



06/10/2008 05:38 PM
GMT

To: "Yose_Planning@nps.gov" <Yose_Planning@nps.gov>
cc: [Redacted]
Subject: [Redacted]

RECEIVED
ARM-S-01
JUN 17 2008
P. 1061

YOSEMITE NATIONAL PARK

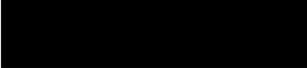
To whom it may concern,

I would like a copy of Yosemite's Aquatic Plan EA and would like to be copied on any updates or revisions. As frequent traveler of the Yosemite backcountry, I been negatively impacted by the plans and lack of communication. For example, I don't see a specific list of area under consideration. 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.

Regards,



Roseville, Ca. 95747



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ARM-3-02
JUN 17 2008
P. 1 of 1



[Redacted]

To: "Yose_Planning@nps.gov" <Yose_Planning@nps.gov>
cc: [Redacted]

06/11/2008 12:06 AM
GMT

Subject: RE: [Redacted]

Hi,

It might be nice if you posted your draft plan on the planning site so we could download it. If that's not possible, I would like a copy of the plan either on CD or hardcopy for review. I too, am concerned that you don't list the names of the lakes that you are "restoring". According to the fact sheet, there are 6 areas that you are restoring. I know the Virginia Lake and Upper Mattie lakes have already been destroyed (in my opinion; We saw the nets).

Given that these lakes aren't stocked anymore, and the fish are (well, were) still thriving, I would begin to consider them native. Virginia Lake was the most excellent destination, and I'm assuming you left Lower Mattie alone because there's revenue there as it has a pack trail directly to that lake. I'd hate to be surprised again to go somewhere off-trail only to find the fish all gone and not be told about it.

Please name the lakes where you're going to kill the fish.

Regards,

[Redacted]

Petaluma, CA 94952

[Redacted]

-----Original Message-----

From: [Redacted]
Sent: Tuesday, June 10, 2008 10:38 AM
To: Yose_Planning@nps.gov
Cc: [Redacted]
Subject:

To whom it may concern,

duplicate see ARM-S-01

I would like a copy of Yosemite's Aquatic Plan EA and would like to be copied on any updates or revisions. As frequent traveler of the Yosemite backcountry, I been negatively impacted by the plans and lack of communication. For example, I don't see a specific list of area under consideration. 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.

Regards,

[Redacted]

Roseville, Ca. 95747

[Redacted]

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06/16/2008 06:11 PM

To <Yose_Planning@nps.gov>

cc

bcc

Subject Knapp eradication of fish populations

I'd like to comment on Mr. Knapps plan (with Yosemite's support) regarding the removal (likely electro-shocking) of healthy back country trout populations. It seems to me that with the emergence of stronger evidence since Mr. Knaaps last unsuccessful attempts that point towards devastating molds being the primary driver of the decline in the yellow legged frog population that this research will prove to be yet again a waste of resources in using money provided by**the public**. There are lakes that can and do support a population of both species. Why not direct research into this equilibrium? WHY not direct resources to planting frogs in lakes where trout are not naturally sustaining I can think of a handful off the top of my head in Northern Yosemite alone Boundary, Bear, SPotted Fawn, Many Island, etc There are many. If this is a mold that likely is endemic to the Sierra and will unquestionably remain, is it not wasting time and resources eradicating one species to support another when we've already proven the outcome!? Why not have these future failed experiments take place in ecosystems that are already devoid of trout populations. There are enough empty canvases for Knapp to paint his picture with out destroying beloved areas and species that he determines is the cause of the Yellow legged demise I, without a doubt, want to see the reintroduction of a native species, but with the evidence already stacked against the liklihood of the frogs self-sustaining does it make sense to destroy healthy trout habitats when other alternatives are available? No.



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 AIRM-5-03
 JUN 18 2008
 Pg. 1 of 1
 YOSEMITE NATIONAL PARK

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06/11/2008 04:26 PM

To "yose_planning@nps.gov" <yose_planning@nps.gov>

cc



bcc

Subject RE: High Elevation Aquatic Resources Mgmt Plan Scoping

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

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ARM-5-04
 JUN 18 2008
Pg 1 of 1
 YOSEMITE NATIONAL PARK

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[Redacted]
06/23/2008 02:35 PM

To yose_planning@nps.gov
cc
bcc
Subject From NPS.gov: High Elevation Aquatic Plan

Email submitted from: /yose/parkmgmt/aquatic.htm

Mailing Address

[Redacted]

Petaluma, CA 94952
USA

RECEIVED
ARM-3-05
JUN 23 2008
Pg. 1 of 1
YOSEMITE NATIONAL PARK

Hi,

I noticed scoping comments are now open on the
Yosemite National Park High Elevation Aquatic Resources Management Plan.

