off" they say, close it, remove it, don't use it. This is eliteist plane and simple. I am frustrated that I cannot camp in the Valley anymore. I want more campsites for us campers, and I want meaningful input that will not be just thrown in the round file when it is recieved. I also wonder why so many meetings are held in San Francisco? (see my elitist comment, and follow the money) Has there ever been a meeting in Stockton? Meetings in the Yosemite Valley are great for the people who live there, but they are employees and people who have a NIMBY small town opinion of "their" park. I want more camp sites in the valley and less people living in houses and apartments there. Where did the idea to replace the lost sites go? Last thought, The Tuolumne River plan will succeed in eliminating most camp sites from the Meadows, what are you going to do about that? When that happens the park will become a daily drive through like the Grand Canyon or Great Smokies where the average stay is measured in minutes or hours not in days and there will be many who will want to stop that also. Sincerly,

Correspondence ID: 64 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: McGinniss Kerr, Bridget
Outside Organization: Unaffiliated Individual

Organization:
Received: Jun,09,2007 00:00:00
Correspondence
Type: E-mail
Correspondence:

The following concern statements, followed by two poems, are submitted as my personal scoping comments for the new Merced River Plan. The Merced River is the life artery for Yosemite National Park . "My River" is a poem about my personal connection to the Merced River as a resident of the Merced Canyon. "A Poem About Ugly" is about the negative impact Yosemite Valley Plan projects are having on both the natural values of the Merced River and general visitor experience in Yosemite Valley. A protective and legally valid Merced River Plan should be the programmatic foundation for a large scale implementation plan like the YVP. However, as a member of two environmental organizations who follow the YVP planning processes closely, I have found the exact opposite to be true. There is an undeniable ugliness brought about by the fact that the YVP is still driving park projects, even while it has been openly acknowledged by park staff that there are serious problems with major portions of the current YVP. I realize that it is unusual for poetry to be submitted for NEPA comments but desperate times call for desperate measures. It is my hope that since it has now been 20 years since the Merced was designated Wild and Scenic, and being that this is your agency's third attempt at producing a Merced River plan, my comments will help produce a protective and legally valid plan. It is my sincere hope that members of your agency will seriously consider the following concern statements and take my poetry to heart. Thank you for the opportunity to submit, as an individual, scoping comments for a "new" MRP planning process. Sincerely,

NPS should not proceed with Yosemite Valley Plan projects until a protective Merced River Plan is sincerely developed and legally in place; NPS should re-visit the YVP before implementing its projects. NPS should communicate respectfully and productively with interested stakeholders in all park planning efforts rather than viewing informed critics as the enemy (this includes local grassroots and national environmental groups, all concerned Native American groups, even those not previously consulted in park planning efforts, and well-informed recreation groups). NPS should clearly define "ecological restoration" in the draft and final EIS. NPS should clearly define "development" in the draft and final EIS. NPS should make all public comments related to this planning process easily available for citizens to view on the NPS website. NPS should make draft alternatives available for public comment. NPS should develop the draft and final EIS to be no larger than one volume, and intelligible to the general public. NPS should include all tributaries of the Merced River within designated river boundaries. NPS should take a serious look at a fresh approach to zoning/management prescriptions within the Merced River corridor boundaries. NPS should conduct soundscape studies and include findings for each segment of the Merced River in the EIS. NPS should conduct rare plant studies for the entire Merced River corridor and include findings in the EIS. NPS should do a complete biological inventory of the Merced River corridor as part of this planning process and include at least a condensed version of this inventory in the EIS. NPS should conduct air quality studies for the entire Merced River corridor and include findings in the EIS. NPS should reconsider appropriateness of the High Sierra Camps in YNP, in general, and their impacts on the Merced River, specifically, in this planning process. NPS should study High Sierra Camp stock use in relation to water quality, visitor experience for hikers, and trail maintenance costs and include these findings in the EIS. NPS should more thoroughly monitor water quality in the Merced River and its tributaries (above and beyond current data gathering under VERP framework). NPS should make every effort to allow families to participate in resource-based, low-cost, low-amenity activities in the Merced River corridor (such as picnicking, tent and traditional auto-camping, rafting with their own rafts, sledding with their own snow devices, riding their own bicycles). NPS should consider more seriously the impacts of concession rafting on the Merced River in Yosemite Valley. NPS should consider more seriously the impacts of concession bike rentals on the Merced River and its related meadows in Yosemite Valley. NPS should identify swimming as a recreational ORV for all segments of the Merced River. NPS should zone community swimming holes in El Portal (such as Patty's Hole) for appropriate recreation and cultural activities (such as swimming, lawful fishing, and Native American gathering) rather than for maximum possible impact/development. NPS should consider the findings of the SNEP Report in this planning process, especially regarding the El Portal segment. NPS should develop a "scenic" category for El Portal ORVs. NPS should have and make available to the public accurate and up-to-date maps of wetlands in El Portal. NPS should zone all wetlands in El Portal for maximum protection rather than for high visitor use. NPS should re-consider having a bulk fuel facility such as Odger's Petroleum next to the Merced River in the El Portal segment. NPS should identify and zone accordingly for Native American cultural ORVs within the entire river corridor; this type of zoning could offer maximum protection from ground disturbing projects while allowing for true ecological restoration AND respectful access/Native American traditional use. NPS should re-consider the "historical" status and significance of some structures in YNP that may no longer be appropriate to the NPS mission or cost-effective to maintain. NPS should protect wetlands and other riparian areas along the Merced River in the western portion of Yosemite Valley from any increase in impermeable surfaces (additional asphalt and concrete).

My River Aloof emerald falling easy over smooth granite, you could help the most tired ghost rise, blessing the earth. You remind me I have an energy that shocks. Dropping beyond what I know, you form gorges and canyons and valleys of many places to rest. You remind me I have a weight upon my shoulders. A blackbird wings up; red and yellow bands flashing; liquid song growing; canyon wrens whistle their descending scale against metamorphic walls; flowing shushing willows. You remind me to forget.

A Poem About Ugly You may wonder why I choose to clamber on top of a dumpster to see the construction, rather than, admiring the autumn trickle of Yosemite Falls, lingering at red and yellow brightness of Indian hemp along meadow edges or hiking the southside trail to view turning maples against granite; I wonder why myself. I think I am drawn to the orange fencing and noise because I want to witness, want you to witness the ugly; sometimes we must. Over the fence, a rushed project the size of a city subdivision, 27 future buildings/desecrating the temple: petroleum fuels mixed with the scent of freshly exposed earth concrete poured pads and hammers framing where black oaks and boulders once bothered no one and were home to many. Just how much are we expected to endure in the name of restoring this Valley? Just what are we bringing back? How many decibels, for how many years, should be allowed for diesel machinery, back-up beeping? How much sewer gas and tour bus fumes can one be expected to tolerate? How many contractors in king cabs must zoom importantly between multiple job sites before we ask if something might be wrong in our national park? Some say that we must be patient with the ugly because in 10-20 years we will all leave our cars and have a quiet place perfectly hardened, encased in cement and asphalt for all to enjoy. --

Correspondence 65 **Project:** 18982 **Document:** 36040
ID:

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Davison, George and Billie
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: Letter
Correspondence: Section 35 and the National Park Service

NPS planners have a historic opportunity to define a positive future for Section 35 in revising the Merced River Plan. We are old enough to have witnessed more than a half century of interaction between NPS and private property owners in Wawona and would like to review a few events to illustrate how things can go wrong and make some suggestions for how things can go right. One summer in the early sixties a private developer began selling parcels of land near Chilnualna Creek. Almost overnight the developer pushed a winding dirt road up the hillside to access the parcels. NPS reacted quickly to stop the development and condemn the land, but it was too late to prevent environmental damage. In only one winter, the road, which lacked any drainage, rutted out and became impassable to vehicle traffic. We south side residents could see the hillside scar for over twenty years. Any buyers would have been cheated when their road disappeared over the winter. During the seventies, Yosemite's administrators decreed that private property owners should pay the same entry fee as park visitors to enjoy park amenities. Different automobile stickers were issued to concessionaire employees, park service employees, and private property owners. If property owners (identified by their stickers) were found at Mariposa Grove, Yosemite Valley, Badger Pass, or even in the high country, they were required to show a valid paid-for pass or be cited. Private property owners were free to travel only to and from their properties without such a pass. It didn't work, and the policy was scrapped by the next park administration. Almost simultaneously NPS initiated a plan to acquire the properties in Section 35 with the intent of eliminating all private holdings in the park. The owners were offered a fair market value for their property and some form of delayed title transfer. The justification for this action was overdevelopment in Section 35, especially on the north side of the river where contamination from septic systems and competing wells had caused serious problems. NPS told Congress that improvements on the acquired properties would be razed and the land returned to nature. NPS also developed a central water supply and a waste water treatment facility with the intent of eliminating separate wells and septic systems in Wawona. It was discovered, however, that the central water system was inadequate, and most of the wells are still in service. NPS acquired many properties during the subsequent thirty years, but razed few of them. The best properties have been used as housing for park service and concessionaire employees. Lesser quality properties are quietly decaying with no serious plan to either restore or remove them because of budget limitations. These properties may indeed "return to nature" but not as originally promised and certainly not during our lifetime. Wawonans are currently developing a community position on redevelopment of Camp Wawona, a Seventh Day Adventist camp located on the south side of the river. Camp Wawona redevelopment planning began in the early nineties when NPS proposed a land swap involving the least developed area of Camp Wawona and park property along Forest Drive, the access road that terminates at Camp Wawona. After more than ten years of discussions with the Central California Conference of the Seventh Day Adventists, all land swap negotiations were terminated by NPS. The Central California Conference declares that it spent more than five million dollars on development plans during this time period. Seven years ago NPS prepared the original Merced River plan followed by the Yosemite Valley Plan. The Merced River Plan zoned a substantial portion of Section 35 as 3A/3C (which permits campgrounds and park administration) on the less-developed south side of the river. The preferred alternative of the Yosemite Valley Plan proposed construction of large residential and park maintenance facilities on the 3A/3C land. The development language was revised after unanimous protest from all Wawona residents and property owners, but the 3A/3C zoning remains in place. So what conclusions can we draw from this short historical review? 1. Private property owners are historically responsible for serious environmental violations and we're obligated to cooperate with NPS and Mariposa County to ensure that similar violations don't occur in the future. 2. NPS undergoes radical policy shifts over time as administrations and budgets change. These shifts create permanent suspicion in the minds of long-time private property owners. Ironically, many park service employees and concessionaire employees share this institutional suspicion. After all we shop at the same stores, go to the same social events, send our children to Wawona School, hike the same trails, swim in the same river, and ski at Badger Pass. 3. Two important community institutions (Wawona Town Planning Advisory Committee and Wawona Area Property Owners Association) were put in place because of past conflicts over development. Discussion between these institutions and NPS planners provides a rational format for avoiding open conflict in the future. We think a review of the 3A/3C zoning in Section 35 is a good place to start. Sincerely,

Correspondence ID: 66 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Outside Organization: Thay, Steven
Received: Jun,09,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent, Yosemite National Park, June 1, 2007 Dear Sir, I visit and enjoy Yosemite NP 10-20 times a year. My first experience was on a family vacation in July 1959! Since then, I have been aware of the negative impact by horses and pack stock throughout the park. The riding stables should be closed! Contaminated water and damaged trails are degrading Yosemite's ecology and visible beauty. The High Sierra Camps pollute the Merced River and hurt the recreation experience by all of us visitors. All of the High Sierra Camps should be removed and the sites restored to their natural health and beauty. I avoid several trails and the High Sierra Camps because of the pollution and ugly buildings. A lot of my wilderness travel in Yosemite is adversely affected by the degradation caused by the horse and pack stock vandalism. Sincerely,

Correspondence ID: 67 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Outside Organization: Ferguson, Cindy
Received: Jun,09,2007 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent, Yosemite National Park, June 1, 2007 Dear Sir, I visit and enjoy Yosemite NP 10-20 times a year. My first experience was on a family vacation in July 1959! Since then, I have been aware of the negative impact by horses and pack stock throughout the park. The riding stables should be closed! Contaminated water and damaged trails are degrading Yosemite's ecology and visible beauty. The High Sierra Camps pollute the Merced River and hurt the recreation experience by all of us visitors. All of the High Sierra Camps should be removed and the sites restored to their natural health and beauty. I avoid several trails and the High Sierra Camps because of the pollution and ugly buildings. A lot of my wilderness travel in Yosemite is adversely affected by the degradation caused by the horse and pack stock vandalism. Sincerely,

Organization:
Received: Jun,09,2007 00:00:00
Correspondence
Type: E-mail
Correspondence: To Whom It Concerns:

I recommend the banks of the Merced River in Yosemite Valley have various areas for public use.

One type of area could allow fishing and sitting on the banks (for reading and quiet contemplation). Another type could allow families to play in the sand and wade in the river, where safe to do so. Other areas could restrict human use.

As for sharing the cultural and natural history of the river area, I loved the new signs set up in the new trail area to Yosemite Falls. They were tastefully done, and they provided good information about the Native Americans, the later settlers, etc. The same kind of signs could be placed near the river with information on the people, animals and plant life before and now.

Please retain the beautiful rock bridges whenever possible. They add to the beauty of the river and provide walking paths.

Thank you,

Correspondence ID: 68 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Rollins, Jack & Pat
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Superintendent Yosemite National Park Attn. Merced River Plan PO Box 577 Yosemite, CA 95389 As long and standing property owners in South Wawona, we wish to voice our concern with the up and coming Merced Wild and Scenic River Comprehensive Management Plan. We are very concerned that the designated land use placed in Wawona would permit public campgrounds, and high density employee housing in Section 35. This high density would be severely detrimental to our small mountain residential and vacation home community. If this plan were implemented in Wawona, it would cause long- term major adverse impacts on Wawona population as well as traffic and congestion. Additionally, the crime element would increase with high density. That is a known. Please allow us to preserve the character of the Wawona Community by not allowing this designated land use. Sincerely,

Correspondence ID: 69 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Coyle, Carol
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Please do not permit public campgrounds or high density employee housing within Section 35 (Wawona). They will be out of character or the residential community.

Correspondence ID: 70 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Lockwood, Steve & Linda
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Hi, The south fork of the Merced river running through Wawona, Yosemite National Park IS IN GRAVE DANGER. I just got your Yosemite NP Planning update for the Tuolumne and Merced Rivers and am quite confused how the current planning for a HUGE expansion by the Seventh Day Adventist Church (SDA), right next to the south bank of the south fork of the Merced river inside Yose Nat'l Park can continue to move ahead while my tax dollars are being spent on mailing after mailing (and lots of payroll) on keeping the rivers in the park "wild and scenic". Don't get me wrong, I WANT THEM KEPT WILD AND SCENIC. And I am having to spend my hard-earned after-tax dollars on trying to fight the SDA to keep from expanding/building a HUGE compound (lodging/restaurants/rec centers) to house many hundreds of visitors. Which will require years of clearing/paving/brutalizing the natural setting of the river as well as WAY OVERPOPULATING the area once done. No one will be even able to really see the river over all the visitors buses travelling right next to the river bank to get to the resort, let alone enjoy it as a natural area, or find a place to sit on a river rock to take in the beauty. Aside from the safety issues THIS DOES NOT BELONG IN A NATIONAL PARK THAT IS SET ASIDE TO BE ENJOYED AS BACK TO NATURE FROM WHICH ONE CAN'T EVEN REMOVE A PINE CONE!!!! It has nothing to do with freedom of religion. They can expand all they want, just not in a National Park !!!! We are being told that MARIPOSA COUNTY IS GOING TO OK IT and that if we want to fight it we will have to do it when it reaches the state and national levels. THAT IS JUST CRAZY, AND I'M SURE NOT WHAT ANYONE ENVISIONED WHEN THEY GAVE

YOSEMITE NATIONAL PARK STATUS. HERE IS YOUR CHANCE TO STEP UP AND STOP SOMETHING BE IT STARTS and tramples the wonderful nature in Wawona. You don't even have to un-do anything at this point just stop them from being able to rape the area, BEFORE ANY DAMAGE IS DONE. I AM VERY FRUSTRATED THAT THIS HAS GONE AS FAR AS IT HAS, I THOUGHT THE NATIONAL PARK SYSTEM WAS CREATED TO PROTECT THIS LAND AND THAT IS CLEARLY NOT HAPPENING. Maybe you're not aware that this is happening, but please step in now and STOP THIS BEFORE EVERYONE IS SORRY AND WONDERS HOW IT COULD HAVE HAPPENED AND THEN OUR GOVERNMENT WANTS TO USE MORE TAX DOLLARS TO TRY TO RETURN IT BACK TO A MORE NATURAL SETTING. PLEASE ACT ON THIS SOON, IT IS BEING VOTED ON IN A WEEK OR TWO BY MARIPOSA COUNTY AND THEY ARE NOT REPRESENTING THE PEOPLE OR THE BEST INTEREST OF THE NATIONAL PARK. I am pleading with you for your help before Wawona is turned into Disneyland. Please reply and let me know if there is anything you can do to try to retain the natural setting of the south fork of the Merced river. Thank you so much, we would appreciate ANYTHING YOU CAN DO TO STOP THIS HUGE DEVELOPMENT Sincerely and with deep appreciation,

Correspondence ID: 71 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Broesamle, Katherine and John
Outside Organization: Wawona Property Owners Associatin Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Superintendent: We have been frequent visitors to the Wawona area since 1960, and currently own a cabin there at XXXXXX. Over the years we have become concerned about the possibility that this very special, historic area, could become degraded as the park service looks to build more employee housing or campgrounds. There is already too much development along the Merced River in Wawona! The Seventh Day Adventist Camp expansion threatens to overwhelm this small area, and bring pollution as masses of additional people utilize the river for recreation. Anything beyond this expansion, which we fear will be approved, has us worried even further. Please recognize the uniqueness of Wawona as it now stands, and preserve the environment for our children and grandchildren to enjoy. Please do not allow development for any reason along this sensitive stretch of river. Please do not allow campgrounds or employee housing to be built here. Very truly yours,

Correspondence ID: 72 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Ice, Charles
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: There's just no end to the special requests for info and different means of participation, is there? Having grown up in the Park, I'm well aware that I'm not the only one with proprietary feelings about the place (but mine are more important/relevant/etc.) Trying to participate from a distance while knowing some are able to impact the process close-up is discouraging, and not having essential information used in problem-definition, scoping, and formulation of questions reduces you to statistical "input" on a done draft. Input at that point cannot be very creative.

Technology can be a beautiful thing, but creates mostly inflated expectations and nightmare logistics. So here's my plea: Is there a source on-line where one can either retrieve interesting stastical data -- like on visitorship, number of high-country reservations requested in a given year or for any given day, cars-per-visitor, and all sorts of other useful data -- or interact with available data to construct one's own queries? Can there be opportunities to interact at early stages when scoping is done, rather than to be solicited for input after the drafts come out? I have received Prep Notices for assistance in scoping, but that is such a wide-open invitation; it doesn't track the issues that caused the initiative in the first place (what's the problem?). I'm going to guess that millions want to be kept informed, but few actually venture beyond their commute zone (temporally or intellectually). Because we're talking about my homeland, I really would like to understand why these issues come up, and what data impinge on them, so that I can make a rational decision to participate. I can't be there like many stakeholders.

