

**HIGH ELEVATION AQUATIC  
ECOSYSTEM RECOVERY &  
STEWARDSHIP PLAN  
(AQUATIC PLAN)  
ENVIRONMENTAL ASSESSMENT**



**Public Scoping and  
Concern Screening Report**

**November 2008**

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## Introduction

During the summer of 2008, the National Park Service (NPS) conducted public scoping as part of the early development of a *High Elevation Aquatic Resources Management Plan/Environmental Assessment* (Aquatic Plan EA) for Yosemite National Park. The purpose of the Aquatic Plan is to guide management actions by the NPS in order to protect Yosemite's diverse aquatic ecosystems and to restore natural composition, structure and function to aquatic ecosystems that have been disturbed by past or ongoing human activities.

During public scoping, the NPS sought comments from members of the public to better understand the spectrum of concerns, interests, and issues that may need to be addressed as part of this planning process. The NPS accepted written comments at a public meeting and an open house and also accepted comments submitted by email, U.S. mail, and fax. This report is a summary of the public comments received during the scoping period.

### Public Scoping Process Summary

Members of the public were invited to submit comments on the Aquatic Plan EA for a period of 33 days from June 23 to July 25, 2008. The NPS provided information about the plan and the public scoping period through the following means:

- 1) A scoping announcement was sent to a list of 212 individuals, agencies, park special use permittees, and organizations that had been identified as potential stakeholders. The scoping announcement was posted on *yosemiteblog.com* (June 11, 2008), *yosemitenews.info* (June 11, 2008) and *www.YubaNet.com* (June 17, 2008).
- 2) A press release describing the intent to begin the public involvement process for the proposed plan was issued on June 16, 2008. The *Union Democrat* published a story about the Sierra Nevada yellow-legged frog on June 16, 2008 and included information on the planning process. The *Mariposa Gazette* published the press release on June 19, 2008.
- 3) The scoping announcement was included in the June 9, 2008 and July 3, 2008 *Yosemite National Park Electronic Newsletter*, which has about 7000 subscribers
- 4) The scoping announcement was included in the park's Daily Report from June 11 through July 25, 2008
- 5) The scoping period was announced via the park's website.
- 6) The plan's fact sheet was made available at the Mono Basin National Forest Scenic Area Visitor Center and at Visitor Centers within the park.
- 7) The planning effort was presented to participants of the June 27, 2008 *Experience Your Yosemite* program
- 8) Information regarding the project was disseminated during the June 25, 2008 monthly Yosemite National Park Open House held in the Yosemite Valley auditorium.
- 9) Park staff held a public meeting for the Aquatic Plan at the Parsons Lodge in Tuolumne Meadows on July 12, 2008.

Invitations to the public meeting and open house were included in the public scoping announcement and the plan's fact sheet. A presentation on issues and management strategies

being considered for inclusion in the plan was given during the public meeting at Parsons Lodge. The presentation also included the life-history and status of Yosemite toad and Sierra Nevada yellow-legged frog as well as factors affecting these animals and the ecosystems they are a part of.

The public meeting included a question-and-answer period, and an open discussion during which public comments were documented for the record. These comments are included in this report which can be found along with copies of the public comment letters on the project website: <http://www.nps.gov/yose/parkmgmt/aquatic.htm>. The plan's fact sheet was available at all public events and is posted on the above website.

Forty-six public scoping responses (including emails, letters, and handwritten comments submitted during public meetings) were received during the public scoping period. These responses were carefully reviewed and individual ideas were identified and assigned a code according to the subject matter addressed. These discrete individual ideas are known as public comments. The 46 public responses consisted of 246 public comments. The public comments were then grouped into 85 concern statements. The public concern statements were used to identify common themes expressed by individuals or groups requesting particular lines of action by the NPS.

The public concerns were then screened to determine whether a concern pertained to the purpose and need for this project and the level of action required by the park's interdisciplinary team and/or park management. The plan's interdisciplinary team is composed of park specialists from a variety of backgrounds including wildlife, vegetation, hydrology, wilderness, public information, environmental compliance, and visitor use/social science. The plan's interdisciplinary team is reviewing the concern statements and will use these concerns to aid in the development of alternatives.

Copies of public comment letters and this report can be found on the project website at: <http://www.nps.gov/yose/parkmgmt/aquatic.htm>

## **Concern Analysis and Screening Process**

### **Comment Analysis Process**

The letters, emails and direct submission represented in this Public Scoping Report were analyzed using a process initially developed by the United States Forest Service, Washington Office Ecosystem Management Staff, Content Analysis Team. For the last seven years, this system has been refined by the NPS and used to analyze comments for nearly all planning efforts in Yosemite National Park.

The comment analysis is comprised of three main components: a coding structure, a comment database, and the narrative summary contained in this report. Initially, a coding structure is developed to sort comments into logical groups by topic. Code categories are derived from an analysis of the range of topics covered in relevant present and past planning documents, NPS legal guidance, and the letters themselves. The purpose of these codes is to allow for quick access to comments on specific topics. The coding structure used was inclusive rather than restrictive—every attempt was made to accurately code all comments, including those that may not have pertained directly to the Aquatic Plan.

The second phase of the analysis process involves the assignment of codes to comments made by the public in their letters, emails and direct submissions. For each comment in a piece of correspondence, codes are assigned by one reader, validated by a second reader, and then entered into a database as verbatim quotes from members of the public. The database, in turn, was used to help construct this Public Scoping Report.

The third phase includes the identification of public concern statements and the preparation of this narrative. Public concerns are identified throughout the coding process and are derived from and supported by quotes from original letters. These public concern statements present common themes identified in comments. Each statement is worded to give decision-makers a clear sense of what action is being requested.

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

### **Screening Public Scoping Concerns**

The purpose of the screening process is to identify whether a concern pertains to the purpose and need for the project and the level of action required by the planning team. All concern statements and supporting quotes presented in this document have been analyzed by park staff and assigned screening codes according to the criteria described below. Screening codes indicate how concerns will be addressed by the proposed project. When screening a public scoping concern, each supporting quote must be examined for the presence of a rationale (the “why”) supporting the requested action. All identified public concerns, whether supported by the comments of one person or many, are considered. This report includes the results of the screening process.

**Screen #1** identifies public concerns that do not meet the purpose and need of the subject planning process, or are non-substantive, and therefore, do not warrant further consideration. These public concerns do not require management consideration. Any concern for which an affirmative answer can be given to one of the following questions falls in this category:

- 1.1 Is the concern outside the scope of the proposed action? (i.e., out-of-scope)
- 1.2 Does law or policy already decide the concern? (i.e., out-of-scope)
- 1.3 Is this the wrong planning level for a decision on this concern? (i.e., out-of-scope)
- 1.4 Would acting on the concern place untenable restrictions on management, conflict with approved plans, or entail significant and reasonably foreseeable negative consequences? (i.e., effectively out-of-scope)
- 1.5 Is the concern a simple editorial correction? (i.e., no response needed)
- 1.6 Is the concern an unsupported personal opinion (i.e., a question, problem, suggestion, or interest, with no supporting “why”); or a simple statement of fact with no request for action, stated or implied? (A non-substantive concern)
- 1.9 Out-of-Scope but take to Management for consideration for any reason

Concerns that do not reasonably match the above criteria are considered within the scope of the subject plan, could be substantive, and are passed on to screen #2.