Is there a plan posted somewhere that we can comment on? I'm not sure what to do but i do have
some thoughts on Frog v. Angler.

Please let me know,

[Redacted]

PS: if you have a draft plan, please post it to the planning site or send it to me at the address
given.

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 ARM-7
 JUL 8 2008
 Pg 1 of 3
 YOSEMITE NATIONAL PARK

June 30, 2008

Michael J. Tollefson, Superintendent
 Yosemite National Park
 Attn: High-Elevation Aquatic Resources Management Plan
 PO Box 577
 Yosemite, CA 95389

Re: Yosemite Public Scoping Announcement for the High-elevation Aquatic Resources Management Plan.

Dear Mr. Tollefson,

I would like to take this opportunity to thank you for allowing California Trout to comment on the proposed High-Elevation Aquatic Resources Management Plan. As you know, California Trout has been active in working with the Park on planning issues over a great many years and has supported several of its planning decisions. With Sequoia/Kings Canyon National Parks now working on an EIS, we are greatly concerned with the protection of many native trout species on National Park Service lands.

California Trout is currently working with the California Department of Fish and Game (DFG) on implementation of a recently passed state law. This law, AB 7 by Senator Cogdill, has instructed the DFG to increase production of native trout in their hatcheries by up to 25% within the next 10 years. One of the major hurdles to reach this goal is that many of these 10 distinct populations of trout have been hybridized by the planting of non-native fish in their historical habitats. 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. 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.

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

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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. I have enclosed two new reports on the successful re-introduction of amphibians that may provide some guidance in proceeding with the planned proposal.

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.

We would like to work with you in order to accomplish our mutual goal to restore natural biodiversity. 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. I have attached for your interest California Trout's policy on selecting waters for fish removal. Any information from the Park Service regarding the history of plantings in these areas would further facilitate our efforts to locate native fish populations. I understand that Phil Bartholomew, a retired DFG employee, worked for years planting waters throughout the Park and would be a great resource. I also recently became aware that the Park Service has a report and data sheets (attached) regarding plantings of Paiute Cutthroat Trout, Lahontan Cutthroat Trout and California Golden Trout into Yosemite Park that was never completed. 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. It might also be helpful to know why this report was left unfinished.

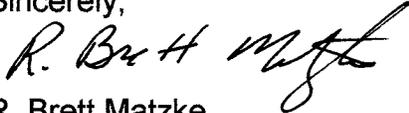
Finally, we hope to collaborate with the Park Service to determine which areas are important for recreational fishing by contacting local fisherpeople and fishing organizations. If you are interested, it might be useful to organize a public meeting.

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.

I would like to be kept advised as the Park's plans evolve and will provide any help I can toward a fair and wise decision regarding the high-elevation areas of Yosemite NP. Please feel free to contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Brett Matzke". The signature is fluid and cursive, with the first name "R. Brett" and the last name "Matzke" clearly distinguishable.

R. Brett Matzke
Wild/Native Trout Manger
California Trout, Inc.

Yosemite National Park

National Park Service
U.S. Department of the Interior



Public Comment Form HIGH-ELEVATION AQUATIC RESOURCES MANAGEMENT PLAN

RECEIVED
HRM-5-06
JUL 3 2008
Page 1

YOSEMITE NATIONAL PARK

All interested individuals, organizations, and agencies are invited to provide written ideas, concerns or suggestions during the public scoping period, which began on **June 23, 2008** and will end on **July 25, 2008**. Written comments may be mailed to: **Superintendent, Yosemite National Park, PO Box 577, Yosemite, CA 95389 (Attn: High-Elevation Aquatic Resources Mgmt Plan)** or may be faxed to: **209/379-1294**. Electronic comments may be emailed to: **Yose_Planning@nps.gov** (in the subject line type: Aquatic). In addition, comments can be submitted online by going to **parkplanning.nps.gov/yose**. Keep track of project status by regularly visiting the park's web site at **www.nps.gov/yose/parkmgmt/aquatic.htm**.