Correspondence ID: 73 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Shekelle, Richard
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: I am getting too old now to do much backpacking but I have several decades of experience to inform my comments below. 1. Stock degrade both the Park's environment, e.g., the stream banks and meadows, and the experience of persons who hike its trails. The smell of the manure and even worse the flies it attracts really stick in my memory as major unpleasant experiences. a. The riding concession in the Valley should be closed permanently. b. Use of stock should be prohibited on some trails and very limited on the remainder. c. More Park rangers are needed to monitor use of the trails and enforce regulations. 2. The High Sierra Camps once had a legitimate purpose in attracting people out into the wilderness where they could learn to appreciate the country's beauty and the need to preserve it. The reverse is true now. Too many people are visiting the areas now. Camping in large groups and using permanent

facilities is hardly the way now to teach people about the wilderness. For most visitors, these camps are a jarring eyesore. A blot on an otherwise beautiful landscape. Keep up with the times, people. The camps should be closed permanently. Sincerely,

Correspondence ID: 74 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Coyle, Carol
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: I would like you to consider the following items when making your plans for the Merced River:

1. I think the valley campgrounds that were closed because of the flood, should be replaced, even if they have to be replaced every 100 years because of flooding. It is the best way lower income families can experience Yosemite.
2. This probably is a comment for the Yosemite Plan. Add a picnic area to the Glacier Point Rd & Hwy 41 junction. There is already a bathroom there.
3. Last summer over July 4th weekend, there was an intersection (near day parking) with 4-way stop & pedestrians that would walk across at leisure, not in groups. This caused cars to be idling for long periods of time, spewing out exhaust fumes.

Wawona area: 1. Please plan to eliminate the pollution problem from the Wawona campground. The septic tanks overflow into the river. The campers use soap in the river as there aren't other facilities. Toilets need to be connected to a sewer system & showers added.

2. At swimming holes on the South Fork, porta-potties & trash bins need to be added to prevent the pollution that is now happening at the Swinging Bridge area (end of Forest Dr) and the Flat Rocks area (off of Chilnualna Falls Rd)
3. The Wawona Town Plan should be upheld as a single family residential community. It existed before Yosemite was made into a national park. Please do not put dorm employee housing in the area. The NPS owns single family housing in Wawona. Please do not add more beds. Please do not make zoning management plans for the Valley that negate the Wawona Town Plan.
4. The Wawona store & History Center's parking area is inadequate to handle the car parking for the Mariposa Grove Shuttle and the recently added Wawona to Valley Shuttle.

River activities to be enjoyed: 1. Swimming, fishing, rafting, hiking beside & listening to its sound. Please do not allow any motors or generators within the sound of the river.

The South Fork of the Merced River is not have an unlimited amount of water. Please do not promote more beds for it to be used by.

Correspondence ID: 75 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Strugnell, Anne-Christine
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: To whom it may concern:

I understand you're reviewing the Merced River Plan, and I wanted to take this opportunity to express my tremendous dismay and disgust at the impact of pack animals on the trails in Yosemite. In the midst of such beauty, the trails are sometimes ankle-deep in manure. I only walk the pack trails early in the season because by mid-summer, it's revolting. Even in spring, manure covers much of the trail, flies swarm, and dust from the manure settles on us. And all this is for what? So some people who are too lazy to walk can ride on some animal, and some other people can make money renting out their animals. That's not in keeping with the purpose of a national park. Let the sedentary tourists watch it all on TV, and let the stables make their money somewhere else.

It's particularly disturbing in light of the impact of stock animals on the watershed of the Merced River. Much as I love the High Sierra Camps, I believe these operations, too should be shut down due to their impact on the Merced River. We can't have it all--comfy camps, profits for pack animal businesses, rides for tourists, and a wilderness experience. We need to choose. We can have all those other things in other places. Yosemite should remain as close to wilderness as it can, so that those of us who make the trek out there can see it and wonder at its beauty, without hiking through manure.

I urge you to close down pack animal operations in the park, and close the High Sierra Camps, too. It would be a tragedy for the allure of Yosemite to prove the death of it.

Regards,

Correspondence ID: 76 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Wilson, Barbara
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: I represent a family of 5 backpackers who have traveled the trails in the Merced River Drainage for over 25 years. Having packed both within and without Yosemite N.P. Due to trail damage, I can say I seek trails where horses are not allowed. Horse droppings, flies, and urine puddles are not the things of a pleasant day's hike. In the rain these are all accentuated. These are my points: As to commercial horse packers using the National Park Service trails (anywhere in Yosemite), I am against it, but if it is ultimately allowed, it cries for control, policing, and citation when and where abused under regulation. This must be budgeted.... Secondly, regarding the riding stables in Yosemite Valley... I am also against them. They incubate all of the above problem issues to me as a backpacker...both at the stable site as well as on the trails the horses travel. My third point, along the same line, is relative to the High Sierra Camps...whose horse/mule trains are only a legitimized version of commercial horse packers....The horse packs destroy their own highways as well as the camp where they are picketed. The ensuing campers create their own over-use issues with sewage, both gray and solid waste as well as the trampling and destroying of the camps. I vote these camps be removed and their sites be naturalized for the next generation of backpackers. Please seriously evaluate the damage done by horses on all trails in Yosemite but, under study currently, in the Merced River drainage. If this generation of administrators does not do this, you will be viewed by future generations as the group who took license with the natural beauty of Yosemite Valley....and with disdain and censorship. Control your legacy. Minimize, or better still, eliminate horse use in this area. Thank you for listening....

Correspondence ID: 77 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: McQuoid, Darin
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Yosemite National Park Superintendent:

I am writing regarding the open comment period for the Merced River Management Plan. One of the current areas of river management in Yosemite Park I would like to see revised is the restriction on boating sections of the Merced River within the park. The Merced River offers boaters many sections of world class whitewater. Currently, boating is restricted on the Merced River on all sections except for the area between Stoneman Bridge and Sentinel Bridge. This ban prohibits boating in many areas offering spectacular whitewater and scenery. Use of non-motorized/human powered watercraft in rivers provides a low environmental impact form of recreation. Whitewater boaters tend to be a very environmentally conscious user group. Modern whitewater boating is very safety oriented and often involves using specialized equipment and training. Whitewater boating on the Merced River also poses no threat to other park visitors. I believe that the Park Service should be encouraging responsible, low environmental impact forms of recreation. During the Merced River Management Plan Scoping, please consider revision of park policy to allow non-motorized boating on all sections of the the Merced River and it's tributaries.

Correspondence ID: 78 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Smith, Kevin
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Yosemite National Park Superintendent:

I am writing regarding the open comment period for the Merced River Management Plan. One of the current areas of river management in Yosemite Park I would like to see revised is the restriction on boating sections of the Merced River within the park. The Merced River offers boaters many sections of world class whitewater. Currently, boating is restricted on the Merced River on all sections except for the area between Stoneman Bridge and Sentinel Bridge. This ban prohibits boating in many areas offering spectacular whitewater and scenery. Use of non-motorized/human powered watercraft in rivers provides a low environmental impact form of recreation. Whitewater boaters tend to be a very environmentally conscious user group. Modern whitewater boating is very safety oriented and often involves using specialized equipment and training. Whitewater boating on the Merced River also poses no threat to other park visitors. I believe that the Park Service should be encouraging responsible, low environmental impact forms of recreation. During the Merced River Management Plan Scoping, please consider revision of park policy to allow non-motorized

boating on all sections of the the Merced River and it's tributaries.

Correspondence ID: 79 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Hacker, Gene
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Yosemite National Park Superintendent:

I am writing regarding the open comment period for the Merced River Management Plan. One of the current areas of river management in Yosemite Park I would like to see revised is the restriction on boating sections of the Merced River within the park. The Merced River offers boaters many sections of world class whitewater. Currently, boating is restricted on the Merced River on all sections except for the area between Stoneman Bridge and Sentinel Bridge. This ban prohibits boating in many areas offering spectacular whitewater and scenery. Use of non-motorized/human powered watercraft in rivers provides a low environmental impact form of recreation. Whitewater boaters tend to be a very environmentally conscious user group. Modern whitewater boating is very safety oriented and often involves using specialized equipment and training. Whitewater boating on the Merced River also poses no threat to other park visitors. I believe that the Park Service should be encouraging responsible, low environmental impact forms of recreation. During the Merced River Management Plan Scoping, please consider revision of park policy to allow non-motorized boating on all sections of the the Merced River and it's tributaries.

Correspondence ID: 80 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Pankratz, Daniel
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: To The Yosemite National Park superintendent I am writing in regards to the Merced River Management Plan. I think that there

needs to be some revisions made to the restrictions on boating sections of the Merced River within the park. The Merced River offers boaters many sections of world class whitewater. The current boating restrictions on the Merced River restrict all sections except for the area between Stoneman Bridge and Sentinel Bridge. That's not right. This ban prohibits boating in many areas offering great whitewater and scenery. Use of non-motorized/human powered watercraft provides a near zero environmental impact form of recreation. Whitewater boaters are an environmentally conscious group and are safety oriented. Whitewater boating on the Merced River also poses no threat to other park visitors. The Park Service should be encouraging responsible, low environmental impact forms of recreation such as whitewater boating. During the Merced River Management Plan process, the park policy should be revised to allow non-motorized boating on all sections of the Merced River.

Correspondence ID: 81 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Ruff, George
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Yosemite National Park Superintendent:

I am writing regarding the open comment period for the Merced River Management Plan. One of the current areas of river management in Yosemite Park I would like to see revised is the restriction on boating sections of the Merced River within the park. The Merced River offers boaters many sections of world class whitewater. Currently, boating is restricted on the Merced River on all sections except for the area between Stoneman Bridge and Sentinel Bridge. This ban prohibits boating in many areas offering spectacular whitewater and scenery. Use of non-motorized/human powered watercraft in rivers provides a low environmental impact form of recreation. Whitewater boaters tend to be a very environmentally conscious user group. Modern whitewater boating is very safety oriented and often involves using specialized equipment and training. Whitewater boating on the Merced River also poses no threat to other park visitors. I believe that the Park Service should be encouraging responsible, low environmental impact forms of recreation. During the Merced River Management Plan Scoping, please consider revision of park policy to allow non-motorized boating on all sections of the the Merced River and it's tributaries.

Correspondence ID: 82 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Stingaciu, Adrian
Outside Organization: Unaffiliated Individual

Received: Jun,09,2007 00:00:00

Correspondence E-mail

Type:

Correspondence: Dear Sir or Madame, I would like to send you my comments on the Merced Wild and Scenic River Comprehensive Management Plan. As an avid backcountry visitor to Yosemite National Park, I have seen both the beautiful grandeur of the Merced wilderness as well as the filth that is strewn along its trails from pack and saddle stock use. While the use of pack and saddle stock use allows a few to visit the wilderness, it spoils its trails by carving deep ruts into the earth, polutes the water sources vital to people and wild animals, and fouls the air. The Merced River Plan needs to address the currently excessive impacts due to pack and saddle stock uses throughout the Merced River watershed. The riding stables in Yosemite Valley are resulting in contaminated water and eroded trails that are polluted by offensive manure, urine, odors, dust, and flies. The riding stables should be closed, and the site naturalized, as called for in the Yosemite Valley Plan. The High Sierra Camps (HSCs) at Vogelsang, Merced Lake, Sunrise and May Lake are polluting the Merced River and adversely affecting the recreation experience of countless park visitors. All of the HSCs should be closed, and the sites restored. Commercial packstock enterprises must be strictly limited to the handicapped to protect the Merced River corridor and the experience of park visitors who are adversely affected by the many impacts of these operations.

Correspondence ID: 83 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Toney, Michael F

Outside Organization: Unaffiliated Individual

Received: Jun,09,2007 00:00:00

Correspondence E-mail

Type:

Correspondence: yose_planning@nps.gov Superintendent, Yosemite National Park Attn: Scoping Comments for the Merced River Plan Dear Superintendent, Yosemite National Park,

I would like to comment on scoping for the new Merced Wild and Scenic River Comprehensive Management Plan and Environmental Impact Statement (MRP/EIS). Please place my comments in the public record for the scoping of this document. I have visited Yosemite for more than 40 years and I care deeply about this region. The Merced River Plan needs to address the currently excessive impacts due to pack and saddle stock uses throughout the Merced River watershed. One specific aspect of this is that the riding stables in Yosemite Valley result in contaminated water in the Merced River. Use of pack stock also results in eroded trails that are polluted by offensive manure, urine, odors, dust, and flies. The riding stables should be closed, and the site naturalized, as called for in the Yosemite Valley Plan. Commercial pack stock enterprises must be strictly limited to protect the Merced River corridor and the experience of park visitors who are adversely affected by the many impacts of these operations. Thank you for considering my views.

Sincerely,

Correspondence ID: 84 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Graham, Tom

Outside Organization: Unaffiliated Individual

Received: Jun,09,2007 00:00:00

Correspondence E-mail

Type:

Correspondence: I write you today to plead with you to re-consider the plan to reduce the number of units in Housekeeping Camp.

Why?

Housekeeping provides some of the most beautiful and comfortable camp sites in all of Yosemite.

1) Situated right on the river, they provide the most intimate connection to the natural power and beauty available to casual every day campers. They have the shelter of Curry Village, but are located right on the river.

2) You can cook. The push to move visitors out of Housekeeping and into Curry is unfair, as you cannot keep food or cook at Curry. That leaves you eating pizza from the concessions, and dramatically increases the cost of camping. Plus family cooking is part of the bonding experience. Cooking out of doors and washing dishes afterwards are rites of passage for young families. Fast food in Curry just does not provide the same experience. Concession food is expensive (This is a big reason why the plan is labeled elitist, and a play to profit the vendor) limited variety time consuming does not provide family time to work together to prepare and clean up, and care for each other

3) Views are outstanding from camp sites. The plan to make them off limits, in order for brush to grow along banks is a terrible waste. There are hundreds of miles of river available for brush to grow on already. This is not necessary right here.

4) Balance between use and preservation needs to be maintained. The value as a visitor spot outweighs the value as a preservation

spot. You don't consider removing the pedestrian bridge at the base of Yosemite falls, because its value outweighs the need to return the spot to its natural environment. This use balance is what defines a park, vs an off limits preserve. Housekeeping is a very high value visitor destination. That value outweighs the lofty plan to return the Merced to its ice age state.

5) Removing the camp sites is outside the scope of the funds granted you to repair flood damage. The sites were not destroyed. Even if they were, your mandate would be to repair or replace them. Not remove viable sites.

Please revisit this part of the plan. Housekeeping is currently booked up solid throughout the season, because it is special. Do not take that away from the families that enjoy it every year.

Correspondence ID: 85 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Seeley, Dick
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: To: Yosemite National Park Superintendent

My only comment is that irrespective of the Court's holding on restricting access to the river corridor and irrespective of the National Parks view of a "conditions based adaptive management user capacity approach", I would fervently hope that the ultimate plan will be one in total favor of the environment, for the trees, the bushes, the grass, the rocks, the animals and other, non-human living things, rather than hotels, motels, strip malls, dams, piers, etc., etc., etc.

If proper care and maintenance require restricting the numbers of humans that can visit the area, then so be it. We humans have ruined enough of the wilderness, the rivers and the animal world, we need to protect what little we, as a nation not to mention the world, have, and thats all I have to say.

Thank you for keeping me informed.

Correspondence ID: 86 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Hart, Chris
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Yosemite National Park Superintendent: I am writing regarding the open comment period for the Merced River Management Plan. One of the current areas of river management in Yosemite Park I would like to see revised is the restriction on boating sections of the Merced River within the park. The Merced River offers boaters many sections of world class whitewater. Currently, boating is restricted on the Merced River on all sections except for the area between Stoneman Bridge and Sentinel Bridge. This ban prohibits boating in many areas offering spectacular whitewater and scenery. Use of non-motorized/human powered watercraft in rivers provides a low environmental impact form of recreation. Whitewater boaters tend to be a very environmentally conscious user group. Modern whitewater boating is very safety oriented and often involves using specialized equipment and training. Whitewater boating on the Merced River also poses no threat to other park visitors. I believe that the Park Service should be encouraging responsible, low environmental impact forms of recreation. During the Merced River Management Plan Scoping, please consider revision of park policy to allow non-motorized boating on all sections of the the Merced River and it's tributaries. Sincerely,

Correspondence ID: 87 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Williams, Thomas
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Park Superintendent Tollefson and Planning Staff:

I agree with the comment in the "Planning Update" for May 2007 (page 4) that having courts define "user capacity" is both dangerous and improper. If labeling the portion of the Merced River within the Valley as "Wild and Scenic" can result in such an absurdity, including overriding your excellent current Merced River Plan, then either that "Wild and Scenic" status needs to be removed within the Valley or the laws for what such a designation means need to be revised. I was just reading in the San Francisco Chronicle (May 26 front page) how there are no rooms available in the Valley for any night during the entire summer. This is how insane removing all of those cabins at the Yosemite Lodge was without creating comparable replacements elsewhere in the Valley,

and I am sure that this stupid "Wild and Scenic" designation was a factor. And as for increasing the park entry fee from \$20 to \$25, I wholly support that increase. That difference is less than two gallons of gas and it is important for users to contribute more to the cost of maintaining and restoring this wonderful park.

Sincerely,

Correspondence ID: 88 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: West, Deanna
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: Park Form
Correspondence: Of special concern: The aesthetic treatment of any buildings or placement of unnatural barriers. What I love: The rushing sound of the Merced; out near the Mirror Lake turnoff there is a bird sanctuary. Experiences valued: seeing it flow from my car. Especially when you first enter the Valley and then when you're leaving. Services: 1. up at Happy Isles there should be Junior Ranger programs in that tranquil area near the Nature Center. 2. A bike trail should be separately following the river. Appropriate activities: I think that the stopping areas are appropriately placed (for viewing the scenic views); climbing hiking and biking should be encouraged. The shuttle bus idea is good.

Correspondence ID: 89 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Fiebigger, Dieter
Outside Organization: Unaffiliated Individual
Received: Jun,09,2007 00:00:00
Correspondence Type: Park Form
Correspondence: I and my family are visitors/campers to YNP since 1963 and for many years I have suggested via these comment forms and at your EYY in 2005 to extend the present bike trail system as far out to Pohono Bridge. The last answer I have received stated that the project was in the planning stages. Please let me know of any progress made of this issue (if any) and I will forward it in my next commissioner's report to my parks & rec commission. P.S. We are extending our present trail system in Mammoth into Mono County. My second suggestion comprises of more campground in the valley, mainly for families who can not afford lodging prices. You may answer: "more people in the valley!" Just take a survey from all the cars with bikes on it. What better way is it to get people out of the village area on an extended bike trail, not to speak of all the rental bikes I see. It has been 10 years after the 100 year flood and we are still short part of Lower Pines and Upper and Lower River campgrounds. Try out for the first season: one of the above for overnights only on a first come first serve basis, and the other one: "tents only" and see how ti works. Best Regards,

Correspondence ID: 90 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Caldera, Angela
Outside Organization: Yosemite Valley Campers Coalition Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Gentlemen: My involvement with Yosemite started in 1950. That was my first trip there as a camper. And our family tradition continues. My involvement with the NPS and the Valley Plan started when I received a copy of the 1980 GMP. My involvement with federal bureaucracy started in 1997 at the open house house in Pasadena Ca. That also continues to date. I have written many letters to you over the last few years. I have met many of you, though quite a few of those people have moved on. But I'm still here and I have no plans to "move on." I will again confine my comments to the camping experience that thousands of Americans have enjoyed over the years. The NPS is continuing their selective discrimination against the largest group of park users - campers. This discrimination is based on socio-economic and ethnic grounds. You can increase the high- end lodging facilities all you want and you will get the high income visitors. These people will not be excluded from the Yosemite experience. But reducing the number of campsites and other low-cost lodging, i.e., Housekeeping, will exclude many low and even middle income visitors, especially young families with children. Economic discrimination is not new. The by-product is ethnic discrimination. If you price anything high enough you eliminate a great many people. The development and commercialization of the valley must stop. When I received that Valley Plan book in 1997 you listed all the people and different groups that had been sent a copy to get their input. You did not include any campers on that list. Your "public" process has been flawed from the beginning. I write you again with the same concerns I have had over the years regarding camping. Yosemite is not a corporation. Yosemite should not be turned into a wilderness "resort." Yosemite IS A NATIONAL PARK, preserved so that ALL people can enjoy Her greatness. You may want to call it "environmental justice" but no matter what you call it, it is discrimination. Further reduction or elimination of campsites in the valley is unacceptable. Restore the Rivers campgrounds.