**Screen #2** defines concerns and comments that fall within the reasonable scope of the project and will be addressed in its compliance document (EA or EIS):

- 2.0 Scoping concern defining an issue already to be addressed within the scope of the planning document, as initially described to the public
- 2.1 Review concern requesting a technical correction (an EA or EIS)
- 2.2 Review concern requesting an action that can be addressed in FONSI (EA), or by rewriting document text for substance or clarification (DEIS, FEIS, ROD)
- 2.3 Review concern requesting an action adequately addressed in the planning document (EA or EIS (including alternatives considered and dismissed); still may need a response in the *Response to Public Comment*)
- 2.8 Scoping concern defining an issue expanding the scope of a project, as initially defined, that now will be included in the project scope on the decision of the project manager.
- 2.9 Scoping concern defining an issue expanding the scope of a project as initially defined that will not be included in the project scope on the decision of the project manager.

**Screen #3** defines concerns and comments that fall within the reasonable scope of the project and will be addressed in its compliance document (EA or EIS) and are coded using the same structure as that of Screen #2. However, these concerns may warrant further consideration by the management team:

- 3.0 Scoping concern defining an issue already to be addressed within the scope of the planning document, as initially described to the public
- 3.1 Review concern requesting a technical correction (an EA or EIS)
- 3.2 Review concern requesting an action that can be addressed in FONSI (EA), or by rewriting document text for substance or clarification (DEIS, FEIS, ROD)
- 3.3 Review concern requesting an action adequately addressed in the planning document (EA or EIS (including alternatives considered and dismissed); still may need a response in the *Response to Public Comment*)
- 3.8 Scoping concern defining an issue expanding the scope of a project, as initially defined, that now will be included in the project scope on the decision of the project manager.
- 3.9 Scoping concern defining an issue expanding the scope of a project as initially defined that will not be included in the project scope on the decision of the project manager.

**Screen #4** defines substantive concerns that need to be reviewed by park management. As defined in the National Park Service Director's Order #12 Handbook (*Conservation Planning, Environmental Impact Analysis, and Decision-Making*) and Council of Environmental Quality regulations, a concern is "substantive" if it meets one or more of the following criteria:

- 4.0 Scoping comment that expands, with reasonable basis, the scope of the project as initially defined to the public
- 4.1 Questions, with reasonable basis, the accuracy of information presented

- 4.2 Questions, with reasonable basis, the adequacy of analysis presented
- 4.3 Questions or helps clarify, improve, or evaluate, with reasonable basis, the appropriate use or span of the park's authority (this includes appropriate scale of planning, public involvement, and legal authorities)
- 4.4 Presents a reasonable new alternative (i.e., not included or considered and dismissed)
- 4.5 Calls for, with reasonable basis, or results in a modification of the proposal
- 4.6 Calls for or would require, with reasonable basis, additional analysis
- 4.9 A substantive concern on which the project manager makes a decision without management review when an issue raised has been sufficiently discussed with the management team

## Using this Report

This report presents public concerns arranged by topic, along with a representative sample of supporting quotes and the concern screening code. The following list of acronyms has been developed to maintain brevity and should assist the reader in reviewing the report.

### List of Acronyms

DEIS –Draft Environmental Impact Statement  
EA – Environmental Assessment  
EIS – Environmental Impact Statement  
FEIS –Final Environmental Impact Statement  
FONSI –Finding of No Significant Impact  
GMP –General Management Plan  
NEPA – National Environmental Policy Act  
NPS –National Park Service  
ROD –Record of Decision

### How information is organized in this document:

#### Scoping Concern Category

##### Concern Statement (expressed as a sentence).

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

Direct quote from a representative public comment (i.e., "Can we get the name of the lakes targeted for fish removal?")

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

**Screen Category:** (i.e., 2-0 - Scoping concern or concern defining issue to be addressed by the planning document)



## Planning Process and Policy

**The National Park Service should identify which lakes are being proposed for fish removal.**

**Letter Numbers:** 1, 2, 4

"Can we get the name of the lakes targeted for fish removal?"

(Individual, Comment #4-1)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should move forward with the High Elevation Aquatic Resources Management Plan.**

**Letter Numbers:** 6

"I support the Aquatic Resources Management Plan"

(Individual, Comment #6-1)

**Screen Category: 1-6** - An unsupported opinion or a simple statement of fact with no stated or implied request for action by the National Park Service

**The National Park Service should prioritize actions that lead to improved or restored conditions in the management area being considered in the High Elevation Aquatic Resources Management Plan.**

**Letter Numbers:** 8

"CSERC urges the management plan to prioritize actions that will lead to improved or restored conditions in the management area"

(Conservation Organization, Twain Harte, CA, Comment #8-3)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should adopt a strong plan that protects Yosemite's high elevation resources from negative impacts associated with recreation and administrative use.**

**Letter Numbers:** 10, 11, 12, 14, 17, 18, 19, 20, 21, 22, 25, 32, 34, 35, 38, 44, 45, 46

"I am concerned about the harmful impacts of recreation and administrative activities on Yosemite's high country, and I urge you to adopt a strong plan to protect Yosemite's fragile high-elevation aquatic resources."

(Conservation Organization, Clovis, CA, Comment #10-1)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should address the adverse impacts to the aquatic environment and wilderness character of Yosemite National Park due to commercial, administrative, and non-commercial activities in the Yosemite high country.**

**Letter Numbers:** 47

"The HSHA is very concerned about the ongoing (and increasing) adverse impacts to the aquatic environment and wilderness character of Yosemite National Park due to commercial, administrative, and non-commercial activities in the Yosemite high country."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-1)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should use current science, not data collected a century ago to monitor and assess Yosemite's aquatic environment.**

**Letter Numbers:** 37

"Monitor and assess Yosemite aquatic environments as to the modern era. Do not rely only on unreproducible/unverifiable data from a century ago."

(Individual, Comment #37-11)

**Screen Category: 2-0** - Scoping concern defining an issue already to be addressed within the scope of the planning document, as originally described to the public.



## **Planning Process and Policy, Implementation Plans and Projects**

**The National Park Service should combine the Vogelsang water/utilities construction proposal with the High Elevation Management Plan to avoid a piecemeal approach to addressing water pollution.**

**Letter Numbers:** 47

"This letter incorporates by reference the project file for your Vogelsang water/utilities

construction proposal, because the projects are very much related. In fact, the two projects should be combined. The current piecemeal approach to addressing water pollution issues in Yosemite's high country is inefficient, disingenuous and against the public interest. Such a disjointed, uncoordinated, piecemeal approach to water pollution issues at Yosemite favors only the commercial interests that want to see business-as-usual prevail."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-2)

**Screen Category: 4-0** - Scoping concern that expands the scope of the project as initially defined to the public

**The National Park Service should take management actions necessary to remove or reduce impacts from nonnative species on native species to comply with the National Park Service's legal mandates.**

**Letter Numbers:** 35

"The Park Service has a mandate and full legal authority to remove or reduce invasive, non-native plants and animals that are deemed by Park scientists and Park managers to pose risk to native species in the Park ecosystem. Despite strongly held views and possible political pressure by various interest groups, the reality is that the Park has a legal mandate and obligation to sustain and preserve the Park resources in a manner that will allow future generations to enjoy those resources. If introduced trout are now inhabiting waters located thousands of feet higher in elevation than any fish habitat that existed prior to transport and introduction by humans, then those fish are invasive. If those fish are known, as is the case, to be contributing clearly to the demise of Sierra

Nevada yellow-legged frogs and to large insects that are a key part of the food chain for the Yosemite toad and other amphibians, then the Park has a legal obligation to take swift action to reduce the fishes' impacts on amphibians."

(Conservation Organization, Twain Harte, CA, Comment #35-1)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should explain how the agency's mission informs how Yosemite plans to manage invasive species.**

**Letter Numbers:** 42

"How does the NPS mission compare to other agencies mission? How does this mission inform how NPS manages invasive species?"