Note: Anonymous comments will not be considered. Generally, the National Park Service will make available to the public for inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses. Individuals' addresses will be withheld from publication of comments; however names will be made available.

Name:



Date of Comment:

June 25, 2008

Address

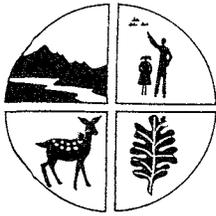
Gold River, CA 95676

Comments

I support the aquatic resources management plan.

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(continue comments on back of page)



Central Sierra Environmental Resource Center

Box 396 • Twain Harte, CA 95383 • (209) 586-7440 • FAX (209) 586-4986

July 3, 2008

Superintendent
 Attn: High-Elevation Aquatic Resources Management Plan
 P.O. Box 577
 Yosemite, CA 95389

RECEIVED
 ARM-5-08
 JUL 15 2008
 P-1082
 YOSEMITE NATIONAL PARK

The following input is provided by our Center at this early stage of public scoping for the High-elevation Aquatic Resources Management Plan. As we participate in the July 12th session and begin to understand the specific actions being considered by Park management, our staff will provide far more detailed input.

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. Climate change and connected threats to aquatic resources cannot be controlled by Park management actions or policies, even if the Park's contribution to greenhouse gas emissions can be intentionally reduced. 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. But the direct ability for the Park to directly control or influence pesticide drift is limited. The Park, on the other hand, does have the ability to control recreational use in the high country and to control the presence of non-native fish. CSERC urges the management plan to prioritize actions that will lead to improved or restored conditions in the management area.

Second, fish removal must be a priority action. CSERC staff members enthusiastically fish recreationally in lakes and streams all across the region, 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. Trout not only consume tadpoles, but trout compete directly with Yosemite Toads and Sierra Nevada yellow-legged frogs for food such as flying insects and macro-invertebrates. CSERC strongly supports a program of removing fish through the use of non-chemical treatments to the extent feasible. Fish should be removed from waters with the most strategic benefits to aquatic resources.

Third, 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. While some Park visitors will be outraged by removal of trout, and while others may be

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P-2072

outraged if blocked from visiting their favorite lakes, the legal mandate under NEPA is for the Park to sustain the ecosystem in a fashion that provides for long-term enjoyment by Americans. If unpopular restrictions are needed to fully protect aquatic resources, then CSERC will press the Park to take such actions and then CSERC will publicly praise the Park and defend it against critics of such actions.

Fourth, CSERC believes that re-introduction 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. It would not appear to make good sense to spend a lot of money and staff time to put fish back into a site with excessive levels of pesticides that may shortly cause a failure of the restoration effort. It would not make good sense to put frogs or toads back into waters where chytridiomycosis persists. Thus, at this stage in the high-elevation aquatic resource management plan, 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.

In closing, 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



Central Sierra Environmental Resource Center

Box 396 • Twain Harte, CA 95383 • (209) 586-7440 • Fax (209) 586-4986

STOCKTON/STKN
CA 952 3 T
03 JUL 2008 PM



USA 42

CONNECTICUT

Superintendent
Attn: High-Elevation Aquatic Resources
Management Plan
P.O. Box 577
Yosemite, CA 95389

95389+0577





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ARM-S-9
JUL 23 2008

Public Comment Form HIGH-ELEVATION AQUATIC RESOURCES MANAGEMENT PLAN ENVIRONMENTAL ASSESSMENT

All interested individuals, organizations, and agencies are invited to provide written ideas, concerns, or suggestions during the public comment period for the Environmental Assessment, which began on June 23, 2008 and will end on July 25, 2008. Written comments may be mailed to: Superintendent, Yosemite National Park, PO Box 577, Yosemite, CA 95389 (Attn: High-elevation Aquatic Resources Management Plan) or may be faxed to: 209/379-1294. Electronic comments may be emailed to: Yose_Planning@nps.gov (in the subject line type: High-elevation Aquatic Resources Management Plan). Keep track of project status by regularly visiting the park's web site at www.nps.gov/yose/parkmgmt/aquatic.htm

Note: Anonymous comments will not be considered. Generally, the National Park Service will make available to the public for inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses. Individuals' addresses will be withheld from publication of comments; however names will be made available.