Correspondence ID: 91 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Acree, Martin

Outside Organization: Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence:

Superintendent Michael Tollefson P.O. Box 577 Yosemite, CA 95389 Dear Sir: Thank you for the opportunity once again to comment on the Merced River Plan. Having lived and worked in Yosemite since 1982 and lived within view of the river in my El Portal home since 1986, I feel a sense of responsibility to share some observations of how this plan may help to better preserve and protect the river resources that Congress intended to protect with the Wild and Scenic River legislation. If I sometimes sound critical of the NPS please forgive me as I too am the NPS and learn from my success as well as less than successful work and life ventures. I feel strongly that the NPS needs to do a better job at allowing natural processes to prevail. This is a goal of the GMP, and the MRP should have an emphasis to accomplish these goals. What I have seen over the past twenty- plus years is at times to the contrary with a lack of respect for the river environment. In particular, concerns are the many areas alongside the river used as construction staging areas. Perhaps the environmental compliance that allows for such use states that mitigation will occur but I have not seen the mitigation and have only seen the staging areas turn into degraded areas, or to put it more bluntly DUMPS. I have witnessed some of the most valuable real estate on the planet earth used as landfill with river oxbow topography filled because of poor construction management practices. Examples include but are not limited to Camp 6, the former Upper and Lower River Campgrounds, the Greenmeyer sand pit in El Portal, the former construction trailer site adjacent the wetlands near the El Portal fiscal office and the dirt area across from the new RMS building in El Portal. All of these substantially degraded areas due to their use as CONSTRUCTION STAGING AREAS received no follow through to mitigate the impact of the staging areas. This sort of mismanagement of areas so close to the river seems at times to be a way to have incremental degradation of the sites to make future development easier. I am not suggesting that this was intentional, yet there has been no intentional mitigation to restore these sites to pre-staging area conditions. Jerry Fischer has had a similar strategy at Yosemite View Lodge and has either placed his employee trailers and most recently, a bone yard and contractor staging areas where he next plans to develop. In addition, he then makes these eyesores magically disappear with his beautifully landscaped three story Motel 6 copies, parking lots and enough light pollution to illuminate the granite walls of the Parkline slabs inside Yosemite National Park. I lived in Camp 6 in the early eighties. It was a former campground which had evolved into employee housing - tent cabins. The rumor in the eighties was that it was to become a parking lot. The area changed over the next two decades, as it was filled and leveled. Projects such as the construction of the Sentinel Bridge and most recently the Utility work filled remaining low-lying areas, completely changing the soil and plant structure. Comparing aerial photographs of Camp 6 from the 1980's to the present illustrates the degradation. Upper and Lower River Campgrounds were well on their way to the restoration called for in the YVP EIS. Their use as CONSTRUCTION STAGING AREAS for the utility projects left behind compacted soils and dump piles of asphalt and construction debris. As the high water of the previous two winters moved through these areas, we again see why they were set aside for restoration, except this time the water had to negotiate piles of asphalt and construction spoil pile. These actions are not very appropriate management of the river. The 1997 flood restored much of the Greenmeyer sand pit in El Portal. Again by allowing this area to be used as a construction staging area for the Emergency repairs of the flood damaged El Portal Road and later the El Portal Road project it was degraded by dumping thousands of cubic yards of rock, soil, concrete and asphalt and grading materials on the banks and bed of the river. Ten years later and again, no mitigation has occurred as is always promised. The same goes for the flat across from the new RMS building where wildflowers were present prior to its "temporary" use as a batch plant. The temporary power pole and lighting still remain and instead of wildflowers, we have a dirt parking area. Once again, a lack of planning, for if a parking lot was formally planned for the site it would have to conform to state water quality standards and have oil separation filters for the run off. Therefore, like Camp 6, we have another parking area never formally planned and therefore no water quality protection incorporated into the design. Probably the best way to codify our intent to restore the construction staging areas is to zone them as restoration or revegetation zones. Adding more language to mitigations seems to get lost, and enforcement of mitigation seems to be a bit lax. The issue of construction staging areas in the river corridor that are never restored is just one example of what I mean when I say we need to show respect for the riverine environment. We need a plan that encompasses more than a narrow river channel, one that protects the floodplain as well. Address use limits- we do not have room for unlimited parking. Move Camp 6 to the north of North Side Drive as the authors of the YVP EIS promised. Allow the free flowing river to shape the landscape, unhindered by construction spoil piles. Take action to restore the function 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. I have heard many times over the two and one half decades that I have lived and worked in Yosemite that members of the park staff write off Yosemite Valley as a sacrifice zone. I remain hopeful that future managers dismiss such attitudes and work with nature to restore the processes, which helped form such beauty. In addition, remove inappropriate development to allow such processes to prevail.

Sincerely,

Correspondence ID: 92 **Project:** 18982 **Document:** 36040
Project Name: Merced Wild and Scenic River Comprehensive Management Plan
Outside Organization: Barman, Martin
Wawona Property Owners Association Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Superintendent: We are owners of a home in North Wawona since 1968 and we are strongly opposed to any plan that would permit public campgrounds or high density development in the Wawona area. These kinds of projects would produce an unwanted environmental impact on Wawona, a single home area. We can think of NO reason to change the environment of Wawona (for all time!). This type of development was previously proposed by the Park Service in the past, perhaps the 70's and defeated. Why does

the Park Service want to change the environment in such a historic area?! It makes no sense. If you have any questions or comments, please contact us @XXXXX. Sincerely,

Correspondence ID: 93 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Loberg, Pierce L
Outside Organization: Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Mr. Michael J. Tollefson Superintendent, Yosemite National Park P.O. Box 577 Yosemite, CA 95389

REF: Merced River Plan Version 3 Scoping Comments

Dear Mike:

I thank you for the opportunity to again provide scoping comments on the above referenced plan. It is a shame that the NPS must spend so much time and budget on planning and re-planning. You will never be able to satisfy everyone and it seems that there are some that are determined to get their way by ignoring the laws that created the parks and the NPS.

Yosemite Valley is unique. It was granted to the State of California so that it would not be homesteaded and privatized. The public's right of access was guaranteed by language in the law that said the area was "... to be held for all time by the United States of America for public use, resort and recreation."

The NPS produced a General Management Plan that recognized the public's right of access. However, when the Wilderness Act was passed, it was made to infringe upon the Yosemite Grant and limit the public's right of access. Later, the Wild and Scenic Rivers Act was passed and applied to the Merced River, it also infringed upon the Yosemite Grant. Only 3 percent of the original Yosemite Grant is unencumbered by the Wilderness or River Plan designations. The NPS established a scientific approach (VERP) to appropriately manage visitation (public access) to carry out its responsibilities under the Organic Act. But the Court has directed that visitation limits should be fixed. The Court is ignoring the public's right of access.

1. The Wild and Scenic Rivers Act does not apply to private property. Yosemite Valley is unique and the Wild and Scenic Rivers Act does not apply. The public's right of access to Yosemite Valley should not be limited by a law that was written to limit construction of dams and reservoirs on public land. I believe that you should exclude the Yosemite Grant from the Merced River Plan corridor.

2. Tributaries such as Tenaya Creek at Tenaya Lake should be included in the River Plan. Other tributaries such as Bridal Veil Creek and Yosemite Creek should be included as well. The previous plans did not include tributaries of the Merced River just so the maximum corridor width would be available in Yosemite Valley. Sincerely,

Correspondence ID: 94 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Stark, Joshua
Outside Organization: National Parks Conservation Association Stockton Program Manager Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence: To Whom It May Concern:

Attached and within the body of the text you will find the National Parks Conservation Association comments for the Merced River Plan.

June 8, 2007

Michael Tollefson Superintendent Yosemite National Park Attn: Merced River Plan P.O. Box 577 Yosemite, CA 95389
Yose_Planning@nps.gov

RE: Public Scoping Comments for conservation planning and environmental impact analysis for the Merced Wild and Scenic River Comprehensive Management Plan (Merced River Plan), noticed in 72 Fed. Reg. 18272 (April 11, 2007)

Dear Mr. Tollefson:

On behalf of The National Parks Conservation Association (NPCA), thank you for the opportunity to comment on the Merced River Plan. NPCA is America's leading private, non-profit advocacy organization dedicated solely to protecting, preserving and enhancing the National Park System. NPCA was founded in 1919 and has more than 320,000 members and supporters.

For the past thirty-five years NPCA has been advocating for the restoration of Yosemite Valley to a more natural and beautiful place by phasing out facilities and services that do not belong in a national park. We appreciate all of the work the National Park Service has put into identifying ways to measure and act on carrying capacity concerns. We understand the difficulties that have arisen as NPS has attempted to manage a river much loved by millions of people. This is an important and delicate undertaking, which requires the NPS to use science and monitoring to manage the park in a way that will protect the remarkable natural and cultural resources while facilitating, to the extent sustainable, a great visitor experience. After all, visitors travel to Yosemite to enjoy nature's beauty unimpaired for generations to come ? not to suffer stifling crowds and degraded riverbanks.

As you know, NPCA supports the Merced Plan that was issued in 2005, and commends the Service for producing a sound, practical and effective map for the future of the river corridor. We regret the fact that this current planning effort is necessary, and although we understand that it is court-imposed, it is disturbing nonetheless. The litigation has impacted the park's ability to proceed on projects approved in the Yosemite Valley Plan that are within the river corridor and were enjoined. Because of this situation, we urge you to expedite this MRP and Environmental Impact Statement (EIS) process to the greatest extent possible. While the current proposed timeline indicates that a Record of Decision would result on September 30, 2009, we hope that this can be completed sooner, since delays of some of the projects are adding to environmental problems. Perhaps with additional staffing and resources, some of the steps can be accelerated, for example the report drafting. We are not suggesting that comment periods be reduced.

General Comments

As stated above, the Merced River Plan that was overturned by the District Court was entirely acceptable. We are supporting the park in its appeal of this decision, and hope that the decision will be reversed within the year, and you will be able to proceed with the projects in the Yosemite Valley Plan. That said, there is always the possibility that the appeal will not succeed, and while we would strongly disagree with such an outcome, we will have to accept the situation. For that reason, we respectfully submit these comments for the public scoping phase for this third revision. We are reluctant to do so, in fear that anything might be interpreted to suggest that the earlier plan was legally insufficient. In order to avoid that, we want to make it clear that the following comments are intended to improve the plan process, but must not be construed as identifying legal flaws in the earlier plans. In fact, if the appeal is unsuccessful, these comments are designed to guide the process towards a plan that will better satisfy its detractors, by specifically explaining how the concerns expressed by the court were addressed. By far the most controversial elements of the overturned plan relate to its approach to setting limits on visitor capacity. In a mystifying opinion in July 2006, the District Court found that the park's use of the Visitor Experience and Resource Protection (VERP) program was "inadequate to constitute the primary feature of a user capacity program." The court seemed to misunderstand that the park had included specific measurable limits in the interim period as VERP is implemented, and misconstrued the requirements of the Wild and Scenic Rivers Act in relation to this issue. This all argues for a more concerted effort in this new plan to explain this approach comprehensively, and to identify exactly how these adaptive management approaches are applied to the different parts of the river corridor. In other words, the plan should be regarded as almost a primer on the application of the VERP program, designed for laypersons with no resource management background.

For instance, examples might be teased out that show how standards are determined (pulling out some specific ones as illustrative), how comparable locations are identified to set standards and determine reasonableness, and how research studies and screening processes are used to determine a meaningful standard (again using concrete examples). The park must also show how monitoring strategies are employed, and what actions are triggered when standards are breached. We realize that much of these are available in reports and informational material about planning, but it is evident in this case that there could be a benefit in including such detail.

We were surprised that the Court did not realize that there were concrete interim limits in the overturned plan, so perhaps the new plan could be more explicit about them. During discussions with us about the lawsuit, park planners were extremely clear and open about these limits and methods. During formulation of the new plan, these clear explanations should be included. The five types of limits should be thoroughly explained and shown where they apply. There should be a section that talks about interim limits to be set while the VERP process unfolds, and lists those limits and where applied. For example, the character of the limitation should be identified (duration, time of day, user number, entry limits) along with the activity associated with it (rafting, fishing, etc.). Limits on facilities must be clearly identified as visitor capacity limits. This includes things like number of lodging units, campsites, tour bus parking spaces, employee beds, etc., that have an effect on how many visitors can be accommodated. Again, we are not saying that these were not included in the overturned plan ? but perhaps the use of them could be more fully shaded in, so that anyone reading could see that the park has a plan for protecting the carrying capacity of the land.

Finally, it may be useful to explain in both the public meetings and in the draft plan itself the evolution of VERP. Many of the groups challenging the earlier plan possibly based their objections to misunderstandings about where VERP has gone in the last twenty years. In its early years, many parks may have applied this approach using trial and error methodology. As more experts gained experience with the concepts, the approach can now be described as one of the most effective ways to protect carrying capacity in existence, if applied effectively. Many years ago, resource managers espoused the concept of adaptive management approaches, and began searching for ways to apply this. The Forest Service formalized "Limits of Acceptable Change" in the 1980's, which was embraced and incorporated into VERP in 1993. Subsequently, these approaches have developed improved scientific ways to set standards, measure and compare actual data on the ground, and apply the management prescriptions when indicated. While not perfect, the approach far exceeds any existing approach and is galaxies ahead of sehoc and unscientifically-based numbers. The public meetings and plan might benefit from a very short recitation of this. No more than a paragraph is necessary. But park users and potential litigants must realize what are the alternatives to VERP, and understand what they are criticizing when they call for going back to outmoded and less effective ways of limiting visitors.

Outstandingly Remarkable Values Protection

Much of the emphasis at public meetings is on the entire park, and the public's desire to maintain its natural, majestic, iconic values by limiting visitors. The park needs to emphasize the fact that this plan, although a precursor to broad park protections, is designed to impose additional protections to benefit the Merced River corridor. We feel that was adequately conveyed in the overturned plan. However, it should be recognized that the plan was criticized by some river protection groups from outside the state, and there have been complaints from some of them that the Park Service as a whole does not take the Wild and Scenic River Act seriously enough. While we heartily disagree, we wonder if the Merced River Plan can be used to educate and remind people that the Park Service does take its responsibilities seriously, and recognizes that its protection in this iconic park is perhaps one of the most important responsibilities it has. This plan is an opportunity to address misconceptions in a segment of the river protection community.

During the scoping meetings and plan formulation, NPCA urges you to repeat the exercise of generating ideas from the public about the most important Outstandingly Remarkable Values (ORVs) of the River, and how best to protect them. While this was done last time, perhaps you can document this process more and include more of the discussions in the plan. We believe the National Park Service sets the tone and direction for the entire country on Wild and Scenic River Act planning, so plans that effectively protect extremely well-known and loved Rivers like the Merced set an important precedent. This is why we think that an expanded discussion of ORV protections is vital, and would benefit the Wild and Scenic Rivers System in its entirety.

Incorporating Lessons from the Tuolumne River Plan Outreach Process

We urge you to incorporate the outreach approach you have been using in the Tuolumne Wild & Scenic River plan processes. We feel you have been very successful with inviting participation and attracting input from disparate groups, through an extremely open and well-publicized public process. After the public scoping phase, the planning team at Yosemite National Park offered a series of public workshops, to explain and offer public input into the second phase. These include helping to develop management prescriptions based on the public comments and legal requirements, and "painting" the river corridor with proposed management prescriptions. While we recognized that earlier Merced River Plan processes also reached out to many groups, we encourage you to build upon those successes, and build a broader base of commentators. We urge you in particular to include the organizations that challenged the earlier plan, to help explain resource issues and demonstrate that their views are valuable. As you know, greater inclusiveness can potentially curb opposition from groups that may not have understood the plan's effects, or even may have felt somehow disenfranchised or ignored in earlier planning processes.

Funding One of our greatest concerns is that the plan is implemented, but vital functions cannot be performed due to lack of resources. In some cases, this can undermine the entire plan. A good example is the VERP program, where an inability to monitor the conditions would render the adaptive management process ineffective. This discussion of funding should be included in two areas.

First, we urge you to identify areas, such as the above-mentioned VERP monitoring provisions that are vital. Once identified, explicit direction should be included in discussions if they cannot be carried out due to lack of funding, the activity or use associated with that area must be curtailed. This is simply logical. A plan must not simply be a piece of paper ? when a vital piece cannot be performed, it must be acknowledged that the plan is not being followed, and repercussions must ensue.

Second, the discussions should include predictions of likely or potential funding problems, and identify alternatives if a shortfall should occur. For example, if the park lacks full-time enforcement officers, will the park make provisions to for self-policing mechanisms on some trails, hire volunteers, or engage part time officers to fill in gaps? Anticipating funding problems makes this plan more realistic and more likely to be successful.

Conclusion

Thank you again for the opportunity to comment on the Merced Wild & Scenic River Plan scoping process. We appreciate all of your efforts in revising, defending and reaching out to the public about the earlier versions of this plan, and thank you for your dedication. We look forward to further opportunities to provide comment and input as this plan moves forward.

Sincerely,

Correspondence ID:	95	Project:	18982	Document:	36040
Project Name:	Merced Wild and Scenic River Comprehensive Management Plan				
Outside Organization:	Adair, Gregory M Friends of Yosemite Valley Unaffiliated Individual				
Received:	Jun,11,2007 00:00:00				
Correspondence Type:	E-mail				
Correspondence:	Attn: Merced River Plan, Yosemite National Park, PO Box 577, Yosemite National Park, California 95389				

From: The Friends of Yosemite Valley, and Mariposans for Environmentally Responsible Government To: Yosemite National Park Planners and Staff:

Thank you for this opportunity to participate in scoping for the Merced River CMP.

We would like first of all to recognize that there are many well-meaning employees within Yosemite's ranks, who want the best for the Park and for the Merced. We acknowledge them, and thank them for being here in Yosemite. We greatly hope they will find the courage to speak out on behalf of the River in their official roles during this process.

The voices of those of us outside the NPS who have called for meaningful protection of Yosemite's Merced have not yet been taken seriously. We have filed administrative comments at every possible juncture, in the hopes that this would change. Of those who have been largely resisted or ignored, we would include ourselves, MERG, the Sierra Club, and also very astute private citizens like Jeanne and Lou Aceto, and many others. We are surprised by how very good ideas, with some exception, have been shut out. We would simply say that we are, at this moment, hoping to again state clearly some good ideas which we think are fundamental in completing the task at hand. We will try to avoid the temptation to cynicism given the circumstances of NPS's current appeal in the 9th Circuit..