(Individual, Comment #42-5)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should take management actions necessary to prevent the continued decline of at-risk populations to comply with NEPA and the Endangered Species Act.**

**Letter Numbers:** 35, 42, 8

“ CSERC points out that the status of warranted, but precluded, mandates that managing agencies take whatever action is necessary to prevent further decline in at risk populations of declining species. If that action must include a substantial portion of the high country being set off-limits to recreational visitors, pack stock, overnight camping, or other activities that cumulatively affect aquatic resources, then NEPA and the Endangered Species Act both require the adoption of such feasible mitigation measures. CSERC urges the Park to set an example for the nation by making protection and preservation of aquatic resources the guiding objective that dictates which human activities are or aren't allowed in the Park's high country.

John Buckley, Executive Director"

(Conservation Organization, Twain Harte, CA, Comment #8-10)

"If listing of the Sierra Nevada yellow-legged trout and Yosemite toad is warranted, isn't action warranted? Could NPS be litigated for not looking to remove [fish] from all feasible lakes?"

(Individual, Comment #42-6)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should not withhold information related to the plan when that information is not sensitive in nature.**

**Letter Numbers:** 41

"That the Park will not disclose the location of introduced, non-native trout, yet ask for public comments how to manage them within the greater Park ecosystem is as ludicrous as it is disingenuous."

(Individual, Nevada City, CA, Comment #41-1)

**Screen Category: 1-2** – Already decided by law, regulation, national policy, or an approved park plan.

**The National Park Service should consult with the U.S. Fish and Wildlife Service regarding species listed, or proposed for listing, as Threatened or Endangered under the Endangered Species Act.**

**Letter Numbers:** 7

"The Paiute is listed as a Threatened species as is the Lahontan under the ESA and the California Golden Trout is a sensitive species that is currently under consideration for listing. The Park Service may want to consider consulting with the National Fish and Wildlife Service regarding these fish if you have not already done so."

(Conservation Organization, Comment #7-6)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should work with individuals and organizations to identify important areas for recreational fishing while preparing this plan.**

**Letter Numbers:** 7

"Finally, we hope to collaborate with the Park Service to determine which areas are important for recreational fishing by contacting local fisherpeople and fishing organizations."

(Conservation Organization, Comment #7-7)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document



## Alternatives

**The National Park Service should include an alternative in the High Elevation Aquatic Resources Management Plan that prohibits all livestock grazing in Yosemite's high country to eliminate the negative impacts associated with this use.**

**Letter Numbers:** 10, 11, 12, 14, 18, 19, 21, 22, 25, 27, 34

"Because domestic livestock (i.e., horses, mules, etc.) are known to pollute water, spread weeds, and trample sensitive wetlands (including habitat for threatened species such as the Yosemite toad), the plan must include an alternative to prohibit all grazing by domestic livestock in Yosemite's high country. A "no grazing" alternative would allow stock use to continue while preventing many of the harmful effects of stock use. Such an alternative is entirely reasonable; many other national parks require stock users to carry their own feed and to keep animals tied up when not being used so that park lands are not trampled and grazed."

(Individual, Comment #18-2)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should include an alternative in the High Elevation Aquatic Resources Management Plan that phases out all domestic stock use except for essential administrative purposes.**

**Letter Numbers:** 10, 11, 12, 14, 18, 19, 21, 22, 32, 33, 38, 44, 45

"I was recently amazed to learn that horses and mules produce about 33 pounds of manure and 18 pounds of urine per-animal per-day. This means that a group of 25 stock animals on a one-week trip produces nearly three tons of manure and 400 gallons of urine that are left behind in the park. Currently, there are no controls on where this material is deposited, and much of it ends up in surface waters, wetlands, meadows, and on trails. While the use of diapers and proper disposal of manure may mitigate some effects of the manure, the unavoidable impacts of stock use such as erosion of trails and the discharge of livestock urine can only be controlled if stock use is limited. Therefore, your plan should adopt strict upper limits on the number of stock animals that may enter the Yosemite high country each year."

(Individual, Charlottesville, VA, Comment #11-5)

**The National Park Service should include alternatives in the High Elevation Aquatic Resources Management Plan to: eliminate the High Sierra Camps, ban grazing, limit the number of allowable stock days, require diapers for all stock animals, and adopt mandatory measures for proper disposal of livestock manure and urine and the prevention of the spread of noxious weeds.**

**Letter Numbers:** 47

"Elimination of the High Sierra Camps. The time has come to remove these offensive and polluting developments in the Yosemite high country."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-21)

"No Grazing. Stock use would be allowed to continue but stock users must keep animals tied up when not in use, and provide weed-free feed, as required in many other national parks. (A second alternative might consider allowing limited grazing for essential administrative purposes-such as pack animals used by rangers to remove trash from the high country-but only after a "minimum tool" analysis has been carefully completed with opportunity for public comment.)"

(Conservation Organization, S Lake Tahoe, CA, Comment #47-22)

"Mandatory measures to prevent the spread of weeds (including effective cleaning of livestock coats/hooves to prevent epizoochory, effective quarantine and conditioning of animals to prevent endozoochory, and a monitoring and enforcement program to verify implementation and effectiveness of the mitigation measures)."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-25)

**Screen Category: 4-0** - Scoping concern that expands the scope of the project as initially defined to the public

**The National Park Service should consider a wide range of alternatives when developing the Aquatic Plan EA.**

**Letter Numbers:** 42

"Need diverse alternatives"

(Individual, Comment #42-2)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document



## Resources

**The National Park Service should conduct fish removal without chemical treatments to the extent feasible.**

**Letter Numbers:** 42, 8

"CSERC strongly supports a program of removing fish through the use of non-chemical treatments to the extent feasible"

(Conservation Organization, Twain Harte, CA, Comment #8-5)

"Don't use chemicals to remove fish"

(Individual, Comment #42-14)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should prioritize fish removal based on what would result in the most strategic benefits to aquatic resources.**

**Letter Numbers:** 8

"Fish should be removed from waters with the most strategic benefits to aquatic resources."

(Conservation Organization, Twain Harte, CA, Comment #8-6)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should emphasize ecological needs over recreation preferences in managing the high elevation aquatic resources in Yosemite National Park.**

**Letter Numbers:** 35

"The current description of the Management Plan ties to an objective of continuing to offer high quality recreational fishing opportunities in a wide variety of habitats. With an admitted strong bias as a life-long, ardent, zealous fisherman, I totally understand the desire for many Park-lovers who believe that fishing for trout in high country lakes and streams is a key part of a satisfying visit. However, despite being a zealous fisherman, I recognize that the bottom line for Park management must always be sustaining in a healthy, viable condition all native species in the ecosystem -- not providing a recreational experience for fishermen. Any NEPA evaluation of fishing will show that there are not only high levels of fishing opportunities on private lands throughout the State and throughout the mountain range, but there are already incredibly high levels of

high mountain, back-country fishing opportunities in national forest wilderness areas to both the north and the south of the Park. The ecological needs of the ecosystem should and must take precedence over outdoor recreation desires of a segment of Park visitors."

(Conservation Organization, Twain Harte, CA, Comment #35-3)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document



## Water Resources

**The National Park Service should consider other methods to dispose of fish carcasses besides sinking them in lakes.**

**Letter Numbers:** 42

"Are there other ways to distribute fish carcasses besides sinking them in lakes?"