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Name: [Redacted]

Date: July 12, 2008

Address: Boise, ID 83712

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Comments

The environmental assessment made for this plan seemed thorough and well-researched. Clearly, the introduction of non-native fish to Yosemite National Park has contributed to a significant decrease in the abundance of native invertebrates such as the Sierra Nevada Yellow-legged Frogs and a native toad species. In order to restore the frog and toad populations as well as the health of the entire ecosystem, ~~the~~ non-native fish should be removed wherever possible in the park. ~~to remove this invasive~~ This could be accomplished by having scientists (continue comments on back of page) remove fish ~~and~~ 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~~ are not native. This would work in part because it would ~~diminish~~ nearly eliminate one of the five or so reasons for the rapid decline in ~~fish~~ invertebrate populations in the park. Keeping fish in places that they fish didn't naturally occur would not work in restoring endemic invertebrate populations, because the fish would continue to prey on the frogs and toads. ~~Anglers could~~ Once fish are gone from ~~nearly~~ as many parts of the park where the fish didn't originally live as possible, anglers could continue to fish in the Yosemite Valley, where ^{some} fish ^{species} are native.

Also, livestock could be prohibited from grazing in areas where the frogs and toads ~~live~~ live until a date when tadpoles typically turn into frogs. This would succeed in boosting frog and toad populations, because ~~it~~ it would keep ponds and lakes wet and maintain water levels long ~~enough~~ enough for the tadpoles to have the chance to survive until adulthood. Why is this? Because grazing animals ~~can~~ have been proven to diminish water levels and water quality, which can ~~prevent~~ prevent ponds from lasting late into the season from they would without the presence of livestock.



"Lloyd Carter"
 <lcarter0i@comcast.net>
 07/22/2008 01:09 PM

To <Yose_Planning@nps.gov>
 cc
 bcc
 Subject HARM comment

RECEIVED
 ARM-5-10
 JUL 25 2008
 P-102
 YOSEMITE NATIONAL PARK

Dear Superintendent,

I am president of the board of directors of the California Save Our Streams Council, a nonprofit organization founded in 1981 to protect the creeks and streams of the Sierra.

I am writing to provide scoping comments on Yosemite's **High-elevation Aquatic Resources Management (HARM) Plan**. 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. My specific comments are as follows:

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.

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. 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.

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.

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.

The waste produced by the High Sierra Camps (i.e., human sewage, gray water, livestock manure) is polluting Yosemite's high country. These outdated commercial developments should be closed, and the sites restored. Your HARM Plan should utilize this excellent opportunity to protect Yosemite's high country by closing these aged and ugly developments once and for all.

Thank you for this opportunity to provide comments.

Sincerely yours,

Lloyd G. Carter
 President, California Save Our Streams Council
 2863 Everglade Ave.

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ARM-5-10
p.2 of 2

Clovis, CA 93619



07/22/2008 11:17 AM

To Yose_Planning@nps.gov
cc
bcc
Subject HARM Plan for Yosemite

RECEIVED
ARM-5-11
JUL 25 2008
p. 10/2
YOSEMITE NATIONAL PARK

Dear Superintendent,

I am writing to provide scoping comments on Yosemite's **High-elevation Aquatic Resources Management (HARM) Plan**. I have been concerned about the harmful impacts of recreation and administrative activities on Yosemite's high country for many years, and I urge you to adopt a strong plan to protect Yosemite's fragile high-elevation aquatic resources. My specific comments are as follows:

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.

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

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.

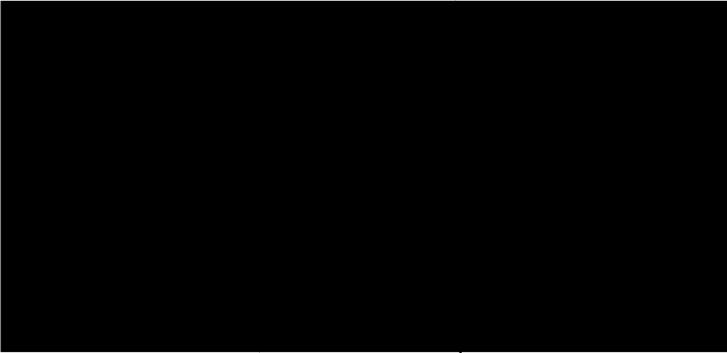
The waste produced by the High Sierra Camps (i.e., human sewage, gray water, livestock manure) is polluting Yosemite's high country. These outdated commercial developments should be closed, and the sites restored. Your HARM Plan should utilize this excellent opportunity to protect Yosemite's high country by closing these aged and ugly developments once and for all. Finally, pack animals are very hard on trails and make them human unfriendly. When my friends and I go backpacking we go to great lengths to avoid trails that are frequented by horses and mules. Not only are the trails unattractive and unpleasant to hike, the destinations where people are packed typically suffer significant environmental damage. It would seem that if the animals were required to use non-steel shoes the damage to the trails could be mitigated.