Of those who have been ignored so far, we regretfully include the Ninth Circuit Court of Appeals. We would ask that the NPS recognize that the courts often play a key and productive role in changing agency culture and ideas, and in shaping the thinking about plans in an evolving legal environment over time. Admittedly there is an element of "pain" if an agency is corrected by a court. But we think it is a mistake for the NPS to merely react to this, and to resist a new opportunity towards a directed change. We have been honestly, extremely surprised by the NPS's response to the Appellate decision in 2004. Whereas the Court made it clear that the entire CMP was held invalid, NPS made efforts to portray another reality in the public press, essentially saying that the earlier CPM was a good plan in need of specific technical corrections. This became the public position of the Park Spokesman, the Chief of Planning, and in fact of the 2005 CPM itself. This was obviously misguided, given the plain language of the 9th Circuit's holdings, as underscored by the ruling of the District Court last July. We do not mention this to belabor errors of the past. Quite respectfully, we mention it because it appears that the NPS still holds this erroneous position. A few weeks ago, the Spokesman for the NPS publicly re-iterated the belief that the 9th Circuit (and now the District Court) had merely ordered something akin to a technical correction of an existing CMP. The problem is that this has not been the position of any court since 2004, and was never the position of the 9th Circuit. It should not be the position of the NPS now. We think that the NPS should publicly clarify that we -- collectively -- are before the task of producing a new and different CMP.

D). Concerning public posture in advancing this planning process:

NPS should decide to produce a new CMP. By this we mean, simply, that you should collectively intend to do it. We worry that because of your parallel action to preserve the old CMP through appeal, you really do not intend to produce a new one. We worry that you are just going through the motions, and dragging us all along.

NPS should produce a new CMP. A new CMP needs to thoroughly rethink management elements in order to succeed. We think the best course for a new CMP is a comprehensively new CMP, which freshly proposes management elements which will actually protect the River's values. Most important to this is re-thinking ORVs, giving them quantified and geographic substance, and defining a capacity of use which will result in their protection, as we discuss below.

NPS should produce a new CMP and properly explain this action to the public. NPS should make every effort to explain that it is intentionally and thoroughly revisiting, or newly proposing any and all management elements necessary to provide the Merced with a legal and protective CMP. This would begin to correct the errors of 2005, when NPS improperly reigned in the scoping process by announcing that the scope of the plan would be limited to revision of El Portal Boundaries and re-proposing VERP. We ask that NPS make it clear to the public that this new plan is, and must be, open for fundamental revision.

National Input NPS should expand its outreach for comments on his plan. Yosemite is a significant national and international resource. Thus, the scoping process should include a means and solicitation for public input from across the U.S. to comment. It appears that most of the time and effort of the scoping process, and the public participation throughout the past planning process (e.g., evaluation of alternatives), has been too focused on the current visitors and local residents.

In explaining the character of a new CMP to the public, the NPS should begin to correctly characterize what the law requires for its user capacity aspect in the public press, and should facilitate an honest public dialogue. It is within NPS's power, and its responsibility, to begin an honest public dialogue about what a legal user capacity program means in managing Yosemite. As we describe below, creating user capacity for Yosemite's Merced is an administrative decision, and as such it requires the participation and credence of all who can be named as stakeholders. The law, the courts, and the Interagency Guidelines give very sound language for describing what is meant by "user capacity". We respectfully ask that NPS stop using the negative term "quota" in the press, and to no longer claim that FoYV is advocating a "quota". Additionally, we ask that NPS stop saying that (FOYV et. al.) want to enforce a regime of "bouncers at a nightclub", and so on. This does the public a great disservice. It undermines the work which we must all try to accomplish together, next. Implementing a legally valid user capacity program for Yosemite requires honest engagement with the public. It must involve dialogue about the meaning, importance, and practical steps involved in establishing a workable and legal user capacity.

NPS should publicly explain that, because it will produce a new CMP for the Merced, it will revisit decisions made in the Yosemite Valley Plan (YVP) and its tiering documents. We ask that the Chief of Planning correct earlier statement(s) concerning the NPS having no intention to revisit the YVP. We ask that this correction be conveyed through the park spokesman as well. We think the error in this is plain, and should be corrected.

II). NPS should rescind the Yosemite Valley Plan ROD. NPS should integrate the rescission of the YVP into the development of this CMP, at this time. NPS should subsequently revisit planning for Yosemite Valley, the Merced Gorge, El Portal, and Wawona upon the guidance of a legally valid CMP, and the court-mandated revision of the GMP.

Doing this (rescinding the YVP ROD) is important because of history. The earlier, invalid CMP was undermined at its conception, because the YVP and its program was truthfully, and obviously in force. We have been saying this all along:

"The head of the MRP revision planning team indicated that as part of preparation for the revision of the MRP, the planning team re-read the Yosemite Valley Plan and consider it in the planning process. When a member of FoYV questioned this, it was indicated that this did not seem to be a problem. We feel it is a major problem to producing a protective River Plan. The ORVs need to come first. They need to be what forms the River Plan. The Yosemite Valley Plan and its myriad of development projects, lurking on the sidelines, should not be determining what happens in the MRP. The short term goals of previous and current administrators of Yosemite National Park to get the Yosemite Valley Plan implemented need to be set aside by the Merced River Planning Team." (FoYV, CMP Scoping, 2005)

Friends of Yosemite Valley have many times made the point that the 2000 CMP was obviously, and improperly developed in light of decisions in the Yosemite Valley Plan. The plans were developed simultaneously, but the management ideas of the YVP had a longer history and deeper roots in Yosemite's planning culture. The YVP itself, and perhaps more generally its management ideas, broad redevelopment program, and unchecked environmental impacts, profoundly shaped the invalid 2000 CMP. The 2000 CMP's progeny in 2005 was thoroughly undermined for the same reason. We characterized this situation as the "development cart" standing in the way of the "protection horse". We think that the CMP for the Merced has never been properly developed because its scope and objectives have been constrained by management objectives of other plans, particularly the YVP. This is improper.

If the correct "horse-to-cart" relationship for the Merced CMP is to be established, the CMP must provide direction and guidance for "managing visitor use, development of lands and facilities, and resource protection" within the Merced River corridor while providing a "template against which future implementation plans are judged." ... The new River Plan should be developed under the assumption that the (extant) 2000 YVP is not providing guidance in the development of the new CMP. To rescind the YVP ROD is the most important single measure which would assure that the new CMP would actually place the horse in front of the cart, for the first time. In order to credibly produce a CMP for the Merced which guides subsequent decisions concerning development of lands and facilities, and because of the numerous inescapable conflicts between the YVP agenda and the protection of ORV's, we have said that the YVP ROD should be rescinded: * We think that NPS should rescind the YVP ROD without delay. * NPS should integrate the rescission of the YVP into the development of the new CMP. * A crucial goal in the development of the CMP -- which depends upon rescission of the YVP ROD -- should be the abandonment or complete re-thinking of "zoning" proposed in the 2000 CMP, also noted below. * The YVP ROD should be set aside because it improperly retains the management objectives of the zoning program of the 2000 CMP. (Please note, conversely; a new CMP would remain immune to real alteration, unless the new CMP improperly adopts the same management zoning scheme as prior plans, because these schemes were designed to dovetail with the YVP). * This CMP should start fresh from a very different "use" perspective, tied closely to the protection and enhancement of ORV's (as discussed below). * We think that a decision to rescind the YVP ROD is properly within the scope of this CMP. Decisions on ORV protection, user capacity, zoning, and all land use are determinative of all planning for Yosemite Valley, El Portal, the Gorge, and Wawona. These decisions must occur FIRST, within this CMP. It would be improper to "grandfather in" these decisions from a prior document. Land use decisions of the YVP are particularly inappropriate as CMP management constraints, because the NPS can simply translate these into new CMP management elements on the pattern of the former zoning.

III) The NPS should draft a CMP based upon the protection of the Merced River's ORVs

* The NPS should more clearly define ORVs:

Recognizing the importance of ORVs, the WSRA Interagency Commission (2002) provided another management directive: "Thoroughly define the ORVs to guide future management actions and to serve as the baseline for monitoring." The NPS should more clearly define the ORVs in Yosemite, in order to actually protect them. In 2004 we wrote:

"The National Park Service has stated that by being more general in their descriptions of the ORVs they can better protect the ORVs. On the contrary, in the River Plan, NPS needs to be transparent and specific in their description and discussion of the ORVs, their locations, interactions with other animals, plants, processes, etc. The public should understand the specifics of the ORVs in order to be able to help watch and follow and participate in working towards and monitoring their protection and enhancement ..."

There is a lingering problem in how the NPS has ill-defined ORV's, because lacking proper definition, quantification and protective measures do not follow. NPS should clearly define, quantify, locate, and establish protective measures for ORVs. One person wrote in 2004: "We urge the NPS to present thorough documentation and justification of ORVs. The often-repeated statement that ORVs may be in conflict appears to be a barrier to providing adequate protection for any of them: are there too many; do they need to be weighted; what are the specific measurable goals and objectives for each ORV that will guarantee their protection within each project and plan. Currently, it appears that the decision as to which ORVs are protected and which are pushed aside using the "net gain" argument is made in an arbitrary and inconsistent manner by the NPS to advance a predetermined agenda; there is no clear and objective methodology that is consistently applied. The issue of ORVs needs to be reexamined". (Comments of Jeanne and Lou Aceto, Merced CMP Scoping 2004).

While there is no common "definition" of an ORV, It is commonly agreed that an ORV should be that which is the very best of the best in terms of a river's values, and that it should be river-dependant or river-related. Do people travel a great distance to see or

experience it because it is not available elsewhere? Is there anything comparable in the region or the nation? Is it unique and irreplaceable? NPS should look closely at the individual ORVs to determine exactly what is or is not an ORV, and what it must actually protect.

In drafting the CMP, and explaining it to the public, the NPS should recognize that there is a hierarchy or priority of values among ORVs: natural, scientific, cultural are prioritized logically. Some plans have "weighted" ORVs differently. We think this lends support to the idea that the listing of an ORV should not create a non-hierarchical, "flat" plane across which ORVs conflict. NPS should place more weight on the natural, scientific, scenic, and cultural ORVs than upon the recreational.

With that logical recognition, NPS should also consider a more "wholistic" view of the natural, scientific, scenic, and cultural ORVs. ORVs in Yosemite are interrelated in natural systems, aesthetic landscapes, and cultural landscapes.

It is clear that there is an assemblage of values which clearly fit the definition of ORV. Perhaps an "overview" of what truly matters in Yosemite is in order, in order to try to see this as an assemblage or a "whole". (This is not meant to suggest a definitive "list"; we hope that NPS will re-engage the question this way with its resource managers). One dimension of this assemblage is fundamentally natural; the scenic beauty, hydrologic function, biological value of areas of the corridor, and various special status species are all interrelated. To a great degree these things depend on one another, and their protection should re-inforce one another. The naturalness and productivity of meadows and wetlands, the flood regime, the water table, channel migration, are clearly related to the unique type of scenic beauty of Yosemite Valley, as well as to the quality of habitat for species. We see, as we would expect, a relationship between these values. We think it is therefore logical that NPS define, study, and protect and enhance these values individually and collectively. We should add that to the extent that any of these values are driven to extinction elsewhere, their importance in a protective system in Yosemite increases; such sensitivity to the regional or national setting and current change is important to understand with respect to El Portal, for example, where small wetlands and river-related features now figure very large. NPS should redefine its description of natural ORVs with this in mind. Another dimension of Yosemite's ORV "assemblage" is fundamentally cultural: how the native inhabitants of the place have lived from and rendered the landscape sacred, and thus unique and irreplaceable. The Native American cultural landscape, ongoing through use of traditional plants, visits to sacred and ancestral locations, is truly unique to all reaches of the Merced. In turn, it is related to sacred burial sites of ancestors and sites of occupation, which are not to be disturbed. 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 from 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 build-out of Utilities Phase 1. ORV selection should not foolishly embrace a "culture" which is widespread but which stands in continual conflict with one which is legitimately native, rare, and threatened. The direction of WSRA is against this. The "tourism landscape" is also NOT unique by any measure. We think that this "ORV" is false, and needs to be pulled out of the ORV list, and scrapped. Doing so will add clarity to what cultural values are worthy of statutory protection in Yosemite, and hopefully deliver future managers from the gravity of a very slippery slope.

WSRA gives primary emphasis to protection of scenic, scientific, biological and cultural values. NPS should explicitly recognize that this provides needed direction, and hierarchy in order to identify ORVs, and to resolve conflicts between ORVs. To put the question of conflicts simply, we think NPS should adopt the principle that quality, river-related human use of the Merced River is dependent upon the protection and enhancement of the (natural/scientific / cultural) values. Because of this, the (natural/scientific / cultural) ORVs should be weighted differently than those involving visitor experience.

We would like to point out that, with respect to those recreational activities NPS may inscribe in its WSR plan, not all of the activities discussed so far are "unique, exemplary, river-related". Recreation activities need to be scrutinized, and some of them very likely removed from the process. Recreation discussed in this plan should be nature-experience and river-experience oriented. Recreation as discussed in this plan should put the recreation-ist in close contact with a unique or exemplary river value. Having scrutinized individual recreational activity, we also think the NPS should exercise the judgment that, if a particular recreational activity truly rises to the status of unique or exemplary and is river related, that it also not conflict with natural/cultural ORVs so as to degrade them. A very unwise "balancing" was previously accepted between "recreation" and natural values. This led to latent conflicts which we do not think should be written into the plan. There should be inherent conflicts between values; this system -- a system of protection and enhancement of ORVs -- should be managed through a user capacity, and ORV conditions should thus be stable and improving. NPS should apply far more rigor to its selection of what "recreation" is unique and worthy of statutory protection in Yosemite.

In considering what values to express in the CMP, WSRA directs ORV-relatedness. This should lead to decisions to validate camping, hiking, and other activities closely related to ORVs and the experience of natural resources of the Merced. For example, at the Subcommittee Hearing held in the Park on April 20, 2003, Paul Minault provided an excellent analysis on the value of camping as a resource-focused activity:

"National Park Service management policy is to "encourage visitor activities that . . . foster an understanding of, and appreciation for, park resources and values, or will promote enjoyment through a direct association with, interaction with, or relation to park resources." Management Policy 2001- 8.2 Visitor Use (emphasis added). In our comments to the Valley Plan, we listed the ways in which camping enhances the visitor experience, furthers park values, and promotes the enjoyment of Yosemite National Park through a direct association with park resources. First, we pointed out that camping is a form of recreation, unlike lodging in developed accommodations, which is a form of leisure. Second, camping promotes a closer relationship to park resources than any other form of overnight accommodation. Third, camping distances the visitor from the commercial values of comfort and convenience and the expression of social status through consumption that pervade American society. Camping brings the visitor closer to nature, the simple necessities of daily life, and the way people lived in the past. Fourth, camping is democratic. In campgrounds, social distinctions account for little, and camping has the potential to bring people together in shared appreciation of their natural surroundings in a manner that reduces social barriers. The nations' great parks present an opportunity to be a force for social equality.

Unfortunately, the lodging picture in Yosemite preserves the social distinctions of the greater society, rather than leveling them, which we believe should be a goal of the parks. Fifth, camping is inherently communal. Campers have an enhanced opportunity to associate with other people, develop new relationships, and broaden their social horizons. Unfortunately, the Valley Plan largely ignored these values, with the result that camping suffered the loss of 300 campsites in the Valley. Instead, the park now emphasizes exclusive and expensive lodging over traditional camping accommodations that are more in line with NPS management policies."

The CMP should express values opposed to commercialism: We note in passing what NPS already knows: the entire bluster of roads and transit and commerce and resort activity, dining, raft rentals, housing, support, administration and police activity is plainly not river related, and not unique or exemplary. It is still today, as the 1980 GMP declared it to be, the unwanted "fragments of suburbia". Thus, the natural and cultural ORVs of Yosemite, and even activities related to these ORVs which are worthy activities, are a subset of the overall landscape of the place and distinct from it. It is important that NPS grasp this fact; there are two sets of values on the move in Yosemite, and in this plan we can only offer protection to one. Otherwise incorrect values, which do not deserve protection under WSRA or this plan, will crowd out the real ones. (We treat the topic of commercialism separately under "Capacity", below. NPS is required to differentiate commercial and non-commercial uses to establish capacity).

IV) The NPS should document resource baseline conditions for ORVs, and establish a monitoring program including each of these conditions. The NPS should immediately and diligently identify data needs, so that a truly effective ORV monitoring, protection, enhancement program can be enacted as a part of this CMP.

A recent (2002) technical assistance paper published by the Wild and Scenic Rivers Interagency Commission states as a management directive: "To achieve a nondegradation standard, the river-administering agency must document baseline resource conditions and monitor changes to these conditions." Such a scientific base of information would need to document the resources that are to be protected and preserved in the park; the condition of those resources; any changes in condition over time; and actions needed to ensure preservation (Natural Resource Challenge Action Plan, 1999). Such a program needs to be in place FIRST, to provide information critical to this planning process for the Merced CMP. While we hold out hope that the deficiencies will be remedied, we have great concern. For example, an ecological restoration report was released by the Park in June of 2003 which included details of a workshop held in November of 2002. Some very honest random comments by workshop participants included:

"Have monitoring plan in place before start of restoration: 1. Need adequate baseline information; a) Monitor migration of in-stream woody material; b) Soil compaction bulk density measurements"

"...park should collect reference data on existing conditions now for Tenaya and Merced, so have reference for future monitoring. Work on Tenaya Creek should be performed within first five years of project, so work can progress from upstream through downstream areas."

"...noted that she doesn't feel it's possible to restore Valley to pre-Euro American contact because of the extent to which the landscape has changed"

"Don't want to keep doing what we've been doing just in case we are going on the wrong path"

"Experiment with small plots in every area. Monitor over 1 year and then proceed with area that does best"

Such comments imply that baseline information on condition of resources as well as a monitoring program are lacking.

However, the above-mentioned comments validate our concerns with respect to the lack of a sound scientific base of information with respect to resource conditions and monitoring. How can the Park hope to achieve the nondegradation standard mandated in WSRA without such documentation? How will this lack of information imperil the planning process? The NPS should identify those areas where it does and does not have data on the status of ORV, and correct deficiencies.

V) ORV Data / Geography: We think that the baseline conditions of the Merced's ORVs should be quantified, and the ORV's themselves geographically located within the corridor. This is in order to create a system ongoing monitoring of conditions, and to build a capacity system which works well. The NPS should map the location of ORVs, so that they can be transparently understood by the public and agency personnel in terms of present and future management for protection and enhancement. (The normal statutory protection for Native American cultural properties is the exception, though NPS could create a data layer for this for non-public purposes).

To the extent that NPS may rely upon a geographic depiction of areas of the corridor and conditions, we think a map of ORV status, management, and monitoring oriented towards protection should replace the old "zoning" maps. We think that the "land use zoning" map adopted by the former CMP was completely misguided, because it completely lacked relationship to ORVs. It involved experiences, not ORVs. Instead, in this CMP (we hope) a geographic component of an ORV protection and enhancement program should replace the prior "land use zoning" map. We think a true focus on ORVs in this plan, and a geographic treatment of them, should completely re-focus any subsequent discussion of land use, or "visitor use" decisions, as the case may be.

We note in this regard that there is improved data for El Portal in terms of the location of ORVs. As we discussed before the District Court, the problem is that, despite improved knowledge of the condition and location of the resources, "zoning" still was not based upon this knowledge. 3C "zoning" sought to achieve radically different objectives than any depiction of ORV resources in El Portal. In all reaches of the Merced, noting the glaring disconnect in dealing with ORVs in El Portal, we ask that NPS develop geographic

data related to status of ORVs, and dump e earlier "zoning" idea. We feel that the 3c zoning in El Portal is an ongoing disgrace. We look forward to the day when the ORVs of this reach are considered foremost in any and all land use decisions which follow the CMP.