(Individual, Comment #42-15)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should comply with state and federal water quality standards in addressing water quality impacts associated with the High Sierra Camps and stock use.**

**Letter Numbers:** 47

"In addition, your environmental document must acknowledge not only the State of California's specific water quality standards, but also the state/federal anti-degradation requirements. 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 Sec 131.12. The Park Service cannot allow high-elevation waters in Yosemite to be continually polluted by domestic stock animals without at least making the anti-degradation findings required by the federal Clean Water Act and the State of California's Porter-Cologne Water Quality Act. 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 very 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 throughout the Yosemite high country. Because the degradation and pollution of water resulting from both the High Sierra Camps and the commercial packtrains are feasibly controllable, that degradation and pollution must be fully prevented (unless the findings required by Res. 68-16 are formally made). These violations of state and federal water quality laws must be stopped."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-18)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document



## **Wildlife (not rare, threatened or endangered)**

**The National Park Service should consider fish stocked in high elevation lakes and streams as a potential source of genetically pure California native fish stock that could be used for preservation or refugia of native genetic variability, including listed species.**

**Letter Numbers:** 7

"Yosemite Park's high elevation lakes and streams may represent an essential source of California's genetically pure native fish and we feel that the Park needs to take a slow approach in this proposed process. A careful investigation of what is there and how it can be protected, especially in the case of ESA-listed species, needs to be part of the equation. It is our mutual goal to restore California's native wildlife and their habitats, and California Trout hopes to be able to work with the Park to reach this goal."

(Conservation Organization, Comment #7-8)

**Screen Category: 2-8** - Scoping concern defining an issue expanding, with reasonable basis, the scope of the project as initially defined and accepted by project manager based on professional judgment

**The National Park Service should move slowly on developing a High Elevation Aquatic Resources Management Plan while new research on native fish species in low elevations is forthcoming.**

**Letter Numbers:** 7

"Conversely, NOAA researcher Carlos Garza's, Ph.D., work on isolated populations of steelhead at lower elevations has shown that these populations were native to waters throughout California and are still intact. They have not hybridized with the fish that were planted throughout the years. This report is soon to be published and should be taken into consideration in returning habitat in Yosemite/Sequoia/Kings National Parks back to natural conditions. It would behoove the Park Service to proceed slowly with the proposed plan until further information is made available in order to preserve one of

Yosemite Park's major attractions: fishing."

(Conservation Organization, Comment #7-4)

**Screen Category: 2-8** - Scoping concern defining an issue expanding, with reasonable basis, the scope of the project as initially defined and accepted by project manager based on professional judgment

**The National Park Service should allow time to collect genetic samples of introduced fish to determine if they are remnant populations of genetically pure California native trout before proceeding with fish eradication.**

**Letter Numbers:** 7

"The DFG and many NGOs have been sampling extensively throughout the state in search of native populations that might have been planted in waters historically void of fish. If these populations exist, they may serve either as refugia and/or can be transplanted to other areas to preserve the genetic viability of some of these native fish. Many lakes and streams in Yosemite NP are in this category. Fish have been planted in them not only by the DFG, but by individuals over 100 years ago and may be of significant value for our restoration program."

(Conservation Organization, Comment #7-1)

"We realize that their presence may conflict with the long term goal of the Park Service to remove non-native fish from selected areas as many of these high-elevation settings were historically absent of fish. However, these fish may be the only link we have to many of California's genetically pure native trout."

(Conservation Organization, Comment #7-2)

"It would greatly benefit our cause if the DFG could be consulted and time allowed for genetic samples to be run before any action occurs in areas slated for fish eradication."

(Conservation Organization, Comment #7-5)

**Screen Category: 2-8** - Scoping concern defining an issue expanding, with reasonable basis, the scope of the project as initially defined and accepted by project manager based on professional judgment

**The National Park Service should consider established populations of introduced fish as native species.**

**Letter Numbers:** 2, 37

"Given that these lakes aren't stocked anymore, and the fish are (well, were) still thriving, I would begin to consider them native."

(Individual, Comment #2-2)

**Screen Category: 1-2** - Already decided by law, regulation, national policy, or an approved park plan

**The National Park Service should not focus on eliminating fish when the main reason for the decline of the yellow-legged frog is the chytrid fungus.**

**Letter Numbers:** 3

"It seems to me that with the emergence of stronger evidence since Mr. Knapp's last unsuccessful attempts that point towards devastating molds being the primary driver of the decline in the yellow legged frog population."

(Individual, Comment #3-1)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should direct research towards seeking equilibrium between healthy fish populations and healthy Sierra Nevada yellow-legged frog populations.**

**Letter Numbers:** 3

"There are lakes that can and do support a population of both species. Why not direct research into this equilibrium?"

(Individual, Comment #3-2)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should explain why trout are considered non-native in high elevation aquatic environments.**

**Letter Numbers:** 42

"Why are trout non-native?"

(Individual, Comment #42-3)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should seek opportunities to restore native species without destroying healthy trout populations.**

**Letter Numbers:** 3, 37

"I, without a doubt, want to see the reintroduction of a native species, but with the evidence already stacked against the likelihood of the frogs self-sustaining does it make sense to destroy healthy trout habitats when other alternatives are available?"

(Individual, Comment #3-4)

"Yosemite already has a 90% fish-less lake environment. If the amphibians are already in decline with a near 90% fish-less environment, removing more fish from 9% of Yosemite lakes will only be productive in 10% of Yosemite lakes. The program/plan has lost its focus. Redirect 90% to 100% of your efforts, manpower and resources in those 90%

lakes where you can make an immediate impact. (If, as some have said, that 50% of those 90% lakes are not 'prime candidates' for reintroduction, then to limit one's self to only those prime candidates is a defeatist mentality. -Get to work on those 50% your in love with, and experiment with some of the other 50%, think out side of your research box!)"

(Individual, Comment #37-5)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should consider a variety of fish removal strategies, including removal by park scientists and the elimination of requirements for a state fishing license to encourage unlimited take of non-native fish in targeted locations.**

**Letter Numbers:** 42, 9

"This could be accomplished by having scientists remove fish and by allowing fishermen and fisherwomen to fish as many fish as they can catch without a permit/fishing license in places where fish are not native."

(Individual, Boise, ID, Comment #9-2)

"Consider removing licensing/take limits on fish"

(Individual, Comment #42-20)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should concentrate on developing actions in response to threats to amphibians that the Park can logically control or influence.**

**Letter Numbers:** 42, 8

"First and foremost, we emphasize that Yosemite Park managers must concentrate actions on the threats' to amphibians that the Park can logically control or influence."

(Conservation Organization, Twain Harte, CA, Comment #8-1)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should not reintroduce native species into locations where the factor that is contributing to the species decline is still present.**

**Letter Numbers:** 8

"Reintroduction of amphibians or other species to suitable locations within their historic range is a matter of concern unless the factor that led to the extirpation is first eliminated."

(Conservation Organization, Twain Harte, CA, Comment #8-8)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should take actions to halt the spread of pathogens or remove non-native predators before reintroducing frogs to locations where they have been locally extirpated.**

**Letter Numbers:** 8

"It appears that halting the spread of pathogens or removing non-native predators are steps that should be completed prior to the next stage of possible restoration, efforts."

(Conservation Organization, Twain Harte, CA, Comment #8-9)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document



## Rare, Threatened and Endangered Species

**The National Park Service should try to determine whether or not people are spreading the chytrid fungus.**

**Letter Numbers:** 37, 42

"Educate the public as to the fungus containing drainages. Formulate a continuous sanitation plan as the science evolves, then educate the public that visit those drainages that the fungus has been

found. (Maybe people are inadvertently spreading the fungus)"

(Individual, Comment #37-7)

"Is it possible that people are spreading chytrid?"