Thank you for this opportunity to provide comments.

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ARM-5-11
p. 2/2

Sincerely yours,





[Redacted]

07/21/2008 07:37 PM

[Redacted]

To <Yose_Planning@nps.gov>

cc

bcc

Subject Aquatic Resources Management Plan

RECEIVED

ARM-5-12

JUL 25 2008

p-1082

YOSEMITE NATIONAL PARK

Dear Superintendent,

I am writing to provide scoping comments on Yosemite's **High-elevation Aquatic Resources Management (HARM) Plan**. 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. My specific comments are as follows:

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.

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. 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.

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.

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.

The waste produced by the High Sierra Camps (I.e., human sewage, gray water, livestock

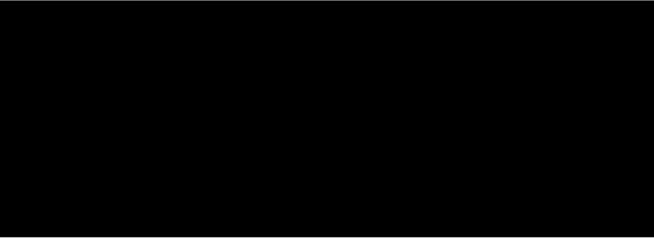
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manure) is polluting Yosemite's high country. These outdated commercial developments should be closed, and the sites restored. Your HARM Plan should utilize this excellent opportunity to protect Yosemite's high country by closing these aged and ugly developments once and for all.

Thank you for this opportunity to provide comments.

Sincerely yours,

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[Redacted]

07/25/2008 11:59 PM

[Redacted]

To <Yose_Planning@nps.gov>
cc
bcc
Subject Aquatic Management Plan

RECEIVED
ARM-S-13
JUL 25 2008
P. 1036
YOSEMITE NATIONAL PARK

Dear Sir,

Please find the attached comment letter for the Aquatic Management Plan for Yosemite National Park, and a pdf copy of my dissertation on the habitat needs and management of the Yosemite toad.

Thank you,

[Redacted]



[Redacted]

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ARM-S-13
p. 2 of 6

San Jose, CA 95123

25 July 2008

Michael J. Tollefson
Superintendent, Yosemite National Park
Attn: High-Elevation Aquatic Resources Management Plan
P.O. Box 577
Yosemite, CA 95389
Phone: 209/379-1365; Fax: 209/379-1294
E-mail: Yose_Planning@nps.gov

Dear Superintendent Tollefson,

I am writing to you in regards to the Aquatic Management Plan for Yosemite National Park. 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. Further, a close examination of packstock impacts on toad habitat needs to be included in such an aquatic management plan.

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 ($\bar{x} = 278.60$ 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.

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.

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.

ARM-5-13
P. 486

I have included a pdf copy of my dissertation (Decline, Movement and Habitat Utilization of the Yosemite Toad (*Bufo canorus*): An Endangered Anuran Endemic to the Sierra Nevada of California) with this email to help you better understand the full scope of the habitat requirements of the Yosemite toad, and to help you establish more biologically meaningful protection zones for this species.

Should you wish to contact me with regard to this matter, I can be reached at the letterhead address or by email at [REDACTED]

Thank you for your attention to this matter.

Sincerely,

[REDACTED]

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07/21/2008 08:37 PM

To Yose_Planning@nps.gov

cc

bcc

Subject High-elevation Aquatic Resources Management (HARM) Plan

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ARM-5-14
JUL 25 2008

P. 1 of 2

YOSEMITE NATIONAL PARK

Dear Superintendent,

I am writing to provide scoping comments on Yosemite's **High-elevation Aquatic Resources Management (HARM) Plan**. 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. My specific comments are as follows:

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. 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.

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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.

The waste produced by the High Sierra Camps (i.e., human sewage, gray water, livestock manure) is polluting Yosemite's high country. These outdated commercial developments should be closed, and the sites restored. Your HARM Plan should utilize this excellent opportunity to protect Yosemite's high country by closing these aged and ugly developments once and for all.

Thank you for this opportunity to provide comments.