VI) Zoning : The former "zoning" should be scrapped and not re-proposed . It had nothing to do with the protection and enhancement of ORV's, and involved no study of the status of ORVs. The is CMP must protect and enhance ORVs, not establish the template for future (non-ORV-related) land use decisions. We defer to the excellent description of the problem of the earlier CMP's zoning articulated by Jeanne Aceto in 2004: "WSRA Guidelines specifically state that "studies will be made during preparation of the management plan and periodically thereafter to determine the quantity and mixture of recreation and other public use which can be permitted without adverse impact on the resource values of the river area. Management of the river area can then be planned accordingly." The amount of use an area can sustain is inextricably linked to how the resource is to be managed. Adhering to hollow zoning delineations that were developed without resource and monitoring information coupled with a lack of user capacity research renders any new' Plan fatally flawed. Current land-use management zoning appears to have been designed to accommodate predetermined development projects rather than protection of natural resources as the primary focus.

VII) ORV Management Should Protect and Enhance ORV's, in keeping with WSRA: The CMP should apply principles of protection and enhancement to management of ORVs. The NPS should elaborate a list of protection/enhancement principles with respect to ORVs. Below we have begun a list of some important principles which come to mind. (Again, we do not offer a definitive listing of every issue here; we hope NPS Resources Staff will elaborate on this or a similar list, and we will hope to comment further when the draft is prepared.)

* NPS should immediately disown the idea of "net gain", which derives from mitigation. Mitigation and "net gain" accept the principle of loss and replacement. This is contrary to the very idea of an ORV : an ORV is unique and irreplaceable. * In the case of the cultural landscape: no new disturbance / avoidance / enhancement of biological or scenic aspects which would improve the ORV should apply. * Again in the case of the cultural landscape: full inclusion and consultation with any and all individuals, tribes and other native american groups with ancestral ties to Yosemite. Real, meaningful consultation is doubly required because not all of the cultural landscape in Yosemite has been disclosed to the NPS (which, based on the behavior of Euro- Americans in Yosemite including NPS, has been a wise move by Native Americans). * Complete avoidance of archaeological sites / no digging or disturbance. The Natioanl Park Service should immediately cease all ground-disturbing human activity on and around these sites. * 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 * No loss of cultural plant resources. * Based upon up-to-date study of conditions, no loss of special status/ t/e species or their habitat. * Based upon up-to-date study of conditions, enhancement of special status/ t/e species or their habitat. * No loss of sensitive plants or supportive soil types. * Protection and enhancement of water quality in all reaches of Yosemite's Merced. * Protection of sensitive plants or supportive soil types * Enhancement of sensitive plants or supportive soil types. * Demonstrable improvement in allowance of free-flow of the river (removal of some of the many mies of riprap; * Improvement in air quality trough regulation and removal of local sources of pollution (deisel vehicles, campfires, generators, etc.). * In terms of future levels of facilities and services, these should be limited to those which would guarantee both protection and enhancement of ORVs (see also our comments under "capacity"). * In terms of future levels of facilities and services; the NPS should explicitly give greater value to those which bring visitors into close connection with the unique and river-related values of he Merced. (See also our citation of a discussion of camping, below) *This CMP should propose to restore Yosemite's Terminal Moraine as an enhancement of the Valley's hydrology. *This CMP should comprehensively study and propose future enhancement of surface hydrology, particularly in Yosemite valley, through the removal of development, unnatural drainage features, riprap, and obstructions of free flow.

VIII) Earlier management elements of the 2000 CMP should be eliminated, because they do not protect ORVs.

The RPO allowed construction and development of a variety of amenities. We have discussed this elsewhere in comments on the prior plans. Section 7 was proposed in he CMP to circumvent protections of the river channel and riparian areas. We think these should be removed from the CMP until and unless they prove to serve the overarching goal of protecting the ORVs of the Merced River..

VIV) Visitor Capacity:

The CMP should establish a user capacity for the Merced River Corridor which will protect and enhance the Merced's ORV's. According to the Wild and Scenic Rivers Interagency Guidelines (1982), user capacity is defined as: the quantity of recreation use which an area can sustain without adverse impact on the outstandingly remarkable values and free-flowing character of the river area, the quality of recreation experience, and public health and safety."

This same definition was highlighted by the 9th Circuit, after applying the plain meaning of the terms "adress", "user", and "capacity within the language of the statute.

According to the 1982 WSRA Guidelines, management plans must state the kinds and amounts of public use which the river area can sustain without impact to the values for which it was designated. And though specific management strategies will vary according to classification they will always be designed to protect and enhance the values of the river area. The very definition of user capacity mandates no adverse impact on the ORVs.

The CMP, operating as a plan to intentionally protect and enhance well-defined ORVs, should establish a quantity of recreation to

support and achieve this objective.

A new CMP should describe an actual level of visitor use for the Merced which will protect and enhance the river's ORVs. Capacity is a foundational element that impacts every other management element. The determination on capacity cannot be made in isolation and simply plugged into the invalid Merced River Plan. Instead such determination must be integrated in combination with other management elements. The new Merced River Plan should embrace the larger vision and responsibility of the Park Service to protect and enhance the Outstandingly Remarkable Values (ORV) of the Merced River corridor.

The CMP user capacity discussion should specifically consider how much commercial use is appropriate and consistent with protecting the river's ORVs. There is a difference in impact to the river corridor between public users who do not use commercial services and those who do, and the commercial services themselves. For instance, commercial use requires more employees, more infrastructure, more asphalt and hardened structures and more maintenance to name a few. People who come to the Park and the River who are self sufficient have less of an impact. Thus, commercial services are intrinsically connected to user capacity and what is appropriate and necessary. Once upon a time there was a goal that "visitors can step into Yosemite and find nature uncluttered by piecemeal stumbling blocks of commercialism, machines, and fragments of suburbia" (1980 GMP). Do swimming pools, pizza parlors, bars/liquor outlets, gift shops, equipment sales/rentals, 22-bay bus depot with expanded restaurant seating, never ending streams of buses, in-room TV, RV hook-ups, etc. contribute to the uniqueness of Yosemite Valley or are they intrusive "fragments of suburbia"? What is the base level of services to be provided in the Valley and what is the base level of employees required? Each employee needs housing, food, water, parking place, HR services and more, requiring an increased development footprint while adding to the capacity in the park. At present, it appears that 80% of the development footprint in the Valley is in support of the 20% of visitors who stay overnight in the park.

Definition of a Visitor Capacity: Visitor capacity is defined as the supply, or prescribed number, of appropriate visitor opportunities that will be accommodated in an area. As discussed above, this quantity should be a prescription specifically arrived at to protect and enhance the ORV's for Yosemite's Merced River corridor.

The terms in the definition were chosen carefully. "Supply" means the quantity or amount available; "prescribed" means a decision by a person of authority; "number" means a specific number or numeric range; "appropriate" means in accordance with management direction (here the WSRA, non-degradation, and protection/enhancement standards, but also over-arching direction on river-relatedness and ORV-relatedness of visitor activities) ; visitor opportunity refers to the integrated package of activities, settings, experiences, and benefits; "accommodate" recognizes that there are conditions and considerations that influence a decision and implies that the use of public resources is a privilege and has responsibilities; and "area" is an inclusive term that can refer to a facility, program, recreation system, or any geographic scale such as a site, unit, designation, or region; here it means the Merced River corridor, and should include those locations adjoining the corridor containing ORV's.

Purposes of a Visitor Capacity A capacity is a concept and tool with widespread application and purpose in our everyday lives ? restaurants, airports, golf courses, concerts, classrooms, low-income housing, hotel occupancy, lobster harvests, annual timber cuts, ozone alerts, air-travel operations, water storage, mortgage loans, insurance policies, power grids, military response, landfills, welfare benefits, prison facilities, urban housing density, emergency medical response, sport hunting, sport fishing, museums, amusement parks, group tours, and countless other manifestations.

The overarching function of a visitor capacity is to serve as one tool to help sustain natural and cultural resources, as well as the recreation opportunities and other benefits these resources afford the public. As discussed above, a determination of visitor capacity is essential and necessary for a program of protection for the ORV's of Yosemite's Merced, including those related to visitor experience. The literature recognizes nine purposes of a visitor capacity.

1. a measurement of the supply of available opportunities 2. trigger for actions and resources 3. risk management tool 4. visitor trip planning 5. administrative and historic record (hindsight analysis) 6. regional recreation planning 7. recreation allocation decisions 8. private sector and community planning 9. managing public (recreation and non-recreation) use

We would note, in relation to our introductory paragraph, that an important part of creating a visitor capacity is communication extrinsic to Yosemite itself. A capacity decision implies transparency for interagency recreation planning, regional planning, and even individual trip planning. As noted above, we also think that principled communication by NPS with stake-holders is necessary in arriving at a capacity decision.

The Substantive Standard for Visitor Capacities Recreation carrying capacities, or visitor capacities, are administrative decisions. Sound professional judgment is the substantive standard for decision making by responsible public officials. Sound professional judgment is defined as a reasonable decision that has given full and fair consideration to all the appropriate information, that is based upon principled and reasoned analysis and the best available science and expertise, and that complies with applicable laws. As discussed, we believe that Yosemite has some but not all of the information it needs to make the decision required in his plan. Moreover, even when adequate information, the NPS must build a plan for the protection and enhancement of ORVs as outlined in the WSRA and the interagency guidelines, if a capacity decision is to escape from being arbitrary.

Sound professional judgment relies on many informational inputs. Those particularly relevant to a visitor capacity decision might include:

* management objectives (including all legislative and policy guidance; see discussion of WSRA-guided management, above) ; * desired future conditions and quality standards (resource, social, management); * current resources, conditions, uniqueness,

capability, and trends; (see prior discussion of baseline conditions and monitoring) * current management capability and suitability; * current type, amount, and design of facilities and infrastructure; * appropriateness (compatibility) of current or proposed recreation opportunities; (see discussions of commercialism, values above) * regional supply of the same and similar recreational opportunities; * foreseeable changes in recreation and nonrecreational uses; * existing allocations to permittees and other land uses/users; * significance of the visitation issues and concerns; * potential for natural or cultural resource impairment, (and application of WSRA non-degradation standard); * type and amount of best available science and information; (see above discussion) * level of uncertainty and risk surrounding consequences of decision; and the * expected quality of the monitoring program. (see above).

The Procedural Standard for Visitor Capacities While sound professional judgment is the substantive standard for visitor capacities, a rational public planning process is the procedural (process) standard for capacity decision making. The procedural standard for visitor capacities for a Wild and Scenic River should be a NEPA-compliant planning process which leads to the river's comprehensive management plan. Visitor capacities decisions are made as part of this comprehensive, integrated, transparent, and deliberate public planning process. Each alternative should clearly compare and contrast the visitor capacity(ies) for the area or units within. Furthermore, in that visitor capacities are decisions made as part of a rational public planning process, such decisions should be guided by accepted principles. While it is true that alternatives can allow for varying intensities of use, alternatives should describe actual measures of visitor use which will protect and enhance the ORVs of the river. (It would be unacceptable to describe alternatives which allow degradation of river values). Additionally concerning alternative development: in the development of alternatives, the CMP should include different user capacity limits that not only protect ORVs, but that would help restore degraded ORVs.

Principles for Visitor Capacity Decision Making The Administrative Procedure Act (1946: 60 Stat. 237, 5 U.S.C.A.) set forth the legal standard that decisions must be principled and reasoned; that is, arbitrary decisions are in violation of federal law. Professional principles help meet this responsibility by clarifying institutional values, philosophy, and perspectives. They serve as a guide and rule of thumb for making decisions and taking action, and, very importantly, they help stakeholders understand and meaningfully participate in a planning process.

Below are principles that reflect important and central values for visitor capacity decision making. Full and deliberate consideration of these principles will contribute to a logical, reasoned, transparent, and defensible decision.

1. Management direction principally defines the visitor capacity, regardless of whether the management direction or visitor capacity is explicitly stated or not stated at all. The management of the Merced WSR remains subject to the non-degradation and the protection/enhancement standards. 2. A visitor capacity helps to sustain the integrity of natural and cultural resources, as well as the important recreational and nonrecreational benefits they afford to local, regional, and national publics. 3. A visitor capacity is a complex decision that is based upon sound professional judgment; i.e., defined as a decision that has given full and fair consideration to all appropriate information, that is based upon principled and reasoned analysis and the best available science and expertise, and that complies with applicable laws. Here we wish to emphasize the fundamental importance of establishing the baseline conditions of ORV's in making such a decision in Yosemite, and the central goals of the Merced CMP to legally protect and enhance the ORVs of the Merced WSR. 4. A visitor capacity decision is made by a responsible official as part of a public planning process; and in some instances, may benefit from the thoroughness and legal sufficiency afforded by a NEPA-compliant planning process. (As noted, the centrality of the NEPA process, and an anticipated dialogue with stake-holders are certain benefits to the development of Yosemite's CMP). 5. A visitor capacity quantifies the supply of available visitor opportunities that an area can accommodate, and may also address the allocation of opportunities across the variety of affected visitors ? types of recreationists, commercial operators, educational programs, scientists, and others. 6. A visitor capacity decision considers the larger regional landscape and system of opportunities affecting the particular area of recreation concern. 7. A visitor capacity provides clarity for focused dialogue and an analysis of consequences across the proposed management alternatives under consideration in a planning process. 8. A visitor capacity decision uses a sliding-scale rule, in which the level of analysis is commensurate with the potential consequence of the decision. 9. A visitor capacity serves as a trigger or signal for managers, permittees, the general public, and all stakeholders. 10. Visitor use approaching a capacity triggers consideration of a full range of reasonable management responses. 11. A visitor capacity decision needs to be adaptive to new science, information, uses, technology, trends, conditions, and other circumstances of importance. 12. The effectiveness of a visitor capacity depends on an adequate program of monitoring that is commensurate with the level of potential consequences, risk, and uncertainty. See above.

Visitor Capacities Are Not the Same as VERP Monitoring: The Wild and Scenic River Act (1974) and the National Parks and Recreation Act (1978) require that managers address the visitor capacity for an area. We do not believe that monitoring, in and of itself, is an adequate replacement for addressing visitor capacity. We are not opposed to VERP as a monitoring program, but it is not a substitute for addressing visitor capacity.

We sharply contrast VERP type monitoring and visitor capacity as follows:

A. A visitor capacity is an administrative decision about the supply of available recreation opportunities in an area. VERP is a monitoring program of indicators, standards, and data collection protocols. A visitor capacity is not an indicator, a standard, a process, or a research finding. Conversely, VERP is not a visitor capacity decision.

B. Visitor capacities and monitoring are two different management tools. Visitor capacities and monitoring serve two different purposes. They do not substitute for one another.

C. The question of visitor capacities and monitoring does not pose an either/or option; that is, both visitor capacities and monitoring

are important for park and visitor protection.

D. VERP, as with any monitoring effort and resultant data, can be helpful in making a visitor capacity decision. VERP can also be useful in adapting and refining a visitor capacity decision in the future. But again, VERP is not a visitor capacity.

E. Visitor capacities require the integrated consideration of many factors (e.g., goals, actions, desired future conditions, proposed actions, management capability). One important factor in the decision is the best available monitoring information and science, be it from VERP or any other monitoring effort. We have addressed this under "ORV's, above). VERP or another monitoring system can provide important information, but in and of itself, VERP information does not determine a visitor capacity.

F. Visitor capacities are typically made in an integrated comprehensive public planning process involving tier 1 or 2 general plans, whereas VERP is an internal technical management tool typically scoped out (e.g., standards, data collection tools, sampling locations and intensities, analyses) in tier 4 or 5 implementation plans.

G. A visitor capacity requires a supporting monitoring program, be it VERP or another program. Principle #12 from the Federal Interagency Task Force states the "effectiveness of a visitor capacity decision depends on an adequate program for monitoring that is commensurate with the level of potential consequences, risk, and uncertainty."

NPS Would be Well-Served to Consult an Array of Capacity Experts in Developing a Capacity for the Yosemite Merced. We were happy to learn that the NPS is following up on including capacity experts from across the country in some form of symposium or consultation on this decision. (We were disappointed, however, that we were not previously asked to contribute names of people who might shed light on the problem, which we would like to do now). The NPS should invite credentialed experts to their workshop who have gone through a public planning process to make a visitor capacity decision (s); and not simply those who advocate a monitoring program like VERP.

Following, please find the names of Credentialed Experts in Addressing Visitor Capacity whose opinions should be sought in this process. the list includes experts who have worked on the legislative side, academic experts, and, importantly, administrative decision makers who have faced the same type of decision as for Yosemite's Merced: 1) Mr. Lyle Laverty, nominated Assistant Secretary for Fish and Wildlife and Parks, Department of the Interior, Washington, D.C.

Mr. Wayne Woodroof, Director of Planning, California State Parks

Mr. Clay Peters, senior professional staff and author of the visitor capacity section of the 1978 National Parks and Recreation Act.

Mr. Steve Martin, Superintendent of Grand Canyon National Park, former NPS Deputy Director

Mr. Keith Brown, Outdoor Recreation Planner, Prineville District, BLM

Dr. Robert Aukerman, Professor Emeritus, Colorado State University

Dr. Glenn Haas, Professor Emeritus, Colorado State University

Dr. Jan W Van Wagendonk, USGS

Mr. Floyd Thompson, Director of Recreation Planning, USDA Forest Service

Mr. Bob Ratcliffe, Director of Recreation, USDI Bureau of Land Management

2) Administrative decision makers of the 95 field units listed in Appendix B of the report entitled Visitor Capacity on Public Lands and Waters: Making Better Decisions (2002), prepared by the U.S. Department of the Interior's Federal Interagency Task Force on Visitor Capacity on Public Lands (this report was previously submitted and is part of the NPS's administrative record for the Merced River WSR)

3) National Park Superintendents from: Yellowstone National Park Voyageurs National Park Denali National Park Channel Islands National Park Rocky Mountain National Park Washington Monument Devils Tower National Monument

Additional Comments: Tuolumne CMP; We would like to re-iterate as a follow-up to last summer's comment that the Tuolumne CMP was scoped inappropriately. The representation that VERP would be the capacity mechanism available for discussion under all alternatives of the Tuolumne CMP replicates a glaring error of the 2005 Plan for the Merced, and improperly constrained scoping. We think the scoping should be re-opened, and the lessons of the failed Merced plan, including the direction of the court concerning VERP ,incorporated into the public process for a new beginning on the Tuolumne.

Prior Comments on the Yosemite Merced: We wish to incorporate by reference our administrative comments from the 2000 and

2005 Plans, as well as those discussions of CMP elements treated here, discussed in our court filings from 2000 to the present time.

Conclusion:

Thank you for the opportunity to participate in Scoping for the Merced River CMP.

In Yosemite, 9 June 2007

Correspondence ID: 96 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Brown, Bart
Outside Organization: Mariposans for Environmental Responsible Growth Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence:

Correspondence ID: 97 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Christianson, Tony
Outside Organization: Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence: The South Fork of the Merced River flows through the residential community of Wawona. Wawona is primarily single family residences with a year round population of under 160 adults and children. Wawona has an elementary school, athletic field, post office, 2 grocery stores, county library, gas station, and community building. Wawona also has many amenities shared by visitors and residents alike, including a Victorian hotel complex with golf course and restaurant, hiking trails, and swimming in the river.