(Individual, Comment #42-8)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should prioritize management decisions based on scientific evidence and make scientific data available to others.**

**Letter Numbers:** 1

"I don't see the scientific data that supports that the removal of fish or other non-native species would restore the frog populations given other factors like pollution and fungus."

(Individual, Roseville, CA, Comment #1-2)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should not emphasize the role of non-native fish in the decline of native amphibian populations in Yosemite National Park because California native fish evolved with amphibians in other environments, and amphibian populations are declining here and in other parts of the world for reasons other than the presence of non-native fish.**

**Letter Numbers:** 7

"Protection of these fish is particularly important for both California Trout and the Park Service given that new scientific research has begun to deemphasize the role of fish in amphibian declines. Roland Knapp, PH.D has found that even after an initial recovery of amphibian populations due to fish removal, several areas continued to suffer declines because of Chytridiomycosis fungal infections. The reasons for these declines are still unknown; however, it seems strange that many of California's native fish species, which co-evolved with amphibians, would be among these reasons. Research points rather to pesticide drift, UV radiation and the spread of Chytridiomycosis fungal infections as important causes of decline. Indeed, amphibian declines are being reported across the globe, including areas where invasive fish were never introduced"

(Conservation Organization, Comment #7-3)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should emphasize restoration of Sierra Nevada yellow-legged frogs into lakes that are already fishless.**

**Letter Numbers:** 3, 37, 42

"Why not direct resources to planting frogs in lakes where trout are not naturally sustaining."

(Individual, Comment #3-3)

"If fish are only in 9% of YOSE lakes, why target those lakes? Why not target lakes that are already fish-free?"

(Individual, Comment #42-4)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should select some basins for complete fish removal to restore frog habitat while maintaining fish in other basins for recreational fishing.**

**Letter Numbers:** 16

"I would advocate complete fish removal for entire water basins to establish as much habitat as possible for the frog, while still maintaining some basins with fish for recreational fishing opportunities."

(Individual, Windsor, CO, Comment #16-3)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should remove trout from many high elevation lakes to promote the survival of native species.**

**Letter Numbers:** 16, 8, 9

"yet we strongly believe that removing trout from many high elevation lakes is essential if Sierra Nevada yellow-legged frogs in particular are to survive."

(Conservation Organization, Twain Harte, CA, Comment #8-4)

"In order to restore the ecosystem, non-native fish should be removed where possible in the park."

(Individual, Boise, ID, Comment #9-1)

"Establishing and maintaining fishless habitat will be key to the survival of these two species"

(Individual, Windsor, CO, Comment #16-1)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should consider chemical removal of fish to avoid hindering the potential for successful recovery of declining amphibian populations.**

**Letter Numbers:** 16

"Chemical fish removal must be considered as an option due to the problem of complete fish eradication with mechanical removal. Important research is currently underway in Sequoia-Kings Park looking at effects of chemical removal on aquatic ecosystems; excluding chemical removal from the High Elevation Aquatic Resource Management Plan without complete information could limit the effectiveness of fish removal and severely hinder the recovery of the Mountain Yellow-legged Frog"

(Individual, Windsor, CO, Comment #16-2)

**Screen Category: 3-9** - Scoping concern defining an issue expanding, with reasonable basis, the scope of the project as initially defined but rejected by project manager based on professional judgment

**The National Park Service should consider both the aquatic and terrestrial habitat needs of declining amphibian species.**

**Letter Numbers:** 13

"One of the issues that the plan is intended to address is the needs of declining amphibian species including the Yosemite toad (*Bufo canorus*). In order to adequately address the habitat needs of this species a more holistic approach to management needs to be taken that includes both the aquatic and terrestrial habitat utilized by this species."

(Individual, Clovis, CA, Comment #13-1)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should include upland terrestrial habitat requirements of Yosemite toad when considering how to best manage for this declining amphibian species in the park's High Elevation Aquatic Resource Management Plan.**

**Letter Numbers:** 13

"Most studies of amphibian ecology, particularly those of pool-breeding anurans, have thus far focused primarily on breeding sites because adult anurans are easily detected in pools during the short breeding season. Further, embryonic and larval forms are easily detected throughout much of the active season in the breeding pools, thereby indicating the presence of a reproducing population and providing at least some indication of relative abundance (e.g., Martin et al. 1992; Brown 2002; Lind et al. 2006). Once breeding is concluded, however, adult anurans typically immigrate to terrestrial foraging habitats that may be some distance away from the breeding pools; but because many pool-breeding amphibians are typically fossorial, or drawn to habitat with dense vegetation, they are usually very difficult to locate in the terrestrial habitats that they occupy. This secretive behavior and the attendant challenges to conducting research on relatively small amphibians in their terrestrial habitats often result in the terrestrial ecology, which constitutes the majority of amphibian life history, being overlooked by land managers even though terrestrial habitats are an essential component in the protection and recovery of amphibian populations (Dodd & Cade 1998; Semlitsch 1998, 2000, 2002; Semlitsch 2003; Semlitsch & Bodie 2003; Martin 2008). There are numerous reports of Yosemite toads being found 150-750 m away from breeding pools in upslope habitat that is presumed to be used for foraging and/or overwintering (Mullally 1953; Mullally & Cunningham 1956; Karlstrom 1962; Kagarise Sherman 1980; Morton 1981; Kagarise Sherman & Morton 1984). A more recent study (Martin 2008) found that adult Yosemite toads are capable of traveling up to 657.44 meters (= 278.60 m) from breeding pools to upland foraging habitat. This distance is well within the longest dispersal distance from breeding pools (750 m) previously reported for this species (Morton 1981), but this study also found that upland habitats are commonly used as foraging habitat by adult Yosemite toads. Such upland terrestrial habitats are considered to be of paramount importance in the protection of amphibian species (Dodd 1996; Madison 1997; Dodd & Cade 1998; Semlitsch 1998; Lamoureux & Madison 1999; Semlitsch 2000; Richter et al. 2001; Biek et al. 2002; Semlitsch 2002; Vonesh & De la Cruz 2002; Semlitsch & Bodie 2003; Semlitsch 2003b; Schabetsberger et al. 2004; Trenham & Shaffer 2005; Martin

2008) and thus must be considered part of the core habitat needs of the Yosemite toad that must be protected in addition to the breeding habitat if populations of this toad are to remain viable."

(Individual, Clovis, CA, Comment #13-3)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should boost existing populations of frogs.**

**Letter Numbers:** 42

"Action is time sensitive (10% loss of yellow-legged frog/year)"

(Individual, Comment #42-7)

"Transplanting frogs is "iffy" at best, tadpoles take a long time to mature NPS should choose areas where the frog is persisting minimally and boost populations"

(Individual, Comment #42-13)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should not introduce frogs or tadpoles into new locations where they may inadvertently introduce the chytrid fungus.**

**Letter Numbers:** 42

"Non re-introduction into systems where frogs/tadpoles may introduce chytrid"

(Individual, Comment #42-16)

"Consider limiting livestock use to protect Yosemite toad tadpole stage"

(Individual, Comment #42-18)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should consider studying similar lakes under different management approaches.**

**Letter Numbers:** 42

"Consider studying similar lakes under different management approaches"

(Individual, Comment #42-19)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should only consider non-lethal control if native predators become a problem for declining amphibian species.**

**Letter Numbers:** 42

"If native predators are an issue, consider non-lethal control/management actions"

(Individual, Comment #42-21)

**Screen Category: 2-8** - Scoping concern defining an issue expanding, with reasonable basis, the scope of the project as initially defined and accepted by project manager based on professional judgment

**The National Park Service should enact stringent provisions to support the restoration of declining populations of native amphibians.**

**Letter Numbers:** 30

"Many years ago I noticed the disappearance of almost all frogs. Clearly stringent provisions should be in the plan until they have returned."