Sincerely yours,

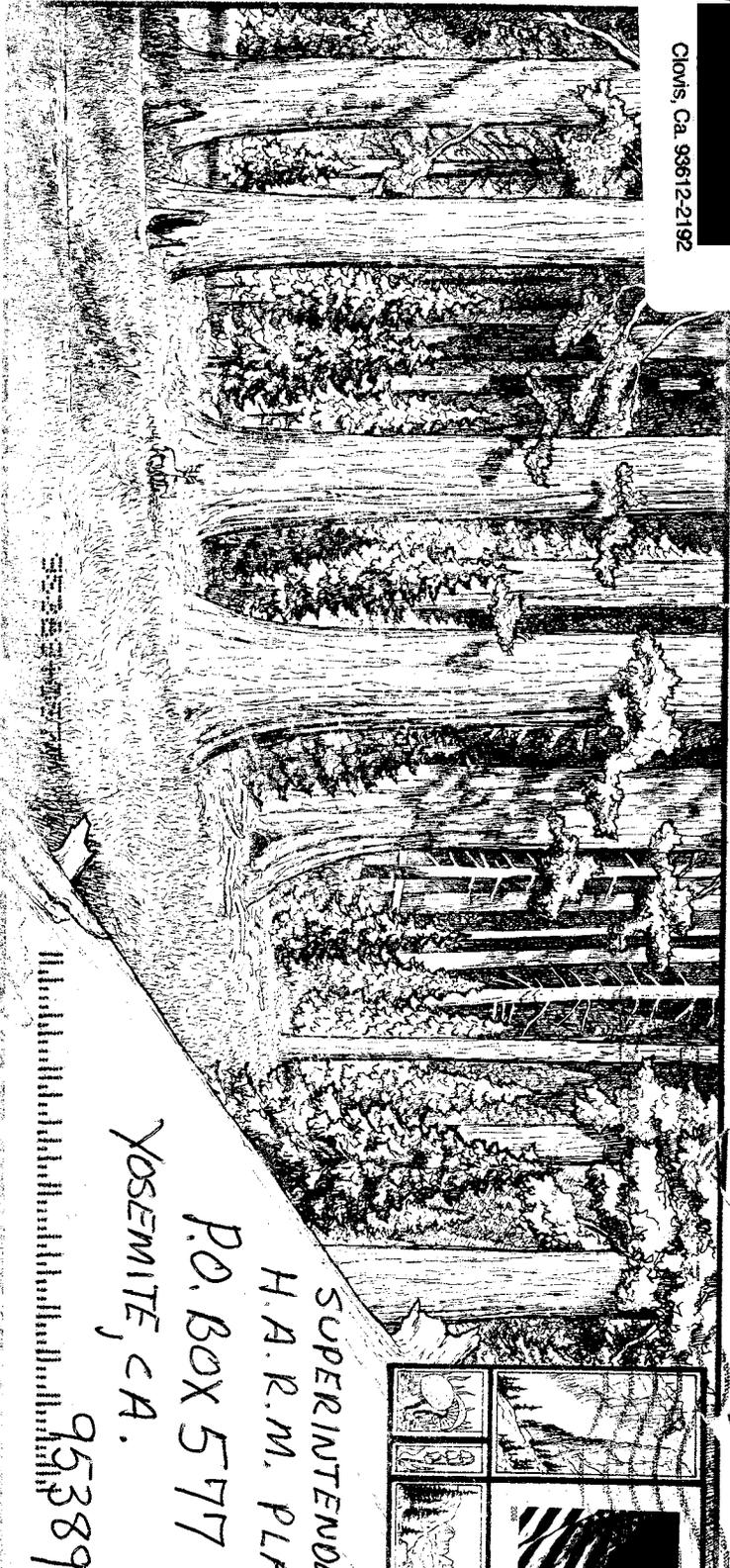


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Clowis, Ca. 93612-2192



SUPERINTENDENT
H.A.R.M. PLK
P.O. BOX 5777
YOSEMITE, CA.
95389

17-21-08

Dear Superintendent

here are my comments on your HARM Plan. I really really really wish you would ban all horses and pack animals from the park they are eating the plants and grasses & contaminate water - they stink up the trail and ruin camp sites. All this affects the fish & frogs in the high country you should require everyone to use wag bags and carry out all solid wastes of the High sierra camps

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ARM-5-15
JUL 25 2008
P. 101
YOSEMITE NATIONAL PARK

Action FYI
Assigned: Planning
Due Dates: _____

Thank - you



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