Yosemite visitors stay in Wawona at the hotel or at one of the many residential homes available for short-term rent. Visitors can also camp year round adjacent the river at the nearby Wawona campground.

Because Wawona is relatively small, somewhat isolated and less visited by park visitors, the community provides visitors and residents an increased sense of privacy, peace, and scenic beauty. There is little congestion, noise or pollution.

Wawona itself is an "Outstandingly Remarkable Value" in the river corridor. Any addition of campgrounds or employee housing to Wawona will be very detrimental to the character of the area, and will detrimentally impact the visitor experience there.

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Correspondence ID: 98 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Christianson, Tony
Outside Organization: Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Camping by car should be THE preferred way to stay and experience the grandeur of Yosemite. This is the traditional way. And it is a very good way.

Yes, some room accommodations for those who prefer not to camp.

But the scale should tilt in favor of the camper, not the other way around.

The majority of Americans, the taxpayers whose dollars support Yosemite, have families and children. Most don't have the money to pay for expensive hotel rooms, or to pay for bus transportation. They are quite content to experience Yosemite in the comfort of their car and sleep in a campground at night.

And as an additional benefit, fewer commercial rooms in Yosemite equates to fewer concessionaire employees needed to fix the beds. Campers fix their own beds.

Fewer concessionaire employees equates to no need for more employee housing.

Please rebuild the Yosemite Valley drive-in campgrounds.

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Correspondence ID: 99 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Christianson, Tony
Outside Organization: Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: E-mail
Correspondence: Single lane Forest Drive runs primarily through parkland alongside the South Fork of the Merced River and is the only paved road to Camp Wawona. Camp Wawona is located adjacent the South Fork of the Merced River within the residential community of Wawona. The owners of Camp Wawona have applied to Mariposa County for a permit to rebuild Camp Wawona in a significantly larger format.

Forest Drive is typical of mountain roads serving rural homes. For occasional visitor traffic and the needs of the homes along Forest Drive, the road is more than adequate. The residents are familiar with Forest Drive's blind spots and irregularities, and know how to drive the road safely. However, as the only access road for groups of hundreds of people driving from the city to Camp Wawona - most unfamiliar with the road and tending to drive fast (Forest Drive is posted 15 mph) - Forest Drive is unsafe at the speeds Camp Wawona goers typically drive (any speed above 15 mph).

The Camp Wawona Environmental Impact Report acknowledged the limitations of Forest Drive, but discounted the problem and increased the risk by recommending that Camp Wawona be resized to handle year-round operation at peak historic occupancy levels. This recommendation does not appropriately deal with the user capacity requirements of the Merced Wild and Scenic River Comprehensive Management Plan.

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Correspondence ID: 100 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Jones, Chuck
Outside Organization: Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: Letter
Correspondence: 9 June 2007 Re: Scoping Comments for Revised Plan The following comments all apply to the Wawona area, especially Section 35. 1. Zoning for Section 35 needs to be carefully considered. We do not want it to be zoned 3A or 3C - at the risk of turning historic Wawona into another "Company Town" . In particular, it would be inappropriate to add entry-level housing or campgrounds to the historic Wawona community in Section 35. Please note that former Yosemite National Park Superintendent David Mihalic, in letter to the Mariposa County Board of Supervisors recognized the uniqueness of Wawona: "Based on the congressionally mandated mission, the NPS cannot agree to any amendments to the town plan which change the small mountain community atmosphere of Wawona or which allow for more intensive development of the area" - David Mihalic, 17 February 2000. 2. the Wawona "Swinging Bridge" area has become very busy, with the Wawona Campground and the Wawona Hotel directing visitors there. The SDA Camp Wawona especially sends large groups (100s) of guests there simultaneously. Toilet and trash facilities need to be constructed or else the size of the groups limited. 3. The section of the South Fork of the Merced River, from the containment dam to the Wawona Campground has many improvements in the flood plain. This section of the river cannot be considered wild and scenic. 4. To lessen the danger on substandard Forest Drive from an over-built Camp Wawona and to improve emergency egress for the children, YNP should consider implementing a road from Studhorse to the Camp. The Wawona golf course should remain "as is" . Respectfully,

Correspondence ID: 101 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Dunlavey, Dorian
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,11,2007 00:00:00
Correspondence Type: Fax
Correspondence: Superintendent, Yosemite National Park, Attn: Merced River Plan, PO Box 577, Yosemite, CA 95389 Dear Superintendent, I am a home owner in Wawona. As I think about the Planning for the Merced Wild and Scenic River and the resulting Comprehensive Management Plan my concern is of the planning and zoning, particularly of the National Park Service owned land in Section 35. The goal of such planning and zoning should be to preserve the character of the Wawona community. I am opposed to dormitories or housing units for Park Service employees or concessionaires as well as public campgrounds and high density housing in Section 35.

The South Fork of the Merced River should be protected. Overcrowding at the Swinging Bridge area has adverse impacts on the river. The proposed expansion of Camp Wawona is a real threat to the South Fork of the Merced River downstream. We need to protect the quality of the river's water. In my opinion, there should have been an official scoping meeting in Wawona. We had only a speaker concerning the South Fork. The Wawona Golf Course, established in 1918, should be classified as recreational in the river plan. The Park Service should provide restrooms and trash containers at the Swinging Bridge and at the Vagim property (Flat rock) to avoid contamination of the river in those areas. A carrying capacity for the Valley needs to be established. Overcrowding means no place to park and degraded enjoyment of the Valley experience. The abandoned government homes in the River Corridor need to be demolished. They are an attractive nuisance and a fire hazard. I like the Valley. I like to be able to take the Shuttle Bus to the Valley to enjoy the unparalleled monoliths, waterfalls, nature and unique scenery. But, I love the area and the feel of Wawona and the South Fork. At all cost, the preservation and protection of the rural mountain residential community of Wawona and its South Fork of the Merced River should and must be maintained. I think of the South Fork as a recreational river where one can fish, swim or just enjoy the wonderful and beautiful sights and sounds of it. Very truly yours,

Correspondence ID: 102 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Nespoor, Greg
Outside Organization: Unaffiliated Individual
Received: Jun,12,2007 00:00:00
Correspondence Type: Park Form
Correspondence: 6/8/07 I would like to see fewer rafts on the Merced. They cause major erosion and are an eyesore when you see hundreds of people at a time. El Rio de Nuestra Senora de la Merced should be protected because of the wildlife that depends on it. Too many rented rafts!

Correspondence ID: 103 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Corn, Carolyn
Outside Organization: Unaffiliated Individual
Received: Jun,12,2007 00:00:00
Correspondence Type: Park Form
Correspondence: SLD will take away people allowed into the park. Special int. group vs. general profit. What do you love about the Merced River and the Yosemite Valley? Views, vista that can be seen by those unable to walk and rare species, the quiet serenity of the area w/o human noise. What types of experiences do you value along the river? Water volume and quality-sound of flowing river, views, swimming holes with warm flat rocks to lie on. What kind of natural environment do you want to see? What kind of social environment? How would you like to see the culture and history of Yosemite preserved and shared? Natural envir. w/o weeds, introd, species i.e.birds, plants, limit human social envir. To present hotels, campsites, and store complexes already built and historical in use, keep museum as is for those wanting historical and cultural perspectives. Guided walks /hikes. What kinds of services or facilities would you like to see offered, improved or removed? Keep bridge railings low so handicapped people can see and enjoy the river views from their cars. Do not add to existing services and facilities, no entry fees at park entrances (we pay thru our federal taxes) and financially poor individuals cannot afford paying twice. What characteristics of the river-scientific, scenic, geological, recreation, biological, cultural, and hydrologic processes - are important to you? Free flowing water quality and quantity; natural views; swimming holes; native plant species incl. rare plants and animals; protection of archeological sites. Are there other river-related values that you'd like to include? Tell us why. Kekekp exotic/non-native biota/fauna out. Maintain status quo on water quantity and quality for Wawona w/o additional visitors; good air quality, no pine needles burning or prescribed burns; put out lightning fires to allow visitors to see views-valley and elsewhere-rather than hinder human health issues, such as asthma. What kind of environmental conditions and recreational activities you would like to see for various areas along the Merced River? Swimming, fishing w/quotas, rafting w/in reason (individual not organized, water for drinking, home use in Wawona (continued private ownership) continued Wawona golf course use. How might various methods for managing human use help achieve these conditions? Set quotas where needed, enforce violators, no financial charges for activities, and no (private or concessionaire) enterprises put in charge of public activities. Of the management methods you may be familiar with, how do they fare in providing equal opportunities for visitors of various economic, social and ethnic backgrounds? Poor for senior citizens with limited mobility(can't climb into buses) need to balance = opportunities for all; financially strapped individuals and carloads cannot afford paying fed taxes and entry fees or additional fees, such as bus rides. What activities do you think are appropriate for the Merced River area? Swimming, fishing, water for established Wawona homes, already established campgrounds, rafting (non-motorzed) hiking, photography, golfing on Wawona golf course, no condemnations/seizures/condemantaions of private properties /Wawona homes, no expansion of Yosemite Valley overflows into Wawona, no additional commercial enterprises on/along river, non-noise activities, picnicking. What are the impacts of these activities? Possible pollution, trampling of plants, introduction of weeds, scaring of wildlife, degradation of drinking water. What other "hidden issues" can you identify that will need to be considered? Encouragement of park visitors to use swimming holes in Wawona, especially Swinging Bridge, has led to swimmers going upstream to escape noise and people. They are using the Wawona community water intake swimming hole with dogs /animals ans humans swimming-water quality! is being jeopardized.

Correspondence ID: 104 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan
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Outside Organization: High Sierra Hikers Association Non-Governmental
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Correspondence Letter

Type:

Correspondence: HIGHSIERRAHIKERSASSOCIATION PO Box 8920, South Lake Tahoe, CA 96158 June 6, 2007 Superintendent Yosemite National Park Attn: Merced River Plan P.O. Box 577 Yosemite, CA 95389 Dear Superintendent, The High Sierra Hikers Association (HSHA) is a nonprofit public-benefit organization that seeks to inform and educate its members, public agencies, and the general public about issues affecting hikers and the Sierra Nevada. Many of the HSHA's members visit the Merced River basin in Yosemite National Park for hiking, camping, backpacking, horse packing, and other recreational pursuits. Following are our scoping comments on the Merced Wild and Scenic River Comprehensive Management Plan. Please place a copy of this letter in the project record.

General Comments The HSHA is concerned about the ongoing (and increasing) adverse impacts in the Merced River basin due to commercial stock animal usage, in particular to supply the High Sierra Camps. This planning process should be used to terminate-forever-the impairment of park, wilderness, and wild & scenic river resources and values resulting from these high-impact activities. Following are our specific comments: The HSHA is especially concerned with the Merced Lake, Vogelsang, May Lake, and Sunrise High Sierra Camps (HSCs). These aged and ugly facilities have a significant negative impact on the Merced River corridor, the trails leading to those camps, and ultimately on Yosemite Valley and beyond. All the by-products of human occupancy are produced at these camps: sewage (human body wastes), "gray water" from showers, grease and detergent from kitchens. But there are no water or sewage treatment plants. Wastewater ends up in the meadows, soils, and waters of Yosemite National Park.

California Wilderness Act Congress specifically recognized this threat to Yosemite when it passed the California Wilderness Act of 1984 (CWA). The Act, signed by President Reagan, bestowed formal wilderness designation upon the Yosemite backcountry. The Act allowed the HSCs to remain, but stated: "If and when it occurs that the continued operation of these facilities . . . results in an increased adverse impact on the adjacent wilderness environment (including increased Superintendent, Yosemite National Park adverse impact on the natural environment within the enclaves themselves), the operation of these facilities shall be promptly terminated, the facilities removed, the sites naturalized, and in the procedure set forth by section 9 of the bill, the areas promptly designated as wilderness." The four HSCs cited above are classified as "potential wilderness," which, by law, must be treated the same as wilderness. The HSCs are an anachronism-an out-of-date holdover from the bad old days from 1916 (the Merced Lake camp) through the early 1960s, when more development and more commercialism were considered desirable and beneficial. One way to look at the HSCs today is this: If the NPS were to propose establishing an HSC in the Yosemite backcountry at the present time, the project would never get off the ground. It would violate the Wilderness Act (WA), it would violate the CWA, and it wouldn't have a chance of surviving a NEPA process. That being so, why should not the existing HSCs be abolished? Fifty years ago, no one talked about environmentalism. Now we have a federal agency, the EPA, and all and sundry declare themselves to be in favor of environmental protection. It is long past time for the National Park Service at Yosemite to heed the mandate of its Organic Act, adhere to the strictures of the WA, the CWA, and the Wild and Scenic Rivers Act, obey NEPA requirements, and follow the direction of the General Management Plan (GMP) of 1980, by choosing preservation of park resources, scenery, wilderness character, and wild river values over ongoing exploitation and impairment.

Vogelsang HSC The Vogelsang HSC (capacity 42) is supplied from Tuolumne Meadows, but its very existence has a significant impact on the Merced River corridor. The trail from Tuolumne Meadows to Vogelsang HSC, like all trails traversed by the HSC supply trains, is battered and polluted, featuring flies and stench and dust. One is not out of sight of manure for the entire seven miles. The same is true of the trails to Merced Lake (capacity 60), May Lake (capacity 36), and Sunrise, (capacity 34). For the sake of those few, dozens of people every day-and during the course of an entire season, thousands-are inconvenienced, offended, and exposed to health hazards by the disgusting condition of the trails. The 1984 CWA also stated: "Because of the importance of continuing monitoring and assessment of this situation, immediately upon enactment of this bill into law, the Secretary of the Interior should document current baseline operational and environmental impact conditions of all of these facilities [HSC camps], and he should also, within one year of the date of enactment, report in writing to the relevant committee of the House and Senate, his findings and recommendations as to this matter. Annual assessments of this situation should thereafter be made by the Secretary to assure continued monitoring of conditions." Has the Park Service at Yosemite prepared the baseline reports and submitted the annual monitoring reports as requested by Congress? If such reports do exist, they should be made public at once and included in the record for this project.

Superintendent, Yosemite National Park Illegal Construction Those HSCs are classified as "potential wilderness additions," which, by law, must be treated and managed essentially the same as wilderness. (See the California Wilderness Act of 1984, Section 9.) However, despite the ongoing and increased impacts of the HSCs, and the clear direction from Congress, we are aware that the NPS has made continuing efforts to hide the impacts of these facilities from Congress and the public, and has illegally continued to use nonconforming methods (i.e., helicopters) to maintain the HSCs and to construct new developments (i.e., sewage mounds, toilets, etc.) at the HSCs. Congress specifically directed that: "Helicopter use for routine nonemergency purposes associated with visitor use is a questionable activity in national park system wilderness areas and should be eliminated within designated national park system wilderness." (House Committee Report No. 98-40, at p. 51.) The 1980 GMP, which preceded the CWA by four years, stated: "Potential wilderness classification will prevent any further development of facilities or services; should existing developments be removed, there will be no reconstruction of facilities. Wilderness classification will require the eventual elimination of all improvements that do not conform with wilderness activities. Use of wilderness areas will be restricted to activities that are compatible with wilderness as cited in the Wilderness Recommendation for Yosemite National Park." (National Park Service, 1972).

Vogelsang HSC After passage of the 1984 CWA it became evident that the meadows and streams around the Vogelsang HSC were being threatened by sewage and wastewater from the camp. Instead of closing the camp, as required by law, the Park Service in 1985 constructed a new "leach mound" system in an effort to contain the wastes. The project involved a great amount of explosives, soil disturbance, and helicopter use. But this fix was short-lived. By 1990 it was obvious to the Yosemite administration and to the Curry Company (the operator of the camp) that the mound system was failing. "After several seasons of continuing environmental concerns, NPS maintenance representatives have determined that the mound system for sewage disposal at the Vogelsang High Sierra Camp is inadequate to properly handle solid wastes generated by Camp guests and employees." (Yosemite National Park Project Proposal Form, dated 1/16/91.) At this point, as in 1985, the only correct, legal action would have been to close the camp, naturalize the site, and designate it as wilderness. Nevertheless, in the summer of 1991, without asking for public comment, the Park Service once again ignored the law and constructed new toilet facilities at Vogelsang HSC.

Sunrise HSC In 1991 the Park Service admitted that: Superintendent, Yosemite National Park "At Sunrise camp, there are inadequacies in the sewage system and in potable water; work will be required in the near future." (Draft Concession Services Plan Environmental Impact Statement, December 1991.) Instead of complying with the law by documenting the problems with the Sunrise sewage system (a cesspool), and removing the camp, the Park Service constructed a 604-square-foot building at the Sunrise camp to house toilets and showers. This was done in blatant disregard of the Organic Act, the California Wilderness Act, the Wilderness Act, the Wild & Scenic Rivers Act, and the 1980 General Management Plan. In sum, all four of the HSCs cited above should be subject to site-specific Environmental Impact Statements (EISs) as part of the Merced River planning process. This has never been done, and is necessary to illuminate the scope and nature of the substantial environmental impacts of those facilities. Significant issues include, but are not limited to: (1) impaired scenery; (2) degraded trails; (3) pollution of

surface and ground waters by sewage and wastewater produced at the HSCs; (4) pollution of surface waters by manure (bacteria, etc.) produced by pack animals that service the camps; (5) harm to wildlife that come in contact with sewage, kitchen/bath wastes, and human food sources; (6) harm to native songbirds due to proliferation of brown-headed cowbirds; etc. Given the above, your planning process for the Merced River should include and adopt alternatives that will permanently remove all four of the HSCs discussed above, restore the sites, and propose that the potential wilderness additions at those four HSCs be designated as wilderness as intended by Congress in the California Wilderness Act (see that Act, Section 9; and House Committee Report No. 98-40).

Commercial Packstock Enterprises The use of stock animals can be legitimate, appropriate, and even necessary for certain recreational and/or administrative purposes. We want to make clear at the beginning that we do not advocate or suggest the complete elimination of recreational or administrative stock use from the Merced River basin. Our primary concern is that the NPS must acknowledge and substantially reduce the many adverse impacts that are occurring due to the currently excessive and poorly controlled activities of commercial stock enterprises. We are aware that commercial packstock activities and impacts have increased substantially in recent years throughout Yosemite National Park. Your planning process should begin by producing a complete disclosure of the increases in stock use, facilities, and impacts that have occurred over the past few decades. Then, your plans should significantly reduce/control commercial stock use to avoid the identified impacts, and incorporate definitive limits to prevent future harmful increases in commercial stock enterprises.

Quotas and Permits for Commercial Stock Outfitters The Yosemite backcountry, including portions of the Merced Wild & Scenic River corridor, is so popular that quotas on its use have been implemented to prevent unacceptable impacts. We support the implementation of restrictions designed to protect park, wilderness, and wild & scenic river values. However, we remain concerned that commercial outfitters are allowed easy access when the general public is turned away due to use quotas. A fundamental tenet of environmental science that must be acknowledged is that one horse (or mule) can produce at Superintendent, Yosemite National Park 5 least as much impact as several people (see references below). Your management plans for the Merced River should state clearly that: (1) Commercial stock use of Yosemite National Park is a privilege—not a right, and (2) Commercial stock use shall not be given priority over private foot travel. Wherever rationing (i.e., a quota system) is necessary, commercial stock use shall be reduced to maximize the number of people allowed to enjoy the area. In addition, all commercial outfitters (and/or their clients) should have to wait in line with the rest of the public to obtain wilderness reservations and permits. Commercial packstock enterprises should never be allowed to issue their own wilderness permits to conduct commercial operations in Yosemite National Park. (This is a ridiculous notion, and one that illustrates the unfair special treatment that commercial packers receive from land managers in some areas.)