(Individual, Santa Fe, NM, Comment #30-7)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document



## Air Quality

**The National Park Service should publicize threats to amphibians from impacts originating outside the park, such as pesticide drift.**

**Letter Numbers:** 8

"If pesticide drift is determined to be a significant threat to high-elevation aquatic species, it would appear both essential and morally correct for Park Service staff

to/publicize the harm caused by pesticide drift and to advocate for reduced pesticide use and greater control of applications in areas that lie west of the Park."

(Conservation Organization, Twain Harte, CA, Comment #8-2)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

# Wilderness

**The National Park Service should not allow development in Wilderness.**

**Letter Numbers:** 24

"Without any doubt, the greatest destruction of any remaining semblance of wilderness, has been done by the burning desire of the controlling agencies to develop them. Development induces growth, resulting in promotions, money, power, etc, all of which are completely detrimental to the objective of retaining a place of solitude in which to regenerate oneself."

(Individual, Comment #24-1)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project



## Visitor Experience

**The National Park Service should address the disparity between the condition of the facilities at the High Sierra Camps, and the way that they are advertised.**

**Letter Numbers:** 20

"Delaware North Company continues to promote availability of ample toilet and shower facilities for 30 or more guests throughout the High Sierra Camp system only telling their clients that they are dysfunctional when the scheduled hikers are on their way or have arrived at the camp. There they learn of the lack of advertised showers and one toilet for 30

people...or occasionally supplemented by a walk to a composting toilet which is likely to be dysfunctional and treated with huge amounts of ammonia to hide the odor of waste. (Ammonia is specifically NOT to be used in composting toilets)."

(Individual, Walnut Creek, CA, Comment #20-3)

**Screen Category: 1-1** - Out-of-Scope or unrelated to project



## Access

**If scientific evidence identifies recreational visitor use as a likely mechanism for the spread of the chytrid fungus, then the National Park Service should take action to limit the spread through visitor education or strategic temporary area closures to determine whether or not this helps to prevent the spread of the fungus.**

**Letter Numbers:** 42, 8

“if advisory scientists believe that a high potential exists for the spread•

of the chytrid fungus by recreational visitors, CSERC openly throws out a suggestion that a good number of strategically identified lakes and basins be made off-limits to recreational visitation for a 5-year or 10-year test period to assess whether or not chytridiomycosis does or doesn't spread without human transfer of the pathogen.”

(Conservation Organization, Twain Harte, CA, Comment #8-7)

“Can some basins be “off-limits” or temporary restrictions/access to evaluate benefits?”

(Individual, Comment #42-9)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should not give commercial stock use preference over the use of other groups of people.**

**Letter Numbers:** 47

“The Yosemite backcountry 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 least as much impact as several people (see references below). Your environmental document for this project should state clearly that: (1) Commercial stock use of Yosemite's high-elevation areas is a privilege-not a right, and (2) Commercial stock use shall not be given priority over self-guided visitors. Wherever rationing (i.e., a quota system) is necessary, commercial stock use (including animals used to service the HSCs), should be reduced to maximize the number of people allowed to enjoy the area.”

(Conservation Organization, S Lake Tahoe, CA, Comment #47-14)

"In addition, all commercial outfitters (or their clients) should have to wait in line with the rest of the public to obtain wilderness reservations and permits to use the Yosemite high country. Commercial packstock enterprises should never be allowed to issue their own 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.)"

(Conservation Organization, S Lake Tahoe, CA, Comment #47-15)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project

**The National Park Service should look for ways to concentrate visitor use to more resilient areas.**

**Letter Numbers:** 42

"Are there ways to concentrate use to more resilient areas (traditionally well-used areas)?"

(Individual, Comment #42-10)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project



## Recreation

**The National Park Service should increase the distance from lake fronts where people may camp.**

**Letter Numbers:** 37

"Increase the camping distance from lake fronts and aggressively enforce. (I've seen people camping at the shore line)."

(Individual, Comment #37-8)

**Screen Category: 1-2** - Already decided by law, regulation, national policy, or an approved park plan

**The National Park Service should not remove fish from any lakes in Yosemite that contain fish.**

**Letter Numbers:** 37, 42

"Leave completely alone all of the Yosemite lakes that contain trout, as these are 9% of the lakes in Yosemite that have self sustaining populations of fish. Leave these lakes for the fisherman! 9% of the lakes of Yosemite are available for fishing? That isn't enough! Maintain this enjoyment level!"

(Individual, Comment #37-2)



(House Committee Report No. 98-40). The Park Service has never made any effort to prepare the baseline reports or the annual monitoring reports that Congress requested decades ago. Why? Because past NPS managers have been hell-bent on promoting the commercial developments at all cost, and have made every effort to "band-aid" and cover up the many harmful impacts of the HSCs. We hope you will agree that it is time to reverse such dishonest and blindly pro-development policies."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-5)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project

**The National Park Service should close the High Sierra Camps and restore these sites to eliminate the wilderness, human waste, gray water, aesthetic, and stock use impacts associated with the operation of these facilities.**

**Letter Numbers:** 10, 11, 12, 14, 15, 17, 18, 19, 20, 22, 25, 26, 29, 30, 32, 33, 34, 39, 45, 46, 47

"Because the High Sierra Camps pollute Yosemite's high-elevation aquatic ecosystems (with human sewage, gray water, livestock manure, soil erosion, etc.), these archaic commercial developments should be closed, and the sites restored. Your HARM Plan should embrace this opportunity to protect Yosemite's high country by closing these polluting developments as soon as possible."

(Individual, Newark, DE, Comment #17-3)

"As a long time user of Yosemite's Back Country, I am always dismayed at the noise, and mess of the High Sierra Camps and their surrounding areas. I try to plan my trips so as to get as far away from these "cities" as possible. The amount of over use is staggering, and the accompanying horse pollution is problematic. I would highly recommend taking the High Sierra Camps out and returning the areas into natural habitats once again"

(Individual, Walnut Creek, CA, Comment #26-1)

"The High Sierra Camps (HSCs) are aged, ugly and polluting facilities that have significant negative impacts on the aquatic and terrestrial environments of Yosemite and on the experience of countless park visitors. All the by-products of human occupancy are produced at the camps: sewage, "gray water" from washing, grease and detergent from kitchens, etc. The wastewater and sewage produced at the camps pollutes the meadows, soils, wetlands and waters of Yosemite National Park."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-4)

"In other words, sewage and wastewater from the camp was leaking from the mound and polluting surrounding wetlands and waters. At this point, as in 1985, the only intelligent 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 secretly set about to control the wastes by constructing more new toilet facilities at Vogelsang HSC. And now, because of "public health and safety issues and utility deficiencies at the Vogelsang High Sierra Camp" the Park Service is again proposing more band-aids at the camp. Given the long overdue but welcome acknowledgment that the high-elevation aquatic ecosystems of

Yosemite deserve protection (Le., Yosemite Public Scoping Announcement for HARM Plan, June 9, 2008), the time has come to stop the dishonesty, stop the cover-ups, stop the clandestine helicopter use, stop the "band-aid" attempts to mitigate the harm caused by the HSCs, and close the camps once and for all."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-7)

**Screen Category: 4-0** - Scoping concern that expands the scope of the project as initially defined to the public

### **The National Park Service should address the wilderness impacts created by the High Sierra Camps.**

**Letter Numbers:** 40, 47

"Yosemite's 1980 General Management Plan (GMP), which preceded the California Wilderness Act by four years, states: "...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.""

(Conservation Organization, S Lake Tahoe, CA, Comment #47-6)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project

## **Park Operations**

### **The National Park Service should require that all human waste be packed out.**

**Letter Numbers:** 15

"You should require everyone to use wag bags and carry out all solid wastes."

(Individual, Clovis, CA, Comment #15-6)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project



## Stock Use

**The National Park Service should address the impacts of stock use on high elevation aquatic resources.**

**Letter Numbers:** 23, 27

"I have been backpacking in the Sierras for over 20 years and have seen first hand what enormous damage livestock and grazing animals can do. Please fulfill your duty to

protect these highly fragile areas by allowing an alternative point of view to be reviewed."

(Individual, Paradise, CA, Comment #27-2)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should address pack stock use in designated Wilderness.**

**Letter Numbers:** 24, 29, 47

"It is my conservative estimate that a single horse does as much damage to the wilderness as fifty individual hikers. Considering America's obesity problem, wouldn't it be far better if we ate the low fat horsemeat, and used that energy to propel us on foot into the wilderness? Also, in this way, wouldn't our grandchildren have a much better world in which to live."

(Individual, Comment #24-2)

"Further, commercial stock use within designated wilderness must be allowed only to the extent that it is necessary and proper under the Wilderness Act."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-13)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project

**The National Park Service should include a strong management plan for managing stock use in Yosemite.**

**Letter Numbers:** 14, 47

"I would prefer that all stock be prohibited in the Yosemite backcountry, but in order to make the wilderness available to those that cannot travel by foot alone, I support a strong management plan for stock use."

(Individual, Cypress, CA, Comment #14-2)

"The National Park Service at Yosemite has for many decades conducted, permitted

and/or condoned activities that are known to harm high-elevation aquatic resources. For example, commercial packtrains have long been permitted to overgraze, trample and pollute sensitive high-elevation wetland meadows, lakeshores and streams with little or no oversight by the Park Service. The permits for such commercial activities are routinely "rubber-stamped" by the Park Service with little or no analysis, few or no limits, and vague, non-binding or no mitigation measures. In order for potentially harmful activities (such as commercial packtrains) to be legally permitted via NEPA "categorical exclusions," the activities must be limited, controlled and mitigated to levels of insignificance. Considered in this context, the proposed High-elevation Aquatic Resources Management (HARM) Plan provides an historic opportunity for the Park Service to finally rein in the ongoing harm being caused by commercial, administrative and certain non-commercial activities in the Yosemite high country, and we appreciate this opportunity to provide comments."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-3)

**Screen Category: 1-9** - Out of Scope but take to Management for consideration for any reason

**The National Park Service should address the impacts of stock use on aquatic resources.**

**Letter Numbers:** 15, 20, 22, 28, 29, 30, 38, 47

"I have seen stock animals contaminate stream crossings all along the Muir Trail and its east and west branches...and including John Muir's Lake Ediza where the animals were turned out into THE HEADWATERS of the lake ruining the quality of the water to our immediate area and downstream."

(Individual, Walnut Creek, CA, Comment #20-1)

"Based on my frequent experiences hiking in Yosemite, the biggest threat to stream water quality is stock animals. Besides the direct degradation caused by urine and manure deposits in or near the water, they often breakdown stream and lake banks causing muddy waters and lack of shore vegetation."

(Individual, Comment #28-1)

"Numerous studies have documented adverse impacts to mountain 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 Ralieggh 1978, Bohn and Buckhouse 1985, Kauffman and Krueger 1984, Kauffman et al. 1983, Siekert et al. 1985). Streambanks and lakeshores are particularly susceptible to trampling because of their high moisture content (Marlow and Pogacnik 1985). Unstable streambanks lead to accelerated erosion and elevated instream sediment loads (Duff 1979, Winegar 1977). In sum, the impacts of recreational stock animals on meadows, streams, wetlands, and lakeshores are substantial, and need to be addressed in this planning process."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-16)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should require all recreation and administrative stock to wear diapers to prevent water pollution.**

**Letter Numbers:** 10, 12, 14, 18, 25, 34, 38, 39, 45

"Because of documented water pollution caused by pack and saddle stock animals, all recreation and administrative stock should be required to wear diapers (which are now widely available and easy to obtain), and the manure should be properly disposed so that water is not contaminated."

(Conservation Organization, Clovis, CA, Comment #10-4)

**Screen Category: 3-8** - Scoping concern defining an issue expanding, with reasonable basis, the scope of the project as initially defined and accepted by project manager based on professional judgment

**The National Park Service should address the negative health impacts and aesthetic impacts associated with manure and urine from stock animals that contaminates drinking water sources used by backpackers.**

**Letter Numbers:** 10, 11, 12, 14, 18, 25, 29, 30, 34, 37, 45, 47

"As a backpacker I object to drinking water that has been contaminated by stock manure or urine because it is a health hazard and because it detracts from my aesthetic enjoyment of Yosemite's high country."

(Individual, Charlottesville, VA, Comment #11-3)

"The realization that I was breathing dust contaminated by their deposits on the trails was disturbing"

(Individual, Santa Fe, NM, Comment #30-3)

"Limits on the number of allowable stock days. Some impacts of stock animals, such as trail erosion, cannot be feasibly mitigated and must be controlled with limits on the amount of use."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-23)

"Diapers on all stock animals, and mandatory guidance for proper disposal of livestock manure and urine. Diapers for livestock are commercially available and accepted throughout the world. It is time for Yosemite to catch up with the times."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-24)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

## **The National Park Service should address the impacts to water quality and health and safety from waste associated with stock use.**

**Letter Numbers:** 47

"Stock urine and manure contribute to eutrophication of streams and lakes (see Stanley et al. 1979, Derlet and others 2008). Such impacts are a significant concern in the oligotrophic aquatic environments of Yosemite National Park. For example, a recent publication by the National Academy of Sciences documents that nutrients from livestock wastes can cause deformities in amphibians. See Johnson et al. 2007 II Aquatic Eutrophication Promotes Pathogenic Infection in Amphibians". Livestock manure can also pollute water with harmful bacteria and other organisms such as *Aeromonas*, *Salmonella*, *E coli*, *Giardia* and *Cryptosporidium*, which are pathogenic to humans and other animals. (See, for example, Derlet and Carlson 2006, Derlet and others 2008). 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, and is counter to the available scientific evidence. The cross-transmission of enteric pathogens from stock animals is certainly not completely understood, however, there is a substantial and increasing body of evidence demonstrating that pathogenic bacteria, protozoa, 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, Derlet and others 2008, 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, Strandén 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 the Tuolumne River/Meadows areas contained pathogenic bacteria as well as *Giardia*. Derlet and Carlson (2006) also found pathogenic bacteria in surface waters of Yosemite's high country, and concluded that: "pack animals are most likely the source of coliform [bacterial pollution]." A recent report confirms those findings: "The finding of a high prevalence of coliforms in wilderness areas frequented by pack animals is important...Pack animals produce high volumes of manure, which is deposited directly onto the surface of trails, soil, or meadows. In contrast to human waste, pack animal manure is not buried in the soil. Manure deposited on the ground can be swept into streams during summer rains or spring snow runoff...Fecal contamination, as indicated by the finding of coliforms, would place the watershed at risk for harboring microbes capable of causing human disease. As is the case with cattle, these threats include certain pathogenic strains of *E coli*, *Salmonella*, *Campylobacter*, *Aeromonas*, and protozoa such as *Giardia*. Pack animals entering the High Sierra have been subject to analysis, and *Giardia* has been found in their manure. The organism *Hafnia alvei* was found in one study conducted along the John Muir Trail in the Sierra Nevada, even in old manure. *H alvei* can cause diarrhea in humans...In comparison to Pack Animal sites, only a small percentage of Backpacker sites had coliforms. This finding would support the conclusion that most of the microbial contamination in pack animal areas is a result of pack animal

manure...In wilderness areas where cattle or pack animals have been present, we recommend that drinking water be treated. In Sierra Nevada wilderness areas, water from alpine side streams that are free from upstream domesticated animal use have a very low risk of harboring coliforms and we believe have a minimal risk of illness if drunk untreated." (Derlet and others 2008).