Impacts of Recreational Stock Use Parties traveling with stock animals have much greater impact on park, wilderness, and wild & scenic river resources and values than groups traveling on foot. The disproportionate amount of impact created by stock users must be much more limited and much better controlled. Impacts to meadows, stream zones, wetlands, and lake shores. Numerous studies have documented adverse impacts to meadows caused by stock animals used for recreation (Cole 1977, Merkle 1963, Nagy and Scotter 1974, Neuman 1990 & 1991a-b, Strand 1972, Strand 1979a-c, Sumner and Leonard 1947, Weaver and Dale 1978). Trampling and grazing by livestock are known to increase soil compaction and to contribute to streambank erosion, sedimentation, widening and shallowing of channels, elevated stream temperatures, and physical destruction of vegetation (Behnke and Raligh 1978, Bohn and Buckhouse 1985, Kauffman and Krueger 1984, Kauffman et al. 1983, Siekert et al. 1985). Streambanks and lake shores are particularly susceptible to trampling because of their high moisture content (Marlow and Pogacnik 1985). Unstable streambanks lead to accelerated erosion and elevated in-stream sediment loads (Duff 1979, Winegar 1977). In sum, the impacts of recreational stock animals on meadows, streams, wetlands, and lake shores are substantial, and need to be addressed in this planning process. Impacts due to invasive weeds. The role of herbivores in dispersing weeds is now well established. Seeds can be spread from one location to another by attachment to the bodies of animals (epizoochory) or by being ingested and later excreted (endozoochory). (See, for example, Fenner 1985, Hammit and Cole 1987, Harmon and Kiem 1934, Heady 1954, Janzen 1982, Ridley 1930.) Many native herbivores have been shown to be effective seed dispersers. In addition, domestic stock animals such as cattle, sheep, pigs, and horses have all been shown to pass viable seeds through their intestinal tracts. (See, for example, Harmon and Kiem 1934, Harper 1977, Heady 1954, Janzen 1981 and 1982, McCully 1951, Piggitt 1978, St John-Sweeting and Morris 1991, Welch 1985.) A detailed review of the scientific literature regarding the spread of weeds by domestic livestock (cattle, sheep, and horses) concluded: Superintendent, Yosemite National Park "Recent research showing that livestock significantly increase invasions by nonindigenous plants in the western U.S. is persuasive. Similar results were found in all western states and for nearly every introduced species that has been studied. Although many of these studies would have benefited from both better replication and more recent research techniques, the pattern of evidence is overwhelming." (Belsky and Gelbard 2000) Numerous other reports document specifically that recreation livestock (i.e., horses, mules, etc.) can and do spread exotic weeds. (See Benninger 1989, Benninger-Truax et al. 1992, Campbell and Gibson 2001, Hammit and Cole 1987, Harmon and Kiem 1934, Janzen 1981 and 1982, Landsberg et al. 2001, Quinn et al. 2006, Weaver and Adams 1996.) For example, several reports show that horses can excrete viable seeds for many days or even weeks after ingestion. (See, for example, Janzen 1981, and St John-Sweeting and Morris 1991.) Hammit and Cole (1987) state that horse manure is a major source for exotic seeds in wilderness recreation areas. Campbell and Gibson (2001) found that "seeds transported via horse dung can become established on trail systems," and that weed seeds found in horse manure had become established along trails used by horses, but not along trails that weren't used by horses. Weaver and Adams (1996) documented "substantial overlap in the weed species germinated from horse manure and the weeds present along trails used by horses." After reviewing all available scientific evidence, Landsberg et al. (2001) concluded that "concerns about dispersal of weeds by horses are legitimate." Invasive (i.e., weed) species have been specifically identified-at the national level-as one of the four greatest threats to our national forests.¹ The spread of invasive weeds has also been identified by the Regional Forester as an urgent issue that needs to be addressed in all Forest Service activities in California.* Current direction requires Forest Service units adjoining Yosemite to address these issues. For example, specific Standards and Guidelines applicable to neighboring Forest Service lands include:³ 42. Encourage use of certified weed free hay and straw. Cooperate with other agencies and the public in developing a certification program for weed free hay and straw. Phase in the program as certified weed free hay and straw becomes available. This standard and guideline applies to pack and saddle stock used by the public, livestock permittees, outfitter guide permittees, and local, State, and Federal agencies. 43. Include weed prevention measures, as necessary, when amending or re-issuing permits (including, but not limited to, livestock grazing, special uses, and pack stock operator permits). As outlined above, scientists have (in the past five to seven years) documented "overwhelming" evidence that domestic livestock (including horses, mules, etc.) can and do spread harmful weeds. This relatively new issue has never been adequately evaluated by the NPS at Yosemite. Therefore, your plans for the Merced River should address the issues of 1. See <http://www.fs.fed.us/projects/four-threats/> 2. See <http://www.fs.fed.us/r5/noxiousweeds/> 3. See <http://www.fs.fed.us/r5/snfpa/final-seis/rod/appendix-a/standards-guidelines/forest-wide.html> Superintendent, Yosemite National Park 7

weeds and plant pathogens that may be spread by domestic stock animals. This would include, at minimum, a range of reasonable alternatives for mitigating the potential for spread of weeds and plant pathogens, such as: (1) prohibiting all grazing by domestic stock (to minimize the free-roaming of stock animals and dispersion of seeds across the landscape via epizoochory and endozoochory); (2) requiring stock users to feed their animals weed-free forage for at least several days before entering the park (in

order for stock animals to excrete viable weed seeds before entering Yosemite); and (3) cleaning stock coats and hooves before entering the park (to minimize the potential for epizoochory). Given the above-described impacts, your management plans for the Merced River should include the following elements to mitigate these impacts: No grazing by recreation livestock should be permitted. Stock users should be required to carry feed for their animals, as is required in many other national parks. Certified weed-free feed should be required to minimize the spread of weeds. This is consistent with the biocentric approach described in Hende and others (1990). Lower group size limits for stock parties should be adopted to mitigate the greater impact of stock on park resources and wild & scenic river values (see below for detailed discussion of group size limits). Trail damage by stock animals. When compared to hikers, stock parties cause substantially greater impacts to trails (Dale and Weaver 1974, Frissell 1973, Kuss et al. 1986, Laing 1961, McQuaid-Cook 1978, Trotter and Scotter 1975, Weaver and Dale 1978, Weaver et al. 1979, Whitson 1974, Whittaker 1978, Wilson and Seney 1994). Whitson (1974) provides a good discussion of how horse impact differs from hiker impact. Dale and Weaver (1974) observed that trails used by horses were deeper than trails used by hikers only. Trotter and Scotter (1975) documented deterioration of trails used by large horse parties. Weaver and Dale (1978) found that horses caused significantly greater trail damage than hikers. Whittaker (1978) concluded that horses significantly increased the potential for severe erosion by churning soil into dust or mud. Weaver et al. (1979) found that horses caused more trail wear than both hikers and motorcycles. After reviewing the available literature, Kuss et al. (1986) concluded that: "Pack stock and horse travel is considerably more damaging to trails than hiking." Recent research (Wilson and Seney 1994) has confirmed these earlier studies, concluding that "horses produced significantly larger quantities of sediment compared to hikers, off-road bicycles, and motorcycles." To mitigate these impacts of stock use, your Merced River management plan should include the following elements: Groups using stock should be limited to ten or fewer animals per party (as suggested by Cole 1989 & 1990). To allow reasonable access for stock users, and to reduce the impacts of stock use on trails, some trails should be designated and maintained to withstand stock travel. Proper Superintendent, Yosemite National Park maintenance of these trails (and reconstruction where necessary) may reduce (but not offset) the impacts of stock travel. A network of "foot travel only" trails must be designated so that hikers can enjoy a stock-free experience. These trails should be maintained for foot travel only. Funds saved by designating a network of "foot travel only" trails could be used for intensive maintenance of the stock trails (see Cole [1990], p. 461). Water quality impacts of stock animals. Stock urine and manure contribute to eutrophication of streams and lakes (Stanley et al. 1979). Such impacts are a significant concern in the oligotrophic aquatic environments of Yosemite National Park. Livestock manure can also pollute water with harmful bacteria and other organisms such as Giardia and Cryptosporidium, which are pathogenic to humans and other animals. (See, for example, Derlet and Carlson 2002 and 2006). Some stock users continue to claim that the strains of Giardia and Campylobacter spread by domestic livestock are not infective to humans. This is wishful thinking. For example, their argument that humans cannot contract Giardia from stock animals hinges on a single inconclusive study conducted on domestic cats. The cross-transmission of enteric pathogens from stock animals is certainly not fully understood. However, there is an increasing body of evidence showing that pathogenic bacteria, protozoa such as Giardia and Cryptosporidium, and other harmful pathogens can be spread from stock animals to humans (Bemrick 1968, Blaser et al. 1984, Buret et al. 1990, Capon et al. 1989, Davies and Hibler 1979, Derlet and Carlson 2002, Derlet and Carlson 2006, Faubert 1988, Isaac-Renton 1993, Kasprzak and Pawlowski 1989, Kirkpatrick and Skand 1985, Kirkpatrick 1989, LeChevallier et al. 1991, Manahan 1970, Manser and Dalziel 1985, Meyer 1988, Rosquist 1984, Saeed et al. 1993, Stranden et al. 1990, Suk 1983, Suk et al. 1986, Taylor et al. 1983, Upcroft and Upcroft 1994, Weniger et al. 1983, Xiao et al. 1993). Specifically, Derlet and Carlson (2002) found pathogenic organisms in 15 of 81 manure samples collected from pack animals along the John Muir Trail. This documents that about twenty percent of the manure piles in the Sierra contain potentially pathogenic organisms (i.e., organisms that may cause disease in humans). Pack animal manure collected in Yosemite contained pathogenic bacteria as well as Giardia. Derlet and Carlson (2006; copy enclosed) also found pathogenic bacteria in surface waters in parts of Yosemite that are used by packstock, and concluded that "pack animals are most likely the source of coliform [bacterial pollution]." Your environmental document must evaluate and disclose the effects of domestic animal wastes on the environment, and your management plan(s) should include the following elements to minimize the amount of animal waste that reaches water courses: Campsites for stock users should be designated away from water, on level and dry sites. Stock users should be required to camp at these designated sites, and to keep their animals tied at all times when not in use. This will require stock users to carry feed for their animals, as is required in many other national parks. Managers should carefully select and designate campsites and hitching sites for such use (see Cole [1990], pp. 45-62). Superintendent, Yosemite National Park Stock users should be required to use other management tools (i.e., use of portable electric fencing when watering stock, diapers on horses, etc.) to prevent pollution of surface waters by livestock manure. (See enclosed report "Horses in Diapers Help Mexico's Beach Cleanup.") This report documents the feasibility of requiring diapers on horses to prevent the spread of diseases found in horse manure. Horse diapers are commercially available and have been accepted around the world.⁴ In addition, your environmental document must acknowledge not only the State's specific water quality standards, but also the state/federal anti-degradation requirements.⁵ Significantly, the waters of Yosemite National Park are high quality waters that are eligible for designation as Outstanding National Resource Waters. The federal and State anti-degradation requirements clearly apply. Specifically, the National Park Service must comply with the California State Water Board's Resolution No. 68-16, which requires that existing high quality waters be fully protected, unless every specific formal findings are made. In this case, neither the Central Valley Regional Water Quality Control Board, the California State Water Resources Control Board, nor the U.S. Environmental Protection Agency has ever made the overriding findings necessary to allow degradation of water quality from the High Sierra Camps or the commercial stock enterprises that operate within Yosemite. Therefore, because the degradation and pollution of water resulting from both the High Sierra Camps and the commercial pack & saddle stock enterprises are controllable, that degradation and pollution must be fully prevented (unless the findings required by Res. 68-16 are formally made). Impacts of brown-headed cowbirds. The operation of livestock pack stations, stables, and corrals (i.e., stock holding areas) is contributing to the demise of songbird populations in the Sierra Nevada by creating artificial habitat for the parasitic brown-headed cowbird. Cowbirds are obligate brood parasites that can significantly impact native passerine species. One study in the northern Sierra found that up to 78 percent of warbler nests are parasitized by cowbirds, resulting in significant decreases in the reproductive success of those species (Airola 1986). Elsewhere in the Sierra, individual female cowbirds have been reported to lay an average of 30 eggs per season (Fleischer et al. 1987). These high rates of parasitism and fecundity by cowbirds indicate that significant local impacts occur wherever cowbird populations are present. Habitat modifications, pack stations, corrals, and the presence of livestock throughout the Sierra may contribute significantly to regional declines in songbird populations (Graber 1996). A detailed literature review on cowbird impacts is enclosed and incorporated by reference. The impacts of stock holding facilities must be evaluated. An environmental impact statement (EIS) should be prepared that clearly discloses the environmental consequences of, and alternatives to, the continued operation of stock holding facilities in the planning areas. Your management plan(s) should include the following elements to address the impacts of brown-headed cowbirds: 4. See <http://www.equisan.com.au/> 5. See the Water Quality Control Plan for the Central Valley Region, the State Water Resource Control Board's Resolution No. 68-16 ("Statement of Policy with Respect to Maintaining High Quality Waters in California"), and 40 CFR 5 131.12 Superintendent, Yosemite National Park Remove pack stations and stables from national park lands Reduce stock use to the minimum amount that is necessary Aesthetic effects-

adverse impacts on visitors' experience. We are also concerned about the many aesthetic impacts that result from stock use, such as the presence of annoying bells, dust, manure, urine, and flies, and the proliferation of unsightly hoofprints, drift fences, and overgrazed areas (see Absher 1979, Cole 1990, Stankey 1973, Watson et al. 1993). Most of the mitigation measures suggested above would have the added benefit of offsetting these "social" impacts. For instance, designating campsites for stock users would prevent sites used by hikers from being littered with stock manure. Tying stock and supplying feed will eliminate the need for bells and drift fences, prevent overgrazing and trampling of sensitive areas by stock, and reduce the pollution of surface waters by stock animal wastes (i.e., manure and urine). Designation of a network of "foot travel only" trails will provide hikers with a stock-free experience (i.e., no manure or dusty trails churned by stock, etc.). Adoption of group size limits based on science (see below, especially Cole 1989 & 1990, Watson et al. 1993) will reduce the impacts of large stock groups on the experience of hikers. Group size limits. The NPS at Yosemite has in the past taken the irresponsible, unsupportable (and illegal) position that limits on group size will only be adjusted in conjunction with surrounding land units. This ignores the mandate of the Wilderness Act and the Wild and Scenic Rivers Act to preserve wilderness and wild & scenic river values regardless of how other surrounding areas might be managed (or mismanaged). The fact that officials in the central and southern Sierra agreed on a consistent number in 1991 for maximum group sizes is no excuse to ignore the mandates of the Wilderness Act, the Wild and Scenic Rivers Act, and the Park Service's Organic Act. This is especially true since the 15-year-old decision to allow 25 stock animals per group throughout the central/southern Sierra was adopted without following any NEPA process, and was implemented over the strong objections of hundreds of citizens and scores of conservation groups. Further, the current group size limits have been shown to significantly and adversely affect park resources and values. In order to adequately protect Yosemite's environment and wild & scenic river values, the group size limits must be revised downward. Number of persons per group (on trails). Dr. David Cole, an internationally recognized research scientist, has written: "Limits on party size must be quite low (certainly no larger than 10) to be worthwhile" (Cole 1989). We therefore propose that group size (on trails) be limited to 10 persons, as suggested by Dr. Cole. Number of persons per group (off trail). Large groups traveling "cross-country" cause significantly greater impacts to resources and the experience of visitors (Cole 1989 & 1990, Stankey 1973). Dr. Cole (1989) has written: ". . . small parties are critical to avoid the creation of new campsites and trails in little-used places. . . . Once a party exceeds a certain number (perhaps four to six), special care must be taken in Superintendent, Yosemite National Park 11 off-trail travel." As suggested by Dr. Cole, group size should be limited to no more than four to six persons for all off-trail travel. Number of stock animals per group. Dr. Cole has found that thresholds in group size that result in unacceptable impacts ". . . would certainly d i ' e r between backpackers and parties with stock" (Cole 1989). He adds that lower limits are necessary for stock parties, since they cause greater social and ecological impacts. Dr. Cole has estimated that parties traveling with stock animals often cause ten times more impact than groups traveling without stock. (See enclosed 8/6/99 letter from D. N. Cole to J. E. Bailey). Yosemite National Park must acknowledge the available research findings and conclusions, and regulate hikers and stock users according to their varying degrees of impact. The current group size regulations in effect for Yosemite's backco-mtry-which employ the same limits for hikers and stock users-were arbitrarily adopted for "ease of management." This scheme does not comply with either the Wilderness Act, the Wild and Scenic Rivers Act, or the Park Service's own Organic Act or wilderness management policies. Recent research has shed light on the effects of large stock groups on the experience of wilderness users. Watson et al. (1993) documented that the average hiker in the central/ southern Sierra is unacceptably affected by encountering stock groups with more than nine animals. Even stock users themselves are negatively affected by encounters with large groups: The average stock user in the central/southern Sierra is unacceptably affected by encountering groups with over fifteen animals (Watson et al. 1993, Table 29 & Table 10). Thus it is very clear that twenty-five animals in a group will degrade the character of the Merced River corridor for the majority of visitors. The Park Service must take action to prevent impairment of these areas by lowering the group size limit for stock parties. We propose that groups be limited to no more than nine head of stock per party in the Merced River corridor-and indeed throughout the entire park. (see Cole 1989 & 1990, Watson et al. 1993), and that all off-trail travel by stock be prohibited. Cross-country (off-trail) travel with stock. One very important element in Yosemite's existing Wilderness Management Plan (WMP) is the prohibition on cross-country travel by groups with stock animals or groups over 8 persons. The plan states: "It is Service policy to deemphasize cross-country travel by limiting such travel in Yosemite Wilderness to groups of eight people or fewer. This plan recognizes actual and potential environmental deterioration from off-trail use." and "Stock must travel on designated trails or authorized stock routes and remain within one quarter mile of trails for watering, rest stops, and camping." This important language must be retained (and strengthened as per our comments above). We recommend against any attempt to weaken this language or to open new areas to off-trail stock use. Superintendent, Yosemite National Park 12 Two harmful loopholes in the current WMP must be addressed during this planning process for the Merced River corridor. First, the exceptions in the WMP (Appendix G) for cross-country travel by stock animals must be removed. Secondly, nowhere does the plan list or define "designated" or "established" trails. (Appendix G lists "authorized" exceptions but not the "designated" or "established" trails on which large groups are permitted). Some older maps, still in use, show trails that are no longer maintained, and which are not suitable for travel with stock or by large groups. A list or map clearly defining what trails/routes are open to travel with stock and by large groups in the Merced River corridor should be included in this planning process. This will make clear, to both the public and agency personnel, which routes are open and closed to travel with stock and to large groups. We request the opportunity to review the map or list described above before it is adopted. It should be included in the draft environmental impact statement(s) (DEIS/s) for this planning process. Summary and Conclusions As discussed above, the above mentioned four High Sierra Camps and commercial packstock enterprises are having significant, adverse impacts on the environment in the Merced River Wild & Scenic River corridor. Your plans should fully address these impacts by eliminating the HSCs, and adopting effective limits and controls on commercial packstock enterprises. Thank you for considering the above comments, and incorporating these issues into your plans for the Merced River. Please contact me at the letterhead address if you have any questions about this letter. Please also send f ~ -palple r copies of all environmental and decision documents for our review. Sincerely yours, -")-- \ .ei-n

Enclosures (4): (1) "Coliform Bacteria in Sierra Nevada Wilderness Lakes and Streams: What Is the Impact of Backpackers, Pack Animals, and Cattle?" by Derlet and Carlson (2006) (6 pages); (2) "The Brown-headed Cowbird in the Sierra Nevada: Impacts on Native Songbirds and Possible Mitigation Measures," by B.C.S pence (5 pages); (3) "Horses in Diapers Help Mexico's Beach Cleanup," by Reuters, August 2003 (3 pages); and (4) letter dated August 6,1999, from Dr. David N. Cole, Research Biologist, Aldo Leopold Wilderness Research Institute, to Jeffrey E. Bailey, Forest Supervisor, Inyo National Forest (2 pages). REFERENCES Absher, J., and E. Absher. 1979. "Sierra club wilderness outing participants and their effect on Sierra Nevada wilderness users," pg. 31-60. In: J.T. Stanley et al. (eds.) A Report On the Wilderness Impact Study. Sierra Clt-bP, alo Alto, CA. Airola, D.A. 1986. "Brown-headed cowbird parasitism and habitat disturbance in the Sierra Nevada." J Wildlife Manage 50(4):571-75. Superintendent, Yosemite National Park Ames, C.R. 1977. "Wildlife conflicts in riparian management: Grazing." pp. 49-52. In: Johnson, R.R. and D.A. Jones. Importance, Preservation and Management of Riparian Habitats. USDA Forest Service, Gen. Tech. Rpt. RM-43. Rocky Mtn. Forest & Range Experiment Station, Ft. Collins, CO. Armour, C. 1979. "Livestock management approaches and the fisheries

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Winegar, H.H. 1977. "Camp Creek channel fencing: plant, wildlife, and soil and water response." *Rangeman's Journal* 4: 10-12. Xiao, L., R.P. Herd, and D.M. h g s . 1993. *Vet Parasitol* 51:41-48.