Your HARM Plan should evaluate and disclose the effects of domestic animal wastes on the environment, and adopt mandatory measures to mitigate the harmful effects. For example, stock users should be required to use diapers on pack and saddle stock animals to prevent pollution of surface waters by livestock manure and urine. Horse diapers that capture both manure and urine are commercially available and have been accepted around the world."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-17)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should address the impacts of stock animals on vegetation, including wet meadows.**

**Letter Numbers:** 15, 29, 30

"I have watched while stock animals eat the wild flowers that I so much appreciate. I resent this pollution of my water source and destruction of meadows."

(Individual, Sonoma, CA, Comment #29-3)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should manage stock use to prevent the unintended spread of invasive and nonnative plants.**

**Letter Numbers:** 10, 12, 14, 18, 19, 22, 25, 29, 31, 34, 45, 47

"Because livestock are known to spread invasive weeds by importing weed seeds on their coats and in their manure, all stock animals should be strictly required to be properly washed and quarantined before they are allowed to enter Yosemite's high country."

(Individual, Cypress, CA, Comment #14-7)

"Also the animals should be required to carry their own feed. They should be tied when not traveling. Stock animals should NOT be allowed to roam free and graze."

(Individual, Sonoma, CA, Comment #29-6)

"As outlined above, scientists have documented U overwhelming" evidence that domestic livestock (including horses, mules, etc.) can and do spread harmful weeds. Although adjacent national forests (such as the Toiyabe National Forest) now require the use of weed-free feed by recreation livestock, this issue has never been adequately addressed by the Park Service at Yosemite. Your HARM Plan should address the issues of weeds and plant pathogens that may be spread by domestic stock animals used throughout the

Yosemite high country, and require definitive prevention measures. This should include, at minimum, mandatory measures to mitigate 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 quarantine and 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); (3) effectively cleaning stock coats and hooves before entering the park (to minimize the potential for epizoochory); and (4) a monitoring and enforcement program to verify the implementation and effectiveness of the adopted measures."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-19)

**Screen Category: 2-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should address stock use impacts to amphibians.**

**Letter Numbers:** 15

"All this affects the fish and frogs in the high country"

(Individual, Clovis, CA, Comment #15-5)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should address the impacts of pack stock use on Yosemite toad habitat in this plan.**

**Letter Numbers:** 13, 22

"Further, a close examination of packstock impacts on toad habitat needs to be included in such an aquatic management plan."

(Individual, Clovis, CA, Comment #13-2)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should prohibit livestock grazing in areas where tadpoles are present until a date when metamorphosis typically occurs.**

**Letter Numbers:** 13, 42, 9

"Further, while the mountain yellow-legged frog is more closely tied to aquatic habitats than the Yosemite toad, this frog also utilizes terrestrial habitats as adults (Matthews, K. R., and K. L. Pope. 1999) and thus is also susceptible to mortality and aquatic habitat degradation resulting from stock grazing."

(Individual, Clovis, CA, Comment #13-5)

"USFS does not allow livestock in wet meadows/ponds until after tadpole stage"

(Individual, Comment #42-17)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should restrict stock grazing from all habitat occupied by the Yosemite toad, including aquatic, meadow, upland and overwintering habitats with a core habitat protection zone extending 500 meters from all known Yosemite toad breeding pools**

**Letter Numbers:** 13

"The impact of stock grazing has long been identified as one of, if not the major, cause of the decline of the Yosemite toad in published scientific literature since at least 1994 (Jennings & Hayes 1994; Jennings 1996). Stock grazing was included as a decline factor in a report of research contracted by the Forest Service in 1992 (Martin et al. 1993). Stock grazing has also been suggested as a major component in the decline of the Yosemite toad in several papers presented at scientific meetings since 1990 (Martin 1990, 1991a, b, 1993, 1994, 1997), which were subsequently cited by USFS in other agency documents related to grazing impacts on the Yosemite toad since at least 1994 (e.g., Biological Evaluation For Livestock Grazing At High Elevations On The Stanislaus National Forest (1994); Sierra Nevada Framework Management Plan (2001)). Further, the U.S. Fish and Wildlife Service identified stock grazing as one factor that may be contributing to the decline of the Yosemite toad. Thus, any aquatic management plan for Yosemite National Park that is intended to improve the habitat utilized by the Yosemite toad must restrict stock grazing from all habitat occupied by the Yosemite toad, including aquatic, meadow, upland and overwintering habitats. My own studies suggest that a core habitat protection zone extending 500 meters from all known Yosemite toad breeding pools needs to be established if the aquatic management plan is to succeed."

(Individual, Clovis, CA, Comment #13-4)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document

**The National Park Service should adopt strict upper limits on the number of stock animals that may enter the Yosemite high country to mitigate the impacts associated with stock use.**

**Letter Numbers:** 26, 29, 30, 31, 34, 36, 45, 47

"I would also think it prudent to limit horse travel and grazing to better protect our precious back country resources."

(Individual, Walnut Creek, CA, Comment #26-2)

"Entry of stock animals in the High country should be greatly limited in number"

(Individual, Sonoma, CA, Comment #29-5)

"I recognize that stock use is a historic use of the Park, but what was once acceptable or even encouraged use of the backcountry - much like sheep grazing a hundred years ago -

is no longer acceptable now. I strongly urge a reduction in the use of stock animals in the High Elevation areas."

(Individual, Los Angeles, CA, Comment #36-3)

"The use of stock animals may be sometimes necessary for certain recreational and/or administrative purposes. We want to make clear that we do not advocate or suggest the complete elimination of recreational or administrative stock use from Yosemite National Park. 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 regulated use of stock animals in Yosemite's high country."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-11)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project

### **The National Park Service should ban stock use in the park.**

**Letter Numbers:** 15, 28, 30, 40

"I really, really, really wish you ban all horses and pack animals from the park"

(Individual, Clovis, CA, Comment #15-1)

"I am opposed to domestic animals such as cows, horses and mules in the Yosemite NP. I request that you plan to eliminate all uses of these animals in the park, with the possible exception of ranger use in rescue situations."

(Individual, San Rafael, CA, Comment #40-1)

**Screen Category: 1-1** - Clearly Out-of-Scope or unrelated to project

### **The National Park Service should address the cumulative impacts to aquatic resources associated with commercial packstock activities, and then take management actions to eliminate or reduce impacts.**

**Letter Numbers:** 47

"We are aware that commercial packstock activities and impacts have increased substantially in recent years in Yosemite, yet the Park Service has made almost no effort to establish limits or require modern practices to prevent pollution caused by pack and saddle stock. Your planning process should begin by producing a complete disclosure of the cumulative stock use, associated facilities, and impacts to aquatic ecosystems that have occurred over the past few decades. Then, your plan should, at minimum, significantly reduce/control commercial, administrative and private stock use to avoid the identified direct, indirect and cumulative impacts, and incorporate definitive limits on the number of allowable "stock days" to prevent future increases in harmful stock animal uses."

(Conservation Organization, S Lake Tahoe, CA, Comment #47-12)

**Screen Category: 3-0** - Scoping concern or concern defining issue to be addressed by the planning document