Correspondence ID: 105 **Project:** 18982 **Document:** 36040

Project Name: Merced Wild and Scenic River Comprehensive Management Plan

Outside Organization: Robbins, Jack
Unaffiliated Individual

Received: Jun,12,2007 00:00:00

Correspondence Type: Letter

Correspondence: Superntendent, Yosemite National Park, Attn: Merced River Plan, PO Box 577, Yosemite, CA 95389 I participated in the public process of prepaing long range plans for Yosemite Valley and the Merced River, and was very pleased with the resulting plans.

Unfortunately, some of the requirements of those general plans have not been met yet. So, I urge that the new plan include the following, which I thought we had already achieved. 1. Close the stables in Yosemite Valley and naturalize the area. 2. Reduce the pack and stock impacts which are excessive. 3. Limit the commercial pack trips allowed in the Merced River Corridor. 4. Close the High Sierra Camps and restore the sites. Sincerely yours,

Correspondence ID: 106 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Loberg, Pierce
Outside Organization: Wawona Property Owners Association Unaffiliated Individual
Received: Jun,12,2007 00:00:00
Correspondence Type: Letter

Correspondence: June 7,2007 Mr. Michael J. Tollefson Superintendent, Yosemite National Park PO Box 577 Yosemite National Park, CA 95389 REF: Scoping Comments for Merced River Plan (MRP) Dear Mike: I thank you for the opportunity to provide Scoping Comments on the recently Court ordered Comprehensive Management Plan for the Merced River. I represented WAPOA in the earlier planning process and had submitted the enclosed letter on the Draft MRP. I am resubmitting the letter as new Scoping Comments because the letter was not considered by the NPS in drafting the earlier final MRP. It had been ruled as having not been timely filed even though it had been hand delivered to the superintendent's office. It was good that the earlier MRP designated the Wawona area as Recreational and not Scenic as had been proposed. Because of the Court's view of user capacity, however, I feel it is all the more important that Section 35 in Wawona be excluded from the MRP river corridor altogether. The Wild and Scenic Rivers Act does not apply to private land and much of the area within the river corridor in Section 35 is private. Development issues within the corridor such as conflicts between County and NPS zoning were addressed in the Record of Decision for the earlier plan. These should be included in any new MRP. Fixed user limits in this area as mandated by the Court, however, would be impossible to enforce. It would be best to follow the direction of former superintendent Mihalic and delete Section 35 from the MRP. Sincerely, L..Pierce Loberg, P.E., F.NS Civil Engineer Encl. WAPOA letter dated March 23, 2000 to Supt. David Mihalic March 23, 2000 Mr. David Mihalic Superintendent Yosemite National Park P.O. Box 577 Yosemite, CA 95389 Hand delivered REF: Draft Merced Wild and Scenic River Management Plan Dear David: This is the letter you requested following our meetings in your office on February 29 and March 2,2000. The second meeting was also attended by Deputy Superintendent Kevin Cann. The Merced River Plan (MRP) was among the items we discussed and is the subject of this letter. You rejected my verbal request for a sixty day extension of the public comment period. After two days of thinking about it, I agreed with your assessment that conditions are favorable now to move promptly on completing the various Park planning projects. As you put it, "...the stars are lined up. An opportunity such as this might not occur again for some time". I expressed concern, however, about the planning process; that the techniques being employed would produce a bad plan, one that would ultimately lack public support and acceptance. Following the recent court ruling, the MRP has been elevated from obscurity to a position equal to the General Management Plan (GMP). I expressed my view that the general public is unaware that the MRP is an amendment to the GMP. The comprehensive Yosemite Valley Plan and others to follow will be subordinate to the MRP as well as the GMP. While the MRP does not implement, it does set management guidelines that would facilitate changes not now allowed. We talked about facilities, such as the Yosemite Lodge, that were constructed under the Mission 66 program and sanctioned to remain under the GMP which are now targets for elimination. Historic Valley campgrounds, slated to continue by the GMP, were removed following the '97 flood and may never be rebuilt according to MRP alternatives under consideration. While I have a personal interest in the Valley, the changes to the Draft MRP that I have requested on behalf of WAPOA are limited to Wawona and the South Fork and are of paramount interest to our members. PROPOSED CHANGE NO. 1 The first change I proposed was to simply remove the proposed zoning from within Section 35. The Wawona Specific Plan is the mechanism that should be used to manage that portion of the river corridor. In Alternative no. 2, that would mean removing the proposed 2B Discovery zone and incorporate appropriate language in the present Flood Plain zone. As I stated, the Land Use Subcommittee of the Wawona Town Plan Advisory Committee has already recommended such a change. Whereas, applying new zoning on top of existing zoning would lead to inevitable conflicts, utilizing the existing zoning document would eliminate conflicts and insure that the language would apply to private as well as public property. You said, "That's a good idea", and directed Kevin Cann to inform Amy Scheneckenburger. PROPOSED CHANGE NO. 2 The second change I proposed was to classify the South Fork between the impoundment and the campground as Recreational, instead of Scenic. According to the WSR Act, classification is to be based on the level of existing or prior development. The river in Wawona is readily accessible by road, it has extensive development and has now and in the past had impoundment and diversion. For Wawona to be properly classified as Scenic, it would have to be "...free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads." I compared the classifications in the Draft MRP for El Portal and Wawona and mentioned examples of historic activity in Wawona that would support a Recreational classification. The photo is evidence of the quarry and rock crusher operation I described. Product from this operation in Wawona was used by the NPS, the concessionaire and others for projects in the Park during the 1960s. Much earlier, the Washburn's Wawona Hotel Co. enterprise was a major development by today's standards. There was a power house, barns, river fords, bridge, dams for an ice pond, ice house, sewage treatment plant, slaughterhouse and even a fish hatchery on the banks of the South Fork. There was a two-mile long ditch that conveyed water from the river to the Hotel complex and meadow for power generation and irrigation. In 1907, plans were prepared for a dam to be constructed just above the campground. The U.S. Army occupied an area along the river known as Soldier's Flat. Physical evidence of many of these activities on the South Fork exist today. I would be pleased to give you a tour of Wawona and show you the evidence of development, both past and present. PROPOSED CHANGE NO. 3 Not discussed in our meetings but of equal importance is the proposed River Protection Overlay. To manage this variable-width corridor through Section 35 would be a nightmare. Management actions taken on one portion of the river invariably affect upstream property. Again, I would propose that management policies envisioned for this overlay be incorporated in the existing Flood Plain zone. The 1997 flood provides a recent demarcation of the limits of river management and zoning that are not likely to be challenged. The otherwise inevitable conflicts would be avoided. I would urge you to exclude Section 35 from the proposed overlay. I stated that WAPOA could support Alternative no. 2, if these changes were made to the Draft MRP. Sincerely,

Correspondence ID: 107 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Davis, Eugene
Outside Unaffiliated Individual

Organization:
Received: Jun,12,2007 00:00:00
Correspondence Letter

Type:
Correspondence: June 6,2007 Superintendent Yosemite National Park Attn: Merced River Plan P.O. Box 577 Yosemite, California 95389 The following are my scoping comments for the new Wild and Scenic River plan for the parts of the main stem and South Fork of the Merced River within the jurisdiction of the National Park Service: One of the goals of the planning process is to define the Outstanding Remarkable values of these rivers. With respect to the South Fork, my only experience is at Wawona, where it adds to the historic setting. I believe the Wawona Hotel has the oldest buildings in which one can rent a room for a night in any of the major scenic national parks, and its preservation as a well maintained, functioning hotel would be one of my priorities in the plan. The remainder of my remarks will be in reference to the main stem, which I shall refer to simply as "the River" or "the Merced River". The Merced River's truly Outstandingly Remarkable scenic value is that it flows freely through Yosemite Valley, one of the most scenic areas on this Earth. One of the things to consider in the plan is if a river can be free flowing when there are some bridges with abutments and some retaining walls to help support roads and trails (and a gauging station). My feeling is that it can be. The Merced has many moods in its journey through Yosemite that I value. It can be quite peaceful at many places in the east end of the valley, more clearly flowing near the west end and a raging and rocky torrent at Happy Isles. All of which are Outstandingly Remarkable values. In California we have very few free flowing rivers left, so having the Merced in such a striking setting is extremely valuable. Another issue in the plan is the amount of human presence that can be around the river and still have it be Wild and Scenic. I feel that having humans observe it (and photograph or sketch it) does not detract from its wildness and certainly not from it being scenic. In part it depends on whether the other humans are beside you or in front of you across the River. Looking at a scene alone or in the company of several other people is the same to me. I feel strongly that if parts of the River are not readily accessible to large numbers of people, then part of the value of the designation will be lost. In our dry part of the world, the value of an actual free flowing river can only be well appreciated by those who see it. By dividing the route of the River into zones one can create areas of different expectations for social interaction. For example, those walking from Happy Isles up (and it is certainly up) to the bridge from which one can see Vernal Falls (Vernal and Nevada Falls are certainly another Outstandingly Remarkable value) can expect to encounter many other people on the trail. In fact, the whole experience is a social one, sharing information about the trail and the sights with others, often complete strangers. In my opinion this adds to the experience and when one sees the River below the trail cascading wildly through boulders, it adds another dimension to its value as a Wild and Scenic river. As one ascends further up the staircase, past the Silver Apron, to the area below Nevada Falls, and then up the switchbacks beside Nevada Falls, the crowds thin progressively. If then one walks over the crest into Little Yosemite Valley, one finds a peaceful river and very few other people. There is a great sense of tranquility or serenity, another Outstandingly Remarkable value. However one does not have to have the physical ability to hike that far in order to find places of serenity. Along the River near the Ahwahnee one experiences a quietly flowing serene river, usually with very few other people present. And at Happy Isles, though the River is anything but serene, my experience is that if you walk out to the upstream end of the islands, you will be alone or close to it in a very natural setting, and everyone seems to be in a quiet, contemplative mood. I feel that access is important and those who want a quieter experience can find it if they just go to the right places, rather than trying to legislate limits on the number of people near the river, (something I doubt is enforceable). Another question is whether specific activities of humans or domestic animals harms the River itself, by polluting it or by destroying its banks by random entrance onto them. I think the whole issue of domestic equines needs to be examined. They have great potential for pollution and their droppings make walking on trails that they use unpleasant. If they are still maintained in Yosemite Valley or Wawona for trail rides, I would suggest that such activities no longer be allowed and the equines that were used for that purpose be removed. The whole issue of their use in supplying the High Sierra camps needs to be examined. I wonder if one large helicopter taking in supplies and taking out garbage once or twice a week would be less of an intrusion than the pack trains. In terms of bank preservation, I think the part of the Housekeeping Camp that immediately abuts the River should be removed and I think all camp sites should be set back from the River's edge. Picnic tables should also be set back from the River's edge, but they (and campsites) can be within viewing distance of the River. Another issue to be addressed on the plan is what level of human habitation should be accommodated in Yosemite Valley and in El Portal. One needs to start, in my opinion, with the knowledge that Yosemite Valley (referred to as "the Valley" hereafter) has been occupied by humans for hundreds, if not thousands, of years. The main settled area is called Yosemite Village because, in my opinion, it is one. 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. Concerns about the number of people in Yosemite Valley should not be a reason for continuing to block the needed conversion of Valley rooms for rent by the night from an over supply of tent cabins (which are inexpensive, but do not have the amenities many people expect) to a more reasonable supply of midpriced rooms by building more rooms at Yosemite Lodge. As to the question of how many people should be allowed east of the El Capitan crossover at any given time, I would suggest that procedures already developed be used. On the few occasions that the roads in the east end of the valley become hopelessly clogged, there is an existing system for limiting the number of day users. I do not believe existing usage is degrading the River, except for the items that I mentioned in the second paragraph above. In addition, the question of how much (if any) rafting should be allowed in the River needs to be addressed (as well as where it should be allowed). In summery, I value the Merced River through Yosemite greatly the way it is. I value the outstanding scenic values it has the entire way from the wilderness to Briceberg. And I value the human structures (mainly the roads and the bridges) that make it possible for all to see it and enjoy it. I also value the variety of lodging and camping possibilities along it that allow persons of varied financial means and tastes visit the River and its incomparable Valley. I believe that this planning process should reaffirm what is there now and not be used as a way to reduce its accessibility in the future.

Correspondence 108 **Project:** 18982 **Document:** 36040
ID:
Project: Merced Wild and Scenic River Comprehensive Management Plan
Name: Northcutt, James F
Outside Wawona Property Owners Association Unaffiliated Individual
Organization:

Received: Jun,12,2007 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent, I am property owner in Wawona. My first visit to Wawona was the summer Of 1972. I worked at the Hotel Wawona that season and came back for five more seasons to work. I am deeply concerned about the new zoning that may be applied to Wawona, section 35. I am opposed to any new development in the community. This would include camp grounds and high density employee housing. Please help to preserve this unique community as it is. Thank you,

Correspondence ID: 109 **Project:** 18982 **Document:** 36040
Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Duke, Lawrence
Outside Organization: Unaffiliated Individual

Received: Jun,12,2007 00:00:00

Correspondence Type: Letter

Correspondence: Musings about the possible future of Wawona of care and good judgement are'nt exercised in the Merced River Plan

Correspondence ID: 110 **Project:** 18982 **Document:** 36040

Project: Merced Wild and Scenic River Comprehensive Management Plan

Name: Ouzounian, Brian H

Outside Organization: Yosemite Valley Campers Coalition Unaffiliated Individual

Organization:

Received: Aug,30,2007 00:00:00

Correspondence Type: E-mail

Correspondence: Please find the revised 2nd Comments for the Merced River Plan, with corrections (typo errors) in bold. Brian Ouzounian June 9, 2007

Dear YNPS Planning Staff: This is to submit second comments for the latest Merced River Plan (MRP) as a supplement to my previous submission on June 8, 2007, on behalf of the Yosemite Valley Campers Coalition.

This writing is to address process and procedure related to all planning efforts by the NPS and the following elaborates: a. No clear structure or procedure for the public process has been established; b. Allowing the NPS to formulate this procedure is like the "fox guarding the hen house;" c. At a minimum, Congress, including the House Resources Committee, should establish guidelines so as to prevent the private interests within all our parks and the Department of Interiors from conflicts of interest. Private individuals/businesses from the public should not assist in this planning procedure process. d. The NPS has shown itself incompetent to be fair, reasonable, and just in its outreach to the public for its plans, specifically related to Yosemite, which is the spear head of its planning for other national parks e. To date, scant and scattered hearings and open houses have occurred to give the perception of a public process. The General Management Plan (GMP) was the start of their misguided policies. As it went unchallenged except for this writer's effort's locally and in Washington DC, it has continued on a path of deception and unfair practices. f. Evaluating each plans' demographic and quantitative analysis clearly shows the poor and declining response over the years, which translates as "unproductive" and "cloudy" and "suspect" results. The public participation in the planning process has dwindled to a few over the years based upon the public continuing negative views of our NPS. Simply count the numbers of respondents over the years, plan by plan. They only get smaller. This writer was the only one to testify at a past Southern California MRP hearing in Burbank in 2005, on a Thursday evening. Only one other elderly woman attended byt when she saw the court reporter and the 5 minute limit and the 35 NPS staff watching her, she left the venue out of worry! The questions to me by the Superintendent Mike Tollefson was "Why do you believe there is such a poor turnout tonight?" The answer was simple; "The NPS has lost the trust and confidence of the public to be effective and responsive to their participation." Many of the past respondents were campers and the NPS failed to show positive response to their comments. g. Even after federal courts slapped the hands of the NPS over the MRP, the NPS continued on the same process for the Tuolumne River Plan (TRP) without shame. Would this along not disqualify the TRP as it is now in planning? A "HOLD" on that plan should be implemented. h. Past NPS personnel have tainted the MRP as joint spouses conducted the planning process, carried over from previous plans using different names that deceived the public. Specifically, these were dependents of the past Western Regional Director. i. All Yosemite Plans should be suspended until a process is agreed upon, including the subject, court order revised MRP and the illegal Yosemite Valley Plan. j. It is clear that the NPS has gone unsupervised over the past two decades and that private interests have corrupted the NPS. Since the NPS has financial interest in the profits from the operations of the parks, an objective process is needed and warranted. k. The current planning efforts in Yosemite have profited motives written all over them, including the closure of the two "Rivers" campgrounds after the flood to allow the busing plan to be implemented in the future mast scheme and so that the NPS can pat itself on the backs, in public, as to how the development plan s are qualified to proceed based on the "greening up" or "restoration" of the parcels; when in fact the NPS planned this land swap for their own profit motivations or that of the concessionaire present and future. l. The closure of the Rivers Campgrounds allowed the NPS to continue their development master plan by using this land as a laydown yard for the master plan utilities project. Were it not for this land, the project would have had harder alternatives for construction of temporary facilities.

All in all, much more needs to be addressed by the NPS to properly be good stewards of our Yosemite, the MRP and future projects. Failure to address the above egregiously breaches the duties of the NPS, charged with care, custody, and control of its original 1864 commission by President Lincoln (a good camper). No doubt President Theodore Roosevelt felt the same and loved to camp. Contrary to Yosemite's Superintendent, Mike Tollefson in his May, 2007, newsletter (Volume 31), the NPS does not have the "privilege" of managing the Merced River; it has the DUTY to manage it for the public trust via preservation and enjoyment to perpetuity.

